PROPOSED SECTION REVISIONS

VOCATIONAL REHABILITATION PROGRAM ELEMENTS

RI Department of Human Services, Office of Rehabilitative Services
Vocational Rehabilitation Program Elements  RI DHS/Office of Rehabilitation Services

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;

ORS has not yet received input from the State Rehabilitation Council.

ORDER OF SELECTION:

SRC COMMENT:

In the past, ORS was able to serve all eligible individuals. However, as need for services grew, coupled with the need to provide for better employment outcomes for eligible customers, ORS has had to use an Order of Selection and place individuals on a waitlist. ORS has done very well to make efforts to serve all its eligible customers, and also has done a good job in keeping the waitlist relatively short and reducing wait times.

In reviewing changes to WIOA, the SRC policy committee noted an important change to the law allowing ORS to exercise its discretion to open up an Order of Selection category for individuals who are working but who might need VR services to maintain employment. The SRC recognized that VR services might be the defining moment for a person to either keep his/her employment or lose it. We encouraged ORS to exercise its discretion under WIOA and provide an exception for what we anticipated may only be a small subset of individuals. Of course, we recognized that ORS would have to determine whether it could use existing resources before committing to it and adding it to its State Plan. We are pleased that very quickly after we raised this issue with ORS, and prior to the State Plan draft, ORS informed the SRC that they were going to incorporate this into their State Plan.

ORS RESPONSE:

ORS concurred with the SRC about the benefits of acting on its discretion to provide services to individuals on the wait list who are presently employed and require vocational rehabilitation services in order to maintain employment in an integrated competitive setting.

TRANSITION:

SRC COMMENT:
WIOA has a renewed focus on transition aged youth. For many years, the SRC has been interested in transition aged youth as we have recognized that early supports and job exploration opportunities that allow for personal growth and maturity are hallmarks to success as adults. The SRC had a transition committee that provided input to ORS as needed. We applaud ORS for its development of projects and work opportunities for this population before the changes to WIOA renewed the commitment to this population. As a result of its efforts, ORS has (as of FFY2011) exceeded the national average of serving transition aged youth. ORS thus has a head-start with transition aged youth, but the work is far from done. ORS has a longstanding cooperative arrangement with entities that serve in-school youth.

Under WIOA, the focus is also on out of school youth. The SRC thinks more efforts may be needed to locate the out-of-school youth. ORS may need to think of additional strategies to outreach to this population. We urge ORS to do so.

ORS RESPONSE:
ORS has a well-developed Transition Program for in-school youth. The SRC’s concern about identification and engagement of young adults not affiliated with a formal educational setting is an area that could be included in the Comprehensive Needs Assessment (CNA).

3. COORDINATION WITH NONPROFITS, EDUCATION OFFICIALS AND EMPLOYERS:
SRC COMMENT:
The SRC made several recommendations regarding interagency cooperation and coordination with other entities. At this point ORS has not, pursuant to Attachment 4.2(c) addressed many of these recommendations. Among our recommendations included that ORS update broken links on its website. We also suggested that ORS review its expired MOU between it and RIDE as well as other MOU partners. In addition, we look forward to working with ORS on the revised Comprehensive Needs Assessment to capture WIOA expectations and employer needs. With regard to coordination with employers, we assisted ORS in framing goals. As this is a new attachment, we look forward to hearing more about ORS efforts to create new pilot projects such as Project Search expansion and additional partnerships with businesses. We continue to be interested in ORS serving as a leader in requiring Community Rehabilitation Providers (CRPs) to deliver services consistent with the spirit of WIOA. We are interested in ORS efforts to modify fee structures, expand upon the competence of CRPs, and other efforts to change the culture to one that has an expectation that all services should ultimately culminate in competitive employment outcomes for people with disabilities. Again, many of these issues were addressed in our January 19, 2016 communication to ORS.

ORS RESPONSE:
ORS will examine its web-site to identify and correct errors or problems.

ORS and RIDE have discussed the need to renew the Cooperative Agreement (CA) and will be exercising the option to continue the agreement via a letter of agreement. Both ORS and RIDE want to have the opportunity to examine what changes, based on WIOA and experience, need to be included in a new CA.
Business Engagement is a new performance measure and expectation of RSA. ORS plans to enlist Technical Assistance offered by our funding source as well as collaboration with partners. However, enlisting the SRC to help ORS include this new deliverable service as part of our C.N.A. would be very helpful. In addition, quite a few members of the SRC have considerable expertise in this area and could provide guidance. Their knowledge and competence was acutely apparent in the development of several attachments of the state plan.

4. SUPPORTED EMPLOYMENT:

SRC COMMENT:
The SRC fully believes that, regardless of disability, all individuals can benefit from competitive and integrated employment if they have the appropriate support services. However, these services are needed over a long period of time in some cases. With changes to WIOA, ORS can now provide twenty-four months of supported employment services instead of eighteen months. However, the SRC remains concerned about the longer term for these individuals. Many years ago, we strongly encouraged ORS to be a leader to set the tone for its CRPs. In response, ORS created a fee structure with the expectation that CRPs would be finding competitive integrated employment for individuals with the most significant disabilities. We believe this is still the case—that ORS can be a leader—and continue to set the tone for this expectation. More funding avenues for longer-term supports may need to be identified as time progresses, but we are hopeful that the change in the law to a longer period of time will be helpful in the interim.

ORS RESPONSE:
ORS agrees with the SRC’s confidence in our ability to provide leadership and creativity to an important employment service for individuals with the most significant disabilities.

However, I think it is important to measure that confidence with the recognition that ORS does have limitations in its scope of authority in changing the priorities and objectives of other agencies.

5. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT:

SRC COMMENT:
The SRC strongly agrees with the requirement that all new VR Counselors possess a Master's degree in Rehabilitation Counseling. We believe that this will attract the best new talent to the agency. ORS should post its new VR Counselor job openings with the area colleges.

In addition, the SRC suggested that ORS explore paid internships with these colleges, and we are pleased that ORS will be exploring this possibility. We remain interested in learning about the agency’s strategies to recruit and retain personnel from diverse cultural backgrounds and how these strategies have been working.

ORS RESPONSE:
ORS agrees with SRC suggestions.

6. CONFLICTS AND CLIENT RIGHTS:
**SRC COMMENT:**
The SRC has long suggested that ORS policies retain consistent language used in federal law. Client rights information being removed from policies as has been done in recent changes to ORS policies is strongly disfavored by the SRC. At the core of ORS is a guiding body of law and its terms, vision, spirit and directives should be preserved and replicated within ORS policies and in its State Plan. Going forward, we will continue to advocate along these lines, and have been disappointed in the ORS response to our concerns.

**ORS RESPONSE:**
As stated previously, ORS appreciates the SRC’s concern regarding removal of the Procedure section of the policy and access to information about the Client Assistance Program (CAP). The removal of procedures is in direct response to the Governor’s Office, OHHS and DHS position. In addition, a review of several other VR agencies Policy Manuals indicated that the procedural steps of implementing a policy were not consistently incorporated into that document. ORS wants to reassure the SRC that the agency will continue to ensure client access to information about client rights and the CAP through the intake process, in conjunction with IPE development and/or Amendment, communication about denial of services as well as at case closure notification. In addition, CAP information will be posted within the agency and on the ORS web site.

ORS is striving to make agency policies helpful to our clients. The regulations do not require that agency policy mirror the language of federal regulations. All policies reference the appropriate law that serves as the foundation for the policy.

**7. AGENCY MARKETING:**

**SRC COMMENT:**
The SRC comments have been replete with questions and suggestions about marketing efforts. We have asked how ORS will market to expand upon vendor competence, how it will outreach to transition aged youth, how it will market to attract new interested business partnerships, and how it will market to attract new talent to its own agency. ORS need to continue to create more visibility to potential employees, new vendors, new customers, and to new businesses cannot be understated. WIOA expects outcomes and delivery in a streamlined fashion. The SRC recognizes that the changes presented are not all ironed out for ORS and remains committed to helping the agency where we can to effectuate its mission that all individuals, regardless of disability, can work in a competitive integrated setting if they have the right supports. We look forward to the future.

**ORS RESPONSE:**
ORS had a marketing committee that partnered with the SRC Marketing committee. However, the agency marketing committee faltered due to staff turnover and competing demands. The SRC Marketing Committee was disbanded.

ORS agrees with the SRC that a focus on marketing is critical. I wonder if the SRC would consider resurrecting the Sub-committee on Marketing to assist ORS in enhancing our visibility to potential employers.
2. the Designated State unit's response to the Council’s input and recommendations; and
N/A at this time

3. the designated State unit’s explanations for rejecting any of the Council’s input or
recommendations.
N/A at this time

b. Request for Waiver of Statewideness

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

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

2. the designated State unit will approve each proposed service before it is put into effect;
   and
   N/A

3. All State plan requirements will apply requirements of the VR services portion of the
Unified or Combined State Plan will apply to the services approved under the waiver.
   N/A

c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide
Workforce Development System. (formerly 4.8(b)(1))

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;
   (a) 4.8(b)(1) 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 investment system with respect to:

   • Federal, state, and local agencies and programs;

   • State programs carried out under Section 4 of the Assistive Technology Act of
     1998;

   • Programs carried out by the Under Secretary for Rural Development of the United
     States Department of Agriculture;

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

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

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

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

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

ORS continues to be the lead and implementing agency for the State Grants for Assistive Technology. In this role, ORS has facilitated a program called the Assistive Technology Access Partnership (ATAP). This partnership relies on contractual relationships with Ocean State Center for Independent Living (OSCIL), TechACCESS of RI, and East Bay Educational Collaborative to provide performance-measured services including device loans, demonstrations, device re-utilization, public awareness, and information and assistance. ORS also operates a state-funded program called the Adaptive Telephone Equipment Loan (ATEL) program, that is also included in the ATAP partnership. Based on ATAP’s strong collaboration, ORS utilizes ATAP services for ORS clients who need access to the above services for resources, vocational assessments, and job retention, as well as making sure an individual is able to utilize technology recommended to them to increase their vocational and independent living potential. ATAP, in conjunction with the ATAP Partners and State Independent Living Center (OSCIL), provides training to ORS Rehabilitation Counselors.
about assistive technology and the services of the program. The ATAP Partners also participate in the Assistive Technology Conference of New England, which is held each Fall.

3. Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture:
   ORS does not have such cooperative agreements at this time.

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

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

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

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

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

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

   In order to enhance these working relationships, ORS assigns Vocational Rehabilitation Counselors to function as liaisons to various community agencies.

   ORS has been the lead agency for the state AT Grant since its inception. In this role, ORS has facilitated a program called the Assistive Technology Access Partnership (ATAP). This partnership relies on contractual relationships with Ocean State Center for Independent Living...
(OSCIL), TechAccess of RI, and East Bay Educational Collaborative to provide the array of
deliverables offered by the AT Grant, including device loans, demonstrations, device re-use,
education, and referral services. In addition, ORS operates a state-funded program called the
Adaptive Telephone Equipment Loan (ATEL) program that is also included in the ATAP
partnership. Through this leadership role, ORS is able to enlist ATAP services for ORS clients
who need access to device loans and re-use for vocational assessments and/or work experiences.
In addition, ATAP in conjunction with the Business Leadership Network (BLN) and at times
with the Job Accommodation Network (JAN), provides training to ORS Rehabilitation
Counselors about assistive technology and the services of the program

4.8(b)(2) Coordination with Education Officials:

Describe:

• 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 vocational rehabilitation services, including provisions for the
development and approval of an individualized plan for employment before each
student determined to be eligible for vocational rehabilitation services, including pre-
employment transition services, as well as procedures for the timely development and
approval of individualized plans for employment for the students.

• information on the formal interagency agreement with the state educational agency
  with respect to

• 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;

• transition planning by personnel of the designated state agency and educational
  agency that facilitates the development and completion of their individualized
  education programs;

• roles and responsibilities, including financial responsibilities, of each agency,
  including provisions for determining state lead agencies and qualified personnel
  responsible for transition services;

procedures for outreach to and identification of students with disabilities who need
d. Coordination with Education Officials (formerly attachment 4.8(b)(2))

1. DSU's plans

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

ORS has several formal agreements with Education Officials: (1) RI Department of Education
(RIDE), and (2) RI Institutions of Higher Education.
I. COOPERATIVE AGREEMENT WITH RHODE ISLAND DEPARTMENT OF EDUCATION (RIDE)

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

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

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

• VOCATIONAL REHABILITATION SERVICES/INDIVIDUALIZED PLAN FOR EMPLOYMENT:

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

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

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

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

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

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

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

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

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

RIDE has contracts with the Regional Educational Collaboratives to support transition planning and information about adult services within each high school. So each fall, the ORS Rehabilitation Counselor, in collaboration with the local Regional Educational Collaboratives and BHDDH staff, provide an orientation to Special Education/Transition personnel about adult services in general and Vocational Rehabilitation services in particular. This Orientation meeting serves as an opportunity to reinforce the referral process to ORS (including information about potential Wait List). In addition to the school-based interventions and consultation with the LEA, ORS is involved in each region’s Transition Advisory Council (TAC), the statewide Transition Council, and a myriad of other system development efforts to enhance work experiences and transition for in-school youth with disabilities, regardless of IEP/504 status.

Each high school has an identified ORS Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, discuss Pre-ETS, Order of Selection/Wait List, and accept referrals. The ORS Rehabilitation Counselor establishes a schedule with each school so that IEPs, referrals, and consultation can be arranged on the days that the counselor is physically present at the school, if possible.

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

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

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

The DOJ/State Consent Decree has added some additional expectations of ORS and LEAs for in-school youth with significant intellectual disabilities (I/DD). The DOJ requires each high school to develop Career Development Plans (CDP) on all in-school youth with I/DD beginning at age fourteen and reviewed annually. ORS contributes to this process through Vocational Rehabilitation Counselor attendance and/or consultation to the transition team meetings. In addition, the DOJ/State Consent Decree requires in-school youth with I/DD to experience 120 days of trial work experiences prior to graduation. Therefore, ORS services incorporate a review with the CDP team (Student, family, LEA, BHDDH & ORS representation) of any community/work experiences that have occurred. The team, including the student and family, determine the additional school/home/community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities may include such services as: Community-Based Work Experiences, Transition Academies, Summer Employment Alliance, Summer Work, Project Search, and other work experiences. This information will assist the team and the Vocational Rehabilitation Counselor in achieving the 120-day Trial Work Experience mandate of the DOJ/State Consent Decree.

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

The Transition program is based on the CA between ORS and RIDE. ORS functions as a referral source, technical assistance, and consultation partner to the LEAs. RIDE oversees the different state Local Education Authority (LEA) responsibilities for academic requirements, IDEA, and transition activities. RIDE conducts periodic monitoring visits with each LEA and includes ORS in those evaluations.

The Cooperative Agreement describes interagency collaboration and coordination, the role and responsibilities of each partner, and the process for resolving disagreements. This CA has no financial component. In addition, a Collaborative Services Chart (CSC) identifies the agency primarily responsible for services in each of the following categories: Assessment Services, Career Development Services, Community Living Services, Related Services and Auxiliary Services.

D. procedures for outreach to and identification of students with disabilities who need transition services.

The LEA identifies students with disabilities who may be eligible for transition services with ORS, and facilitates a formal referral to the agency with parental approval. The LEA provides education records as part of the referral packet to ORS. Upon receipt of the referral packet, approved by the parents, the ORS Vocational Rehabilitation Counselor schedules a meeting with the student and family to explain the program, become familiar with the student, and plan next steps. The Vocational Rehabilitation Counselor will explain Pre-ETS services, Order of Selection/Wait List, and provide informed choice options, including whether to apply for services. Eligibility determination must occur within 60 days of application, and IPE must be developed within 90 days of eligibility Category I.
At times, school personnel may request Vocational Rehabilitation Counselor presence at an IEP meeting prior to a formal referral to ORS.

- transition services.

This attachment addresses coordination with Education Officials. Therefore, it is important to highlight that ORS has formal agreements with (1) RI Department of Education (RIDE) for inschool youth, and (2) an MOU with the state institutions of higher learning for out of high school youth in college.

The specific policies that guide ORS practice in terms of referrals, eligibility determination, Individualized Plan for Employment (IPE), services, and training for adult and youth are located in the agency Policy Manual, which can be accessed through the ORS website www.ors.ri.gov.

Pre-Employment Transition Services (PETS) for In-School Youth

The plans and procedures for coordination with RIDE and ORS, an RSA Best Practice, has been the foundation of a collaborative relationship focused on school-to-work transition for over 16 years. This collaboration has enabled ORS to have an MA level Rehabilitation Counselor at each high school to provide an array of services that were formerly referred to as Transition Services to the new WIOA term of Pre-Employment Transition Services (PETS). The Cooperative Agreement describes interagency collaboration and coordination, the role and responsibilities of each partner and the process for resolving disagreements. In addition, a Collaborative Services Chart (CSC) identifies the agency primarily responsible for services in each of the following categories: Assessment Services, Career Development Services, Community Living Services, Related Services and Auxiliary Services.

The ORS Rehabilitation Counselor in each high school or Local Education Authority (LEA) assists in planning transition activities, provides technical assistance, and consults with school personnel about youth with IEPs, 504 plans, as well as vocational planning. The LEA identifies students with disabilities who may be eligible for transition services with ORS, consults with the ORS Rehabilitation Counselor and facilitates a formal referral to the agency with parental approval.

The referral to ORS from the LEA, with parental consent, is the first step in the referral process. The ORS Vocational Rehabilitation Counselor then conducts an intake meeting with the youth and family to explain services, the eligibility determination process, and the purpose of the program. This creates the foundation for ORS Pre-Employment Transition Services (PETS), under the auspices of the Agreement between ORS and RIDE, to in-school youth with disabilities in collaboration with each Local Education Authority (LEA). These transition services fall under the regulations outlined in the 2014 Workforce Investment Opportunities Act (WIOA) to help to prepare students for employment after high school. The Office of Rehabilitation Services strives to assist all students with significant disabilities to gain the necessary skills, preparation, exploration and supports to enter the workforce. Incorporated into the ORS PETS Program is an expectation that all students who are found eligible for services will have an ORS approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility. This IPE establishes an employment goal and the steps/services needed to reach
that goal. An IPE developed in high school will often change as the student learns more about themselves and has work experiences prior to school graduation.

Pre-Employment Transition Services (PETS) will focus on employment related information and services to in school youth with significant disabilities that have an IEP or 504 plan. PETS will also be provided to students with significant intellectual disabilities as the state of Rhode Island is obligated to provide an array of transition services based on a Department of Justice (DOJ) Consent Decree (CD)/Interim Settlement Agreement (ISA).

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

The DOJ court order requires in-school youth with IDD to have had an opportunity to experience 120 days of trial work experiences. Therefore, PETS incorporates a review with the CDP team of any community/work experiences that have occurred. The team, including the student and family, determine the additional school/home/community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities may include such services as: Community Based Work Experiences, Transition Academies, Summer Employment Alliance, Summer Work, Project Search, and other work activities. This information will assist the team and the ORS Counselor in achieving the 120 day Trial Work Experience mandate of the Consent Decree.

In addition to the school-based interventions and consultation with the LEA, ORS is involved in each region’s Transition Advisory Council (TAC), the statewide Transition Council, and a myriad of other system development efforts to enhance work experiences and transition for youth.

**Training Services for Out of School Youth**

ORS develops IPEs with youth within 90 days of eligibility determination. The IPE establishes an occupational goal for the individual that is updated prior to completion of high school. This
IPE also establishes if employment, training, and/or college will be required to reach that occupational goal.

ORS has fee-for-service arrangements for service arrangements with job developers that can be enlisted to assist the individual in obtaining a job or the training required for the job goal. This fee-for-service structure enables youth to receive the services and/or training necessary to transition to employment.

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

4.8(b)(3) Cooperative Agreements with Private Nonprofit Organizations.

☐ Describe the manner in which the designated state agency establishes cooperative agreements with private non-profit vocational rehabilitation service providers.

The Rhode Island Office of Rehabilitation Services (ORS) will continue to develop fee-for-service agreements with a wide network of private vocational rehabilitation providers in order to meet the vocational rehabilitation needs of Rhode Islanders with disabilities. An identified need, as determined by the Statewide Comprehensive Needs Assessment (CNA), labor market information, or by the individualized needs of customers, will initiate efforts to create a new service or training option. However, training programs must demonstrate that employment in the field is identified by industry sectors as illustrated by the GWB strategic goals and Real Jobs RI.

Fee-for-service agreements incorporate a similar process with the Community Rehabilitation Provider (CRP) being funded based upon authorization, service provision, and competitive employment outcomes. ORS will utilize the information from the FFY2014 Statewide Comprehensive Needs Assessment (CNA) as a foundation for expansion and/or development of new fee-for-service agreements that meet the employment needs of customers and businesses. In FFY 2016/2017, a revised Comprehensive Needs Assessment will be completed that captures WIOA expectations of employer needs.

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

ORS has a long-standing history of cultivating a productive collaboration between ORS, CRPs, and the netWORKri One-Stop system. It is anticipated that this effort will continue through FFY2017. ORS, through its parent agency, Rhode Island Department of Human Services and as required by WIOA, is a financial and programmatic partner with Rhode Island netWORKri OneStop Centers. ORS counselors have designated days and times at each of the One-Stop Centers in order to provide access to ORS services including applications, counseling, information and referral, and placement services. This is also where counselors have the opportunity to reinforce that ORS is a resource to procure skills needed for today’s workforce. ORS is another resource for eligible customers to align with Real Jobs RI. ORS personnel attend monthly statewide Employer Services Network meetings at the Providence/Cranston One-Stop Career Center/netWORKri. In addition, ORS personnel, through the Assistive Technology grant (ATAP), provide consultation and training to the One-Stop staff on disability issues, accessibility considerations, and assistive technology. ORS has two Memorandums of Understanding with the RI Workforce Investment Board that defines the relationship between ORS and the One Stop Centers. In addition, ORS personnel are members of each of the two regional workforce investment boards (WIB): Providence/Cranston Workforce Solutions and Greater Rhode Island Workforce Partnerships. Each WIB has a Youth Board that ORS personnel attend and also participate in annual Request for Proposal reviews.

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

4.8(b)(4) Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.

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

The Rhode Island Office of Rehabilitation Services (ORS) continues to provide supported employment services, as requirements of WIOA and the Department of Justice settlements, as a means to enable individuals with the most significant disabilities to have access to integrated competitive employment opportunities. ORS has maintained involvement with two Supported Employment (SE) Advisory Councils, representation on the Developmental Disabilities Council, and the RI Transition Council.

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

The time frame for transitioning an individual from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer. ORS has been working with CRPs who provide Supported Employment Services to improve the quality and availability of employment-related services.

ORS will continue to encourage CRPs to collaborate with each other, through a quarterly meeting sponsored by ORS, to meet the diverse employment needs of significantly disabled individuals with intellectual and behavioral health issues. This collaboration is also encouraged at individual and joint meetings of the BHDDH, Divisions of DD and BH Supported Employment Councils. Some ORS customers not eligible for the long-term supports provided by DD or BH agencies have significant functional limitations and could benefit from the supports and job-coaching expertise of SE agencies, with an overall goal of increasing integrated, competitive employment outcomes. SE customers have increased the average number of hours employed, however, ORS is continuing to work with staff and vendors on improving the quality of the jobs, salary, and benefits for its’ supported employment population. A new service delivery model and fee structure was designed and implemented on 4/1/2013 and will be modified in FFY2017.

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

The three state entities have created a Transition timeline for staff, families, and school personnel to clarify each agencies’ obligations to implement the DOJ requirements for in-school
youth. ORS has had a Cooperative Agreement with RIDE for over 16 years. This agreement is the foundation for ORS to have a MA level Rehabilitation Counselor at each high school in the state. The ORS Rehabilitation Counselor functions as a liaison, consultant, and referral source to the transition personnel of each high school in the state. ORS has been providing a wide array of transition services (PETS) since the inception of the Cooperative Agreement. The array of services for in-school youth with disabilities include: Vocational Evaluations and Assessments; Community Based Work Experiences; support of participation in Transition Academies and ORS/LEA Summer Employment experiences; Summer Work; Project Search; and other work activities. ORS, according to the DOJ Consent Decree, is responsible for ensuring youth with I/DD have a 120-day Trial Work Experience prior to leaving high school.

The array of transition services in place for both in-school youth with disabilities, as well as for youth eligible for supported employment services, meet the requirements of WIOA for PETS and the DOJ service requirements for in-school youth with I/DD.

g. Coordination with Employers (Formerly known 4.8(b)(5)) 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:

VR Services;

Transition Services, including pre-employment transition services for students and youth with disabilities

I. VOCATIONAL REHABILITATION SERVICES:

The Office of Rehabilitation Services (ORS) has several existing partnerships and services that involve the business community. On a fee-for-service basis, Community Rehabilitation Program (CRP) vendors provide Community-Based Work Experiences (CBWEs) to offer clients paid, community-based, integrated work experiences consistent with client interests. Employer Based Skill Evaluation (EBSE), a partnership between ORS and specific businesses, provides up to three months’ salary subsidized work experience in a particular career interest area of the client. This service provides a unique opportunity for ORS to assess an individual’s work skills and behaviors within a business environment. The employer provides feedback to the agency and the client about their skills and potential in a particular occupation. Some of these assessments have resulted in a job match, while others have provided information to justify on-going education/training in the field or in some cases exploration of alternate careers. In addition, ORS coordinates with employers and potential hires participates in On-the-Job Training (OJT) opportunities, and Community-Based Work Experiences (CBWE) opportunities.

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

The Workforce Development Supervisor has developed more than 30 business partners with a myriad of companies in Rhode Island. When provided with job openings from these partners, alerts are forwarded to the 45 counselors who share this information with appropriate job seekers. Once a qualified job seeker has applied and after a confidential release has been obtained, ORS contacts the employer and job develops on the qualified job seeker’s behalf.

II. PRE-EMPLOYMENT TRANSITION SERVICES (Pre-ETS):

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

In addition, ORS funds summer work experiences for youth since 2010. ORS has also developed two other Pre-ETS work initiatives, Summer Employment Alliance and twelve Tri-Employment programs for work experiences to potentially eligible students with disabilities. All of these work experiences are in integrated community based work settings at minimum wage or above.

III. COMPREHENSIVE NEEDS ASSESSMENT:

ORS will be conducting a state-wide Comprehensive Needs Assessment (CNA) in collaboration with the SRC in 2016. This CNA will incorporate a component related to the needs of the business community, and in order to create a foundation for developing new and innovative training and services specific to those needs. As part of the design for the CNA, ORS will also consult with the WIOA partners.

IV. MARKETING/OUTREACH STRATEGY:

Over the next year, ORS will enlist its state partners and the SRC to develop a marketing plan that targets specific business sectors. Collaboration with the Governor’s Workforce Board, the Workforce Investment Boards (WIBs), Rhode Island Department of Education (RIDE), and Rhode Island Department of Labor and Training (DLT) will be critical as the state moves to implement the Comprehensive System Change Plan (CSIP).
h. Interagency Cooperation (formerly 4.8(b)(6) 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”

The state Medicaid plan under title XIX of the Social Security Act;
The State agency responsible for providing services for individuals with developmental
disabilities;
The State agency responsible for providing mental health services.
ORS has a working relationship with each of the entities referenced in this attachment.

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY
   ACT:
   Rhode Island has a work incentive program called the Sherlock Plan which enables
   individuals with significant disabilities to maintain Medicaid while working. The Sherlock
   Plan is administered by the Department of Human Services. However, the complexities of
   increased income on other benefits such as the Developmental Disability agency’s service
   cost share, subsidized housing, and food stamps requires considerable coordination among the
   state agencies. ORS participates on a monthly case coordination team that examines the
   Sherlock Plan.

   In addition, the Department of Justice Consent Decree (CD) and Interim Settlement
   Agreement (ISA) require all individuals with significant intellectual disabilities receive a
   complete Benefit Analysis by a Benefits Counselor. ORS is working with Medicaid and Behavioral Health,
   Developmental Disabilities and Hospitals (BHDDH) to examine how the service can be
   reimbursed by Medicaid.

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

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

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

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

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

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

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

ORS funds an array of Supported Employment services for adults and youth with Behavioral Health issues through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRP). Many of these Supported Employment CRPs are also licensed by BHDDH to provide support services to individuals with behavioral health disabilities.
ORS continues to provide supported employment services as a means to enable individuals with the most significant disabilities to have access to integrated competitive employment opportunities. ORS sponsors and participates in the Supported Employment Advisory Council for Behavioral Health, and has MA Masters’ level Rehabilitation Counselors function as liaisons to CRPs and these agencies that offer SE services to individuals with behavioral health issues.

ORS has a referral, liaison, and consultative -relationship with the CRPs and funds a continuum of Supported Employment services, through the customer-selected CRP, that are expected to culminate in integrated competitive employment outcomes. ORS, as a leader, trainer, and funding source of supported employment services, ORS engages CRPs - who rely on BHDDH funding - to provide the long term supports that help sustain employment for individuals with significant developmental disabilities. Long-term supports are planned for and included in the customers’ ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each supported employment service. The IPE also identifies the CRP accepting responsibility to provide long term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer and WIOA standards. ORS has been working with CRPs who provide Supported Employment Services to improve the quality and availability of employment related services. As the funding source ORS holds a quarterly meeting with all of the I/DD Supported Employment CRP’s to ensure consistency in service delivery, appropriate employment outcomes are being reached and to offer support and guidance to the providers.

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

ORS personnel provide consultation to the One-Stop staff on disability issues, accessibility considerations, and assistive technology. ORS will provide One Stop Staff with resources to support individuals with disabilities. Resources including the ATAP partnership and state independent living center are key supports in providing consultation and training to One Stop Staff. ORS also works with other pertinent assistive technology professionals through fee for service and comparable benefits that may benefit the needs of One Stop Staff.

ORS has two Memorandums of Understanding with the RI Workforce Investment Board that defines the relationship between ORS and the One-Stop Centers. In addition, ORS personnel are members of each of the two regional Workforce Investment Boards (WIB): Providence/Cranston Workforce Solutions and Greater Rhode Island Workforce Partnerships. Each WIB has a Youth Board that ORS personnel attend, and also participate in annual Request for Proposal reviews.
RI has two Workforce Investment Boards (WIBs). Recently ORS became an active participant in the Disability Committee required by WIOA - both WIBs agreed to combine their Disability Sector Committee into one state-wide entity in order to maximize resource involvement.

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


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

1. Data System on Personnel and Personnel Development

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

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

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

(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.

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:

(A) a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

(B) the number of students enrolled at each of those institutions, broken down by type of program; and

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

In FFY2017, ORS provided services to approximately 3,985 individuals, with an average caseload of 92. ORS has a total of 92 full-time equivalent (FTE) positions, which includes 44 MA level Vocational Rehabilitation Counselor positions. When approved, ORS has continued to recruit and hire Vocational Rehabilitation Counselor for vacancies when they arise. All new counselors have Master’s Degrees in Vocational Rehabilitation Counseling.

During FFY2017, 6 ORS staff retired or left the agency. Promotions resulted in the following positions: vacancies in a VR Counselor I position, a VR Counselor II, Rehabilitation Counselor, Human Services Business Officer, and Food Service Administrator. Supervisor position, and 2 VR Counselor II positions. One of the VRC II positions has been filled, and the other is in the process of being-filled. Already in FFY2018, due to retirements and a promotion, the following positions are currently vacant: two Assistant Administrator positions, one VR Supervisor position, one VR Counselor I position, and one Senior Casework Supervisor. ORS also had vacancies in the following positions: Human Services Business Officer, Information Aide, Senior Word Processing Typist, and Property Control/Supply Clerk.

Over the next 3 to 5-year period, ORS estimates that approximately 10-15 individuals (administrators, supervisors, counselors and support staff) will be eligible for retirement. Given the number of employees that could potentially leave state service, ORS is actively pursuing graduate students for internships with ORS via the Rehabilitation Counseling programs from local universities and colleges.

<table>
<thead>
<tr>
<th>Row</th>
<th>Job Title</th>
<th>Total positions</th>
<th>Current vacancies</th>
<th>Projected vacancies over the next 5 years</th>
</tr>
</thead>
</table>

pg. 25
<table>
<thead>
<tr>
<th></th>
<th>Position</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Vocational Rehabilitation Counselor I</td>
<td>29</td>
<td></td>
<td>3</td>
</tr>
<tr>
<td>2</td>
<td>Vocational Rehabilitation Counselor II</td>
<td>14</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>3</td>
<td>Vocational Rehabilitation Counselor for the Deaf</td>
<td>1</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>4</td>
<td>Supervisory</td>
<td>1143</td>
<td>24</td>
<td>2</td>
</tr>
<tr>
<td>5</td>
<td>Administrative</td>
<td>7</td>
<td>24</td>
<td>1</td>
</tr>
<tr>
<td>6</td>
<td>Fiscal</td>
<td>6</td>
<td>0</td>
<td>44</td>
</tr>
<tr>
<td>7</td>
<td>Case Aide</td>
<td>3</td>
<td>0</td>
<td>1</td>
</tr>
</tbody>
</table>
B. PERSONNEL DEVELOPMENT:
Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

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

ORS has cultivated a relationship with two area colleges that offer graduate training in Rehabilitation Counseling: Assumption College in Worcester, MA and Salve Regina University in Newport, RI. There are approximately 138 students enrolled in the graduate programs (83 at Assumption College and 55 at Salve Regina University).

ii. the number of students enrolled at each of those institutions, broken down by type of program; and
As of 1/2018, there are 138 students enrolled in the graduate programs (83 at Assumption College and 55 at Salve Regina University) to obtain their MA in Rehabilitation Counseling.

iii. the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.
Assumption College - 32 Graduates from previous year with a MA in Rehabilitation Counseling
Salve Regina University - 16 Graduates from previous year with a MA in Rehabilitation Counseling
<table>
<thead>
<tr>
<th>Row</th>
<th>Institutions</th>
<th>Students enrolled</th>
<th>Employees sponsored by agency and/or RSA</th>
<th>Graduates sponsored by agency and/or RSA</th>
<th>Graduates from the previous year</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Assumption College</td>
<td>84</td>
<td>0</td>
<td>0</td>
<td>-32</td>
</tr>
<tr>
<td>2</td>
<td>Salve Regina University</td>
<td>55</td>
<td>0</td>
<td>9</td>
<td>14</td>
</tr>
<tr>
<td>3</td>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>


- 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.

Plan for Recruitment, Preparation and Retention of Qualified Personnel

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

ORS provides both practicum and internship opportunities for local graduate students. In FFY2015, ORS had five graduate students. Of the three from Salve Regina University and the two from Assumption College, three of the interns were hired by ORS. Currently ORS has one intern from Salve Regina University. ORS participates on the Advisory Board for the
Rehabilitation Counseling Graduate Program at Salve Regina University and University of Massachusetts.

For FFY2017, ORS plans to explore increasing ORS Vocational Rehabilitation Counselor supervisory capacity, funding for payment to interns, and availability of internship acceptance from Salve Regina University, Assumption College, and University of Massachusetts.

ORS plans to participate in the Salve Regina University initiative to provide supervisory training for Vocational Rehabilitation Counselors providing internship supervision. Staff are hired in accordance with the Department of Human Services affirmative action policies. Job announcements are distributed to community-based agencies with the intent of attracting qualified individuals, particularly individuals with disabilities and minority backgrounds. For FFY2017, ORS will explore facilitating job posting with Salve Regina University, Assumption College, and UMass. Job openings are also advertised through the State of Rhode Island “ApplyRI” website.

ORS has recruited and retained a number of qualified individuals with disabilities (visual impairments, Deafness, psychiatric/emotional, physical disabilities, etc.) and minority backgrounds (bilingual case aides and counselors). ORS actively recruits graduate students with disabilities and minority backgrounds for the practicum and internship program. ORS has had 29 graduate students for practicum/internships over the past few years, of which 20 were hired as Rehabilitation Counselors, all with Masters Degrees in Rehabilitation Counseling.

ORS will continue to explore long-term strategies in FFY2017 for recruitment and retention of personnel from diverse cultural backgrounds.

II3. Personnel Standards

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

(1) 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

(2) the establishment and maintenance of education and experience requirements, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

Describe the State agency’s policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:
standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

1. ADEQUATELY PREPARED AND TRAINED STAFF

Rhode Island does not have a state approved or recognized certification, licensure, or registration requirements for Rehabilitation Counselors. The Rhode Island Office of Rehabilitation Services has elected to base its minimum personnel standards for recruitment of counselors on the requirement of a Master’s Degree in Rehabilitation Counseling. ORS will continue to monitor any state efforts for licensure of Rehabilitation Counselors.

During FFY2013 ORS piloted a program to encourage and fund counselors to pursue their CRC, which has resulted in nine VR Counselors receiving their CRC. At present ORS has 25 VR Counselors, Supervisors and Administrators who are CRC certified, and has one VR Counselor currently pursuing their CRC. ORS will explore the feasibility of continuing to sponsor VRC staff acquisition of the CRC.

Rehabilitation Counselors are highly encouraged to obtain the State of RI Qualified Rehabilitation Counselor Certification. ORS has assigned an Administrator and Supervisor to the Department of Human Services RAMPS team which has a focus on succession planning and recruitment. (RAMPS is a long term project that attempts to install both “off ramp” (exit processes, knowledge retention & succession development) and “on ramp” (on-boarding and orientation) programs and policies for the Department.)

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

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

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

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

ORS will continue to seek Commission on Rehabilitation Counselor Certification Approval for training provided by ORS. Currently ORS has 32 VR Counselors, Supervisors, and Administrators who are CRC certified.
Training opportunities on provided on an ongoing basis to ensure that staff have the most current information on the labor market, best practices and assistive technology.

Since December 2009, all ORS Rehabilitation Counselors hired have met the Rhode Island standard (100% compliance) of a Master’s level in Rehabilitation Counseling. All field VR Supervisors and Administrators meet the CSPD standard. ORS continues to dedicate financial and Training Coordinator time to support the CSPD plan. ORS is structuring mentoring activities around specific specialization areas in anticipation of future retirements. All existing fiscal and support staff meet or exceed state requirements for education and experience.

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:
  1. 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

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

2. ANNUAL PERSONNEL NEEDS ASSESSMENTS

ORS remains committed to providing ongoing professional development for all agency staff. Sponsorship at conferences, workshops, OTD training etc. is predicated on the availability of agency funding.

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

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

Top areas of training needs self-reported by VR Counselors, Supervisors and Administrators included: Supported Employment Training for VR Counselors and VR Vendors, Policy and Procedure updates, Physical Disabilities and relationship to employment, Ethics and Vocational Rehabilitation, Order of Selection and Eligibility Determination, Workforce Innovation and Opportunity Act in the area of data collection/electronic case management system, Pre-ETS, Supported Employment, etc.
Through the State Office of Training and Development agency staff have the opportunity to attend trainings such as: MS Power Point, Advanced Workplace Writing, Effective Writing, Supervisory and Leadership training, etc.

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

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

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

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

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

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

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

**4. STAFF DEVELOPMENT:**

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

**A. System of staff development**

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

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

The development of a monthly support group for Vocational Rehabilitation Supervisors providing supervision to interns from Salve Regina University and Assumption College is planned.

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

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

Eight of the forty-two ORS Vocational Rehabilitation Counselors, eight have been on the job for less than 5 years; thus necessitating the training on rehabilitation basic, best practices, and ORS policies and procedures.

ORS believes that the next 3-4 year period is a critical time to assist newer counselors and supervisory personnel in professional development and growth to transition into positions of increased responsibility due to anticipated promotions and retirements. Explore ways to best cultivate available staff resources within the agency in the role of Business Ambassadors, agency marketers, advocates, and educators to the business community.

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

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

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

The Training Coordinator elicits input from counselors, supervisors, support staff, and administrators regarding their training needs.
If a Corrective Action Plan around personnel performance is necessary, the Corrective Action Plan would be in compliance with the CSPD, ORS policy & procedures, and union regulations.

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

ORS will enlist the Employer Cadre to assist with enhancing staff competencies in addressing the needs of business community. Will be a priority for training and examining staff responsibilities.

B. Acquisition and dissemination of significant knowledge

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

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

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

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

5.4 PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

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

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

The Blind Service region of ORS has staff who routinely employ alternate forms of communication including enhanced print or contrasted print materials, Braille, tactile sign,
software and voice over programs for text recognition, in addition to a variety of computer/electronic assistive devices and technologies.

The staff of the Blind Service VR unit of ORS include VR professionals who are themselves blind as well as those trained in vision rehabilitation teaching and technology and whom serve as a resource for staff development and training in addition to their direct service responsibilities.

The Sr. Human Services Policy and Systems Specialist, who manages the ORS and the Assistive Technology Access Partnership (ATAP) web pages, has expertise in providing materials in alternate formats, and develops electronic tools for counselors. ORS assures that all information disseminated to staff with disabilities and customers is available in accessible format.

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

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

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

VII. 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.

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

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

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

A Cooperative Agreement between RIDE and ORS has been the foundation of a collaborative relationship focused on school to work transition for over 16 years. This collaboration has enabled ORS to have an MA level Rehabilitation Counselor at each high school to provide an array of services formerly referred to as Transition to the new WIOA term of Pre-Employment Transition Services (PETS). The Cooperative Agreement describes interagency collaboration and coordination, the role and responsibilities of each partner, the process for resolving
disagreements, as well as provides a Collaborative Services Chart (CSC). The CSC identifies the agency primarily responsible for services in each of the following categories: Assessment Services, Career Development Services, Community Living Services, Related Services, and Auxiliary Services.

Pre-Employment Transition Services (PETS) are ORS services that are provided, under the auspices of the Agreement between ORS and RIDE, to in-school youth with disabilities in collaboration with each Local Education Authority (LEA). These transition services fall under the regulations outlined in the 2014 Workforce Investment Opportunities Act (WIOA) to help to prepare students for employment after high school. The Office of Rehabilitation Services strives to assist all students with significant disabilities to gain the necessary skills, preparation, exploration, and supports to enter the workforce. Incorporated into the ORS PETS Program is an expectation that all students who are found eligible for services will have an ORS approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility.

Pre-Employment Transition Services (PETS) focus on employment related information and services to in-school youth with significant disabilities what have an IEP or 504 plan. In addition, the state of Rhode Island is obligated to provide an array of transition services—based on a Department of Justice (DOJ) Consent Decree/Interim Settlement agreement—to in-school youth identified as having a significant intellectual disability (I/DD).

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

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

STATE REHABILITATION COUNCIL

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

j. Statewide Assessments (Formerly known as Attachment 4.11(a))

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

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

   • 4.11(a) Statewide Assessment.
• Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the state, particularly the vocational rehabilitation services needs of:
  
  o Individuals with most significant disabilities, including their need for supported employment services;
  
  o Individuals with disabilities who are minorities;
  
  o Individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program; and
  
  o Individuals with disabilities served through other components of the statewide workforce investment system.

• Identify the need to establish, develop, or improve community rehabilitation programs within the state.

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

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

ORS and the State Rehabilitation Council (SRC) will be initiating a CNA in FFY2016/17 for the 2018 State Plan. This assessment will incorporate the new WIOA regulations and focus on the rehabilitative needs of individuals with disabilities residing within the State, particularly the VR service needs of those:

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

• Who are minorities;
• Who have been unserved or underserved by the VR program;
• Who have been served through other components of the statewide workforce development system; and
• Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.
Identify the need to establish, develop, or improve community rehabilitation programs within the state.

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.

During FFY2016/17, ORS addressed the Statewide Comprehensive Needs Assessment using several resources including:

- Agency strategic planning
- Annual personnel needs assessments
- Community Comprehensive Needs Assessment Survey
- Compliance with Rehabilitation Services Administrations’ Standards & Performance Indicators
- Customer Satisfaction Survey
- Implementation of the ORS 107 Monitoring Report
- Rhode Island Governor’s Commission on Disability Public Forums
- Office of Rehabilitation Services Staff Comprehensive Needs Assessment Survey
- Focus group with key staff informants

AGENCY STRATEGIC PLANNING

The Rhode Island Office of Rehabilitation Services (ORS) seeks to involve agency staff in identifying the challenges and solutions needed to more effectively assist all individuals with significant disabilities to select, prepare for, obtain and maintain employment. On December 20, 2013 Vocational Rehabilitation Services staff convened for a strategic planning day to reinforce the agency’s strategic planning goals and development of annual work plans. Information for strategic planning was gathered through 2013/2014 CNA activities, meetings with the seven field services regions, annual agency work plans, and Quality Improvement Activities. ORS will continue to assess information as it becomes available and will continue to address the concerns raised in the RSA 107 Monitoring Report and Program Improvement Plan. Therefore, the strategic planning objectives have been modified in the following way:
Coordinate joint training opportunities for CRP and ORS personnel
Maximize ORS’ collaboration with the netWORKri One-Stop Career Centers, Youth Centers, and business community
Promote CRP capability in the provision of a continuum of employment services
Encourage assessment activities and plan development that promotes informed choice, self-determination, and ease movement toward employment
Enhance Supported Employment services with emphasis in integrated and competitive goals
Coordinate staff resources to work in collaboration with the SRC Outreach, QI/State Plan and Transition Subcommittees
Emphasize outreach strategies that target underserved and unserved disability and minority populations, and address the needs of specific businesses
Maintain a focus on quality employment outcomes (integrated, competitive employment at minimum wage or higher with benefits)

ANNUAL PERSONNEL NEEDS ASSESSMENTS

The Training Coordinator of ORS conducted a Training Needs Assessment. Information elicited from staff is used to establish a list of training topics and concerns.

The VR Counselor CNA survey consisted of staff self-report identifying their top areas of training needs. Example of areas identified for training include: Supported Employment Training for VR Counselors and VR Vendors, Motivational Interviewing, Substance Abuse, Ethics and Vocational Rehabilitation, Autism/Asperger's Training, Worker’s Compensation, Learning Disabilities and Transition, and Working with clients who have Criminal Backgrounds.

Training will also incorporate 21st century understanding of the evolving labor force and the needs of individuals with disabilities as outlined by WIOA. A training schedule is developed based upon the identified needs and will be implemented throughout the year. This year, ORS anticipates an increase in the number of referrals of individuals with most significant disabilities who may require supported employment or extended evaluation services. Training in this area is planned for both staff, state partners, and for Community Rehabilitation Providers (CRP’S).

ORS has many new counselors (8 out of 44) who have been on the job 5 years or less. ORS will also be providing some specialized training to Management staff and Vocational Rehabilitation Counselor II’s in the areas of clinical supervision and leadership skills. The agency continues to maintain a relationship with two colleges that offer MA programs in Rehabilitation Counseling. An adequate supply of qualified Rehabilitation Counselors, supervisory, administrative, fiscal, and support personnel are essential to provide quality rehabilitation services to customers of ORS.

COMMUNITY COMPREHENSIVE NEEDS ASSESSMENT SURVEY

The 2014-2017 survey conducted by ORS and the RI State Rehabilitation Council (SRC) was sent to 398,492 individuals, which included CRPs, educational providers, the Department of Labor and Training, and service providers of Intellectually Developmentally Disabled and Behavioral
Health individuals, employers, ORS staff, and ORS consumers. Recipients of the survey were also encouraged to forward the survey to other interested parties; therefore the exact number who received the survey is unclear. Seventy-eight individuals completed the survey which represents a 31.5% return rate based on the 492. By comparison in 2011 the Community CRP CNA was sent to 67 recipients with a response of 34 surveys or 51%. While the response percentage is lower in 2014, by reaching more individuals the agency saw a 44% increase over the 2011 number of responses thus providing the agency with more information on the needs of individuals with disabilities. A broader range of the community, along with more individuals, received and answered the surveys, thus providing ORS with more information on the needs of individuals with disabilities.

The CRP survey conducted through Survey Monkey sought to identify the following:

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

Individuals with disabilities who are underserved

The Employer survey yielded the following. Several significant findings were reflected by the results:

Availability of jobs, individual’s social skills, personal/home life barriers and fear of losing SSI and SSDI, medical benefits, and other subsidies, ranked as the top four issues preventing individuals from obtaining employment

- Communication and the ability to effectively provide accommodations were the largest challenges faced when hiring a person with a disability.
Accommodations, reliability, performing the necessary job duties and adaptability were the largest concerns in hiring people with disabilities.

Joy, helping, watching employee growth and gaining valuable employees were the largest rewards in hiring individuals with disabilities.

The top four issues preventing individuals from maintaining employment included personal home life barriers, social skills, availability of jobs and availability/cost of transportation.

Organizations felt unable to meet customers’ needs for benefits counseling and off-site retention supports, including long-term Supported Employment supports and job coaching. Work trials, internships and situational assessments were also noted, as was job preparation counseling, employment planning/assessments, interview preparation, and case management.

Respondents identified the following disabilities as least served by ORS:

- Substance abuse related disorders
- Intellectual Developmental Disability
- Behavioral Health

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

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

Employers CRPs and consumers indicated that ORS could:

- Promote awareness of ORS
- Enhance providers awareness of employer resources i.e. ADA, tax incentives, etc.
- Continue to enhance communication regarding ORS updates and changes to policies affecting services
- Continue to build and improve liaison relationships between counselors and CRPs
- Increase awareness of other provider resources, such as long-term funding options
- Assist with recruitment of employers

COMPLIANCE WITH STANDARDS & PERFORMANCE INDICATORS

For FFY2015 ORS again met Standard 1 with positive outcomes for Performance Indicators 1.1, 1.2, 1.3, 1.4 and 1.6 and met standard 2.1. As a result of not making Standard 1 and 2 for FFY2012, the Office of Rehabilitation Services as directed by Section 107 of the Rehabilitation Act is currently on a Program Improvement Plan, though is hopeful with having met Standard 1 and 2 for the two required years that the PIP will be discontinued by RSA. With the goal of maintaining the highest quality of service to customers, the Strategic Planning Supervisor will continue to monitor the agency’s compliance with all Standard and Indicators on a monthly
CUS_2201337402_1209_Revised-01.pdf

CUSTOMER SATISFACTION SURVEY

ORS maintained utilization of the Customer Satisfaction Surveys re-designed in 201209 with input from the SRC State Plan and Quality Improvement sub-committee. The survey, designed as an ongoing tool to be distributed at set intervals, provides longitudinal data on customer satisfaction. Surveys are sent to customers with successful case closures, as well as to those whose cases closed unsuccessfully following receipt of services, and those who are receiving some type of training provided by ORS.

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

Successful Closure Satisfaction Survey:
Since the 2011 CNA respondents to the survey indicated ORS has improved in preparing participants to obtain and maintain employment that matches their goals, interest and abilities. The 2015 satisfaction survey results reflect an increase from the 2014 responses, and continue to reflect improvement over the 2014 data in the areas of better preparing participants for employment and providing information to enable individuals to make informed decisions regarding benefits, Social Security and state specific benefits. Areas that continue to reflect need for monitoring are ensuring individuals are aware they can re-contact ORS for services after they are closed, continued learning and skill enhancement for advancement and quality of employment outcomes. Overall respondents continue to indicate that they would refer a friend for family member to ORS services.

Individuals commonly responded that they feel they were assisted in obtaining employment that matched their stated goals, interests and abilities; were better prepared by ORS to obtain and maintain employment; were provided the necessary information to make decisions regarding social security and work incentives; became more financially independent; were aware that they can re-connect with ORS for help after their case is closed; would refer a family member or friend with a disability to ORS.

Status 28 Customer Satisfaction Survey – Unsuccessful Closure after provision of services:
Results of the satisfaction survey since the 2011 CNA reflect the following areas for continued monitoring: ensuring customers are provided information on work incentives, Social Security and state specific benefits, educating customers on the assessment process and identifying the need for assistive technology. 2015 surveys reflected positive informed choice trends in the areas of identification of interest, abilities and strengths as related to an employment goal and assistive technology assessments/needs. Areas for continued monitoring are guidance and counseling leading to enhanced understanding of the VR process and informed choice in the area of services. While respondents indicated a positive trend in receipt of benefits planning information it was noted that the number of respondents who discontinued engagement with VR due to a concern of loosing of Social Security, medical coverage, etc. increased.
Individuals commonly responded that: they did not receive assessments to assist with determining their need for assistive technology; were not provided the necessary information to make decisions regarding social security and medical coverage; nearly half responded that they were not referred to services that matched their individual needs and were not assisted with identifying an employment goal that matched their interests, abilities and strengths.

Overall consumer surveys yielded the following suggestions for changes to ORS:

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

**ENVIRONMENTAL SCAN**

The environmental scan included information from a variety of sources such as: Agency MIS data, Comprehensive System Improvement Plan, RSA data, RI Department of Labor & Training (DLT) and Department of Labor – Bureau of Labor Statistics, Disability Employment Statistics-U.S Department of Labor’s Bureau of Labor Statistics, American Community Survey-US Census Bureau, RI Department of Education and Office of Disability Employment Policy, 2009-2011, 2011 RI Employee Benefits Report, and November 2012 RI Employment Trends & Workforce Issues RI Department of Labor and Training Market Unit. The sources indicated the following:

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

pg. 43
• Disability in the National Workforce: 18.2% worked in the service fields (excluding protective service); 15% worked in Administrative support; 10.4% worked in Sales; 9% worked in Management, Business and Finance.

• According to the RI Department of Education, their five-year strategic plan focuses on the following: increase retention on both students and educators; promote one student to computer training philosophy; expand student access to early college and career education training programs; expand and deepen college and career counseling services, while informing youth and adults into the decision making process; reach out to business and industries to partner with schools in the development and management of career and technical education programs; collaborate with districts, education providers and business providers to offer recognized, career-ready credentials and skills transcripts; reach out to employers and internship providers to partner with school districts to complete employability skills assessments and transcripts.

• The number of Rhode Islanders obtaining a high school degree/equivalency is below the national average and is the lowest in New England. This educational disparity will present a challenge in the coming years as it is projected that 41.7% of available jobs require a minimum of a High School/equivalency degree.

• While RI employment rate has improved since the 2011 CNA it remains one of the highest in the nation at 9% and the highest among the New England States.

• The 2011 Rhode Island Employee Benefits Report indicated that 73% of RI employers offered health insurance to full time employees and 13% offered health insurance to part time employees.

• The American Community Survey US Census Bureau 2009-2011 earnings estimate reflects that Rhode Islanders with a disability median income for a 12-month period in 2011 was $21,932 overall, males earned $26,464 and females earned $18,890. Conversely, their non-disabled counterparts for the same period had a median income of $31,957 overall, males $38,024 and females $27,098.

• Information from the November 2012 RI Employment Trends & Workforce Issues, RI Department of Labor and Training Market Unit indicates 44.3% of RI residents in 2010 were more likely to come from Latin America. 51.5% of European born RI residents are from Portugal and 80.7% are from Western Africa. RI foreign born residents (39.2% of the total population) are three times more likely to have not graduated high school than those born in the U.S. The 2010 Census and 2000 Census indicated that the largest population in RI is Caucasian, followed by Hispanic or Latino, Black or African American, and Asian. 6% identified themselves as some other race. RI counties with the highest Asian population are Providence 3.7%, Kent County 2.0% and Newport and Washington County at 1.6%. Hispanic populations centered in the counties of Providence 18.8%, Newport 4.2% and Kent 3.2%.

• Information obtained from Disability Employment Policy Resource by Topic in January 2013 16 to 19 year-olds with a disability were employed at a rate of 12.7% as opposed to 24.9% for non-disabled youth. For youth ages 20 to 24 with a disability, the employment rate was 25.7% versus 60.6% for non-disabled.

Post 9/11 and Total Veteran’s Unemployment Rates by State for 2011 show veterans in RI with an overall unemployment rate of 14.6% versus the US rate of 8.3%. The post
9/11 veteran unemployment rate is 16.8% for RI, and 12.1% for the US. RI is above its neighbors of Massachusetts and Connecticut who have over all % respectively of 9.5% and 9.4% and post 9/11 veteran unemployment rates of 7% and 8.7%.

Analysis of available RSA statistics for average hours worked per week highlights that in FFY 2011 the ORS average for non SE placements of 28.36 hours/week was below the national average of 32.23. The same held true for ORS average hourly earnings ($11.15) compared to the national average of $11.44. Supported Employment data showed ORS to be below the national average of 24.17 in work hours at 16.21/week, but above the national average in hourly wage with $9.17 versus $8.94. ORS was below the national average in work hours, but above the national pay per hour for Self-Employment. BEP work hours and pay were below the national average.

RSA data on ORS employment outcomes by disability for FFY 2011 indicates that ORS is above the national average for visual impairments and mental & emotional disabilities and below the national average for physical impairments, communicative impairments, and cognitive impairments.

Data available through RSA indicates for FFY 2011 ORS was above the national average in percentage of transition age youth (14 to 24) served in general/combined agencies with 38.7% versus the national average of 35.18%. For the same period ORSs’ transition employment rate was 63.31% as opposed to the national average of 51.83%. Average work hours of 25.74% and average hourly pay of $9.36 for the transition population in FFY 2011 was below the national average of 29.90 hours/week and $9.56/hour. RSA data for individual age 65 and over reflects that RI is below the national average in employment rate, wage and hours.

IMPLEMENTATION OF THE ORS 107 MONITORING REPORT

The Rehabilitation Services Administration (RSA) conducted a review of ORS in March 2012. The RSA review processes included program performance evaluations, on-site and telephone discussions with stakeholders, and on-site visits with staff, and members of the SRC. RSA found several strengths in the program: strong leadership and dedicated staff; close collaboration with key partners; statewide presence at the netWORKri One-Stop Centers; and statewide cooperative partnerships with all school districts and transition services to youth. The most recent review included an assessment of transition services, organizational structure, and fiscal integrity of ORS. For FFY2015 ORS will focus on the following areas identified in the monitoring report as programmatic goals:

- Continue implementation of a comprehensive Continuous Quality Improvement Plan (CQIP)
- Meet compliance standards for eligibility and IPE development
- Improve the quality of employment outcomes for transition-aged youth, Supported Employment, and adults
- Improve the rehabilitation rate for transitioning youth
RHODE ISLAND GOVERNORS COMMISSION ON DISABILITIES PUBLIC FORUMS TO IDENTIFY THE CONCERNS OF PEOPLE WITH DISABILITIES AND THEIR FAMILIES

The Office of Rehabilitation Services participates annually in the Rhode Island Governor's Commission on Disabilities (GCD) Public Forums. In 2015, staff from ORS participated in the seven forums held throughout the state. The forums allow individuals with disabilities, family members, advocates, and providers to present concerns about any of the services/resources for individuals with disabilities. The forums and subsequent public document by the GCD provides ORS with information on themes relevant to employment services for individuals with disabilities.

Employment related themes included:

- Concern over the continuum of services related to the Employment First Initiative
- Supported employment services, lack of long-term funding options and service need ratio to staffing
- Impact on individual benefits and services
- Continuity of services for transition age youth as they move from one system to another

VR COUNSELOR COMPREHENSIVE NEEDS ASSESSMENT

In the summer of 2016, ORS and the RI State Rehabilitation Council developed and distributed a survey using Survey Monkey. The survey solicited staff perceptions on the needs of VR customers, barriers to services, and suggestions for improvement to VR services. Questions focused on the following areas: needs of the most significantly and significantly disabled, underserved and unserved populations, need for further development of CRPs, as well as use of the DLT netWORKri One-Stop system and youth centers to assist consumers with disabilities to maintain and/or enter employment. The survey was sent to 6079 individuals within the agency with 3346 or 55.8% responses to the survey. In comparison the 2011 CNA was sent to 48 individuals within the agency with a response of 26 or 54.17%. As done with the Community CNA, ORS sought to include more diverse agency input. Therefore, the 2016 staff CNA included VRC, VR Supervisors, VR Administrators, fiscal, support staff, etc.-which resulted in a 56.52% increase in the 2014 CNA response from 2011 CNA. Follow-up was completed with seven key informants who selfidentified in their survey they would like to be contacted. In a focus group setting, 3 of the 7 met on 11/14/13 with the QI Committee to further share their feedback on the needs of individuals served by ORS.

Findings reflected the following themes:

Evaluation of ORS’s improvement in areas noted in 2011

- CNA Services to the Deaf/Hard of Hearing, individuals with Psychiatric and Emotional Disabilities and African-Americans ranked as the top three most improved areas since the 2011 CNA.
Respondents indicated the following as the least improved areas since the 2011 CNA

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

Respondents suggested the following training areas to better encourage customer commitment to the rehabilitation process:

- Workforce Innovation and Opportunity Act (WIOA)
- Motivational Interviewing
- Effective Time Management

Enhance guidance and counseling relationships
- Ensure vendors are accountable for the services they have been approved for through improved communication
- Renewed focus on provision of services/less involvement in activities not related to agency mission
- Focus on liaison relationships/community involvement

Needs of Individuals with Most Significant/Significant Disabilities and Supported Employment Services:
- Continue to develop services and fee structures based on evidence of regional needs for specific populations throughout the state
- Increase the capacity and knowledge base of CRPs who provide Supported Employment services
- Improve access to vendors, and interpreters who have technical competence, as well as awareness of cultural issues and distinctions; make services readily available for emerging populations/minorities, as well as access to services for individuals who are not English-speaking.
- Increase access to vendors with the ability to work with customers using non-English American Sign language.
- Transportation to services that are available
- Increase the capacity of CRPs who work with individuals with Developmental Disabilities to conduct vocational evaluations and situational assessments that focus on meaningful integrated and competitive employment
- Need for a continuum of Supported Employment services for individuals with Behavioral Health and Intellectual/Developmental disabilities.
- Need for CRP’s to have qualified personnel to provide a continuum of services. Educate employers about the use of tax credits, hiring incentives, on-the-job training, internships, and other services that ORS provides.
- Establish a standard for CRP services to ensure consistent quality services through joint training with ORS staff and CRP vendors.
• Develop service options that incorporate work place social skills and daily time management

B. Rehabilitation Needs of Minorities:

• Enhance the cultural competency of ORS staff and CRPs to specific minority populations within the state
• Continue to develop and enhance Supported Employment and Work-Trial opportunities
• Educate staff on availability of internal and external resources such as agency forms in different languages, the Big Word, bilingual co-workers, interpreting resources, and the Cultural Diversity Cadre
• Improve quality of Vocational Evaluation, Situational Assessment, and Job Preparation specific to minority needs with the CRP network
• Incorporate interpretation and communication needs into the IPE Underserved and Unserved Populations:
  • Engage Southeast Asian, Muslim, Liberian, Cambodian, and African American communities through outreach and marketing strategies
  • Incorporate access to services for individuals who are not English-speaking.
  • Ensure services are readily available for emerging populations/minorities.

• Educate ORS staff and vendors on existing wrap around services already available in the community to address mental health, medical needs, substance abuse, and legal barriers to employment
• Engage individual with physical disabilities, traumatic brain injury and individuals meeting Supported Employment eligibility
• Build capacity to support transition age youth with physical, learning, and developmental disabilities, and those with a 504 education plan
• Improve outreach to Deaf and Hard of Hearing and Visually Impaired communities, individuals within the Pervasive Developmental Disorder (PDD) spectrum (specifically Asperger’s Syndrome), and individuals with disabilities who are employed

Need to further develop established and/or establish new CRPs:

• Develop CRPs to address the needs within specific geographic areas, establish new CRPs, as needed, to address unmet needs, and adjust the CRPs network to address the changing needs of the customers and labor market
• Continue to improve quality, consistency, and accountability of services provided to customers in Vocational Evaluations, Situational Assessments, and Job Development
• Examine the Supported Employment process to ensure quality employment outcomes with increased hours, wages, and health benefits
• Utilize and maximize ORS collaboration with netWORKri One-Stop Centers
• Assess CRPs’ ability to work with varying populations and disabilities
C. who have been unserved or underserved by the VR program:

The Comprehensive Needs Assessment (CNA) completed in 2017 identified the following as the most unserved/underserved populations served by the VR program:

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

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

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

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

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

- The 2017 Comprehensive Needs Assessment (CNA) identified that in-school youth with 504 plans are underserved.
- There were 8,400 in RI with IEP’s
- “At-risk” youth with learning disabilities do not want to be identified as having a disability and therefore, are not potentially accessing services
- Youth indicated a positive experience with ORS and that the referral process was seamless
- Youth (and their parents) indicated they are unaware of the full scope of services available to them and had difficulty understanding written materials provided by ORS

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

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

- Transportation barriers, maintaining staff, access to benefits counseling and community based job availability were challenges to delivering services and employment outcome
• Fear of losing Social Security benefits, medical coverage, family expectations, individual expectations, home life and lack of social skills are the most common personal barriers for individuals with disabilities who are seeking employment.
• Need for providers to have qualified personnel to provide a continuum of services, along with the need to increase service provider capacity.
• Assess CRPs’ ability to work with varying populations and disabilities

Meeting the needs of the Business Community:

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

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

• Develop materials about ORS that are easier to comprehend for both students and parents
• Consider strategies on how to better connect to “at-risk” students outside of the schools, as students report feeling stigmatized
• Expand outreach to other programs, such as youth centers, family resource centers and career & education programs
• Strengthen connections to higher education, particularly disability support service coordinators, to increase access to underserved youth
• Assist schools in increasing communication and coordination for “at-risk” youth

Meeting the needs of the Business Community:

• Educate ORS staff and CRPs to the needs of the Business Community
• Enhance presence at business expos and job fairs
• Provide Business Community with information on ADA and workplace accommodations
k. Annual Estimates (Formerly known as Attachment 4.11(b)).

4.11(b) Annual Estimates.

- Identify the number of individuals in the state who are eligible for services.

- Identify the number of eligible individuals who will receive services provided with funds under:
  - Part B of Title I;
  - Part B of Title VI;
  - Each priority category, if under an order of selection.
  - The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and
  - Identify 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. NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES UNDER THIS STATE PLAN

For FFY2015, there were 2,460,217 new applicants, and 1,843,1730 individuals were deemed eligible.

There were a total of 1,591,556 individuals who developed their Individualized Plan for Employment (IPE), and 644,703 individuals who obtained successful employment outcomes.

For FFY2016, ORS has a goal of 2,174,461 new applicants, and expects 1,731,844 individuals to become eligible. ORS anticipates that 1,559 new Individualized Plans for Employment will be developed and 652,646 successful outcomes achieved.

For FFY2017, ORS projects 2,175,462 new applicants, with 1,845,173 individuals to become eligible for ORS services. ORS anticipates that 1,560,558 individuals will develop Individualized Plans for Employment, and projects 65,343 successful outcomes.

2. NUMBER OF INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER TITLE I AND TITLE VI AND NUMBERS TO BE SERVED IN EACH ORDER OF SELECTION PRIORITY CATEGORY

In FFY2017, the projected number of clients to be served under an IPE is 5,060. One hundred percent (100%) of those expected to be served will be classified in the Order of Selection as either Category 1—most significant, Category 2—significantly disabled, or Category 4—currently employed and at risk due to a disability of job loss. For FFY2017, ORS is expected to serve: Category 1 (most significant): 4,879 (Title I—90%; Title VI—10%); Category 2 (significant): 131 (Title I—100%; Title VI—0%).
A. The VR Program;

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

NUMBERS TO BE SERVED IN EACH ORDER OF SELECTION PRIORITY CATEGORY

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

- OOS Category I - 3,318
- OOS Category II - 18
- OOS Category III - 0
- Maintain Employment - 0
- Total - 3,336

B. The Supported Employment Program; and

NUMBER OF INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER TITLE VI AND NUMBERS TO BE SERVED IN EACH ORDER OF SELECTION PRIORITY CATEGORY

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

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

- OOS Category I - Title VI: 677
- OOS Category II - Title VI: 0
- OOS Category III - Title I: 0

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

ORS will not continue to implement the option of serving individuals with a disability who otherwise would not meet the OOS priority category for services and who are currently employed and at risk of job loss due their disability and who could benefit from VR services to maintain employment. ORS believes consumers who are on the wait list
and in Category 1 needs to be the top priority. ORS will revisit this through an amendment if additional funding becomes available and ORS is able to open Category1.

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

In FFY2017 the projected number of clients who will be eligible for VR services but not receiving such services due to an order of selection is 60. ORS placed 53 individuals on the wait list in FFY 2015. At the end of the first quarter of FFY2016 there is 45 individuals on the waitlist.

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

<table>
<thead>
<tr>
<th>Category</th>
<th>Title I or Title VI</th>
<th>Estimated Funds</th>
<th>Estimated Number to be Served</th>
<th>Average Cost of Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>OOS Category I—Title I</td>
<td>Title I</td>
<td>$15,510,204</td>
<td>4,374</td>
<td>$3,546</td>
</tr>
<tr>
<td>OOS Category I—Title VI</td>
<td>Title VI</td>
<td>$1,790,730</td>
<td>505</td>
<td>$3,546</td>
</tr>
<tr>
<td>OOS Category II – Title I</td>
<td>Title I</td>
<td>$420,545</td>
<td>131</td>
<td>$3,210</td>
</tr>
<tr>
<td>------------------------------------------</td>
<td>---------</td>
<td>----------</td>
<td>---------</td>
<td>--------</td>
</tr>
<tr>
<td>OOS Category IV—Title I</td>
<td>Title I</td>
<td>$179,005</td>
<td>50</td>
<td>$3,580</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td>$17,900,481</td>
<td>5060</td>
<td>$3,538</td>
</tr>
</tbody>
</table>

4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

OOS Category I – Title I: $5,600,784.00 $1,687.91 X 3,318 = $5,600,784.00
OOS Category I– Title VI: 1,400,036.00 $2,068.00 X677 = $1,400,036.00
OOS Category II – Title I: $83,340.00 $4,630 X 18 = 83,340.00

I. State Goals and Priorities (Formerly 4.11(c)(1))

State Goals and Priorities. The designated State unit must:

- 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.

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

- Ensure that the goals and priorities are based on an analysis of the following areas:
  - the most recent comprehensive statewide assessment, including any updates;
  - the State’s performance under the performance accountability measures of section 116 of WIOA; and
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.

1. Identify if the goals and priorities were jointly developed

STATE’S GOALS AND PRIORITIES

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

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

GOALS FOR FFY2018

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

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

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

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

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

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

• Implement and coordinate Expand Project Search sites already in process and new one in development for adults with I/DD from two to three sites
• Enlist Community Enterprise Training Utilize Viability, a current ORS vendor, to develop an additional coordinate the two Business/ORS training–employer partnerships.
• Partner with an emerging, high wage business sector

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

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

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

• Adults with disabilities: ensure a wide array of service providers and training programs enable customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.

• Design and modify programs and services as changing needs of customers are identified.

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

• Continue to Develop and implement a Continuous Quality Improvement process for vendors working with customers with Developmental Disabilities, as required by DOJ/State Consent Decree. ORS will monitor Quality Improvement Plans generated by QI visits on a quarterly basis and will provide documentation to DOJ court monitor.
• Implement training opportunities for SE vendors in assessment, job development, and coaching.
• Conduct quarterly VR meetings with SE vendors to reinforce and strengthen Employment First principles and practice.
• Support and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings.
• Encourage vendors to provide a full continuum of SE Services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services.
• Examine the VR fee structure to ensure it rewards integrated employment outcomes.

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

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

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

**Objective #1:** Meet WIOA performance accountability measures

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

**Objective #2:** Meet RSA requirements for eligibility and plan development
• Determine eligibility within 60 days of application
• Develop the Individualized Plan for Employment (IPE) within 90 days of eligibility determination
• Utilize MIS to track adherence to these standards on a monthly basis

**OBJECTIVE 3: Monitoring Wait List**

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

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

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

   Goals and priorities established were based on results of 2017 Comprehensive Needs Assessment, input from the State Rehabilitation Council, and feedback from RI Department of Education (RIDE), employers, CRPs, ORS staff, and clients through client surveys.

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

   ORS and the SRC identified (Goal 3) that ORS will need to develop data collection and reporting methods that meet the common WIOA performance measures and RSA standards of practice as evidenced by agency ability to meet reporting and status change expectations of RSA. In order to meet this goal, ORS plans to continue to participate on the RI DOA common performance measures committee, to determine the “what and how” of contributing ORS data to state reporting requirements, to educate staff to the new data elements that are required and need to be maintained, to obtain guidance from RSA to establish specific numerical targets, to determine how to collect baseline data on performance measures and to enlist Technical Assistance opportunities on capturing performance measures.
C. other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and finding and recommendations from monitoring activities conducted under section 107.

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

m. Order of Selection (Formerly 4.11(c)(3)) Order of Selection.

- Identify the order to be followed in selecting eligible individuals to be provided vocational rehabilitation services.

- Identify the justification for the order.

- Identify the service and outcome goals.

- Identify the time within which these goals may be achieved for individuals in each priority category within the order.

- Describe how individuals with the most significant disabilities are selected for services before all other individuals with disabilities.

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

Order of Selection Description

The Rehabilitation Act, as amended, requires that an Order of Selection for Services be instituted any time that limited resources impede the agency from providing services to all eligible consumers. The Office of Rehabilitation Services (ORS) implemented an Order of Selection within its VR program in 2010. Based on a functional assessment in each of the seven areas of life functioning, eligible individuals are assessed according to the significance of their disability, as defined in the Rehabilitation Act, section 7(21)(A):...

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

• Second priority will be given to consumers with significant disabilities. A consumer has a significant disability if a mental or physical impairment exists that seriously limits two or three functional capacities in terms of an employment outcome and whose vocational rehabilitation requires multiple services over an extended period of time.

• Third priority will be given to other eligible consumers who have a disability that seriously limits one functional capacity in terms of an employment outcome and requires two or more services over an extended period of time. Extended period of time: Six months or more.

Multiple services: Requiring two or more primary services.

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

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

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

B. Justification for order of selection

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

At the conclusion of FFY 2017, ORS was confronted with additional budget constraints, increased costs of services, and agency obligations to comply with a Department of Justice Consent Decree. ORS requested $5,000,000 in re-allotment VR funds and received $532,198, as a portion of the funds was used to assist hurricane states. The culmination of these factors is impeding the Agency’s ability to provide services to all eligible individuals with the most significant disabilities, thus necessitating closure of all categories in the Order of Selection.
The Order of Selection does not discriminate against any person by type of disability, economic status, race, color, national origin, disability, political beliefs, sexual orientation, age, religion, sex, or protected class.

C. The service and outcome goals.

Projections for numbers to be served in FFY2019 are based on the current census. These numbers reflect those currently being served or projected to be served prior to the closure of Category I. All categories will be closed; thus, the numbers below do not reflect any individuals who are determined eligible and placed on a wait list after all categories are closed, or clients who have been found eligible but have not begun to receive services under an IPE.

Order of Selection (OOS):

OOS Category I: 3,318
OOS Category II: 18
Maintain Employment Clients: 0

The goal for all the customers referenced by the Order of Selection categories is an employment outcome. This employment outcome reflects the individual’s informed career choice that has evolved from information about skills, interests, preferences, abilities, and the labor market. The Individualized Plan for Employment (IPE) is then developed to reflect that choice and the specific services/interventions needed by the individual to reach that employment outcome. It is anticipated that multiple services will be necessary over an extended period of time in order for the individual to reach their employment goal.

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

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

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

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

ORS assures that its Order of Selection (OOS) policy gives first priority to individuals with the most significant disabilities, Priority Category I. Services are delivered within a comprehensive, coordinated program that is designed to assist these individuals to
prepare for and engage in gainful employment in an integrated setting. Beginning
12/19/17, ORS closed all categories and will take individuals off the Category I Wait List
as funds are available for services by date of application. ORS does not anticipate
opening the Wait List for any category during FFY 2018.
ORS notifies all individuals who do not meet the current Order of Selection, and provides
information and referral services. These alternative resources are intended to assist in
obtaining employment and related services through such Workforce Development
resources as the American Job Centers. Individuals are re-assessed when additional
information about their functional limitations is received following the OOS
classification decision.

One exemption to placement on the Wait List follows:

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

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

The current restriction on services to Category #1 Order of Selection is expected to
continue from FFY2016 through FFY2017, thereby limiting the Rhode Island Office of
Rehabilitation Services (ORS) to provide services to eligible individuals with the most
significant disabilities as designated under OOS Category 1. In order to meet the need
for rehabilitation services and to provide high-quality employment outcomes, ORS will
continue to monitor the current priority classification within the Order of Selection, and
adjust as necessary. All customers with Individualized Plans for Employment (IPE) are
individuals with the most significant and significant disabilities. These individuals
require multiple services over an extended time. In response to the WIOA waiver to the
Order of Selection Wait List, ORS will be exercising its option to provide services to
individuals, regardless of eligibility category, who are employed and need VR services
to sustain employment. This category of eligibility will be reflected in a new status 4.

The Order of Selection consists of the following four categories:

Category 1. Individuals with the most significant disabilities
Category 2. Individuals with significant disabilities

Category 3. All other individuals with disabilities who cannot be classified in a higher category

Category 4. Individuals with a disability who are currently employed and at risk of job loss due to their disability and who could benefit from VR services to maintain employment

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

Description of Priority categories

The Code of Federal Regulations CFR361.5 Applicable Definitions, (30) and (31) (i), (ii), (iii) defines an individual with the most significant disability in the following manner:

"An individual who has a severe physical or mental disability that seriously limits three or more functional capacities (mobility, communication, self care, self direction, interpersonal skills, work tolerance, or work skills) in terms of employment outcome, and whose vocational rehabilitation is expected to require multiple VR services over an extended period of time, and who have one or more physical or mental disabilities resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, head injury, heart disease, hemiplegia, hemophilia, respiratory or pulmonary dysfunction, mental retardation, mental illness, multiple sclerosis, muscular dystrophy, musculoskeletal disorder, neurological disorders (including stroke and epilepsy), paraplegia, quadriplegia, other spinal cord conditions, sickle cell anemia, specific learning disabilities, end-stage renal disease, or from another disability or combination of disabilities, which based on an assessment for determining eligibility and vocational rehabilitation needs, causes comparable substantial functional limitations."

Priority of categories to receive VR services under the order

ORS assures that its Order of Selection (OOS) policy gives first priority to individuals in Category 1 with the most significant disabilities. Services are delivered within a comprehensive, coordinated program that is designed to assist these individuals to prepare for and engage in gainful employment in an integrated setting.

ORS notifies all individuals that do not meet the current Order of Selection and provides them with information and referral services to assist them with preparation for obtaining employment and related services.
Individuals are reassessed when additional information relevant to OOS is received subsequent to a classification decision. Requests for post-employment services are not subject to Order of Selection.

Additionally, based on WIOA regulations, ORS will waive placement on the agency waitlist for individuals, eligible for ORS but in a wait list category of service, who are currently working and at risk of job loss due to their disability. Pre-Employment Transition Services (PETS) are ORS services that are provided to in-school youth with disabilities in collaboration with each Local Education Authority (LEA). These transition services fall under the regulations outlined in the 2014 Workforce Investment Opportunities Act (WIOA) to help to prepare students for employment after high school. The Office of Rehabilitation Services strives to assist all students with significant disabilities who choose to work, to gain the necessary skills, preparation, exploration and supports to enter the workforce.

Pre-Employment Transition Services (PETS) cluster ORS transition services to meet our shared commitment to two populations of in-school youth with disabilities: (1) Students with significant disabilities that have an IEP or 504 plan; and (2) Students identified as having an IDEA qualifying condition of I/DD through the Rhode Island Department of Education (RIDE) census and are thus covered under the Department of Justice (DOJ) Consent Decree/Interim Settlement agreement.

ORS Pre-Employment Transition Services (PETS) include: Counseling and Guidance, Vocational Evaluations, Community-Based Work Experiences, Transition Academies, Summer Work, Various Community Employment Pilot Projects, and Work Components of the Transition Academies affiliated with the Regional Transition Centers. These PETS are explored based on the needs of the individual student.

The ORS/LEA team has an opportunity to work with the student and family to create the most appropriate Pre-Employment Transition Services based on the student’s interests and aptitudes to assist them to transition from school into the workforce.

Service, outcome goals, and the time within which the goals will be achieved

Projections for numbers to be served in FFY2017 are based on recent performance: Order of Selection (OOS) Category 1 = 4,879; OOS Category 2 = 131; and OOS Category 4 = 50. The goal for all the customers referenced by the Order of Selection categories is an employment outcome. This employment outcome reflects the individual’s
informed career choice that has evolved from information about skills, interests, preferences, abilities and the labor market. The Individualized Plan for Employment (IPE) is then developed to reflect that choice and the specific services/interventions needed by the individual to reach that employment outcome. It is anticipated that multiple services will be necessary over an extended period of time in order for the individual to reach their employment goal. Quantifying the length of time an individual is active with ORS is difficult as the necessary services, duration, and outcome is individualized to the needs of each customer.

<table>
<thead>
<tr>
<th>Priority Category</th>
<th>Number of individuals to be served</th>
<th>Estimated number of individuals who will exit with employment after receiving services</th>
<th>Estimated number of individuals who will exit without employment after receiving services</th>
<th>Time within which goals are to be achieved</th>
<th>Cost of services</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>4,879</td>
<td>651</td>
<td>275</td>
<td>29</td>
<td>$15,689,934</td>
</tr>
<tr>
<td>2</td>
<td>131</td>
<td>30</td>
<td>15</td>
<td>26</td>
<td>$420,545</td>
</tr>
<tr>
<td>4</td>
<td>50</td>
<td>48</td>
<td>2</td>
<td>18</td>
<td>$179,605</td>
</tr>
</tbody>
</table>

goals and plans for distribution of title VI funds.

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

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

pg. 65
(A) the provision of extended services for a period not to exceed 4 years; and

(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.

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

STATE’S GOALS AND PLANS FOR TITLE VI FUNDS

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

GOALS FOR FFY 2018 TITLE VI

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

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

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

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

- Establish a system to disseminate information to VR Counselors
• Encourage RFP requirements of WIOA partners to devote 7% of grants to partnership with ORS and target individuals with disabilities in Request for Proposal (RFP) requirements
• Explore development of consistent processes and methodology of On-the-Job Training (OJT)

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

• Expand Project Search, targeting in-school youth with the most significant disabilities, from two to three to four sites
• Enlist Viability Community Enterprise Training, a current ORS vendor, to develop an additional Business/ORS training–employer partnership.

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

**OBJECTIVE #1:** Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves consumers into adults and youth with the most significant disabilities to improve integrated competitive employment outcomes.

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

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

• Develop and implement a Continuous Quality Improvement (CQI) process for vendors working with customers with Developmental Disabilities, as required by DOI/State Consent Decree. ORS will monitor Quality Improvement Plans generated by QI visits on a quarterly basis.
• Expand the CQI process to all vendors authorized to provide the array of SE services.
• Implement training opportunities for SE vendors in assessment, job development/coaching, and business relationships.
• Conduct quarterly VR meetings with SE vendors to reinforce and strengthen Employment First principles and practice.
• Support and participate in the SE Developmental Disability (DD) and SE Behavioral Health (BH) vendor meetings.

• Encourage vendors to provide a full continuum of SE Services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services.

• Examine, and modify as needed, the VR fee structure to ensure it rewards integrated competitive employment outcomes.

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

• Replicate the Continuous Quality Improvement (CQI) process for training and rehabilitation services vendors.

• Develop and implement training opportunities for SE vendors in assessment, job development, and job coaching.

• Research and evaluate specific services and correlation with employment outcomes as part of QI process to identify areas needing enhancement.

• Offer RFPs that are designed to provide innovative SE services, in collaboration with business and industry specific sectors, which result in increased employment outcomes.

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

GOAL #3: Develop data collection and reporting methods that meet the common WIOA performance measures and RSA standards of practice

Objective #1: Meet WIOA performance accountability measures

• Participate on the RI Department of Administration (DOA) Common Performance Measures Committee

• Determine the “what and how” of contributing ORS data to state reporting requirements

• Continue to educate staff to the new data elements that are required and need to be maintained, be timely, and accurate

• Obtain guidance from RSA to establish specific numerical targets.

• Determine how to collect baseline data on performance measures.

• Participate in Technical Assistance opportunities on capturing performance measures.

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

• Determine eligibility within 60 days of application

• Develop the Individualized Plan for Employment within 90 days of eligibility determination
• Incorporate the time line, specific supports, and long term support providers in SE IPEs
• Enlist RIDE, BHDDH, Medicaid, & ORS to braid funding to support the provision of SE services as part of PETS.
• Establish increased knowledge about each state agency’s responsibility for funding, adults and youth, SE services in collaboration with each state partner and the SE vendor community.

• Utilize MIS to track adherence to these standards on a monthly basic

OBJECTIVE 3: Monitoring Wait List

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

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

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

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

Youth In-School in need of SE Services:

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

Youth Out-of-School in need of SE Services:

• Engage Department of Labor and Training (DLT) Youth Centers, One-Stop Centers, Adult Education Programs, Mental Health agencies, and DD Agencies to identify out-of-school youth in need of SE services.
• Build SE agency capacity to provide a continuum of services.
• Facilitate referrals to Department of Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH) of youth in need of SE services so that long term supports can be available to sustain employment.
• ORS will educate customers, families, and vendors to plan long-term supports prior to the conclusion of ORS SE services.
• ORS plans to track expenditures for SE set-aside on a monthly basis, despite RSA recent rescinding Title VI grant monies.

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

• Enlist Rhode Island Department of Education (RIDE), BHDDH, Department of Human Services (DHS), and ORS to braid funding to support the provision of SE services as part of Transition and Pre-ETS.
• Establish increased knowledge about each state agency’s responsibility for funding, adults and youth, SE services in collaboration with each state partner, and the SE vendor community.
• Maximize existing youth resources, such as DLT Youth Centers.

o. State’s Strategies (formerly 4.11(d)) 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 overcomes any barriers to accessing the VR and the Supported Employment Programs (Sections 101 (a) (15) (D) and (18) (b) of the Rehabilitation Act and section 427 of the General Education Provision Act (GEPA):

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

1. 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.

2. 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.

3. 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 to postsecondary life (including the receipt of VR services, postsecondary education, employment and pre-employment transition services).

4. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the state.

5. Strategies to improve performance of the State with respect to the performance accountability measures under Section 116 of WIOA.

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

7. How the agency’s strategies will be used to:
   
   A. Achieve goals and priorities by the State, consistent with the comprehensive needs assessment;
   
   B. Support innovation and expansion activities;
   
   C. Overcome identified barriers relating to equitable access to and participation of individuals

The goals and priorities established by ORS and the SRC as articulated in Attachment 4.11 (C)(1) State Goals and Priorities and in Attachment 4.11 (C)(4) State Goals and Plans for Title VI Funds will be realized through the following strategies:

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

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

- The overall purpose of ORS, as reinforced by WIOA and the RI Governor’s Workforce Board (GWB) system change initiatives, is to increase the competitive employment opportunities for individuals with disabilities through partnerships with and responsiveness to the needs of the business community. Efforts over the next year will include collaboration with other state agencies to develop a coordinated approach to implementing a business needs and customer driven service delivery system, as described in the GWB’s Comprehensive System Improvement Plan (CSIP). This revised service delivery system is to be based on the identified personnel needs of the business community and the identified training and job preparation needs of the ORS customer. ORS will enlist its partners to identify local two three businesses to develop targeted training programs to meet the specific needs of local business sectors. ORS will continue to participate on the Governors
• Workforce Board (GWB), Workforce Investment Boards (WIBS), Common Performance Measures Task Group, and other advisory groups to gather current information about business sector needs and state responses. In addition, ORS will advocate for the Vocational Rehabilitation needs of individuals with disabilities as the state re-aligns its workforce development resources. ORS will encourage WIOA partners to include an RFP requirement that 7% of grants must be devoted to partnership with ORS and target individuals with disabilities. Several successful business partnerships, Project Search and Viability Community Enterprise Training, will continue to be supported. The Comprehensive Needs Assessment (CNA), required of the SRC and ORS at three-year increments, will incorporate the findings of the CSIP and identify if any additional assessment areas are appropriate.

• ORS staff training focused on workforce development principles will enable Vocational Rehabilitation Counselors to use their knowledge and training about disabilities, functional limitations, and competitive employment to develop plans with clients that include not only acquisition of technical knowledge through training but also development of the work behaviors critical to employment success. Increased use of vocational guidance and counseling, provided by ORS staff, will be essential to help clients prepare for the demands of employment. In addition, incorporating work experiences into employment plan development will increase the client’s ability to make informed choices about career selection and provide the ORS Counselor a feedback opportunity about work behaviors. Participation in employment experiences for individuals needing Supported Employment, in-school youth and clients attending college/training programs, funded by ORS, will be encouraged and included in Individualized Plans for Employment (IPE). ORS will also ensure that services are focused on access to opportunities for real work experiences and integrated competitive employment outcomes at or above minimum wage. ORS will encourage and reinforce, with ORS approved Supported Employment providers and other state entities, Employment First and Recovery principles and practices into service delivery in order to increase expectations that individuals with significant intellectual and behavioral health disabilities can obtain quality employment outcomes in integrated settings at competitive wages. ORS will provide access to information about SSA Work Incentives, Ticket to Work, and other State-specific benefits to customers and their families, CRPs, support staff, and ORS staff in order to support informed choice and support employment.

• ORS will continue to update its web-page to ensure that information about the agency is current and relevant to the WIOA and state priorities around workforce development. Links to partners and examples of partnerships will be helpful to market the services of ORS to potential clients, businesses and other agencies. ORS will expand their communication through social media outlets, explore the feasibility of being able to communicate and advertise using this vehicle of communication. In addition, orientation groups, literature distribution about the agency, presence at the netWORKKri One-Stop Centers, and participation in resource education events around the state will enhance referrals and visibility.

• Expansion and improvement of services involves also examining processes that guide the internal operation of the agency. ORS is critically examining its services through participation in a state-wide LEAN initiative spearheaded by the Governor of Rhode Island. This effort provides an opportunity to explore the specific processes and
methods that structure the operation of the agency. An initial study of agency operations will focus on the intake process in order to develop the most efficient/effective customer-friendly process possible. A second area of study will be the billing process that has a direct impact on timeliness of payment to vendors.

- The ORS Continuous Quality Improvement committee will continue to monitor update the CQI plan annually to ensure a continuous QI system for monitoring, evaluating, and providing timely information for staff and administration about the agency’s progress in meeting the goals outlined in the State plan. Monitoring via monthly reports to ORS Administration and staff of the ORS performance measures on Standards and Indicators will occur. Standard #1, VRs Impact on Employment; Standard #2.1, Equal Access Opportunity for Individuals and the WIOA performance indicators will be the focus of these reports. Additionally, quarterly reporting to the Governor’s office on the status of the deliverables (eligibility, IPE development and IDD Supported Employment services) that are included in the RI Strategic Plan Vocational Rehabilitation objectives. ORS will continue to elicit feedback from customers through satisfaction surveys, waitlist outreach and follow-up as well as ongoing case reviews. The DOJ/State Consent Decree-settlement requires a CQI process and review be implemented to ensure quality services are provided to Supported Employment clients. ORS will continue to refine, pilot and modify the process for CQI review of CRPs.

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

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

- ORS utilizes a broad range of assistive technology services, such as the ATAP Partners that are funded through State Grants for Assistive Technology, ORS Assistive Technology fee-for-services, and purchasing devices through approved vendors. Assistive Technology needs are person-centered and on a case-by-case basis.
- ORS utilizes the ATAP Partnership for demonstration, information and assistance, device reutilization, and device loan to explore if assistive technology would be appropriate for acquisition to assist individuals with disabilities in the rehabilitation process. Device Loan can also be utilized for vocational assessment, as well as the bridge from one device to acquiring another.
- ORS has vendor-approved services through fee-for-services to provide detailed assistive technology services, such as assistive technology assessment, assistive technology installation and repair, assistive technology training, worksite assessment, and device acquisition.
- ORS staff are expected to incorporate access to and acquisition of assistive technology, evaluations, assessment, and training as core services for adults and
youth with disabilities. The Deaf & Hard of Hearing unit and Services for the Blind and Visually Impaired (SBVI) unit are especially knowledgeable about assistive technology. Services for the Blind and Visually Impaired rehabilitation teachers review assistive technology needs of individuals with visual impairments or legal blindness. ORS also houses the ATEL program that operates an assistive technology lab for individuals who are Deaf or Hard of Hearing and/or have other speech and neurological impairments to have the opportunity to trial assistive technology equipment.

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

ORS is able to meet the assistive technology and accommodation needs of its clients through the Assistive Technology grant and through vendors approved to provide services through the fee-for-service authorization process.

ORS is the lead agency for the Assistive Technology Grant in RI. The RI Assistive Technology Access Partnership (ATAP) is the name of the program, operated by ORS, that facilitates the deliverables of the grant. Through contracts with several community based non-profits, ORS ensures that assistive technology demonstrations, device loans and re-use opportunities are available. On an annual basis, ORS enlists the ATAP partners to conduct a training for the Vocational Rehabilitation Counselors of ORS.

ORS staff are expected to incorporate access to and acquisition of assistive technology, evaluations, assessment, and training as core services for adults and youth with disabilities. The Deaf & Hard of Hearing and Services for the Blind and Visually Impaired (SBVI) units are especially knowledgeable about assistive technology and include these resources in all aspects of the vocational rehabilitation process. In addition, ORS has several vendors who can access worksite accommodations and assistive technology needs on a case-by-case basis.

The agency Workforce Development Supervisor is also a resource to employers around accommodations.

ORS plans to enhance the use of the ATAP device demonstration and loan capacity as a resource for making informed choices about equipment, and for using try-outs prior to purchase in order to make more appropriate purchasing decisions. In addition, the DOJ settlement has resulted in an increased use of ATAP for ORS supported employment clients ability to loan equipment and devices.
III. OUTREACH PROCEDURES THAT WILL BE USED TO IDENTIFY AND SERVE INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES, INCLUDING THOSE WITH THE MOST SIGNIFICANT DISABILITIES, AS WELL AS THOSE WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM.

- ORS monitors outcome ratios for minority populations in order to identify the current level of service, the need for expanded or new CRP services, and potential emerging minority populations.
- Review and analyze needs of minority and underserved populations, in order to develop capacity and expand CRP network ability to competently provide services that result in increased quality employment outcomes.
- ORS ensures all agency materials, including those found on the ORS website and available for informational sessions, are provided in Spanish (or other languages), or alternate formats, as needed.
- Establish new and innovative strategies to maintain ORS involvement with in-school youth with disabilities and youth adults who are no longer in school.
- Staff attend in-service training on cultural sensitivity and competence, including instruction on use of interpreters; etc.
- Formulate strategies to maintain communication and services with minority and underserved populations from application through service delivery to a quality employment outcome.
- ORS identified needs of minority population and developed new bi-lingual services to include driving evaluations, occupational therapist training, and clinical/learning disabilities assessments.

IV. 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 TO POST-SECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POST-SECONDARY EDUCATION, EMPLOYMENT AND PRE-EMPLOYMENT TRANSITION SERVICES).

- A Cooperative Agreement (CA) between RIDE and ORS, an RSA Best Practice, has been the foundation of a robust collaborative relationship focused on school to work transition for over 16 years. Incorporated into the ORS Transition and Pre-ETS Program is an expectation that all students who are found eligible for services not subject to OOS will have an ORS-approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility. Transition and Pre-ETS focuses on employment-related information and services to in-school youth with significant disabilities, including those students with an IEP or 504 plan. In addition, the State of Rhode Island is obligated to provide an array of transition services based on a Department of Justice (DOJ)/State Consent Decree/Interim Settlement Agreement to in-school youth identified as having a significant intellectual disability (I/DD).
Attachment 4.8 (B) (5) explains this relationship and the content of the CA so will not be repeated.

ORS plans to build upon its robust Pre-Employment Transition Services (PETS) program to inschool youth with disabilities in collaboration with each Local Education Authority (LEA). Incorporated into the ORS-PETS Program is an expectation that all students who are found eligible for services will have an ORS approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility. PETS focuses on employment related information and services to in-school youth with significant disabilities that have an IEP or 504 plan. In addition, the state of Rhode Island is obligated to provide an array of transition services based on a Department of Justice (DOJ) Consent Decree/ Interim Settlement agreement to in-school youth identified as having a significant intellectual disability (I/DD).

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

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

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

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

• The new CRP Supervisor, formerly a Field Supervisor with the agency, has been in place for the past year. Through his efforts, ORS is establishing to hold quarterly meetings with the Supported Employment, General, and Transition vendors to address concerns specific to their services and to reinforce their role within the Workforce Development community of RI. These meetings also provide an opportunity to clarify agency expectations, new service delivery ideas, and funding issues. Also, meetings are being scheduled with specific high-volume vendors and staff to address agency specific issues as they arise and to cultivate increased communication and partnership. Through his participation on the ORS Continuous Quality Improvement Team, the agency has been developing a Quality Assurance program initially for Supported Employment providers. This Quality Assurance Program is required by the DOJ Consent Decree but will eventually be generalized to all CRP providers.

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

• In 2013, ORS designed a fee-for-service model that provided financial incentives for employment outcomes that meet certain benchmark criteria: (1) hours worked and access to and participation in benefits. ORS reviewed the Quality Incentive Bonus being offered to Community Rehabilitation Program providers for the past two years. This resulted in a suspension and plan to redesign the incentive with a focus on assisting customer with obtaining employment that is in keeping with their vocational goal and offers higher hourly wages and the provision of retention services for a longer period of time to assist customers with position advancement and income.

• The Rhode Island Office of Rehabilitation Services (ORS) will continue to modify fee-for-service agreements with a wide network of private vocational rehabilitation providers in order to meet the vocational rehabilitation needs of Rhode Islanders with disabilities. An identified need, as determined by the Statewide Comprehensive Needs Assessment (CNA), labor market information, or by the individualized needs of customers, will initiate efforts to create a new service or training option. However, training programs must demonstrate that employment in
the field is identified by business sectors. Fee-for-service agreements incorporate a similar process with the Community Rehabilitation Provider (CRP) being funded based upon authorization, service provision, and employment outcomes. ORS will utilize the information from the FFY2017 Statewide Comprehensive Needs Assessment (CNA) as a foundation for expansion and/or development of new fee-for-service agreements that meet the employment needs of customers. In FFY 2016/2017, a new Comprehensive Needs Assessment will be completed that captures WIOA expectations of employer needs.

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

- ORS is participating on the RI Department of Administration (DOA) State Performance Measure Committee that is part of the Governor’s system change efforts. The committee is examining methods to gather and track employment outcomes, educational, and skill advancement, as well as expenditures. ORS is working with the MIS system to be able to capture all required WIOA data elements and employment information to be reported quarterly on open and closed cases.
- In addition, monthly monitoring of time line requirements to determine eligibility and IPE development are in place. Each staff member has annual performance targets for the number of new applications, plans development, and successful employment outcomes. This year will provide an opportunity to gather baseline performance information that will provide the basis for improvement strategies moving forward.
- ORS will seek guidance from the RSA to establish WIOA performance measures.

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

- ORS is in a unique position to assist other components of the Workforce Development system to provide services to individuals with disabilities. The ORS Workforce Development Supervisor interacts with the business community, federal employment resources, National Employment Team (NET), Chamber of Commerce, Women’s Business Enterprise, and Minority Business Enterprise trade organizations. Both the Workforce Development Supervisor and the Administrator of VR participate in the Department of Human Services (DHS) will be represented on each of the two existing Workforce Investment Boards (WIB) covering Providence/Cranston and Greater RI areas and their Youth Sub-committee. ORS staff review RFPs of Rhode Island’s two Workforce Investment Boards, Youth Councils, and Youth Centers; and advocate strategies for the inclusion of youth with disabilities in the Governor’s Workforce Investment initiatives.
- ORS, through its parent agency, Rhode Island Department of Human Services and as required by WIOA, is a financial and programmatic partner with Rhode Island netWORKKri One-Stop Centers. ORS counselors have designated days and times at
each of the One-Stop Centers in order to provide access to ORS services including applications, counseling, information and referral, and placement services. ORS personnel attend monthly statewide Employer Services Network meetings at the Providence/Cranston One-Stop Career Center/netWORKri.

- **ORS personnel provide consultation to the One-Stop staff on disability issues, accessibility considerations, and assistive technology.** ORS will provide One Stop Staff with resources to support individuals with disabilities. Resources including the ATAP partnership and state independent living center are key supports in providing consultation and training to One Stop Staff. ORS also works with other pertinent assistive technology professionals through fee for service and comparable benefits that may benefit the needs of One Stop Staff.

- **In addition, ORS personnel, through the Assistive Technology grant (ATAP), provide consultation and training to the One-Stop staff on disability issues, accessibility considerations, and assistive technology.** ORS has two Memorandums of Understanding with the RI Workforce Investment Board that defines the relationship between ORS and the One-Stop Centers. In addition, ORS personnel are members of each of the two regional workforce investment boards (WIB): Providence Cranston Workforce Solutions and Greater Rhode Island Workforce Partnerships. Each WIB has a Youth Board that ORS personnel attend and participate in annual Request for Proposal reviews.

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

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

**VIII. HOW THE AGENCY’S STRATEGIES WILL BE USED TO:**

**1. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT:**

The goal and objectives outlined by ORS in attachment 4.11(c)(1) to increase competitive integrated employment opportunities for ORS customers and to provide a flexible service delivery system that prepares customers for employment align with the 2013/2014 Comprehensive Needs Assessment (CNA). Information for strategic planning was gathered through 2017-2013/2014 CNA activities, meetings with the seven field services regions, and Quality Improvement Activities. ORS will continue to assess information as it becomes available and to address the concerns raised in the RSA 107 Monitoring Report and Program Improvement Plan. ORS will coordinate joint training opportunities for CRPs and ORS personnel, maximize ORS’ collaboration with the netWORKri One-Stop Career Centers, Youth Centers, and business community, and promote CRP capability in the provision of a continuum of employment services. ORS will encourage assessment activities and plan development that promotes informed
choice, self-determination, and case movement toward integrated competitive employment, enhance Supported Employment services with emphasis in integrated and competitive goals, maintain a focus on quality employment outcomes (integrated, competitive employment at minimum wage or higher with benefits), emphasize outreach strategies that target underserved and unserved disability and minority populations, and address the needs of specific businesses and coordinate staff resources to work in collaboration with the SRC subcommittees as warranted example, QI/State Plan. ORS and SRC will be initiating a new CNA during FFY2017 for incorporation into the 2018 State plan.

2. SUPPORT INNOVATION AND EXPANSION ACTIVITIES:

ORS will utilize Innovation and Expansion (I & E) funds during FFY 2018 to support the activities of the SRC. The SRC and ORS will conduct a state-wide comprehensive needs assessment, as required by RSA in FFY2020. The results of this CNA will establish the Goals and Priorities for the Vocational Rehabilitation and Supported Employment services under WIOA. This CNA will incorporate existing reports from the Governor’s Workforce Board, the results of the Governor’s Commission on Disabilities, as well as DLT reports to frame and structure the CNA.

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

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

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

ORS will use I&E funds to explore development of a performance-based contract specific to the services provided by the SE Vendor community to individuals with significant intellectual disabilities. The purpose of this pilot is to increase the employment outcomes, as per the DOJ settlement, for this population of ORS clients.

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

• ORS will increase the number of minority and underserved populations who participate in services and who obtain integrated competitive employment outcomes by cultivating CRPs to meet the needs identified in the CNA.
• ORS will review and utilize the GWB Comprehensive System Improvement Plan (CSIP) to assess service delivery within the State and development of employment services for ORS customers.
• ORS will enlist the resources of interpreters, ensure forms and information is accessible. Orientation groups are provided for potential applications to attend and apply for services, this includes an orientation group monthly with Hispanic bilingual staff.
• ORS maintains the ability to access information and the application for services on our website.
• VRC are assigned to schools and other community agencies as liaisons to facilitate access to ORS services.

p. Evaluation and Reports of Progress: VR and Supported Employment Goals
(Formerly 4.11(e)(2)) Evaluation and Reports of Progress: VR and Supported Employment Goals.

Describe:

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 contribute to the achievement of the goals

(B) Describe the factors that impeded the achievement of the goals and priorities

☐ An evaluation of the extent to which the Supported Employment Program Goals described in the Supported Employment Supplement for the most recent year were achieved:

a. Identify the strategies that contribute to the achievement of the goals

b. Describe the factors that impeded the achievement of the goals and priorities

☐ The VR program’s performance on the performance accountability indicators under section 116 of WIOA

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

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

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR TITLE I 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.
STATE PLAN FOR VR TITLE I FFY 2016 AND FFY 2017: The State Plan for FFY2016 and FFY2017 incorporated tracking of admissions, service, and employment outcomes for general, transition, underserved, and supported employment customers covered under the Department of Justice (DOJ) Consent Decree in order to analyze these data elements. The use of this data was intended to modify, enhance, and/or develop new services and identify staff training needs.

Accomplishments:

• Several new initiatives, fee-structure adjustments, performance-based supported employment programming, and expanded training programs had been developed in response to the data analysis, Comprehensive Needs Assessment (CNA), and feedback from customers, vendors, and staff. ORS continues to utilize a monthly mechanism for alerting staff and supervisors about the status of admissions eligibility determination within 60 days and IPE Development within 90 days for Adult and Transition customers. This process enabled ORS to continue to meet 60-day eligibility and 90-day plan development requirements. Several of the other initiatives included: development of three Project Search sites in collaboration with three local businesses, Department of Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH), and Local Education Authorities (LEAs); a partnership with two local businesses to provide on-site training and resultant employment for ORS customers; and development of a summer work experience specific to the career goals of customers attending college.

ACTUAL EMPLOYMENT OUTCOMES IN COMPETITIVE SETTINGS:

• FFY2016 - Successful Closures 651
• FFY2017 - Successful Closures 703
• Variance - Successful Closures 52
• Successful Transition Closures for FFY 2016 and 2017 -60
• Successful Minority/Underserved was 200

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

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

Obstacles for FFY2016 and FFY2017 for Title I, VR, include the focus on in-school youth and Pre-ETS service delivery, and adult mandates from DOJ Consent Decree, which has compromised the agency’s focus on other transition and adult populations.

The Rhode Island Office of Rehabilitation Services’ (ORS) goals and priorities, policies, and planning activities were jointly agreed upon by the state agency and the State Rehabilitation Council (SRC). These goals for FFY2015 were generated from the Statewide Comprehensive Needs Assessment (CNA), compliance with federal Standards and Performance Indicators, monitoring reviews, quality improvement findings, and feedback from customers, advocates and other stakeholders. Inherent in
these goals was a belief that ORS will assist individuals with significant
disabilities to move toward achievement of vocational goals, career
development, and increased self-sufficiency. Several new initiatives, fee
structure adjustments, and expanded training programs have been
developed in response to our data analysis; CNA; and feedback from our
customers, vendors, and staff.

I. 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.

Actual employment outcomes in competitive settings:

**FFY2014** – Successful Closures # 608; Successful Transition Closures #186;
Successful Minority/Underserved # 165

**FFY2015** – Successful Closures # 643; Successful Transition Closures #175;
Successful Minority/Underserved # 219

Variance – Successful Closures #35; Successful Transition Closures # 11; Successful Minority/Underserved # 54

II. An evaluation of the extent to which the supported
employment program goals described in the supported
employment supplement for the most recent
year were achieved:

Actual supported employment outcomes in competitive settings:

**FFY2014**

Successful Supported Employment Closures # 60
Successful Minority and Underserved Closures # 18
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.

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

STATE PLAN FOR SE Title VI FFY2016 and FFY2017: The State Plan for FFY 2016 and FFY 2017 incorporated tracking of admissions, service, and employment outcomes for general, transition, underserved, and supported employment customers covered under the DOJ Consent Decree in order to analyze these data elements. The use of this data was intended to modify, enhance, and/or develop new services and identify staff training needs.

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

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

• CRP Supervisor and ORS staff continued work with Alex and Ani for a “boot camp” style training program leading to competitive integrated employment.
• A second business was developed with this model for CVS and is in process.
• ORS began discussion utilizing current Project Search model/template for students to develop and implement an adult Project Search site, targeting individuals with IDD and Autism/Asperger’s via a collaboration with BHDDH and DLT Real Jobs RI initiative. The site in development is RI Hospital, as part of the Lifespan Network.
**OBJECTIVE 2:** Utilize participation on Governors Workforce Board, Workforce Investment Boards, and other advisory groups to gather current information about business sector needs and state responses:

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

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

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

**GOAL 2:** TO PROVIDE A FLEXIBLE SERVICE DELIVERY SYSTEM THAT PREPARES CUSTOMERS FOR EMPLOYMENT AS EVIDENCED BY AN INCREASE IN COMPETITIVE EMPLOYMENT OUTCOMES FROM THE PREVIOUS YEAR.
**OBJECTIVE 1:** Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into integrated competitive employment.

- **In-School Youth with Disabilities:** ORS has a VR Counselor assigned to every high school and developed and enhanced the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. Fact sheets and FAQs pertaining to Pre-ETS were disseminated at Transition Nights, Individualized Employment Plan (IEP) meetings, Career Development Plan (CDP) meetings, and State Agency “Introduction to State Services” meeting with every high school.
  - ORS completed a CNA in 2017 and identified trends and needs for Transition Aged Youth and Adults, such as student and family awareness of the scope of services about the transition-to-adult services.

- **Adults with Disabilities:** ORS ensured a wide array of service providers and training programs enabled customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.
  - ORS completed a CNA in 2017 and identified trends and needs of Adults, and identified areas of need, such as services for individuals with Autism/Asperger’s to design programs and services.

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

- ORS developed and implemented a Continuous Quality Improvement process for vendors working with customers with Developmental Disabilities, as required by DOJ/State Consent Decree. ORS has evaluated seven providers presently and will continue to collaborate with BHDDH to review at least six agencies per year.
- ORS implemented training opportunities for SE vendors in assessment, job development, and job coaching.
- ORS has identified training needs for providers, as a result of CQI reviews, such as fading strategies and identifying employment goals.
- ORS continued to conduct quarterly VR meetings with SE vendors to reinforce and strengthen Employment First principles and practice.
- ORS continued to support and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings on a monthly basis to identify obstacles and training needs.
- ORS continued to examine and modify, as needed, the VR fee structure to ensure it rewarded integrated employment outcomes.
- ORS developed and implemented a pilot with seven Developmental Disability providers for a performance-based supported employment program with focus on employment and increased staff capacity.

**OBJECTIVE 3:** Ensure vendor competence for provision of vocational services and training programs that result in integrated competitive employment outcomes.
• Replicated the Continuous Quality Improvement process for training and rehabilitation services vendors. The model developed from Developmental Disabilities provider QI reviews has been utilized, and can be replicated for reviews with other service providers.
• As part of CQI reviews, ORS researched and evaluated specific services and correlation with employment outcomes. As part of reviews, ORS tracks the placements and services as part of the report which leads to QI Plan with provider.

• As part of the Consent Decree, ORS collaborated with other State Agencies, as part of the State Training Committee, focused on approving curricula for training to DD providers. This purpose for this training was to increase skill level and knowledge base of provider staff supporting individuals with disabilities. One curriculum under consideration increased in a 93% Certified Employment Support Professional (CESP) passing rate.

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

OBJECTIVE 1: Meet WIOA performance accountability measures:

• ORS maintains a consistent presence on the RI Department of Administration (DOA) Common Performance Measures Committee. Partners have focused on their readiness to capture the new WIOA requirements, therefore discussions have been ongoing among the WIOA partners in the state as to what data and how the data will be reported to state partners.
• Upon readiness of the agency electronic case management system, ORS began collecting WIOA performance measures as defined by RSA in July 2017.
• ORS has held several large staff trainings focused on the WIOA reporting requirements. Supervisory training has been provided on the new requirements and entry into the ECM system, guidance documents have been developed, revised as needed and disseminated to staff. Training will continue to be provided as needs arise.
• ORS continues to utilize technical assistance opportunities provided through WINTAC and U.S. Department of Labor WorkforceGPS. ORS will benefit from ongoing technical assistance and guidance from WINTAC, WorkforceGPS, and RSA will be critical to ORS’s further understanding the establishment of the performance measure targets.

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

• ORS still tracks and monitors monthly the 60-day eligibility and 90-day to individualized plan for employment compliance. Regional Supervisors review this data with counselors to determine obstacles towards compliance.

Accomplishments: The DOJ/State Consent Decree with the state of RI created a statewide commitment to Employment First principles in planning and service delivery for in-
school youth and adult with significant intellectual disabilities. ORS has had a long-standing commitment to Integrated Competitive Employment for all individuals with disabilities. However, continued financial support by other state agencies of sheltered workshops impeded resources being re-directed to employment and long-term supports. The DOJ/State Consent Decree mandate forced a realignment of service delivery, funding, and collaboration among state agencies.

• In the interest of overcoming some of these obstacles, ORS developed and implemented a pilot in 2017 with seven Developmental Disabilities providers for a performance-based supported employment program with focus on employment and increased staff capacity.
• ORS also developed two separate programs targeting persons with Asperger’s with an eye on employment and social skills development. The two programs began as pilots in 2017, and have recently begun the second phase.
• ORS also has expanded its Pre-ETS programming and service delivery, and created new innovative summer work experiences, work based learning opportunities, and educated staff, schools, and families about options.

STATE PLAN FOR Title VI FFY 2018:

ACTUAL SUPPORTED EMPLOYMENT OUTCOMES IN COMPETITIVE SETTINGS:

FFY 2016 Successful Supported Employment Closures 113
FFY 2017 Successful Supported Employment Closures 129
Successful Minority and Underserved Closures 36
Variance
Successful Supported Employment Closures 16
Successful Minority and Underserved Closures 18

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

• Both DD and Behavioral Health Providers are impeded by State budgetary constraints, and Medicaid service delivery. ORS collaborated with BHDDH and the provider network to build systems, and change models to meet goals and priorities.
• The focus on the unfunded mandates of the Consent Decree and the Pre-ETS transition population has created obstacles.
• ORS’ own budgetary constraints have led to a significant change in Order of Selection categorization, and moved more towards placement on Wait List.
Obstacles: The obstacles for Title VI program for FFY 2016 and FFY 2017 occur as the focus and resources of Supported Employment has been on individuals with significant intellectual disabilities, employment, and long-term supports for individuals with other behavioral health (BH) issues has seen a decrease in funding, CRP, and supported employment resources. As a consequence, ORS has struggled to provide SE services to individuals with behavioral health issues, as CRPs are not providing vocational services and long-term supports.

Although the state agency responsible for BH services has created a new expectation of MH Centers to address employment issues, the infrastructure for these services will require time to re-build.

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

The WIOA performance accountability indicators are a new requirement for ORS. The agency began tracking the performance accountability data elements via the Electronic Case Management system 7/1/17. It is anticipated ORS will have the ability to report on the new indicators in the next State Plan update.

NEW APPLICANTS, NEW INDIVIDUALIZED PLANS FOR EMPLOYMENT (IPE), AND SUCCESSFUL EMPLOYMENT OUTCOMES

- During FFY 2016 and FFY 2017, ORS monitored the number of new applicants, number of new IPEs that were written, and number of competitive integrated employment outcomes achieved.
- In FFY 2016 there were 2,383 new applicants for services; 1,598 new IPEs developed; and 651 employment outcomes.
- In FFY 2017 there were 2,173 new applicants; 1,591 new IPEs developed; and 703 employment outcomes.
- In the first quarter of FFY 2018, ORS had 563 new applicants; 265 new IPEs; and 210 individuals obtained employment.

COMPLIANCE WITH STANDARDS & PERFORMANCE INDICATORS for FFY2016

As a result of not making Standard 1 and 2 for FFY2012, the Office of Rehabilitation Services, as directed by Section 107 of the Rehabilitation Act, was placed on a Program Improvement Plan that both were resolved in FFY 2015.

- In FFY 2016 ORS met Standard 1 and 2.
• For FFY 2016 ORS again met Standard 1 with positive outcomes for Performance Indicators 1.1, 1.2, 1.3, 1.4 and 1.6 and met standard 2.1. ORS maintained a focus on increasing quality employment outcomes as per the can, Strategic Plan, and RSA 107 monitoring report. In September of 2016, R.I. along with one other state had the 8th highest unemployment rate in the nation at 5.6%. While Indicator 1.5 was not met, improvement was noted for the third consecutive year with an average hourly wage of $12.15 for FFY 2016. This represents an increase from the FFY 2015 hourly wage of $12.05. FFY 2016, ORS met RSA Standard I - VR’s impact on employment and Standard II - Minority Service Rate.

Evaluation Standard 1 - Employment Outcomes

• Performance Indicator 1.1: In FFY 2016, ORS achieved 651 successful employment outcomes. This is an increase from the FFY 2015's 643 successful employment outcomes.

• Performance Indicator 1.2: ORS exceeded the Federal Standard of 55.8% for the rehabilitation rate in FFY 2016 with 61.6%. The 61.6% was a decrease from the FFY 2015 rehabilitation rate of 69.2%.

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

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

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

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

Evaluation Standard 2 - Equal Access to Services

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

As of 7/1/17, ORS has begun collecting data for the new WIOA performance measures and will use the data to establish baseline goals for the WIOA accountability measures.

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

• I & E funds were used to support the Dare to Dream conference attended by ORS Transition Counselors, Transition-Age Students (573 participants ranging from 9th grade to post high school youth), and Teachers.
ORS utilized I & E funds to support the contract with the Paul V. Sherlock Center on Disabilities

III. ACCOMPLISHMENTS AND CHALLENGES

In FFY2015, ORS sought to educate staff, CRPs, and vendors to the expectations and deliverables inherent in WIOA. The renewed emphasis on collaboration with the business community, between and among workforce development providers and new performance standards had a positive impact on the focus of the agency. Some examples of that impact:

I. BUSINESS RELATIONSHIPS

ORS partnered with a CRP to identify the specific training needs of a large and growing business. The training that resulted from this collaboration occurred within the actual business facility and prepares job candidates for the exact skill set required by the employer, and thus a successful job match. The partnership not only offers more community integrated competitive employment opportunities for ORS customers, but it is also is producing a qualified and specifically trained pool of candidates for a local business. The third round of training will be starting January 2016 and customers from the first group are still in milestone #three of four milestones and second group are in milestone #2. The ORS Vocational Rehabilitation Counselor’s efforts at availability, presence, and problem identification and solving has been invaluable to the success of this project.

ORS has developed and actively utilized paid work experiences for assessments, career exploration, job try-outs, and potential reference for clients. ORS partners with CRPs to provide a service to the businesses called Community Based Work Experiences. The CRP covers the workers compensation insurance, the customer’s minimum wage salary per hour of work, and is available for any issues that may arise on the job. This service provides an opportunity for the business to try out potential workers with minimal risk and provides the client with a hands on opportunity to try a job for fit and interest.

Employer Based Skill Evaluation (EBSE), a partnership between ORS and specific businesses, provide up to three months’ salary subsidized work experience in a particular career interest area of the client. The EBSE has been vetted through the Department of Human Services’ Legal Department and has stringent procedures in place to minimize the risk associated with other work experience models. More than five businesses actively participated in this new initiative, which resulted in 3 individuals being hired at 3 different businesses.

Over the past year, ORS has actively pursued enhancing the relationship with the business community through participation in the RI Business Leadership Network (RIBLN) which provided a myriad of educational workshops to employers: disability resources, Job
Accommodation Network (JAN), and ORS services. ORS has representation on each of the two Rhode Island Workforce Investment Boards (WIBs), as well as the Governors’ Workforce Board, the two Youth Councils of each WIB, as well as MOU’s with each of these WIBs. In addition, each WIB has a Disability Sector under the new WIOA regulations, in mutual agreement, this sector from each WIB will now be one. In addition, the Agency Workforce Development Supervisor is the point of contact for not only federal jobs posted through the National Employment Team (NET), but also for those businesses that have a multi-state presence. However, the majority of the positions are not in Rhode Island, and most ORS customers are reluctant to relocate.

The Agency Workforce Development Supervisor has educated staff regarding the changing needs of the business community, identified resources to assist customers with criminal backgrounds, and oriented customers to the on-line application process for most jobs. The Workforce Development Supervisor and two staff have facilitated 5 interview workshops with 37 participants of which 22% of participants achieved successful employment outcomes following their attendance. These workshops help the job seeker become more knowledgeable about and more skillful in the interviewing process. In addition, the Workforce Development Supervisor provides support and critiques of resumes for customers. The Workforce Development Supervisor has also met with numerous students at the Transition Academy to prepare these students for the world of work. Job leads were also sent to the classroom facilitator.

As a component of the PETS program, ORS, in collaboration with other partners, has instituted several Project Search programs within the health care industry sector. The state emphasis and commitment to Employment First principles for individuals with significant intellectual disabilities has helped to facilitate RI Project Search becoming a reality. The first Miriam Hospital Project Search—2014 was so successful, that the program was replicated with Blue Cross in 2015 and is planning to further expand to an additional site in 2016.

The Workforce Development Supervisor (WDS) has developed more than 30 business partners with a myriad of companies in Rhode Island. When provided with job openings from these partners, she immediately sends out this job to the 42 counselors who then send it on to their appropriate job seekers. Once a qualified job seeker has applied and after a confidential release has been obtained, the WDS contacts the employer and job developers on the qualified job seeker’s behalf. In several cases, the job applicant had previously attended one of the interviewing workshops which provides a better awareness of the job seeker’s skills and abilities to perform the job he/she is applying to.

**COMMUNITY REHABILITATION PROVIDERS:**
ORS reviewed the Quality Incentive Bonus being offered to Community Rehabilitation Program providers for the past two years. This resulted in a suspension and plan to redesign the incentive with a focus on assisting customers with obtaining employment that offers higher hourly wages and the provision of retention services for a longer period of time to assist customers with position advancement and income.

Over the past few years, ORS has had several personnel changes and coverage gaps of the Community Rehabilitation Supervisor position due to retirements and ailments. As a result, the communication with the ORS vendor community and ORS Vocational Rehabilitation Counselors has not been as consistent and clear as ideal given the complexities of the fee-for-service relationship. The new CRP Supervisor, formerly a Field Supervisor with the agency, has been in place for the past year. Through his efforts, ORS is establishing quarterly meetings with the Supported Employment, General, and Transition vendors to address concerns specific to their services and to reinforce their role within the Workforce Development community of RI. These meetings also provide an opportunity to clarify agency expectations, new service delivery ideas, and funding issues. Also, meetings are being scheduled with specific high volume vendors and staff to address agency specific issues as they arise and to cultivate increased communication and partnership. Through his participation, over the past year, on the ORS Continuous Quality Improvement Team, the agency is developing quality assurance mechanisms initially for Supported Employment providers, as required by the DOJ Consent Decree, which will be generalized to all CRP providers.

ORS is assisting five educational collaboratives in transitioning from being a contract-based service provider of 220 vocational evaluations per year to multi-service fee-for-service partners. Meetings with the staff and leadership of each collaborative and ORS have continued as the collaboratives transition from a funding contractor to becoming a provider which develops a business model and the technical expertise to become a comprehensive CRP using a fee-for-service model of reimbursement. Training in job development and technical assistance about the array of services necessary to provide a comprehensive rehabilitation program have been offered to the five collaboratives.

**ORS PERSONNEL:**

A critical component of customer education and career counseling is staff training and clinical supervision. ORS counselors have participated in a number of in-person trainings and online trainings designed to reinforce the fundamental principles of the ORS mission, vocational rehabilitation practices, customer service, and quality employment outcomes. These trainings have included areas such as: supported employment, documentation, eligibility determination, plan development, ADA accommodations, transferable skills analysis, assistive technology, and job development and job placement activities. These topics provided a basic skill set for the newer counselors and a refresher for the more experienced counselors. This information has
directly impacted their vocational activities with the customers as they implemented the new
skills that they have learned.

Counselors have been encouraged to incorporate labor market research, volunteer work,
situational assessments, and informational interviews, as well as Ticket to Work and other Social
Security Work Incentives, into vocational exploration with the customer in order to support
informed choice and career development. With this knowledge, the customer could then choose
an appropriate vocational goal based on informed choice, which will help improve the overall
quality of their employment outcomes and job retention.

ORS revised its Supported Employment Program to reinforce Employment First principles, to
provide an array of new services, more specific outcome-based services, and a focus on quality
employment outcome in integrated employment settings. ORS has utilized Vocational
Rehabilitation Counselors in a liaison role for each of the Supported Employment CRP’s
providing services to ORS customers. ORS has created and hired an Assistant Administrator for
Supported Employment and four additional Master’s level Vocational Rehabilitation Counselors
who have been assigned specifically to Supported Employment cases loads. The Assistant
Administrator and the CRP Supervisor are meeting with the SE providers and are training the
CRP’s on the Supported Employment referral, reporting and billing process. The liaisons will
be the main point of contact for the CRP’s and will assist with monitoring outcomes, service
delivery and maintain communication with CRP’s for continued program improvement.

4. CUSTOMER SERVICES:

ADULT SERVICES

ORS provided Benefits Counseling to ORS clients through a fee-for-service arrangement and
through WIPA by using several SSA Certified Benefits Counselors. In addition, a small budget
was reserved to conduct sessions about work incentives to non-ORS customers. ORS, in 2015,
elected to discontinue its administration of WIPA and did not respond to the RFP submitted by
SSA. The staff time involved in oversight and reporting for this SSA grant program suggested
another entity might be indicated. ORS supported the Sherlock Center in its application for
WIPA.

ORS is the primary provider of employment services for RIWORKS (TANF) parents with
disabilities. The referral process consists of both an ORS and a TANF/DHS supervisors/staff
jointly presenting our programs to RI Works parents. Over the past year, DHS has invited 723
referrals to 73 joint Orientation Meetings of which 420 attended. Of the attendees, 122 applied
for services with ORS. RI Works parents continue to be an underserved population that presents
unique obstacles to engagement. A 4-week work readiness program has been quite effective in
providing a structure and support to RI Works parents who are moving towards employment.

VR provides several options for Work Readiness/Job Preparation depending on the
individualized needs of the client. Through the general and supported employment components
of VR, a 4 week job preparation program is tailored for customers to learn about the demands of employment, interviewing and job retention. In addition, the VR Work Force Development Supervisor conducts interviewing workshops for clients. In FY2014, 37 participants attended of which 8 or 22% obtained employment. VR funds clients to attend training programs and educational institutions based on the employment goal of the client’s Individualized Plan for Employment (IPE).

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

ORS developed a pilot program for youth being released from the Training School. The program offers 20 weeks of occupational training and includes 15 weeks of classroom training and a 5 week paid employer-based internship in the industry they are being trained.

5. PRE-EMPLOYMENT TRANSITION SERVICES (PETS):

ORS has had a Cooperative Agreement (CA) with RIDE for over 16 years. This agreement is the foundation for ORS to have an MA Rehabilitation Counselor at each high school in the state. The ORS Rehabilitation Counselor functions as a liaison, consultant, and referral source to the transition personnel of each high school in the state. ORS has been providing a wide array of transition services since the inception of the Cooperative Agreement. This CA creates the foundation for the ORS transition program to provide PETS services at each of the high schools in RI. The array of services for in-school youth with disabilities include: Vocational Evaluations and Assessments, Community Based Work Experiences, support for participation in Transition Academies and ORS/LEA Summer Employment experiences; Summer Work, Project Search, and other work activities.

The new WIOA PETS requirements are addressed through several additional initiatives in response to the unique needs of youth with disabilities:

Miriam Hospital Project Search: ORS has led the steering committee and obtained and funded the license to bring Project Search to Rhode Island. We have partnered with the Providence School Department and the Miriam Hospital to run a successful site this year. We are providing
services to **8 students** in the protected class. Two students have been hired by the Miriam Hospital. The others are participating in job development.

**Blue Cross Project Search:** ORS led the expansion to open our second Project Search site in September 2015. This is a collaboration with the Cranston School Department. ORS applied for the license and arranged technical assistance. ORS is currently working with several medical companies and school systems with the hope of opening two new sites in 2016.

**Summer Employment Alliance/Cumberland:** ORS developed a Service Agreement with Cumberland High School and Northern Collaborative to offer a paid integrated summer work experience for students with I/DD as part of the extended school year program. Cumberland staff provided job coaching. ORS provided funding to the Northern Collaborative for wages and technical assistance. The Northern Collaborative provided the technical assistance to insure integrated community job placements based on the interests/aptitudes of each participant. Students work for 4 weeks at summer positions. The Project is expected to serve **8 students**.

**Pilgrim Employment Pilot:** ORS has partnered with Pilgrim High School and West Bay Collaborative in order to provide 100 hour individualized paid internships in the community along with weekly job readiness training for **10 students** with disabilities in their junior or senior year of high school.

**Central Falls Tri-employment Program:** ORS has partnered with Central Falls High School and Goodwill Industries to provide 100 hours of individualized paid internships in the community along with weekly work readiness training for **10 students** with disabilities in their junior or senior year of high school.

**NorthWest Pilot:** ORS partnered with Northern Rhode Island Collaborative to provide comprehensive employment services to fifteen students in this rural community. The pilot enables services to be provided in the students’ home community. Services include vocational evaluations, community based work experiences, summer work, job development and placement.

**Planning for the Future:** DLT/ORS Pilot is a joint project to collaboratively utilize each agencies funding to provide two years of services to 6 students at North Kingstown High school. ORS funded the first year of summer work. DLT provided job readiness and summer work for the second year of services. ORS and DLT are is exploring expansion of the project to South Kingstown and Northern RI.

ORS has been funding and coordinating summer work program for in-school and out-of-school youth in the community since 2010. Last year ORS funded summer work experiences to 335 students with a range of disabilities.

Eleven ORS approved agencies assisted in developing independent community employment sites where participants received stipends for their work.
The Strategic Planning Supervisor, Assistant Administrator for Operations, two Vocational Rehabilitation Field Supervisors, Community Rehabilitation Program Supervisor, Sr. Human Services Policy & System Specialist, and Sr. Word Processing Typist, developed, administered, and monitored a Continuous Quality Improvement Plan (CQI) in collaboration with the Quality Assurance/State Plan/Policy sub-committee of the State Rehabilitation Council (SRC). The CQI Plan evaluates and monitors agency concerns in collaboration with the SRC. The focus of the CQI Plan is modified to reflect Comprehensive Needs Assessment (CNA). It is updated annually to ensure that data from quarterly reviews and other evaluation activities are incorporated into the assessment of agency accomplishments.

In FFY2015, to address the requirements of the DOJ consent Decree, ORS instituted a CRP/Supported Employment sub-committee to the CQI committee which has focused on development of a vendor certification process.

Through the use of program management, evaluation, and CQI activities, agency staff at all levels of the organization have participated in and contributed to strategic planning and program evaluation. A structured Customer Satisfaction Survey process is included in the CQI Plan to obtain feedback from customers closed in employed, status 26, and unemployed after receipt of services, status 28, and is conducted on a quarterly basis.

In FFY2015, ORS sent 587 surveys to customers closed employed with a return rate of 13.45% (79 surveys). Themes from these surveys suggested the following areas for consideration in service delivery: (1) continued focus by ORS on quality employment outcomes, (2) educate customers on lifelong learning, training, and on-the-job training to support job retention and/or advancement, (3) ensure customers’ understanding of informed choice in obtaining employment that matches their stated goals and interest, (4) ensure information dissemination to customers of their future ability to access ORS services. Respondents did continue to indicate that they would refer a family member or friend for services.

Additionally, ORS sent 251 satisfaction surveys to customers closed unsuccessfully after receiving services. The return rate was 10.36% (26 surveys). Themes from these surveys included: (1) ensure timely response to receipt of an application, scheduled opportunities to meet, and monitor customer movement toward objectives with increased contact at time of plan implementation; (2) inform customers of VR process and services that support their making decisions about goals and needs prior to IPE development; and (3) ensure information dissemination to customers of their future ability to access ORS services if applicable.

In FFY2016 ORS initiated the sending of 80 Supported Employment Surveys to customers closed as employed with a 22.5% (18 surveys) return rate. Eight of the respondents utilized
assistance to complete the survey. Themes noted included: 15 of the respondents indicated receipt of SSI/SSDI, with 9 indicating having met with Benefit Specialist of which 7 strongly agreed/agreed the information provided was helpful. 16 to 17 of the respondents indicated coming to ORS for a job, they were assisted with plan development, listened to by staff, received services when they needed them, and assisted with job keeping. 15 indicated they are still working and understood they could call ORS for support and services post case closure, and 16 would refer a family member or friend for services. Also in FFY2016, ORS initiated a Supported Employment Satisfaction Survey to 47 individuals closed unsuccessfully after receiving service with 7 returns (15%). 6 of the 7 respondents strongly agreed/agreed that: they came to ORS with help in finding a job, staff listened to them, treated them with respect, and developed the IPE with them. All respondents received Social Security, with 3 indicating having met with Benefit Specialist, 2 finding the information useful and 4 no answer and 3 were afraid of benefits loss. 6 respondents reported their disability prevented them from working, 4 did not understand services, and 2 indicated services took too long. None of the respondents are working and 6 of the 7 knew they could contact ORS for future help with employment. 4 of the 7 respondents had assistance with completing the survey. Aggregate findings of satisfaction surveys are shared with administration, supervisors, and direct service staff. ORS will continue to assess the feedback on Supported Employment services from our customers for themes related to positive program delivery and program improvement.

In FFY2015 with the resources of Vocational Rehabilitation Counselor IIs, ORS re-established a formal case review process to take place twice a year. As identified through CQI activities and/or administration additional case reviews are scheduled.

Strategic Planning/QI Supervisor continued to play an active role with the electronic case management system. Liaison to ECM system vendor, remediation of case entry/data concerns and system issues, and ongoing system development and training of staff.

In compliance with the regulatory requirements of 34CFR361.29, ORS completed a CNA in the second half of FFY2013 through first half of FFY2014 for inclusion in the FFY2015 State Plan. This process included staff and community surveys; customer satisfaction surveys; meetings with staff; public forums; and review of agency and RSA data and environmental data. The findings of the most recent CNA are included in Attachment 4.11(a) Statewide Assessment. ORS will be looking to implement a new CNA for inclusion in the 2018 State Plan.

The Strategic Planning/QI Supervisor is an active participant in the New England VR Program Evaluation and Quality Assurance Group (NEPEQA) and the Summit Group. The NEPEQA group, at the request of the NE VR Administrators, created a New England Vocational Rehabilitation Quality Assurance System reference document which was presented at the 7th Annual Vocational Program Evaluation & Quality Assurance Summit held in Kentucky.
September 2014, and the Rehabilitation Program Evaluation Network of the National Rehabilitation Association. Technical Assistance about CQI and program evaluation has been provided through the above entities.

V. THE VR PROGRAM’S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA

The performance of the VR program on the standards and indicators for FY2015:

ORS met RSA Standard I—VR’s impact on employment and Standard II—Minority Service Rate for FFY2015.

ORS maintained a focus on increasing quality employment outcomes as per the CNA Strategic Plan and RSA 107 monitoring report. In October of 2015 R.I. had the highest unemployment rate in New England with 5.4%. While Indicator 1.5 was not met, ORS saw improvement for the third consecutive year with an average hourly wage of $12.05 for FFY 2015. This represents an increase from the FFY 2014 hourly wage of $11.46.

- Evaluation Standard 1—Employment Outcomes

Performance Indicator 1.1: In FFY2015, ORS achieved 643 successful employment outcomes. This is an increase from the FFY 2014’s 608 successful employment outcomes.

Performance Indicator 1.2: ORS exceeded the Federal Standard of 55.8% for the rehabilitation rate. FFY 2015 saw an increase in the rehabilitation rate to 69.2% from the FFY 2014 rate of 59.61%.

Performance Indicator 1.3: ORS exceeded the Federal Standard earnings ratio of 72.6% in FFY 2015 with a rate of 99.7%, which represents an increase from FFY 2014 rate of 99.3%.

Performance Indicator 1.4: ORS exceeded the Federal Standard of 62.40%, with a rate of 100% for both FFY 2015 and 2014.

Performance Indicator 1.5: ORS continues face challenges in meeting this indicator in part due to the RI economy and did not meet the Federal Standard of .52%. ORS saw a slight improvement over the FFY 2014 rate of .50% with an average hourly rate of .51% earned by individuals in FFY 2015. An additional challenge is the Bureau of Labor Statistics (BLS) data runs about three quarters behind which impacts the ability to accurately calculate and monitor progress toward this goal.

Performance Indicator 1.6: ORS continues to exceed the federal standard of .53%. The number of individuals whose own income at the time of exit from services was their largest source of
support was 64.3% in FFY 2015. This result represents a slight decrease from FFY 2014 rate of 64.4%.

Evaluation Standard 2—Equal Access to Services

Performance Indicator 2.1: ORS met the standard of .80% for services and employment outcomes for minorities who are disabled for FFY 2015 with a rate of .84%. This also represents an increase from the FFY 2014 with a rate of .80%.

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

I&E funds were used to support the licensing fees for two Project Search pilots as part of the ORS PETS initiative.

ORS utilized I&E funds for State Rehabilitation Council and State Independent Living Council activities.

q. Quality, Scope, and Extent of Supported Employment Services. (Formerly Attachment 6.3)

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.


   Include the following:

   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.

   The timing of transition to extended services.
OVERVIEW OF SUPPORTED EMPLOYMENT SERVICES:

- The Rhode Island Office of Rehabilitation Services (ORS) continues to provide supported employment services—requirements of WIOA, RSA and the RI Department of Justice/State Consent Decree (DOJ/CD), settlement—as a means to enable individuals with the most significant disabilities to have access to the supports needed to participate in integrated competitive employment opportunities. ORS has maintained involvement with two Supported Employment (SE) Advisory Councils for Developmental Disabilities (DD) and Behavioral Health (BH), representation on the Developmental Disabilities (DD) Council, and the RI Transition Council.

- ORS participates on multiple committees, task groups, and in various arenas to discuss employment expectations with customers, providers, and families.

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

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

SUPPORTED EMPLOYMENT SERVICE DELIVERY:

- ORS has employment services that are available to adults and in-school youth found eligible for Supported Employment Services. The values and principles of ORS to make integrated competitive employment available to all individuals with disabilities has been reinforced by a state of RI settlement with the Department of Justice (DOJ). The recently negotiated Consent Decree (CD) and Interim Settlement Agreement (ISA), between RI and DOJ, resulted in a Governor’s proclamation declaring that RI is an Employment First state. The principles and practices of Employment First, consistent with the mission of ORS and the mandate of the Rehabilitation Service Administration (RSA), are utilized in planning and service delivery to adults, in-school youth, and out-of-school youth.

- The DOJ court order requires three state agencies: (1) Office of Rehabilitation Services (ORS), the Rhode Island Department of Education (RIDE) and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop and implement a service delivery system that ensures individuals, adults and youth, have access to the services and supports that lead to integrated competitive employment opportunities as the first and desired outcome of state funded services. Although ORS has not funded usage of workshop settings has markedly decreased since the initiation of the Consent Decree, for over 15 years, other funding streams
continued to direct resources to segregated workshops and day programs. Staff resources were therefore unavailable to support integrated competitive employment efforts for adults and transition-age youth with significant behavioral health and developmental disabilities. ORS and BHDDH, two of the parties of the DOJ settlement are mandated RI to create a state-wide Supported Employment service delivery system that ensures adults and youth with I/DD are afforded full access to Supported Employment Services and long term supports to maintain employment. There has been a significant increase in collaboration among the State Agencies and the provider network on how best to develop this systems’ change.

The three state entities have developed a Transition timeline for staff, families, and school personnel to clarify each agency’s obligations to implement the DOJ/State Consent Decree requirements for in-school youth’s access to employment exploration and work experiences. An annual “Introduction to State Services” meeting with each high school, continues to be held.

ORS has recently extended a Cooperative agreement with RIDE and is in process of working on a new one. ORS has maintained for over 16 years a very robust presence at each high school in the state for over 17 years. The ORS Rehabilitation Counselor functions as a liaison, consultant and referral source to the transition personnel of each high school in the state. ORS has been providing a wide array of transition services since the inception of the Cooperative Agreement to in-school youth with disabilities, including youth with I/DD. The array of Transition and Pre-Employment Transition Services (Pre-ETS) services for in-school youth with disabilities include: Vocational Evaluations and assessments; Community Based Work Experiences, participation in Transition Academies and ORS/LEA Summer Employment experiences; Summer Work, Project Search, and other work activities. The array of ORS Pre-ETS transition services in place for both in-school youth with disabilities and those youth eligible for supported employment services meet the requirements of WIOA and the DOJ Consent Decree.

In 2017, ORS developed a performance based service agreement with seven DD providers that tied quarterly payments to services leading to community-based integrated employment with a proviso that dedicated employment teams be assigned towards that end. An additional performance-based feature tied an incentive bonus for an individual attaining a placement for at least 20 hours per week. The yearlong pilot will be ending by May 2018; outcomes are being assessed, but initial hopes of increased provider staff capacity did not materialize.

SUPPORTED EMPLOYMENT AGENCY NETWORK:

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with developmental disabilities – Behavioral Health, Developmental Disabilities and Hospitals (BHDDH). ORS funds an array of Supported Employment services for adults and youth with Developmental Disabilities through a fee-for-service arrangement with a network of ORS approved Community Rehabilitation Providers (CRP). Many of these Supported Employment (SE) CRPs are also licensed by BHDDH to provide residential, case management, and support services to individuals with developmental disabilities.
ORS has a referral, liaison, and consultative relationship with the CRPs and funds a continuum of Supported Employment services, through the customer-selected CRP. The objective of the SE services is an integrated competitive employment outcome. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs -- who also rely on BHDDH funding -- to provide the long-term supports that help sustain employment. Long-term supports are planned for and included in the customer’s ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each supported employment service. The IPE also identifies the CRP that is accepting responsibility for long term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer. ORS has been working with CRPs who provide Supported Employment Services to improve the quality and availability of employment related services.

**Due to the complexities of implementation of the DOJ/State Consent Decree, As the funding source, ORS holds a quarterly meeting with all of the I/DD Supported Employment CRPs. These meetings focus on ensuring consistency in service delivery, a target of 20 hours/week as an expectation of employment goal, and appropriate employment outcomes are being reached and to offer support and guidance to the providers.**

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

**ORS will continue to encourage CRPs to collaborate with each other, through a quarterly meeting sponsored by ORS, to meet the diverse employment needs of significantly disabled individuals with intellectual and behavioral health issues. This collaboration is also encouraged at individual and joint meetings of the BHDDH, Divisions of DD and BH Supported Employment Councils. Some ORS customers not eligible for the long-term supports provided by DD or BH agencies have significant functional limitations and could benefit from the supports and job coaching expertise of SE agencies, with an overall goal of increasing integrated, competitive employment outcomes. SE customers have increased the average number of hours employed, however, ORS is continuing to work with staff and vendors on improving**
the quality of the jobs, salary, and benefits for its’ supported employment population. A new service delivery model and fee structure designed and implemented in 4/13 is being re-evaluated in FFY2017. The fee for service model continues to be updated and modified to cover needs of the SE customer.

2H. THE TIMING OF TRANSITION TO EXTENDED SERVICES

• ORS, as a partner and funding source of supported employment services, engages CRPs to provide the extended supports that help sustain employment for individuals with significant disabilities. Long-term supports, generally funded by Behavioral Health, Developmental Disability and Hospitals (BHDDH), are planned for and included in the ORS customers’ Individualized Plan for Employment (IPE). The IPE is based on the needs of the customer and define the scope, specific services and duration of each supported employment component.

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