

# **VR Portion of WIOA State Plan for the State of Idaho**

## **Program-Specific Requirements for Vocational Rehabilitation (General)**

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

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

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

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

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

The responsibilities of the Idaho State Rehabilitation Council (SRC) are outlined in the Rehabilitation Act of 1973, as amended.

The SRC collaborates with the Idaho Division of Vocational Rehabilitation (IDVR) in publishing an annual report, which is distributed in a calendar format. SRC input is featured in the annual report. The SRC also provides input to IDVR at quarterly council meetings and on an ad hoc basis regarding policy changes and special projects as they arise.

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

During 2016-2017 the SRC provided input and made recommendations to IDVR on a variety of subjects. The following summarizes the council's input and recommendations, response of IDVR and explanation of input and recommendations.

##### **1. Proposed Changes to Order of Selection Policy/Rule**

###### ***SRC Input***

The SRC provided input regarding proposed changes to order of selection policy/rule in the spring of 2016 as the changes were being prepared for public comment. Suggestions primarily involved adding clarifying information or retaining text from current policy as follows:

- The SRC suggested that Administrative Requirements Section 14.3 retain information regarding funding arrangements such as the impact of order of selection on third party agreements, given the increased contracting and pilot projects that IDVR is moving towards, especially with pre-employment transition services (Pre-ETS).
- A suggestion was made to expand the Reassessment of Severity of Disability Section 14.4 to provide more procedural guidance on how the customer makes the request, for example, what the role of the vocational rehabilitation counselor is in the process.
- Input for the Maintenance of Statewide Order of Selection Waitlist Section 14.4, included:
  - Adding criteria for the written notification, such as must be written in plain English or the person's native language for non-English speakers and so that people with developmental disabilities, learning disabilities, or other difficulties with language can better understand what is meant.
  - Adding text about the responsibility to notify IDVR in the event of a change in contact information, e.g., address, telephone number, etc., as well as an alternative contact person who might know the whereabouts of the person should they move or die.
  - A request for clarification on the change from 40 days to 30 days for the customer to respond.
  - Expanding information on how a customer can retain their place on the waitlist should they be unable to act on employment services at the time their name comes up on the waitlist.
- For the Information and Referral (I&R) Section 14.5, clarify the process for release of information during referral to another state or federal state program.
- With the removal of information from the procedure manual regarding counseling and guidance, the SRC suggested strengthening the proposed text to better help counselors understand the parameters for engaging in this.

### ***IDVR Response***

IDVR added a statement regarding funding arrangements back into the Administrative Requirements section of the policy and expanded the section on Reassessment of Severity of Disability. IDVR also incorporated the recommendation for plain English language.

IDVR added text regarding the responsibility for the customer to update contact information and respond to the agency contact within 30 days. Additional information was also included to clarify the process for customers to retain placement on the waitlist.

IDVR felt that customer confidentiality protocols apply throughout the rehabilitation process, but reinforced this with an additional reminder of this in the I&R section of the OOS policy. IDVR also felt the proposed policy adequately described the type of information, guidance, and referral services staff are required to provide to customers, along with the documentation requirements. To strengthen understanding of the policy, however, the Division plans to provide comprehensive training regarding OOS, along with additional fact sheets to help staff and customers understand the process and requirements.

## **2. IDAPA 47.01.01, VR Rules and IDVR Field Services Policy Manual**

### ***SRC Input***

A draft notice of rulemaking was presented at the SRC's May 4, 2017 meeting where members were requested to provide input on three policy changes to comply with WIOA involving:

- Supported Employment
- Pre-Employment Transition Services
- Services to Individuals who are Seeking Employment at Subminimum Wage

A variety of questions from council members were answered by IDVR staff following the presentation. An additional comment below was sent by email following the meeting: Section 12.17.3 - Auxiliary Aides or Services Necessary to Support Pre-Employment Transition Services: There is a reference that VR will pay for the service if no other entity is REQUIRED to provide such an aid or service. Is this referencing services required under IDEA? Is this referencing other services such as habilitative intervention or IBI services that may provide behavior management supports that would enable a student to participate in pre-ETS? Would these be considered required or provided by VR?

### ***IDVR Response***

IDVR agrees that the use of the word "required" should be changed to "customarily" and that the definition did not clearly explain what auxiliary aides or services are, therefore, IDVR is changing the language to the following: "If a student with a disability, including potentially eligible students, requires an auxiliary aid or service, e.g., interpreter, reader services, or accessible informational materials, to access or participate in pre-employment transition services, VR may pay for the service, if not customarily provided by another entity, including local educational agencies. Auxiliary aides and services are those services necessary to ensure equal access to pre-employment transition services, as required by the Americans with Disabilities Act of 1990 (ADA), as revised by the ADA Amendments Act of 2008, and Section 504 of the Rehabilitation Act."

## **3. Qualified Hearing Officers**

### ***SRC Input***

The SRC assisted IDVR in identifying qualified hearing officers who have an understanding of or have the ability to understand the nature of the Rehabilitation Act as amended, state and federal regulations pertaining to the provision of VR services, and the policies and procedures developed and maintained by the state.

### ***IDVR Response***

IDVR agreed with the input from the SRC regarding qualified hearing officers and incorporated it in the selection process.

## **4. Transfer of Funds**

### ***SRC Input***

SRC member input was provided to IDVR concerning the agency's intent to utilize transfer funds from the Extended Employment Services (EES) program to the VR program for match purposes.

### ***IDVR Response***

The state Controller's Office subsequently informed IDVR that the funds source must be from the same fund source, i.e., General State funds to General State funds. Because of the timing involved, IDVR decided not to attempt the transfer because it could not be completed prior to the end of the state fiscal year.

## **5. Quarterly Status Report**

### ***SRC Input***

IDVR provides quarterly status updates to the SRC on the progress the Division is making related to performance indicators as well as the goals and priorities for the Division. The SRC commented on drafts of the update at several council meetings in 2017. Some of the information IDVR will be reporting on is new under WIOA, for example, common performance measures, and will be populated over time as data becomes available.

### ***IDVR Response***

IDVR has modified and streamlined the quarterly update report to include the current common performance measures and will incorporate the new goals and priorities, based on the recent CSNA, developed in collaboration with the SRC for a more comprehensive product. The SRC will continue to be asked for input on these as well as any additional indicators that might be helpful in the report. The end product of these quarterly status revisions will be a quarterly report to the SRC that is based on SRC WIOA related goals and priorities that includes quarterly updates on WIOA mandatory primary performance indicators.

## **6. Comprehensive Statewide Needs Assessment (CSNA) Survey Questions**

### ***SRC Input***

Much of the SRC's input regarding survey questions targeted to individuals involved recommendations aimed at gathering additional information on the customer's needs relating to employment goals, especially the need to include examples that help the responder better focus answers to questions. A companion suggestion was to use more of a plain language approach for terms or jargon (i.e. means-tested, assistive technology, disability-related personal care, primary disabling condition etc). The SRC suggested additional questions to gain more feedback on IDVR services as well as a more complete description of the relationship with American Job Centers and other WIOA partners. Suggestions were also made to expand the reach of the survey to potential VR participants.

In the survey to staff, the SRC made suggestions for expanding questions concerning internal processes and staff demographics. Also, to restructure questions for greater consistency, reformat sections to reduce redundancy, and regroup categories to gather additional information on client populations and subcategories within those populations.

Similar to the staff survey, the SRC suggested changes in the survey to community partners that might help increase consistency, lessen redundancy and gather more information on categories of client populations.

For the survey to businesses, the SRC suggested an enhanced focus on identifying gaps that exist between VR and employers, including general awareness of VR. In addition, to include examples as a way to help explain terms that might not be familiar to businesses.

The SRC also made general suggestions on how the survey could be expanded for information on related services that impact individuals with the most significant disabilities, to integrate the survey results with those of focus groups and program data, and how the elements of the needs assessment could further drive development of IDVR's goals and objectives.

### ***IDVR Response***

IDVR agreed with the SRC's comments and forwarded suggestions for revision to SDSU's CSNA coordinator: The SRC's comments and input were forwarded to the survey developers at San Diego State University and most were subsequently incorporated into the four surveys distributed during November-December 2016, while others were used with focus groups in 2017. IDVR will retain these comments to inform the development of its next CSNA which is due to be conducted in PY 2019.

## **7. CSNA Report Developed by San Diego State University**

### ***SRC Input***

The SRC suggested revisions affecting the structure and formatting of the report as well as numerous typographical/grammar changes. As examples, below are two of the suggestions:

In Appendix C: Idaho Regional Demographics, all the work done to collect the data is appreciated, but not sure how it relates to the CSNA unless there is a tie to this in another part of the report. Is there a place where the outcomes achieved by IDVR customers is compared to the data in this appendix? Or, where IDVR resources are tied to the population centers described? Or, where jobs secured by IDVR customers relate to the industries described?

### ***IDVR Response***

IDVR believes Appendix C provides necessary information by which to understand the demographics of the state. It serves as a reference point to better understand the trends in the state's population, prevalence of disabilities in the state, labor force participation and unemployment rates and information on the number of students and youth in the state. This information helps determine whether the agency is providing services to the appropriate target population(s).

### ***SRC Input***

Not sure why Appendix D, which involved Extended Employment Service (EES) rates, was included in the CSNA since EES is not an IDVR service that falls under the purview of the SRC. If there is a purpose, this should be called out.

### ***IDVR Response***

IDVR agrees with the SRC and removed this Appendix from the final report.

### ***SRC Input***

The SRC also gave input on potential issues for consideration in the IDVR portion of the Combined State Plan and the IDVR Strategic Plan based on findings of the CSNA, such as: Access to VR services – transportation is called out as a major barrier; is there a strategy that can be implemented to take VR to the community vs. having the individual have to come to VR to access services? It is called out that growth in rural areas will outpace non-rural areas; does VR need to look at how to address the needs of a more rural population? Is there value in tracking where people reside in the state and set rural goals to ensure this population is served? It is interesting that it is the provider and VR staff that rank transportation as a major barrier to accessing services and customers do not rank this at the same level.

### ***IDVR Response***

The Division recognizes that the lack of adequate public transportation is a major concern and creates a barrier to accessing services in the state. The Division cannot address this issue in isolation. The Division is committed to participating as a member of the Transportation Initiative. Additionally, IDVR provides services in the community, either on a full time or itinerate basis, collaboratively with agencies such as Department of Corrections, Juvenile Corrections, Behavioral Health, and within schools. IDVR also provides services at local one-stop facilities. IDVR may need to further evaluate other ways in which to deliver services to those in rural areas, however transportation is a common issue across multiple core WIOA partners, and may be better addressed at the Combined State Plan level rather than VR specific portion of the WIOA plan level.

### ***SRC Input***

Not necessarily tied specifically to rural areas, but the CSNA indicates lack of information about services and difficulties scheduling meetings with counselors as the two most common barriers cited by customers. These are both within in IDVR's control. Is there a strategy to address these barriers?

### ***IDVR Response***

IDVR does note that Table 13 from the CSNA reflects customer perception on individual barriers to accessing IDVR services, however the Division needs more information around how these barriers are perceived by customers to determine if there are common themes reflected by these responses, or if people are interpreting these items in a variety of ways. The Division will work to better understand what is meant by "Lack of information about services" and "Difficulties scheduling meetings with your counselor" prior to developing a strategy to address these barriers, and has added this item to IDVR's 4-year work plan.

### ***SRC Input***

Quality of services provided by Community Rehabilitation Providers (CRP) – consistent quality service provision is called out as lacking across providers; is there a strategy that can be developed to assess and potentially improve the quality of CRP services? There is reference to participants perceiving there is a lack of a variety of options for employment in Idaho and that CRP's are repeatedly approaching a limited number of employers, which impacts the options. Are there strategies that can be implemented to increase the options or, at least, identify what options are being accessed? If so, how does this compare to the labor market in general?

***IDVR Response***

The Division recognizes this as an important issue and thusly included it as a priority, as reflected in Goal 2, Priority 7 - Collaborate with Community Rehabilitation Program partners to improve the quality of services.

***SRC Input***

The work done by IDVR EES on rate study was called out as a way of understanding issues related to quality and consistency of services; is there value in looking at doing something similar for 110 services?

***IDVR Response***

This was removed from the CSNA by request of the SRC.

***SRC Input***

Reference is made that IDVR is creating programs that are national models that will meet the needs of individuals with disabilities; however, these specific programs are not called out in the CSNA report. What are these models and will expansion of these models need to be included in the State Plan?

***IDVR Response***

The models are mentioned by SDSU referenced the Customized Employment (CE) Pilot Project and process requirements for Section 511 Subminimum Wage Employment. Customized Employment is incorporated into the Goals and Priorities section of the VR Services Portion of the State Plan under Goal 1, Priority 2. The Division has developed the process and policy to meet the requirements of Section 511.

***SRC Input***

IDVR is spending over \$2000 per case that is closed unsuccessfully. What can be done to explore ways to reduce unsuccessful case closures and applying the limited resources VR has to the desired outcome of employment?

***IDVR Response***

IDVR intends to better understand our customer expenditures by conducting an assessment of expenditures as identified in Goal 2, Priority 5 of the VR Services Portion of the State Plan.

***SRC Input***

Throughout the report, there is reference to most significant disability, significant disability and disability. Most significant disability does not appear to be defined in the document, so we do not know what definition our survey respondents based their responses on. Is “disability” a population or is there value in looking at more specific disability types to see if there are underserved or un-served subgroups? For example, evaluating the findings mostly from an “autism parent” or “autism advocate” lens, some observations stand out:

- In the *most significant disability* cases of autism, individuals themselves can rarely respond effectively; they need to rely on someone else (usually a family member or other

willing caregiver) to respond on their behalf , so that a non-expert counselor or Vocational Rehabilitation “assessor” gets an interpretation of needs and/or skills.

- If WIOA guides us to prioritize candidates with *most significant disabilities*, it does not appear that the current findings tell us what we need to do to get more *msd groups* gainfully employed.
- Not specifying the various functional impairments for a “spectrum disability” like autism prevents this needs assessment from being more helpful for assessing a candidate’s needs and employment options more specifically, which includes aligning them with a knowledgeable provider “counselor” who knows how to help an individual with autism overcome or mitigate his disability(ies).
  - For example, hypothetically, our Vocational Rehabilitation program is able to put people with autism—who have *social communication deficits*—into employment options today via a,b, c means. People with autism—who have *no/minimal communication and/or disabling behaviors at times*—can (in the future) be placed in a “Customized Employment” track.

### ***IDVR Response***

IDVR agrees that an explanation of severity of disability i.e., most significant disability, severe disability, and disability would help the reader understand these terms. A paragraph was added explaining these terms in ‘Section 2 – Needs of Individuals with the Most Significant Disabilities Including their need for Supported Employment.’

IDVR intends to provide a comprehensive array of services to individuals with disabilities, including individuals with the most significant disabilities, as identified in Goal 1, Priority 2 by expanding Supported Employment services, implementing customized employment services, developing and delivering benefits planning to those individuals who receive Social Security benefits and are in need of this service. The Division is currently involved in a Customized Employment Pilot project. This project will help inform policy and statewide service delivery.

While we acknowledge that including information on specific disability populations, such as autism would be useful, it was not part of this CSNA. IDVR, in coordination with the SRC, will consider including this approach in the next CSNA. As a more immediate measure, IDVR will consider conducting a separate analyses to determine the needs of target disability groups, such as autism, to better address the concerns of the SRC.

### ***SRC Input***

Financial literacy and benefits counseling is mentioned in several places as themes. Is there a need for this to be addressed in the State Plan beyond generic reference to the need for this to be made available to IDVR customers?

### ***IDVR Response***

Benefits planning and financial literacy are identified in Goal 1, Priority 2 of the VR Services Portion of the State Plan and have been included as elements in IDVR’s 4-year work plan.

### ***SRC Input***

Business relations need to be improved. There are several areas where employers would like more information – is there a marketing strategy that can address education? Reference is made that VR staff lack information and feedback from employers. This is sited as a barrier to



employment outcomes. Why would an employer provide this feedback? Is it the employer's responsibility to provide this information—it seems this is valued by VR in order to be effective in their work, not the other way around. What can IDVR do to gather the information they need to best meet the expectations of employers?

***IDVR Response***

IDVR agrees that more needs to be done to meet the needs of Idaho's businesses, as identified in Goal 3, Priority 1 of the VR Services Portion of the State Plan. The Division has hired a business relations liaison and is developing initial marketing materials to improve the Division's relationships and services to business.

***SRC Input***

Emphasize quality assurance measures for CRPs and other vendors in order to reduce a waste of resources and frustration for customers. Would also like to see some additional services for the transition age youth and folks in rural areas addressed, such as VR covering on-campus housing if they are paying for college. Can be huge barriers for those populations.

***IDVR Response***

The Division agrees that additional measures need to be taken to improve the quality of services provided by CRPs as well as expanding transition services to youth, both of these issues are identified as Goals and Priorities in the VR Services Portion of this State Plan. The agency believes that the current policy around maintenance is sufficient to address all customer needs related to housing, including students attending post-secondary training.

***SRC Input***

In reviewing the methodology, the data points used, etc., the report looks generally professional and the findings and recommendations make sense generally. Some findings in its current form could be useful to assist IDVR in advocating for additional resources, e.g., more travel support to work.

***IDVR Response***

The SRC's feedback regarding the CSNA report structure and content were combined with IDVR's and forwarded to San Diego State University. An updated report is being reviewed before a final report is distributed. SRC suggestions for using findings of the CSNA in a mid-term modification of the IDVR portion of the Combined State Plan have been incorporated within this document.

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

IDVR substantially accepted all of the SRC's input and comments.

**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;**

The Division is not requesting a waiver of statewideness.

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

The Division is not requesting a waiver of statewideness.

**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.

The Division is not requesting a waiver of statewideness.

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

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

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

The Idaho Division of Vocational Rehabilitation (IDVR) and the following entities have entered into or are developing formal agreements with programs to outline to explain the collaborative relationship between the program and IDVR. The agreements outline some or all of the following: goals, planning processes, information sharing and confidentiality, technology, accountability, service delivery support, cost sharing, annual action plans, duration, amendments, and termination/conflict resolution, when applicable.

IDVR has the following cooperative agreements:

**Idaho Industrial Commission (ICC):** This agreement outlines the relationship between IDVR and the ICC with regard to persons injured on the job who may also have other non-work related injuries. The Industrial Commission will be the lead Agency for injured workers in Idaho and will refer them to IDVR when they are unable to return to previous or similar employment due to the work related injury.

**Idaho Department of Health and Welfare Division of Behavioral Health, Adult Mental Health (H&W-Behavioral Health):** The IDVR and H&W-Behavioral Health update this agreement annually for the purpose of better serving Idahoans experiencing severe and persistent mental illness. A team approach will be used to ensure that the Idahoans served by this agreement will benefit as to remaining de-institutionalized and successfully integrated into their respective communities from a psychological, psychosocial, and employment perspective. Those customers who have a severe and persistent mental illness deemed not eligible for this program

will be referred to the general IDVR counselor. Those customers who have a severe and persistent mental illness deemed ineligible for IDVR services will be referred to other appropriate resources for assistance. A designated VR counselor and staff member are assigned to an H&W Behavioral Health Region to better serve customers. The Department of Health and Welfare provides certifiable non-federal monies for IDVR services per explained in the interagency cooperative agreement.

**Reciprocal Referral Services between the two VR Programs in the State:** The State of Idaho has two VR programs, the Idaho Division of Vocational Rehabilitation and the Idaho Commission for the Blind and Visually Impaired. The two programs have a Memorandum of Understanding (MOU) to establish guidelines and policies to delineate the services both agencies will provide to individuals with disabilities. Furthermore, this agreement enhances cooperation and collaboration between the two agencies, improves inter-agency communication, and establishes staff cross-training opportunities.

**Idaho Educational Services for the Deaf and Blind (IESDB):** This agreement establishes guidelines and policies to facilitate the referral of IESDB students to IDVR for appropriate vocational rehabilitation services and to coordinate the provision of services when the student is a mutual customer of both agencies. Furthermore, this agreement will enhance cooperation and collaboration between the two agencies, improve interagency communication, and establish staff cross-training opportunities, when available.

**Independent Living:** IDVR currently contracts Title VII, Part B funds to the State Independent Living Council (SILC) and Disability Action Center-NW (DAC). IDVR has allocated 71% of independent living funding provided through Title VII, Part B funds to the SILC. The remaining 29% is distributed to the Disability Action Center (a center for independent living). Part B funds are used to enhance and expand core independent living services.

**Project Search:** Project Search is a high school transition collaborative effort between school districts, VR, Community Rehabilitation Programs (CRPs) and host businesses. It is an international, evidence-based model which prepares transition students identified as requiring long term supports for the world of work, thus helping them move into community employment after high school graduation. The Project Search program combines two hours of daily classroom training along with four hours of unpaid internship. These internship experiences are provided in three different eight week rotations and can include: housekeeping, dietary, laundry, child care, and equipment transportation. Even though the students may not be hired by the host business, they are better prepared for work and better able to access employment after Project Search completion.

**Tribal VR (Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Bannock Tribe, and Shoshone/Paiute Tribe):** IDVR entered into one collaborative cooperative agreement with three of the four federally funded Tribal VR programs in the state, while also maintaining a single cooperative agreement with the fourth Tribal VR program. These revised cooperative agreements include the WIOA requirements, specifically to include address transition services to students and youth with disabilities.

The intent of these agreements is to develop and implement a cooperative system for providing vocational rehabilitation services to eligible American Indians with disabilities and to promote and enhance to the greatest extent possible vocational rehabilitation services like that of those

provided by the State of Idaho. IDVR has the basic responsibility to provide rehabilitation services to all eligible customers in the State of Idaho. The Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Paiute and Shoshone/Bannock Tribe, through a Federal Section 121 grant, will work cooperatively with IDVR.

**U.S. Department of Veterans Affairs (VA) Vocational Rehabilitation and Employment (VR&E) Program and IDVR:** This cooperative agreement is entered into by the U.S. Department of Veterans Affairs (VA) Vocational Rehabilitation and Employment Program (VR&E), and the Idaho Division of Vocational Rehabilitation with the purpose of ensuring seamless, coordinated, and effective vocational rehabilitation services to Idaho's veterans with disabilities and dependents with disabilities, improving cooperation and collaboration between the two agencies, avoiding duplication of services, improving inter-agency communication, and to establish staff cross-training opportunities.

**Partnership Plus:** IDVR has established four Partnership Plus agreements with Employment Networks (EN's) throughout the state. The Partnership Plus agreements facilitate referrals between the IDVR and the EN under the Social Security Administration's Ticket to Work program. The Agreement defines the responsibilities of each party in working with Social Security beneficiaries (those receiving SSI/SSDI benefits) under the Vocational Rehabilitation Cost Reimbursement (CR) program. This partnership is created for instances where the IDVR has been serving a Ticket Holder under the IDVR CR program and is closing a beneficiary's case with the beneficiary in employment. This agreement establishes the basis for the coordination of vocational rehabilitation services provided by the IDVR with the provision of ongoing support services, benefits counseling, job retention services, and other types of services and supports provided by the EN to assist beneficiaries in maintaining employment and increasing their earnings.

**Idaho Department of Labor as an Employment Network:** The Idaho Department of Labor (IDOL) has recently become an approved Employment Network. IDVR and IDOL are collaborating to formalize an agreement regarding coordinated service delivery. The agreement will describe the referral process between IDVR and IDOL under the Social Security Administration's Ticket to Work program authorized under the Ticket to Work and Work Incentives Improvement Act of 1999 (P.L. 106-170, Title 1, Subtitle A, 42 U.S.C. 1320b-19 et seq.) and the revised regulations Social Security promulgated under 20 CFR Part 411 that took effect July 21, 2008. The Agreement will further describe the responsibilities of each agency in working with Social Security beneficiaries (those receiving SSI/SSDI benefits) under the Vocational Rehabilitation Cost Reimbursement (CR) program.

**Adult Corrections:** The Division in collaboration with the Idaho Department of Correction (IDOC), has two Memorandum of Agreements (MOAs) to provide a cooperative effort in the delivery of comprehensive vocational rehabilitation services to customers who are involved with the criminal justice system. The goal of the MOAs is to provide IDVR eligible customers who are reentering the community and under felony supervision in the following service areas: Region I Coeur d'Alene, Regions III and VII Treasure Valley area, Region IV Twin Falls, Region V Pocatello and Region VI, Idaho Falls area the opportunity of the full spectrum of IDVR services. IDOC will contribute certifiable non-federal funds towards the case service expenditures.

**Transitioning Students with Disabilities:** In collaboration with Special Education and IDEA, as well as federal initiatives, the Division has developed cooperative agreements with schools or school districts in various areas throughout the state to provide comprehensive vocational rehabilitation services to students with disabilities to assist with transition to work. A designated VR counselor and staff member are assigned to a consortium affiliated facility to better serve customers in the respective areas.

The school districts contribute certifiable non-federal funds to IDVR to be used for allowable IDVR case service expenditures per the cooperative agreement. The memoranda agreements cover the following areas of the state:

Region I Coeur d'Alene - Two Projects

Region II Lewiston - One Project

Region III Treasure Valley Special Programs - Four Projects

Region IV Twin Falls - One Project

Region V Pocatello - One Project

Region VI Idaho Falls - One Project

It is worth contrasting the services in the regions of the state covered by the cooperative agreements versus those not covered. Any individual school district may participate in the arrangement. IDVR counselors are either located in high schools or travel to those high schools participating in the project. This increases accessibility to the students eligible and/or potentially eligible for IDVR services. Counselors maintain a dedicated caseload of transitioning students and youth with disabilities until case closure. Dedicated school to work counselors collocated in schools creates closer working relationships with school personnel, provides for more timely referrals, better support throughout the rehabilitation process, and the expertise that comes with specialization. The arrangement has proved important in developing an excellent working relationship between IDVR staff and school districts across the state.

In school districts not covered by the cooperative agreements, students continue to receive the same level of service provision; however, referrals to IDVR are made by school counselors, special education teachers, or by word of mouth. All of the traditional and relevant activities and services are provided by a general caseload counselor. There are no services offered under the cooperative agreements that are not also made available by counselors providing services in the areas not covered by the cooperative agreements. The counselors who only serve students and youth typically are more knowledgeable and specialized in serving this population.

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

The state program which carries out the statewide Assistive Technology program for Idaho is the Idaho Assistive Technology Project (IATP), administered by the Center on Disabilities and Human Development at the University of Idaho. IATP's goal is to increase the availability of assistive technology devices and services for older persons and Idahoans with disabilities. IDVR and IATP have had a long term working relationship to assist IDVR customers with assistive technology services and devices, to include VR representation on the IATP Council. IDVR is in

the early development stages of formalizing a cooperative agreement with IATP. The components of the cooperative agreement will include coordination and availability of services, the reciprocal referral process, and other programs and resources available through the Idaho Assistive Technology Project.

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

The Idaho Division of Vocational Rehabilitation does not engage in any programs carried out by the Under Secretary for Rural Development of the U.S. Department of Agriculture.

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

**Juvenile Corrections:** The Division, in collaboration with the Idaho Department of Juvenile Corrections (IDJC), has a Memorandum of Agreement (MOA) to provide comprehensive vocational rehabilitation services to juvenile offenders both in the IDJC institution and within the community. The goal of this MOA is to provide IDVR eligible customers located within the Treasure Valley area the opportunity to prepare for re-entry into the community by providing the full spectrum of IDVR services. IDJC will contribute non-federal funds towards case service delivery for costs for these customers. While some of the IDJC referrals may be students with disabilities, the majority of the referrals are out-of-school youth.

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

**State Use Contracting Programs:** The Rehabilitation Act of 1973, as amended, created the opportunity for states to give contract preference to businesses that employ individuals with disabilities. Idaho Code Section 67-2319A appointed the “Idaho Council for Purchases from Nonprofit Businesses that Serve People with Disabilities” (commonly referred to as The State Use Council) to facilitate the sale of goods and services from Not for Profit Community Rehabilitation Programs to meet this obligation.

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

Describe:

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

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

**IDVR Pre-Employment Transition Highlights.** IDVR’s Transition Coordinator has extensive experience and an established network across Idaho public K-12 education system. The Division has developed Pre-ETS implementation strategies to provide services at the following levels, including all required pre-employment transition services (job exploration counseling, work based learning experiences, counseling on opportunities for enrollment in postsecondary education, workplace readiness training to develop social skills and independent living, and instruction in self-advocacy). The Division has continued to modify and improve these strategies, including the coordinated and authorized services, as service delivery and partnerships evolve. For example, The Division has developed numerous Memorandum of Agreements (MOAs) with

various Local Education Agencies (LEAs). These include contracting with educators to provide a Self-Advocacy curriculum for students previously developed through a partnership between the State Department of Education, IDVR, a LEA, and National Technical Assistance Center on Transition (NTACT). The Division has also developed MOAs to provide students with an opportunity to participate in a paid work experience.

The Division has also improved coordinated activities by having our VR Counselors work collaboratively with local school personnel to develop effective referral and outreach strategies to maximize opportunities for students with disabilities to participate in Pre-ETS activities. These strategies also include opportunities for students who are receiving accommodations under Section 504 of the Rehabilitation Act. VR Counselors are attending numerous IEP meetings and are working with districts to develop better process for providing timely invitation to VR Counselors to attend these meetings.

IDVR's Transition Coordinator is working with school principals and special education directors to inform them of Pre-ETS activities. The Transition Coordinator is also communicating with all staff engaged in the delivery of Pre-ETS to help develop and enhance existing referral and outreach strategies within schools.

The Idaho Division of Vocational Rehabilitation is an agency of the Idaho State Board of Education and partners with other agencies under the Board through coordination and collaboration.

IDVR has strong relationships with Education agencies throughout the state, including formal interagency agreements with a number of Local Education Agencies (LEAs), a comprehensive formal interagency agreement which addresses collaborative service provision with the State Department of Education (SDE), and the Idaho Commission for Blind and Visually Impaired (ICBVI).

IDVR and the SDE have developed a comprehensive formal interagency agreement which addresses collaborative service provision. This agreement specifies the programmatic and fiscal responsibilities for each agency. LEAs provide different transition services to students with disabilities for various reasons, adequate funding being one of the major reasons. Therefore, the Division needs to understand the types of transition services that are currently provided by each LEA in order to determine what Pre-ETS activities should be considered for students with disabilities at the LEA level. As a result that need, IDVR is coordinating with educational officials and other state agencies to provide a Transition Institute in the fall of 2018. IDVR is working with the SDE, Idaho Parents Unlimited, three LEAs, Boise State University, ICBVI, the Idaho Council for Developmental Disabilities, and the Idaho Department of Labor to develop and deliver the Institute. The Institute will follow the NTACT (formally developed under NSTTAC) Taxonomy for Transition Programming. The Taxonomy for Transition Programming provides solid practices identified from effective programs and evidence based predictors of post school success for implementing Pre-ETS as well as transition focused education. Districts will bring teams, that will include a VR Counselor to the Institute to develop specific goal directed plans based on district data to improve Pre-ETS and transition focused education based on district need. This will provide IDVR with the specific criteria to determine which agency (IDVR or LEA) has primary responsibility for providing and paying for transition related services for students with disabilities as well as what additional Pre-ETS should be targeted to each LEA.

Lastly, IDVR has partnered with the SDE to implement a Statewide Secondary Transition Plan which correlates to the Division's Pre-Employment Transition Plan. The goal on the statewide plan is to develop systems for effective collaboration between students, families secondary and post-secondary educators, rehabilitation counselors, and service providers to evaluate the quality and quantity of transition activities and pre-employment transition services. \* More in section 2 B.)

## **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;**

The formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains a number of provisions designed to promote communication and the sharing of technical expertise in transition planning.

The agreement stipulates that the vocational rehabilitation agency must provide consultative and technical assistance services to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including employment.

The agencies agree to:

1. Encourage staff to work closely with LEAs to ensure coordination between education services, pre-employment transition services, and vocational rehabilitation services.
2. IDVR and ICBVI counselors will provide training and information to school district personnel, students and families on pre-employment transition and vocational rehabilitation services, including their role as IEP team members.
3. IDVR and ICBVI counselors are available to consult with educators concerning pre-employment transition and vocational rehabilitation services for students to assist them toward employment.
4. IDVR and ICBVI counselors will collaborate with the LEAs in their service area to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.
5. IDVR and/or ICBVI counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and/or student's parent or legal guardian. VR counselors may attend either in person or via video or telephone. The IDVR and/or ICBVI counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
6. IDVR and ICBVI counselors will consult with educators concerning referral of students to IDVR and/or ICBVI for rehabilitation services, including pre-employment transition services. Students with blindness or visual impairments should be referred to ICBVI.



Students with multiple disabilities may have dual cases with both IDVR and ICBVI to provide rehabilitation services.

7. IDVR and ICBVI counselors will accept referrals for pre-employment transition or vocational rehabilitation services, when appropriate, and will work collaboratively with input from the student's IEP team, for service provision and/or to develop an IPE. The vocational rehabilitation counselor, student, student's parent or legal guardian, and members of the student's IEP team will collaborate to identify required vocational rehabilitation services that will move the student towards their employment goal.

Idaho Interagency Council on Secondary Transition: In the State of Idaho there is an Interagency Council. The Idaho Interagency Council on Secondary Transition is established by the Superintendent of Public Instruction to advise, review, analyze, and monitor the implementation of the State's Interagency Agreement on Secondary Transition. The authority to establish this Interagency Council lies in IDEA Section 640(b)(1)(A) and regulation 300.154. IDVR continues to be involved in the Idaho Interagency Council on Secondary Transition with the purpose of ensuring that students with disabilities experience a collaborative, comprehensive system that facilitates a smooth transition from secondary school to adult life. The goal of this group is to increase the number of youth with disabilities who are actively engaged in postsecondary education, employment, and community activities. Interagency cooperative planning, information sharing, and the collaborative use of resources assist in accomplishing IDVR's mission at the state and local level. Members include the Idaho State Department of Education (SDE), Idaho Division of Vocational Rehabilitation (IDVR), Idaho Commission for the Blind and Visually Impaired (ICBVI), Idaho Educational Services for the Deaf and Blind, Idaho Parents Unlimited, Council on Development Disabilities, Department of Labor, Boise State University, Idaho State University, The Assistive Technology Project run through the University of Idaho, Idaho Health and Welfare, Juvenile Corrections, Department of Corrections, and LEAs.

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

**Statewide Transition Plan** — IDVR, the State Department of Education (SDE), Idaho Parents Unlimited, Nampa School District, Lake Pend Oreille School District, and Idaho Falls School District, have developed and implemented a statewide secondary Transition Plan with support and assistance from NTACT (National Technical Assistance Center on Transition). The goal of the plan is to develop systems for effective collaboration between students, families secondary and post-secondary educators, rehabilitation counselors, and service providers to evaluate the quality and quantity of transition activities and pre-employment transition services.

Expected outcomes include increase interagency collaboration, increase the number of students receiving pre-employment transition services or educational transition services that they need, increase student knowledge of agencies and other services, increase families knowledge of agencies and services, and provide more effective Pre-ETS based on student need.

Furthermore the formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains a number of provisions designed to facilitate

the development and implementation of individualized education programs (IEPs). The agencies agree:

1. To cooperate in the development of transitioning students' Individualized Education Programs (IEPs) and any relevant Individual Plan for Employment (IPEs). Development of the IEP is vested with the IEP team, including the student and his/her parent or guardian. Approval of the IPE is vested with the IDVR or ICBVI, the student and his/her parent or guardian.

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

**Idaho State Department of Education (SDE) - Secondary Transition:** Idaho Division of Vocational Rehabilitation (IDVR), Idaho Commission for Blind and Visually Impaired (ICBVI), and the State Department of Education (SDE) are currently revising the existing formal cooperative agreement. The agreement ensures a coordinated, comprehensive system focusing on students with disabilities as they transition from secondary school to post-school activities, promoting post-secondary education, vocational training, competitive integrated employment (including supported employment), continuing and adult education, adult services, independent living, and community participation emphasizing a team approach to facilitate the transition of students with disabilities from public education into employment.

This agreement addresses the following:

- Pre-Employment Transition Services
- Roles and responsibilities of each agency, including which agency is state lead
- Financial responsibilities of each agency, including the purchase of Assistive Technology
- Procedures for outreach, consultation, training, and technical assistance
- Transition Planning
- Referral process for students with disabilities to the appropriate VR program
- Data release and data sharing
- Dispute Resolution
- Coordination and documentation requirements under section 511
- Prohibition on entering into an arrangement with an entity holding a 14(c) special wage certificate for the purpose of operating a program where people with disabilities are engaged in work at subminimum wage.

The current draft agreement is expected to be finalized sometime in 2018.

That said, the current agreement establishes the following roles and responsibilities for the involved parties:

A. The Idaho State Department of Education (SDE) agrees to:

1. Assume the role of lead agency in facilitating interagency planning with LEAs and implementation of educational programs and transition services for students with disabilities from high school to post-high school services.
2. Support LEAs in their efforts to write IEPs using an outcome oriented focus and to coordinate transition activities for each IEP eligible student, beginning no later than the IEP before the

student turns age 16 years old (earlier if appropriate), and to address future student needs in the areas of post-secondary education, vocational training, employment, and adult living and communication participation, including assistive technology.

3. Invite IDVR and/or ICBVI to provide information regarding their services, including their role as an IEP team member to school district personnel, students, and their families.
4. Invite IDVR and/or ICBVI counselors, with prior consent from adult students or parents or legal guardians, as appropriate, to participate as members of IEP teams for students who have been referred to IDVR and/or ICBVI for rehabilitation services, or earlier if appropriate.
5. Work with IDVR and ICBVI Vocational Rehabilitation (VR) counselors to identify a process for such counselors to provide input and participate in the development of a student's IEP, including pre-employment transition services, when appropriate.
6. Identify appropriate school personnel who, with prior consent from adult students or parents or legal guardians, as appropriate, will initiate the referral process of students receiving special education services, and students who have a 504 Plan (Rehabilitation Act of 1973), or students with disabilities (e.g., physical, medical, or visual, etc.) who are not eligible for special education services, to IDVR and/or ICBVI for pre-employment transition services and/or vocational rehabilitation services.

B. Idaho Division of Vocational Rehabilitation (IDVR) and Idaho Commission for the Blind and Visually Impaired (ICBVI) agree to:

1. Encourage staff to work closely with LEAs to ensure coordination between education services, pre-employment transition services, and vocational rehabilitation services.
2. IDVR and ICBVI counselors will provide training and information to school district personnel, students and families on pre-employment transition and vocational rehabilitation services, including their role as IEP team members.
3. IDVR and ICBVI counselors are available to consult with educators concerning pre-employment transition and vocational rehabilitation services for students to assist them toward employment.
4. IDVR and ICBVI counselors will collaborate with the LEAs in their service area to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.
5. IDVR and/or ICBVI counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and/or student's parent or legal guardian. VR counselors may attend either in person or via video or telephone. The IDVR and/or ICBVI counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
6. IDVR and ICBVI counselors will consult with educators concerning referral of students to IDVR and/or ICBVI for rehabilitation services, including pre-employment transition services. Students with blindness or visual impairments should be referred to ICBVI. Students with multiple disabilities may have dual cases with both IDVR and ICBVI to provide rehabilitation services.

7. IDVR and ICBVI counselors will accept referrals for pre-employment transition or vocational rehabilitation services, when appropriate, and will work collaboratively with input from the student's IEP team, for service provision and/or to develop an IPE. The vocational rehabilitation counselor, student, student's parent or legal guardian, and members of the student's IEP team will collaborate to identify required vocational rehabilitation services that will move the student towards their employment goal.

8. All Vocational Rehabilitation State Plan requirements, including Order of Selection, will apply to all services provision under this cooperative agreement.

C. The Idaho Division of Vocational Rehabilitation (IDVR) agrees to:

1. Continue current funding of IDVR School to Work Counselors in conjunction with matching funds from participating school districts. IDVR also ensures that in schools where School to Work Counselors are located, cooperative agreements are developed or continued between the LEA and IDVR to identify each agency's responsibilities to this partnership. The continuation and development of the IDVR/LEA School to Work Counselor positions are dependent on the receipt of adequate funding from the federal government and/or Idaho state legislature.

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

Idaho Division of Vocational Rehabilitation (IDVR), Idaho Commission for Blind and Visually Impaired (ICBVI), and the State Department of Education (SDE) currently have a formal cooperative agreement.

The agreement stipulates that the vocational rehabilitation agency is mandated to initiate outreach to, and identification of, students with disabilities who could benefit from transition services. This involves informing the student (or, when appropriate, their representative) as early as possible about the vocational rehabilitation program, its purpose, eligibility criteria, application procedures and scope of available services.

The Division's transition coordinator has met with a large majority of the LEAs across the state to create awareness of the changes in the VR program and to market Pre-ETS. These activities consist of a series of face to face meetings in communities across Idaho including key stakeholder engagement through a series of regional special educator meetings, presentations at statewide administrator meetings, presentation at Tools for Life to parents, students and educators, outreach to Idaho Parents Unlimited, outreach to the Idaho Interagency Council on Secondary Transition, and ongoing discussions with the Idaho State Department of Education.

Additionally, IDVR's School Work Transition counselors, have worked with educational counterparts to significantly increase number of potentially eligible students receiving pre—employment transition services and being found eligible for the VR program.

Finally the Division's transition coordinator has worked with the SDE and the Council on Developmental Disabilities to provide outreach to Spanish speaking families about the process of transition, Pre-ETS, and traditional VR services. Presentations were given to families in Spanish in their community by IDVR's transition coordinator, a VR Counselor, and the SDE's transition coordinator on how to access Pre-ETS and other VR services as well as on how to improve the educational transition process.

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

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

IDVR does not establish cooperative agreements with private nonprofit vocational rehabilitation service providers. Services are purchased on a fee for service basis. IDVR does have cooperative agreements with several nonprofit CRPs for the coordination of services provided by Employment Networks for individuals who are Social Security beneficiaries who are Ticket holders. These cooperative agreements describe the coordination between both agencies.

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

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

IDVR is committed to the advancement of opportunities for Idaho citizens with disabilities, including youth with the most significant disabilities, and encourages employment in the least restrictive and most integrated environments possible. IDVR has established and continues to maintain strong working relationships with pertinent state agencies such as the Department of Health and Welfare (H&W). Under H&W, Home and Community Based Services (HCBS) Waiver and Aged and Disabled Waiver are the two main extended services funding sources for Idahoans in need of Supported Employment. The third funding source is the Extended Employment Services Program. This program is funded through State appropriations only. The primary service providers for long term supports under the three main funding sources are CRPs.

If a youth with a disability has been determined to need an SE strategy and an extended service funding source is not available yet, IDVR will utilize VR funds for the required timeframes or until the funding becomes available for the long term support.

## **g. Coordination with Employers**

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

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

IDVR has hired a Business Relations Liaison to help meet this new emphasis in WIOA. Additionally, IDVR will take advantage of Technical Assistance Center offerings to inform employer engagement efforts. IDVR will continue to coordinate business outreach efforts with the Idaho Department of Labor, and their business outreach team which serves as the central point of contact for WIOA coordinated business outreach activities.

IDVR will work with employers to provide general and customized technical assistance and support services to businesses and industries including:

- Work-based learning experiences
- Section 503 technical assistance for federal contractors and subcontractors
- Training employees with disabilities
- Promote awareness of disability-related obstacles and stigma reduction
- Linking business with state and federal financial incentives for supporting individuals with disabilities (e.g. Work Opportunity Tax Credit).
- Other customized training, consultation, and technical assistance as allowed by WIOA regulations

IDVR will also focus on areas of need identified by employer responses to the latest CSNA including:

- Obtaining information about On-the-Job training programs available for workers with disabilities
- Identifying job accommodations for workers with disabilities
- Obtaining incentives for employing workers with disabilities
- Recruiting job applicants who are people with disabilities
- Obtaining training on disability awareness
- Understanding disability-related legislation such as the Americans with Disabilities Act as amended, the Workforce Innovation and Opportunity Act and the Rehabilitation Act as amended
- Obtaining information such as mentoring opportunities or work experiences for students with disabilities
- Helping workers with disabilities to retain employment

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

IDVR has worked with Union Pacific to provide students with an information/recruitment day with the Nampa school District. Students filled out applications ahead of time and recruitment personnel from Union Pacific went over the applications and provided feedback to the students. They also practiced panel interviews and watched presentations on what Union Pacific looks at as far as positives and negatives in applications and resumes. Union Pacific will also be working with students who attend Academy NexT. Academy NexT is an IDVR project where students spend one week on the Idaho State University campus to participate in job exploration, career counseling, practice interview skills in a simulated environment using an avatar, self-advocacy, independent living skills, community integration, and college life. Students will learn to budget, experience college classes, learn to use technology to support note taking, use of Livescribe pens, Chromebooks, and iPads, tour campus, and with meet disability services staff to better understand services and resources available to them.

IDVR has also coordinated with Hewlett-Packard (HP) and Idaho Parents Unlimited to offer the Work of Art Program during the 2016-2017 school year. Idaho Parents Unlimited offered a program to students where students work with HP to secure a job to create corporate art. Students were paid minimum wage by Idaho Parents Unlimited for their work on the project. The program connected youth with disabilities to HP and provided them with a meaningful employment opportunity. HP provided the students, their families, and agency partners with a

reception following the experience where they could display their creations. The reception was a way to thank the students for their hard work and dedication to the project.

## **h. Interagency Cooperation**

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

### **1. the State Medicaid plan under title XIX of the Social Security Act;**

The Idaho Department of Health and Welfare (H&W) maintains all related programs in the state including the state Medicaid program, the state Developmental Disabilities Program, and the state Mental Health program. Under Medicaid H&W operates the Idaho Home and Community Based Settings project.

IDVR has initiated contact with H&W to develop a formal Cooperative Agreement between the agencies as it relates to Title XIX of the Social Security Act.

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

IDVR has a solid working relationship with the Adult Developmental Disabilities Services program under the Department of H&W. Since July 2014, an informal protocol has been established and implemented in the field between IDVR and H&W Adult Developmental Disabilities Services program.

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

**Idaho Department of Health and Welfare Division of Behavioral Health, Adult Mental Health (H&W-Behavioral Health):** The IDVR and H&W-Behavioral Health update this agreement annually for the purpose of better serving Idahoans experiencing severe and persistent mental illness. A team approach will be used to ensure that the Idahoans served by this agreement will benefit as to remaining de-institutionalized and successfully integrated into their respective communities from a psychological, psychosocial, and employment perspective. Those customers who have a severe and persistent mental illness deemed not eligible for this program will be referred to the general IDVR counselor. Those customers who have a severe and persistent mental illness deemed ineligible for IDVR services will be referred to other appropriate resources for assistance. A designated VR counselor and staff member are assigned to an H&W Behavioral Health Region to better serve customers. The Department of Health and Welfare provides certifiable non-federal monies for IDVR services per explained in the interagency cooperative agreement.

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

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

# 1. Data System on Personnel and Personnel Development

## A. Qualified Personnel Needs.

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

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

Table VR.1: Qualified Personnel

Job Title	Total Positions	Current Vacancies	Projected Vacancies Over the Next 5 years
Qualified Rehabilitations Professionals: Vocational Rehabilitation Counselors	56	3	40
Vocational Rehabilitation Specialist	16	0	35
Vocational Rehabilitation Assistants	46	1	30
Field Management Staff	8	0	1
Human Resources	1	0	0
Fiscal	4	1	1
Information Technology	5.5	0	1
Planning and Evaluation	3.5	0	0
Transition Coordinator	1	0	0
Business Liaison	1	0	0
Administrative Assistants	3	0	2
Deputy Administrator	1	0	0
Administrator	1	0	0
Chief of Field Services	1	0	0

**IDVR currently employs a total of 148 staff. The breakdown of personnel is listed above.**

The Agency has determined that a ratio of one Qualified Rehabilitation Professional (QRP) for every 20,000 people in the state is an ideal staffing ratio. The population of Idaho is approximately 1.65 million people, thus a minimum of 82.5 QRP over the next five years would be required to meet this ratio. IDVR currently has a total of 56 QRP, VRC, and anticipates needing 26.5 additional positions. This shortfall in part will be addressed by employing Vocational Rehabilitation Specialists with the understanding that they work toward VRC QRP status which includes the CRC designation. IDVR currently has 16 VRS positions filled leaving



a shortfall of 9.5 QRP positions across Idaho. Numerous factors including shifting Idaho working age demographics and WIOA workload increases will require a reassessment of the 1 in 20,000 staffing model. In addition, one VRA position would be necessary to support the QRP to meet the demand for IDVR services. The anticipated number of vacancies expected due to retirements or individuals leaving the Agency over the next five years are noted in the above chart. New FTEs have been added to the chart since the initial 4-year plan. This includes a business liaison position, an additional program analyst position and a deputy administrator position which have been added to help address the requirements of WIOA. To help create these positions, the former Organizational Development Specialist position was reclassified as a Training Specialist position, and some former duties of the ODS were spread across these positions.

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

The current vacancies broken down by personnel category can be found in Table VR.1: Qualified Personnel in the preceding section of this plan.

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.

Projected vacancies by personnel category and the rationale informing these projections can be found in Table VR.1: Qualified Personnel which is located in (i)(1)(A)(i) of this section.

## **B. Personnel Development**

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

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

The University of Idaho (U of I) is the only institution of higher education in Idaho that prepares VR counselors. The U of I Rehabilitation Counseling and Human Services Program was awarded a 5-year \$1,000,000 Rehabilitation Training grant from the U.S. Department of Education Office of Special Education and Rehabilitative Services - Rehabilitation Services Administration (RSA). The grant includes a select number of student scholarships for tuition/fees, books and supplies, and travel to professional conferences. This grant runs through September 30, 2020 depending on the utilization of funds. Upon graduation, recipients of the scholarships will, in return, agree to work one year for every semester they receive a scholarship at a state vocational rehabilitation or related-rehabilitation agency.

The program is offered in two Idaho locations and will accommodate 25 students. They also offer a category “R” education program for individuals who have related Masters Degrees and need up to six additional courses to be eligible to sit for the CRC exam.

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

The University of Idaho program is offered in two Idaho locations (Boise and Coeur d' Alene) and will accommodate 25 students. They also offer a category "R" education program for individuals who have related Masters Degrees and need up to six additional courses to be eligible to sit for the CRC exam.

From the current M.Ed./M.S. Rehabilitation Counseling and Human Services Program at the U of I, twelve students are expected to graduate from the Boise campus and ten are expected to graduate from the Coeur D'Alene campus in May 2018. The next cohort will begin May of 2018 and they are expecting to have a full capacity of 25 students. It is expected that students who will be graduating in May of 2018 will sit for the CRC exam in the spring of 2018.

iii. the number of students who graduated during the prior year from each of these 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.

The U of I program will accommodate 25 students. They also offer a category "R" education program for individuals who have related Masters Degrees and need up to six additional courses to be eligible to sit for the CRC exam.

From the last cohort M.Ed./M.S. Rehabilitation Counseling and Human Services Program at the U of I, seven students were expected to graduate from the Boise campus and nine were expected to graduate from the Coeur D'Alene campus in May 2016. The next cohort will began May of 2018 and they are expecting to have a full capacity of 25 students.

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

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

IDVR will continue to recruit qualified staff from the U of I and other regional and national institutions of higher education. We maintain contact with Auburn University, , Hofstra University, Montana State University, New Mexico Highlands University, Portland State University, San Diego State University, University of Arizona, University of Kentucky, University of North Texas, University of Northern Colorado, University of Texas Rio Grande Valley, University of Wisconsin - Stout, Utah State University, Virginia Commonwealth University, West Virginia University, and Western Washington University. Management staff also attends the Fall and Spring National Council on Rehabilitation Education (NCRE) conferences.

IDVR will provide feedback to U of I's RCE department chair and dean on existing and future staffing needs, including individuals with disabilities as well as those from minority backgrounds.

When possible, IDVR supports unpaid internships for Masters level students in Rehabilitation or related fields. During FFYs 2016 and 2017 four unpaid and three paid interns were supported. The Agency anticipates continuing this relationship.

IDVR continues to face challenges in recruiting qualified applicants. The entry-level wage for a QRP is lower than comparable state and private positions. IDVR has begun to address and implement a more competitive wage for QRP's and classified personnel. IDVR will continue to build a compensation package which will be competitive with other states and agencies contingent upon available funding.

All Regional Managers, Central Office Management and other leadership personnel are involved in recruitment activities. Development of recruitment and marketing plans continue to be a priority for the Division.

IDVR participates in Career Fairs around the state to encourage and seek out individuals from diverse backgrounds including individuals with disabilities and from minority backgrounds.

IDVR conducts exit interviews with staff, when possible, to determine whether there are areas of concern affecting staff retention that need to be addressed. The current trend suggests counselors are moving on to positions which do not require a Master's degree and pay approximately \$2.30 more per hour.

IDVR is committed to recruiting and hiring qualified personnel who are individuals with disabilities and/or from minority backgrounds. The Agency has a long history of recruiting, hiring and retaining such individuals.

For PY 2016 the turnover rate for QRP's was 16.07%. The Agency will continue to conduct staff surveys every two years for all employees. Results will be compiled and reviewed to identify specific areas to enhance retention efforts.

### **3. Personnel Standards**

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

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

The State of Idaho does not require a state licensure for rehabilitation counselors. Educational standards for personnel established by IDVR for qualified rehabilitation professionals (QRP) are intended to meet a base level of quality expected by the Division of its counselors.

IDVR has established three QRP levels: Vocational Rehabilitation Counselor I, II and III (VRC I, II and III). The educational standards that satisfy the Agency's CSPD policy for the VRC I & II counselor positions are as follows:

1. A current Certified Rehabilitation Counselor (CRC) designation obtained through the Commission on Rehabilitation Counselor Certification (CRCC OR
2. Graduation from a program accredited by the CORE with a Master's Degree in Rehabilitation Counseling OR

3. A current Licensed Professional Counselor (LPC) or Licensed Clinical Professional Counselor (LCPC) designation issued by the State of Idaho Bureau of Occupational Licensing (IBOL); Rules of the Idaho Licensing Board of Professional Counselors and Marriage and Family Therapists, IDAPA 24.15.01.

CRC designation is required for the VRC III, Chief of Field Services and all Regional Managers. IDVR's minimum standards for all other Agency positions are the State of Idaho's minimum standards for each position.

IDVR places great importance on recruiting, hiring, and retraining staff that are appropriately and adequately trained to provide services to our customers with disabilities. Due to the limited pool of recruits for the QRP positions, IDVR will consider hiring individuals who do not possess the above academic standards. These individuals are hired into the Vocational Rehabilitation Specialist (VRS) title. The VRS is the exempt classification for staff hired who do not meet the minimum qualification standards for IDVR's QRP (VRC).

Minimum qualification standard for the VRS title are: graduation with a Bachelor's or Master's degree in a related field of study, to include but not be limited to, Rehabilitation Counseling, Social Work, Psychology, and Counseling (without the Theories and Techniques of Counseling course in the degree) will be considered under special circumstances. Special circumstances, include, but are not limited to the following: The exhaustion of recruitment efforts for qualified personnel, placement difficulty in rural areas of the state and the service needs of special populations.

The VRS will be required to meet CSPD standard as outlined in IDVR's State Plan within five years of the staff's hire date. In all cases, the Agency's minimum requirements for 'Qualified' personnel will be retained.

The VRS with assistance from Regional Manager (RM) and Human Resource Specialist (HRS) will develop a CSPD Plan within three months of their hire date. Each CSPD plan will require the following elements:

- a.) Educational requirements necessary to complete CSPD (if applicable). Number of courses required and an outline of anticipated timeframe for completion of each course.
- b.) As coursework is completed grades must be submitted to the RM and HRS within two months.
- c.) Employment Internship requirement as outlined in Category "B" of the CRC Certification guide. CSPD will be evaluated for progress as part of the VRS's overall performance requirements as outlined in the VRS job description.

Staff at VRS level will be required to update their CSPD plan annually and have it approved by the RM and HRS who will maintain a copy for their personnel file.

IDVR recognizes that medical conditions and certain medical issues can impact these goals. For further information regarding accommodation requests under the Americans with Disabilities Act Amendments Act (ADAAA), Family Medical Leave Act (FMLA), Worker's Compensation, other rules and regulations as applicable and/or possible medical waiver extensions will be managed by the RM and HR department.

IDVR may provide some financial support to assist the employee with the costs of the education/certifications.

IDVR will recognize current standards as outlined in the CRC Certification Guide when determining qualifying degrees, programs, coursework and acceptable employment experience.

Employees will be required to present IDVR with a notice of eligibility to take the CRCC exam in order to meet CSPD requirements. IDVR will reimburse the cost of the CRCC application and exam fee upon verification of achievement of CRC certification.

**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.**

IDVR is committed to providing all employees with development opportunities which will enhance employee job performance; support the Agency's mission, values and goals; and lead to successful employment outcomes for individuals with disabilities. With the increased WIOA emphasis on workforce development the Division will also concentrate on providing training to strengthen business relationships and increase knowledge of labor market relevance and employer needs.

Through an increased emphasis on data-driven decisions, IDVR will increase utilization of the most recently available labor market information to promote more informed decision making on the part of customers when selecting potential employment options.

IDVR will increase utilization of established and emerging, promising, technologies to better meet the needs of rural and all Idahoans.

#### **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

IDVR tracks and monitors each employee's individual training and development through the Agency's learning management system (LMS), TrackStar. Special emphasis is placed on training required to maintain CRC and/or LPC certification. This includes training on ethics, disability topics, vocational counseling, assessment, job placement strategies, and assistive technology.

##### **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.

An annual training needs assessment is conducted to determine personnel training needs. Individual employee skill sets, position descriptions, and position duties are also assessed to identify areas that require further development. In addition, organizational needs are analyzed to identify areas in need of succession planning, to expand those employee skills essential in the effective servicing of special populations, and to meet job demands. Information gathered from employee performance evaluations; supervisory feedback, employee exit interviews, and administrative review results also assist the Division with identifying areas of need.

In October 2014 IDVR held a statewide in-service. VR managers and counselors were introduced to a dashboard caseload management tool and VR assistants were introduced to a desktop manual that was created specifically for their job title. Breakout sessions included personality disorders, suicide prevention, addiction, DSM-5, legal guardianship, CPR and first aid, employer relationships and employee wellness.

The Division continued to provide facilitator training to IDVR staff statewide, so they could then provide direct training to customers utilizing the *WorkStrides* curriculum that was developed by Washington VR. The career development workshop is geared towards customers that are preparing for plan development. It assists with the amount of time spent on plan development and successful completion of planned services to employment outcomes. During FFY 2016 each region has been tasked with developing a regional career development workshop. For many areas the 20 hour workshop is difficult for staff and customers to attend, so a shorter one to two day workshop may be of more value.

Motivational Interviewing (MI) training for new employees and a refresher option were provided in June 2015.

Throughout the year, training requests are approved for individual and group training in areas of interest or need. A variety of platforms are utilized for dissemination, including face-to-face training, conferences, and online webinars. Topics/conferences included but were not limited to: Ethics, Idaho Conference on Alcohol and Drug Dependency, Tools for Life, and the Conference for Exceptional Children.

Succession planning and leadership development continue to be a focus of the Division. All Central Office and Field Services Managers complete the Supervisory Academy offered by the Idaho Division of Human Resources. The academy includes 10 modules on Performance Management: Development, Coaching and Feedback, Expectations, Motivation, Documentation, Calibrating Ratings, Evaluation, I-Perform (performance evaluation software program), and Progressive Discipline. When financially able the Division supports staff in the Emerging Leaders series. The Division utilizes eight (8) rotating Assistant Regional Manager positions throughout the state to provide additional management experience to staff.

New VR staff participates in a new employee orientation which is provided online through the TrackStar LMS, by Central Office staff, the immediate supervisor, and other designated employees. New VR assistants also participate in an online series designed for paraprofessional staff. The course covers the History of VR, Basic Ethical Considerations, Navigating Sticky Situations, Developing Collaborative Relationships, and Cultural Diversity.

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

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

IDVR employees that are fluent in Spanish are recruited to serve the needs of the Hispanic communities located throughout the state.

The Agency supports one caseload in the Treasure Valley that specifically addresses the needs of deaf and hard of hearing customers. Sign language interpreting services are also purchased when necessary.

Since Idaho has a separate entity that addresses issues related to low vision and blindness, IDVR does not provide specific training to its staff in Braille.

Interpreter services for non-English/non-Spanish speaking individuals are purchased on an as needed basis, as appropriate.

## **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.

The Transition Coordinator will facilitate the required coordination with the State Department of Education and provision of Pre-employment Transition Services, as required under WIOA. Additional training and education will be identified for staff regarding new services, new coordination and best practices in serving students with disabilities. The Transition Coordinator is assigned as an active member of the Idaho Interagency Council on Secondary Transition and the Special Education Advisory Panel, which promotes interagency cooperative planning, information sharing, and the collaborative use of resources at the state and local level. This Council works to ensure that training needs are adequately identified and then addressed through shared training opportunities.

Training opportunities offered by IDVR which are germane to both educators and vocational rehabilitation professionals will be opened to school staff for participation when practicable. For example, in PY 2017, IDVR brought together public educators, DEI staff from the Idaho Department of Labor, VR counselors, CRP staff, central office staff from IDVR, SDE and ICDD, national technical assistance providers for youth, students and people with disabilities for a Customized Employment Pilot training which was applicable to all parties involved. This five day face-to-face training was relevant to all stakeholders and coordinated not only school and VR staff, but talent from a wide array of sources to establish a foundation for the coordinated provision of transition personnel development.

## **j. Statewide Assessment**

(Formerly known as Attachment 4.11(a)).

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

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

IDVR conducted a Comprehensive Statewide Needs Assessment (CSNA) beginning in the fall of 2016, including the rehabilitation needs of youth with disabilities in transition including their need for Pre-Employment Transition Services.

The number of people with disabilities in Idaho is growing. The ACS (2016) one-year estimates of individuals with disabilities in Idaho increased from 200,237 in 2011 to 224,887 in 2016, representing an increase of 12.3% over five years (Table B18101).

According to data from the American Community Survey, published in the Compendium of Disability Statistics, 13.5% of Idaho civilians living in the community report having a disability, including 11.9% of residents of working age (18-64). The prevalence of disability in Idaho roughly corresponds to that of the United States, with estimates all within one-percentage point each of the past seven-years with the exception of 2015, when the rate of disability for Idaho was estimated at 13.8%, while the rate for the United States was estimated at 12.6%. These estimates are also in line with bordering states with the exception of Utah's rate of 9.9% (the lowest disability percentage in the United States). Rates of reported disability range from the low in Utah of 9.9% to a high of 20.1% in West Virginia.

There is a strong correlation between those individuals requiring supported employment (SE) services and presumptively eligible participants in the VR program. To approximate the potential need for SE services, the Division will utilize counts of Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) beneficiaries.

Individuals who qualify for SSI/SSDI are by law presumptively eligible for Vocational Rehabilitation services. The United States Social Security Administration (SSA) estimates that as of December 2016 the number of Idahoans age 18-64 who received SSDI was 46,120. Social Security Administration (SSA) estimates that as of December 2016, SSI benefits were received by 21,177 individuals while 6,369 people concurrently received SSI and SSDI during the same period. These 60,928 individuals represent 6.1% of all working age Idahoans.

According to internal data, IDVR took applications on 5,570 cases in FFY 2017 including 734 cases where SSDI benefits were verified and 895 cases where SSI benefits were verified. This represents a presumptive eligibility rate of 29.3% at application. The Division anticipates an increase in this rate as Pre-ETS requirements increase the likelihood of the establishment and implementation of an Order of Selection and the subsequent referral of candidates on the waiting list to other partner agencies.

**B. who are minorities;**

Historically, the population of Idaho has been ethnically homogenous in comparison to other states in the region. However, Idaho's recent population growth has seen an accompanying growth in the number and diversity of minority populations residing in the state, and some minority populations are experiencing double digit growth. While IDVR did meet this indicator two of the past three federal fiscal years, IDVR remains committed to expanding outreach to minority populations.



The last available 5-year ACS data indicates Idaho is 91.3% White with no other single race representing over 1.3%. When considering ethnicity, Hispanic or Latino (of any race) is second with 12.0%

Idaho's population is expected to grow by 15.3% between 2015 to 2025, while the growth rate for Hispanics the state's largest minority, is expected to be 14.9%. IDVR is cognizant of this change and will continue and expand outreach efforts to match this growth.

In addition to demographic information and internal case management data, IDVR remains informed on the needs of minority population through efforts which are further elaborated on in section o, the program specific section of this plan for the Division.

### **C. who have been unserved or underserved by the VR program;**

According to the latest Comprehensive Statewide Needs Assessment, the most common themes that emerged in this area based on the perceptions of respondents were:

- In general, a case can be made that individuals living in rural areas, with less access to services, support, training and education are underserved.
- Language and culture are barriers to certain populations accessing services or seeking employment, including a growing refugee population in parts of Idaho. Translation services are not readily available.
- Native American tribes live in isolated locales in Idaho with limited employment options.
- IDVR has increased outreach efforts and coordination with partner agencies; however, there is a continued need for outreach to potentially unserved populations.
- Ex-offenders with a high rate of substance abuse issues require services from multiple agencies and face resistance from the employment community.

The WIOA Advisory Group has specifically identified rural service provision a traditionally underserved area to address in II.c.1 of this plan.

The Division utilizes telephone based translation services when possible to bridge language barriers presented by Idaho's growing refugee population.

The outreach activities targeted toward Idaho's refugee and minority populations are detailed in section o of the program specific section of this plan for the Division.

While the perception is listed in the CSNA that Idaho's tribes are underserved, the latest available statistics indicated this population is slightly overserved, however these data should be interpreted with caution as estimates of error can skew these results. The Division notes that the intersection of rural service provision and tribal affiliation can present substantial barriers to obtaining employment in these rural communities, and will continue to view this population as underserved. IDVR will continue outreach efforts accordingly for this population.

The Division will continue to strengthen partnerships with entities in the workforce development system to reach populations of interest such as youth.

The Division already co-locates with the Idaho Department of Correction, including the Idaho Department of Juvenile Corrections through a series of cooperative agreements and will continue to engage with these entities to further efforts to reach youth and adults in the corrections system across Idaho.

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

The WIOA Advisory group has identified a number of core issues to tackle regarding partner collaboration and coordination of service delivery across programs (e.g. business engagement).

Meetings at the local-area level are ongoing including all core partner agencies and numerous One-Stop partners to determine and further strategies for common intake, reducing duplication of efforts and potential increased levels of co-location. These meetings will help inform a better understanding of the needs of individuals with disabilities served by agencies external to VR in the One-Stop system. The WIOA Advisory group, in collaboration with the Workforce Development Council's One-stop Committee will engage in a series of meetings to identify common and unique strategies which are working at local-area levels. The Administrator of IDVR currently heads the WDC's One-stop Committee.

**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 percentage of Idahoans who experience disability varies significantly by age. While this variance can be attributed to a number of factors, in general this rate increases over time with substantial increases both early in life as congenital disabilities are initially identified, and later in life as disabilities are acquired through events or emerge due to the natural aging process. Only 5.4% of individuals aged 5-17 experience disability compared to 11.4% for those aged 18-64, and 36.7% of those ages 65 or more.

Idaho has a higher percentage of workers aged 24 and younger than the nation as a whole, this is historically reflected in the percentage of transition age youth served by IDVR. Students and youth under 25 represented 34.5% of all new cases in FY 2017.

The Division has conducted a targeted statewide needs assessment, in part, to gauge the specific needs of students and youth with disabilities:

While the most recent CSNA did provide some foundational information regarding the needs of youth and students, IDVR is interested in learning more about the needs of this population and intends to conduct further assessment as it specifically relates to Pre-employment transition services. The Division will increase our efforts to deliver services to students with disabilities in response to WIOA mandates. The Division's proposed activities to address Pre-ETS is detailed in section o of this plan.

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

The 2018 CSNA summarizes results in section 6 of the document "Need to Establish, Develop or Improve Community Rehabilitation Programs in Idaho", the most common themes that emerged in this area were:

- There are varying levels of service quality delivered by CRPs.
- There is minimal standardized training for CRP staff.
- CRPs are faced with high turnover and this instability of staff affects the quality of services.
- The perception is that low pay of many CRP staff is the major cause of turnover.

- The quality of job coaches is highly questionable. Many have little more in the way of credentials than a high school diploma.
- There is a need for more effective and standardized quality assurance monitoring and evaluation of CRPs.
- CRPs have a questionable capacity to serve individuals with language barriers.
- There is a need for increased communication between VR and CRPs to gain clarity on expectations and coordination of services.
- CRPs should devote more time in training individuals with disabilities on life skills such as hygiene, budgeting, etc.
- Facility-based CRP services are perceived as less effective than those that offer community-based services.
- VR contracts with specific CRPs in each locale are often perceived by field staff as limiting options for counselors and individuals with disabilities.

There are two primary areas where needs are present to establish, develop, or improve CRPs within the state of Idaho:

1. Meeting the need of emerging/novel requirements of WIOA and expanding the statewide capacity of CRPs to deliver these services with fidelity (e.g. Customized Employment, Pre-ETS and similar services to youth, Youth Extended Services).
2. Monitoring and improving Community Rehabilitation Program performance through a collaborative iterative learning process.

The continuous improvement of CRPs is an ongoing function of IDVR: The establishment, development and improvement of CRPs within the state fall under the purview of IDVR's Planning and Evaluation team. One of P&E's responsibilities within the agency is a comprehensive CRP monitoring process. This process seeks to provide an initial threshold of quality for new CRPs who wish to serve IDVR consumers, provides a maintenance function in retaining a base level quality standard, and a remediation process for CRPs who fall short of standards via a three-year site review process.

IDVR's current goals and priorities address the need based on strategies jointly agreed to by IDVR and the SRC and can be found as Goal 2, Priority 7 in section I of the VR services portion of this combined state plan.

**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 .**

The Idaho State Department of Education provided the following information: 6,822 Idaho Special Education Students ages 15-21 have an Individualized Education Plan. No data was available for students covered under Section 504 of the Rehabilitation Act of 1973, as amended. The latest stratified age data was from FFY 2014.

Idaho uses 15 as the introductory age for engagement with Title IV State Vocational Rehabilitation programs.

## **Overview**

Preliminary data from this CSNA (published 2018) for program years 2015-2017 has been incorporated into this forecast. To complement this CSNA data, and to develop and implement Pre-ETS across Idaho, IDVR's Transition Coordinator engaged in the following needs assessment related activities:

### **WIOA Pre-ETS Needs Assessment Year 1**

The Transition Coordinator employed a multifaceted approach for determining the need for pre-employment transition services in Idaho. Initially the Transition Coordinator visited with numerous Local Education Agencies (LEAs) in all eight administrative regions. These visits included an assessment to determine what transition services were currently being provided by the LEA, and to determine the need for additional pre-employment transition services. During these visits, the Transition Coordinator also provided technical assistance regarding changes to WIOA.

While making LEA visits the Transition Coordinator also met with VR staff to provide updates regarding pre-employment transition services, to brainstorm the needs for the region, and to discuss ways to assist the staff in the implementation of these services.

Using the assessment information provided by the LEAs and Regional VR staff, the Transition Coordinator developed statewide programs based on the evidence-based predictors that lead to increased postsecondary success in education and employment, and were aligned to the five authorized Pre-ETS categories. The Transition Coordinator also worked with LEAs, institutions of higher education, state and federal programs serving students, and employers to enhance pre-employment transition services provided around the state.

### **WIOA Pre-ETS Assessment Year 2**

Following program implementation, the Transition Coordinator assessed and evaluated the effectiveness of service provision of pre-employment transition services. The Transition Coordinator identified service delivery gaps and facilitated the systematic development of innovative strategies for improvement. LEAs and regional VR staff were again asked to assess the current state of Pre-ETS service delivery. The provision of pre-employment transition services was modified based on these assessments. The number of programs and number of slots available for students in each program were determined through collection of stated needs for additional pre-employment transition services in each region.

The Transition Coordinator identified effective marketing strategies and developed materials to reach students and youth in transition and school district personnel to inform parents, educators, administrators, and others about the Vocational Rehabilitation program. The coordinator collected and disseminated information and materials that fosters best practices among counselors who serve transition customers as well as potentially eligible students. Materials include various brochures for each program and a newly designed website directed to students. You can view the website at: <https://vr.idaho.gov/site/students>.

The 2018 CSNA highlights perceived barriers to achieving employment for students in transition as viewed from internal and external stakeholder perspectives. While all reported barriers to employment should be considered, the surveys highlighted common themes across both stakeholder groups including:

- Little to no work experience
- Not having job skills
- Not having education or training
- Poor social skills
- Transportation issues (accessing training/education programs)

While Pre-ETS required activities can address the first four barriers, lack of access to transition services in rural areas is being addressed, in part, through the creation of online, self-paced modules targeted toward Pre-ETS participants.

### **Demonstration of the Availability of Required Services**

The five required Pre-ETS services are provided statewide to eligible and potentially eligible students across Idaho.

Over the past two years, regional contracts for services are allocated based on needs and projected goals as determined by IDVR's Transition Coordinator. Furthermore, projections for need are refined by actual service utilization, continued conversations with LEAs and any unique issues experienced during or as a result of the launch of these initiatives (e.g., a late launch of WIOA year one summer Pre-ETS experiences negatively impacted utilization of those services due to a lack of marketing ahead of time).

The provision and evaluation of various Pre-ETS activities are ongoing. The most recent CSNA results are preliminary; therefore the Division is currently highly reliant on feedback from field staff to determine that the need for Pre-ETS has been addressed. As a result, IDVR anticipates increased utilization of Pre-ETS moving into PY 2017.

It is difficult to estimate the anticipated increase in the utilization of the required Pre-ETS: First, initial launch programs are currently being evaluated, modified, or supplanted. Second, solid baselines for student utilization of services do not yet exist: as marketing efforts take root, knowledge of an interest in Pre-ETS programs will expand.

Strategies surrounding transition services and Pre-ETS are covered in more depth in section o of this plan.

The Idaho Division of Vocational Rehabilitation is an agency of the Idaho State Board of Education and partners with other agencies under the Board through coordination and collaboration.

IDVR has strong relationships with Education agencies throughout the state, including formal interagency agreements with a number of Local Education Agencies (LEAs), a comprehensive formal interagency agreement which addresses collaborative service provision with the State

Department of Education (SDE), and the Idaho Commission for Blind and Visually Impaired (ICBVI).

IDVR and the SDE have developed a comprehensive formal interagency agreement which addresses collaborative service provision. This agreement specifies the programmatic and fiscal responsibilities for each agency. LEAs provide different transition services to students with disabilities for various reasons, adequate funding being one of the major reasons. Therefore, the Division needs to understand the types of transition services that are currently provided by each LEA in order to determine what Pre-ETS activities should be considered for students with disabilities at the LEA level. As a result that need, IDVR is coordinating with educational officials and other state agencies to provide a Transition Institute in the fall of 2018.

Districts will bring teams, that will include a VR Counselor to the Institute to develop specific goal directed plans based on district data to improve Pre-ETS and transition focused education based on district need. This will provide IDVR with the specific criteria to determine which agency (IDVR or LEA) has primary responsibility for providing and paying for transition related services for students with disabilities as well as what additional Pre-ETS should be targeted to each LEA.

Lastly, IDVR has partnered with the SDE to implement a Statewide Secondary Transition Plan which correlates to the Division's Pre-Employment Transition Plan. The goal on the statewide plan is to develop systems for effective collaboration between students, families secondary and post-secondary educators, rehabilitation counselors, and service providers to evaluate the quality and quantity of transition activities and pre-employment transition services.

## **k. Annual Estimates**

(Formerly known as Attachment 4.11(b)). Describe:

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

This estimate includes the number of the individuals in Idaho who are eligible for services which includes those individuals eligible and those individuals receiving services under an IPE, but does not include those in employed status as the majority are not actively receiving services.

Number Served by Program Year (PY)

PY 2014 - 11060

PY 2015 - 11122 (No increase)

PY 2016 - 10578 (4.9% year over year decrease)

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

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

IDVR believes it will be difficult to determine the impact of WIOA on number served without baseline data. While the Division is committed to extending services to all eligible individuals, new provisions including services to 'potentially eligible' groups and pre-employment transition service requirements will both (1) diminish overall funds available to individuals categorized as 'eligible' and (2) fundamentally shift the way IDVR spends more than 15 percent of program

funds. As data become available under the new conditions of WIOA, the Division will increase its confidence in reporting these numbers.

The number of customers served by IDVR is diminishing. Historic rates of unemployment across Idaho and new mandates created by WIOA are likely factors in this recent downturn. The Division estimates that a projected range of 9,500-10,500 individuals to be served for FFY 2019 is reasonable if labor market conditions persist. Future projections will tighten as the Division continues to understand how these numbers are impacted by the actual conditions of WIOA.

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

The Supported Employment program currently lacks funding from Congress, and is not anticipated to return anytime soon. Therefore the Division feels that a range of 0 is reasonable for an FFY 2019 projection. The Division will continue to provide Supported Employment Services and Youth Extended Services utilizing general VR funds.

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

IDVR is not operating under an Order of Selection. IDVR will continue to monitor fiscal conditions as impacted by WIOA to determine whether or not an Order should be established and/or implemented. IDVR currently operates three-tier significance of disability scale in line with Federal ND, SD, and MSD reporting guidelines.

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

N/A

**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.**

IDVR has seen service volumes diminish while service costs per customer continue to increase. This increase in cost, coupled with the redistribution of funds for Pre-ETS could accelerate the need to implement an Order of Selection in Idaho.

**Annual Estimate of Individuals to Be Served and Cost of Services:** The estimated number of all customers who are eligible for services under this State Plan: 5,966. IDVR is not in an order of selection.

**Table VR.2: Annual Estimate of Individuals to Be Served and Cost of Services**

Category	Title I or Title VI Funds	Estimated Number to be Served	Average Cost of Services
Title I Part B	\$9,200,000	5966	\$1542
Title VI Part B	\$0	0	\$1454
Totals	\$9,200,000	5966	\$1542

## **I. State Goals and Priorities**

The designated State unit must:

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

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

IDVR and the State Rehabilitation Council (SRC) revised/modified the goals and priorities based on the recently completed Comprehensive Statewide Needs Assessment (CSNA). New program goals and priorities reflect and align with program changes resulting from WIOA, the results from the latest CSNA, and the goals and strategies of the combined state plan.

IDVR, in collaboration with the SRC, will continue to develop specific strategies that are in alignment with these goals and priorities.

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

The goals and priorities for the Division are reviewed annually and revised as necessary based on input from a variety of sources including the SRC, combined plan partners, the State Independent Living Council (SILC), the Client Advocacy Program (CAP), Tribal VR representatives, findings and recommendations from monitoring activities conducted under Section 107, and the IDVR management team, including management at the regional level. Additionally, the goals and priorities are informed by the Comprehensive Statewide Needs Assessment (CSNA) which is conducted every three years.

#### **Goal 1 - Provide quality, relevant, individualized vocational rehabilitation services to individuals with disabilities to maximize their career potential**

Priority 1 - Expand, monitor, and improve pre-employment transition services (Pre-ETS) to students with disabilities and similar services to youth.

Priority 2 - Provide a comprehensive array of services to individuals with disabilities, including individuals with Most Significant Disabilities (MSD).

Priority 3 - Hire and retain qualified staff to deliver quality vocational rehabilitation services.

Priority 4 - Improve usage of Labor Market Information/Career Pathways to inform customer career choice.

#### **Goal 2 - Improve VR program efficiency through continuous quality improvement activities**

Priority 1 - Meet or exceed negotiated targets on Primary Performance Indicators 1-5 established by the US Department of Education, Rehabilitation Services Administration.

Priority 2 - Revise IDVR's Customer Satisfaction Survey in collaboration with the State Rehabilitation Council to increase the response rate, retention rate, and overall satisfaction rate.



Priority 3 - Maximize the utilization of comparable benefits.

Priority 4 - Increase IDVR integration with the workforce development system.

Priority 5 - Evaluate IDVR assessment expenditures.

Priority 6 - Revise internal case review process to align with WIOA requirements, and inform the continuous quality improvement cycle.

Priority 7 - Collaborate with Community Rehabilitation Program partners to improve the quality of services.

Priority 8 - Evaluate Customer Access to Services

### **Goal 3 - Meet the needs of Idaho businesses**

Priority 1 - IDVR to be recognized by the business community as the disability experts in the workforce system.

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

Discussion of how the goals and priorities were informed by an analysis of the following areas are broken down in the subsequent content area subdivisions:

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

IDVR's current CSNA was published in Winter 2018 and has been modified to include the needs of youth with disabilities in transition, which is required under WIOA.

The Division's newly modified goals and priorities reflect those areas where the Division plans to focus efforts for improvement. The Division worked closely with Idaho's State Rehabilitation Council to take former goals and priorities under WIA, evaluate their fit under WIOA, all while using the results of the latest Comprehensive Statewide Needs Assessment, and have updated these goals and priorities with language that meets the direction provided by the SRC and the mandates of WIOA

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

Title IV Vocational Rehabilitation programs are using a phased-in approach to set levels of performance for all primary performance indicators under this Combined State Plan. RSA-TAC-18-01 released January 18, 2018 provides guidance on the requirements for these indicators for PYs 2018 and 2019, noting that the same required levels of performance for PYs 2016 and 2017 be used. The level of performance for PYs 2016 and 2017 were baseline therefore baseline levels of performance will continue to be collected for PYs 2018 and 2019 to be used in

establishing initial levels of performance for future negotiation. As a result, no performance levels are being reported for the following Primary Performance Indicators:

- Employment in the 2<sup>nd</sup> quarter
- Employment in the 4<sup>th</sup> quarter
- Median earnings
- Credential attainment
- Measurable skill gains
- Effectiveness in serving employers.

The Division has updated our data sharing agreement and is prepared to report on these figures once required by RSA. Additionally, IDVR has presented a request to Idaho's Data Management Council to gain access to Idaho's Statewide Longitudinal Data System in order to pull education related data elements that will allow IDVR to better understand what factors promote quality sustained competitive integrated employment.

The Division will continue to collect and analyze data to inform initial baseline thresholds to establish levels of performance to use for future negotiations with RSA.

**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.**

IDVR's last monitoring report was conducted in 2010. The issues identified in this report were addressed and bear no relationship to the goals and priorities identified in this plan outside of the Division continuing to expand its continuous improvement activities.

## **m. Order of Selection**

Describe:

**1. Whether the designated State unit will implement and order of selection. If so, describe:**

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

IDVR is not currently in order of selection.

**B. The justification for the order.**

IDVR is not currently in order of selection.

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

IDVR is not currently in order of selection.

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

IDVR is not currently in order of selection.

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

IDVR is not currently in order of selection.

**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.**

IDVR is not currently in order of selection.

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

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

IDVR received \$0 in Title VI, Part B funds to date in FFY 2018. Formerly, these funds were distributed in case service allotments to all IDVR regional offices to fund supported employment services under individualized plans for employment (IPE's). IDVR focused Title VI, Part B funds on direct case service provision including Youth Extended Services, and job coaching.

The Division will continue to provide these services under general Title I funds,

Since this population is by definition MSD they would also continue to receive services, even in the event that IDVR implemented an Order of Selection, unless Order were expanded to temporarily suspend services to part or all of the MSD population. No existing fiscal projection would indicate this action.

**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**

If title IV part B funds are reinstated, the following assurances would remain in effect:

IDVR reserves 50 percent of title VI part B funds for the provision of Supported Employment and Extended Services to youth. Any remaining funds can be used for the provision of Supported Employment services for adults, however IDVR's expenditures on SE services far outstrips the funds formerly allocated under title VI part B. The Division would not anticipate any problems expending these funds as authorized, if the allotment were reinstated.

The Division has developed policies to ensure that Youth Extended Services can be provided up to 4 years as needed for individuals under the age of 25 following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. The Division will continue to support YES with title I funds, as required by WIOA, and will continue to leverage other sources of extended services.

**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.**

The Division advocated for an increase of \$340,000 in state general funds for an exclusively state funded Extended Employment Services (EES) program. The Division's request for an additional \$340,000 in state general funds for the EES program was unanimously approved by the Joint Finance Appropriations Committee, and has passed through both chambers of the Idaho legislature and since the last combined state plan update, has been approved by the governor. This reduces the EES waitlist by approximately 80 participants. Since IDVR is the only source of referral to the EES program, this advocacy by the Division resulted in a direct increase in available funds for extended services delivered by an external program for youth and adults.

IDVR utilizes the State's Extended Employment Services program as well as the Medicaid Home and Community-Based Services waivers for long term support. The Division has been working closely with HCBS to streamline our referral process and improve utilization of this external source of extended services funding.

## **o. State's Strategies**

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

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

IDVR maintains the two primary innovation and expansion activities, supporting the activities of both the State Rehabilitation Council (SRC) and the State Independent Living Council (SILC). Additionally, IDVR in FFY 2018 will continue limited pilot projects under Pre-ETS while continuing to monitor and refine those programs now being offered at a statewide level. Furthermore, the Division has launched a Customized Employment (CE) pilot project with the aim of increasing the capacity of the state to deliver CE services with fidelity and seeks to expand CE offerings statewide following the conclusion of pilot activities. The Division will work closely with the SRC to identify further innovation and expansion activities which align with the goals and priorities outlined in WIOA.

The expansion, provision, and evaluation of various Pre-ETS activities are ongoing. Continued collaboration with the SDE and LEAs alongside feedback from customers and parents/guardians when applicable are instrumental in better understanding which services should be continued, modified, or ended. Activities like the Transition Institute will bring these stakeholders together and allow for the collection of rich qualitative data to further inform improvements to these services.

### **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.**

IDVR is committed to expanding the availability and provision of Assistive Technology. The Division has an ongoing partnership with the Idaho Assistive Technology Project (IATP)

administered by the Center on Disabilities and Human Development at the University of Idaho. Through this partnership IATP provides continuing education and technical assistance to IDVR personnel via face to face and distance methods. An IDVR staff member maintains representation on IATP's advisory board.

Current challenges to meet this need include the procurement of devices that students with disabilities have used through IDEA entitlements. The Division has an agreement as of FFY 2015 with the Idaho State Department of Education (SDE) outlining shared responsibilities and implementing a program which:

- Allows IDVR to purchase some AT devices at 50% of original cost from individual school districts, keeping familiar assistive technology in the hands of transitioning students.
- Shares responsibilities with the SDE where IDVR will purchase vocationally relevant AT for students with an IPE. Per WIOA guidance, the SDE retains responsibility for providing AT they have traditionally had the responsibility for.

IDVR is in the process of updating this agreement for PY 2018.

Additional AT resources for staff training include the Idaho Training Clearinghouse, which hosts multiple resources and is funded by SDE's Special Education Division.

IDVR has provided counselors who serve deaf and hard of hearing customers with the AT needed to enhance communication.

### **3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.**

IDVR is trending toward a ratio of minority service rate to non-minority service rate of 1.00. Significant gains in service outreach, an emphasis on accurate coding of race and ethnicity status, and Pre-ETS expansion and outreach have raised the current (PY 2018) ratio to .942, up from .921 in FFY 2017 and .891 in FFY 2016.

The Hispanic population is by far Idaho's largest minority group at 12.0 percent and represents 10.1 percent of the population served by the division in PY 2017 to date. This is contrast with the corresponding figures of 11.7 percent and 7.4 percent two years ago. The second largest minority population, American Indian/Alaska Native (AI/AN), is currently overserved by the division: AI/AN represents 2.4% of Idaho's population and 3.8 percent of IDVR cases. Individuals of Black or African American descent are also overserved representing 1.1 percent of Idaho's population, and 2.2 percent of IDVR cases to date in PY 2017. Asian and Native Hawaiian/Pacific Islanders are underserved categories, but service rates are within one percent of population estimates for both races.

Idaho's demographics are changing, and Idaho was the fastest growing state by percentage in the United States in 2017, experiencing 2.2% annual growth. Idaho is a major state for resettlement and has experienced a significant influx of refugees in Regions 3, 4, 7 and 8. In order to best

understand the needs of this population, IDVR conducts joint staff training in conjunction with the Agency for New American's. IDVR works maintains regular contact and outreach with staff at the International Rescue Committee refugee organization and all three resettlement agencies in the Treasure Valley and Magic Valley regions. The Division maintains contact with Family Medicine, a medical provider to newly arrived refugees in the in these regions to coordinate referrals.

Additionally, IDVR conducts ongoing outreach activities to meet the needs of the Spanish speaking population statewide. A number of these individuals engage in migrant seasonal farm work. The Division works collaboratively with IDOL, the Idaho Migrant Council, and the Idaho Division of Hispanic Affairs to identify these individuals and processes to best conduct outreach activities.

The Division conducts various outreach activities to identify and involve individuals with disabilities from underserved backgrounds. These include but are not limited to:

- Monthly Participation in the Amigo Round Table hosted by the Mexican Consulate
- Working with community based mental health programs to identify leads for potential outreach
- Continuing meetings with Boise State University's Hispanic equivalency recruiter
- Meeting with the Idaho Department of Health and Welfare's bilingual staff as well as ongoing meetings with DHW's Targeted Service Coordinators to identify potential referrals
- Collaborating with Idaho Youth Ranch to look at ways of better serving individuals who are minorities
- Participation in the multi-partner Refugee Employment Networking and Training group hosted by the Idaho Department of Labor

IDVR also conducts tribal outreach, per agreement, in conjunction with 121 projects to the four tribes located in Idaho and the substantial American Indian population residing in the Treasure Valley.

IDVR has connected with the ESL coordinator at the College of Western Idaho who disseminates information to VR staff on free English language classes and training opportunities for customers.

IDVR regularly engages with qualified interpreters for a variety of languages to better serve VR clients with limited English proficiency.

#### **4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).**

The expansion, provision, and evaluation of various Pre-ETS activities are ongoing. Continued collaboration with the SDE and LEAs alongside feedback from customers and parents/guardians when applicable are instrumental in better understanding which services should be continued, modified, or ended. Activities like the Transition Institute will bring these stakeholders together

and allow for the collection of rich qualitative data to further inform improvements to these services.

Our Transition Coordinator is working to increase the connections between families, VR, and Local Education Agency (LEAs) to provide comprehensive services to students with disabilities by providing pre-employment transition services (Pre-ETS). The following tasks are currently in progress toward this end:

- Collect and analyze best practices from other states.
- Conduct a series of 24 local meetings statewide to collect information on Pre-ETS gaps.
- Develop and survey LEAs, families, and students on Pre-ETS.
- Collect and analyze data and research on career readiness assessment options.
- Develop “Expectations” informational packet for parents/families.
- Explore collaboration with State Department of Education to update the “Moving On” informational binder for transition students.
- Develop training and technical assistance targeted toward educators, VR counselors, and families.
- Exploring information sharing between LEAs and VR.

Toward these ends, expected outcomes include an increase in student applications to VR, an increase in the number of students participating in work experiences, an increase in the number of students participating in self-determination curriculum with VR, and an increase in parent engagement and involvement in the transition planning process.

The Division’s Pre-ETS implementation strategies will provide services at the following levels:

Three tiers of service:

Tier 1: Universal (Potentially eligible)

Tier 2: Strategic (Individualized Pre-ETS)

Tier 3: Intensive (Formalized VR services)

IDVR is currently exploring a number of potential partnerships and activities related to transition age youth. These include but are not limited to:

Post-secondary partnerships: Feedback thus far to the Division has emphasized the expressed need to engage with 2-year based technical programs. IDVR is currently in discussion with the College of Western Idaho, the College of Southern Idaho, and Eastern Idaho Technical College in addition to 4-year traditional universities across the state.

The Division is developing a summer paid work experience that includes instruction in self-advocacy, job exploration, and counseling.

The Division is working with the Idaho Assistive Technology Project to increase student access to instruction in employment, assistive technology, post-secondary education, and self-advocacy.

The Division is also in talks with Local Education Agency to pilot paid work experience.

In addition, the Division is in talks with fellow core partner, the Idaho Department of Labor to engage in potential cost-sharing across a number of youth and student based programs.

Other potential program partners include:

- Idaho Educational Services for the Deaf and Blind
- Idaho Parent Unlimited to engage in soft-skill development surrounding VSA (formerly known as Very Special Arts program).
- Tailoring a program with the University of Idaho's McCall Outdoor Science School, to provide hands-on STEM based opportunities for students with disabilities in alignment with Pre-ETS required activities.
- The State Department of Education
- Idaho Centers for Independent Living

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

To further develop positive working relationships with Community Rehabilitation Providers (CRPs) and to enhance service delivery for customers, IDVR participates in CRP association meetings.

IDVR is engaged in a structured program evaluation strategy to maintain and improve the quality of services provided to customers through community rehabilitation providers statewide. This strategy is operationalized in a variety of ways:

First, this three-year monitoring cycle begins with an initial accreditation by an outside body to ensure a base level of compliance. IDVR, as needed, works with both recognized accreditation bodies in the State of Idaho, the Commission on Accreditation of Rehabilitation Facilities (CARF) and the Rehabilitation Services Accreditation System (RSAS) to ensure base standards are being evaluated and to customize additional standards or establish areas of focus when needed. All new CRP providers must be certified and approved by the Chief of Field Services prior to the delivery of services to customers. The Division is currently in the process of evaluating potential changes to improve the CRP monitoring cycle and has recently issued draft guidance to better clarify expectations between CRPs and IDVR.

Second, an initial interview is conducted by the IDVR manager in the region served by the CRP. This interview outlines the expectations of the Division and CRP and introduces these programs to the fiscal and programmatic requirements of the Division, as well as ensuring the Division's counselors are aware of the CRPs and services provided in their local areas.

Third, IDVR generates annual CRP employment reports for each vendor who provided services in the past fiscal year. The tool provides information to customers in order to enhance informed choice while they are selecting a CRP. These reports contain aggregated input gathered from counselors, customer satisfaction surveys, and CRPs. Information provided includes number of cases served, employment outcomes, average hourly wage of consumers who exit the program successfully, average hours worked per week per consumer, average annual earnings per consumer, employer sponsored benefit rate of those successful closures, the top five occupational outcome categories, and the primary impairments of those served. Counselors provide this



information in a manner the consumer can understand to help promote informed choice in response to a 107 finding.

Fourth, monitoring is an ongoing process; however, barring significant issues, site visits are conducted every three years and include a structured review of a sample of cases served by the CRP. If significant issues emerge during the three-year cycle, or during the structured review, a corrective action process is then implemented.

Fifth, IDVR engages in open informal communications with CRPs as needed, but invite CRPs to attend two annual meetings to further enhance collaboration. Likewise, IDVR attends the annual meetings held by the two statewide CRP consortia each year.

Sixth, as a function of its consumer satisfaction survey, IDVR collects information on the satisfaction of consumers who received services from CRPs through an enhanced section of the instrument. IDVR is currently revising its Customer Satisfaction Survey to improve response rates and is considering a revision of items gauging CRP performance.

Finally, IDVR is continuing to evaluate a potential revision of the educational requirements CRPs must engage new staff in before they can serve customers.

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

Vocational Rehabilitation programs are using a phased-in approach to set levels of performance for all primary performance indicators under this Combined State Plan. RSA-TAC-18-01 released January 18, 2018 provides guidance on the requirements for these indicators for PYs 2018 and 2019, noting that the same required levels of performance for PYs 2016 and 2017 be used. The level of performance for PYs 2016 and 2017 were baseline therefore baseline levels of performance will continue to be collected for PYs 2018 and 2019 to be used in establishing initial levels of performance for future negotiation. Once an understanding of these baselines emerge, IDVR will be well positioned to develop strategies to improve upon these baseline figures.

The Division has updated our data sharing agreement and is prepared to report on these figures once required by RSA. Additionally, IDVR has presented a request to Idaho's Data Management Council to gain access to Idaho's Statewide Longitudinal Data System in order to pull education related data elements that will allow IDVR to better understand what factors promote quality sustained competitive integrated employment.

The Division will continue to collect and analyze data to inform initial baseline thresholds to establish levels of performance to use for future negotiations with RSA.

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

The WIOA Advisory Group, in conjunction with Division and the Idaho Commission for the Blind and Visually Impaired has agreed that both IDVR and ICBVI will serve as lead agencies in

addressing the continuing education and technical assistance needs of external workforce partners in best serving individuals with disabilities. IDVR and ICBVI will jointly sponsor a yearly needs assessment of workforce partners regarding employment and disability, efforts to launch this initiative will occur in the next two-year plan cycle. Rather than issue a separate needs assessment for FY 2017, the Division and ICBVI each conducted a Comprehensive Statewide Needs Assessment which included surveys of core workforce partners. This collaboration will include the establishment of stand-alone informational products, tailored face-to-face trainings, and informal consultation as needed.

IDVR's administration advocated for and received a position on Idaho's Workforce Development Council (WDC), and IDVR's administrator currently serves as the one-stop chair for the WDC. This appointment followed a major reorganization of the WDC which was mandated by the Governor's Executive Order.

Maximization of External Resource Utilization: IDVR in concert with other workforce partners and through the WIOA Advisory Group will be discussing the potential for common intake and appropriate referral in order to reduce duplication of services and maximize the array of services people with disabilities can leverage.

The Division will coordinate activities with mandatory One-Stop partners by sharing program contact information, eligibility criteria, and training on program services and mission. The Division will maximize services to individuals with disabilities through increased collaboration and integrated service delivery with various partners in One-Stop centers. Comprehensive information and training will be provided to outside organizations such as, the Department of Mental Health and Welfare's Division of Behavioral Health, School to Work Transition, American Indian Vocational Rehabilitation Services, Centers for Independent Living, and the Idaho Department of Correction. Participants will be encouraged to co-enroll in applicable services at the local One-Stop to ensure participants can benefit from the full range of services available to them.

The Division has partnered with Live Better Idaho (LBI) (<https://www.livebetteridaho.org/>), a virtual portal which "connects service providers with Idahoans seeking those services." This website, exclusively funded by the Idaho Department of Health and Welfare, is an 'agency agnostic' service which is offered to public and private providers of services and connects Idahoans in need to relevant services by matching individuals with programs they may qualify for. The tool is localized and customized, connecting users to services that are relevant and available in their local areas.

IDVR has created a presence on LBI to connect potential customers to Vocational Rehabilitation. The tool can help connect rural Idahoans to locally available resources, including VR, and expands the range of options youth can use to find appropriate employment programs.

IDVR staff have been trained on LBI and can use it with customers to explore other complimentary programs which may offer specific funding in areas of need, reducing direct IDVR expenditures, and program redundancy while increasing overall collaboration with partners external to WIOA.

Efforts continue to find an approach to identify co-enrollees in various program while services are still being conducted. Idaho does have a mechanism to identify co-enrollees, but this is currently a lagging mechanism and the state could increase efficiency and utility by identifying these individuals that are co-enrolled at intake, or find a way to exchange this level of information in real time.

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

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

The agency's goals and priorities have been outline in section (l): state goals and priorities. This section (o) has addressed the program specific strategies to achieve the goals and priorities and related these back to the CSNA and other data sources to support these arguments. This information in concert with the initiatives laid out in the combined plan operational elements iii.a precisely addresses how the State will approach these priorities.

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

The Division's strategies to support innovation and expansion activities have been outlined above in section (o)(1).

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

The 2018 IDVR CSNA reported that the Division has improved its outreach services to unserved, underserved and minority populations.

IDVR is trending toward a ratio of minority service rate to non-minority service rate of 1.00. Significant gains in service outreach, an emphasis on accurate coding of race and ethnicity status, and Pre-ETS expansion and outreach have raised the current (PY 2018) ratio to .942, up from .921 in FFY 2017 and .891 in FFY 2016.

Staff recommendation to improve services contained in the CSNA indicated the next focus should be on transition age youth. Sections (o)(3) and (o) (4) of IDVR's program specific strategies (contained above) further elaborate on how the Division will address equitable access and participation as it relates to this section.

By reducing actual funding for the State VR Services Program to zero, Congress has effectively imposed equitable access to that program.

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

Describe:

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

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

Goal 1: To provide excellent customer service to individuals with disabilities while they prepare to obtain, maintain, or regain competitive integrated employment and long term supported employment.

Priority 1: Provide customers with effective job supports, including adequate job preparedness and training, to increase employment stability and retention.

IDVR's first benchmark for this priority is successful rehabilitations. The Division has realized an 11% year-over-year increase in successful rehabilitations in FFY 2015.

IDVR's second benchmark is hourly wage. Hourly wages for each quarter in FFY 2015 were higher than those reported in FFY 2014.

The Division's third benchmark, workforce development opportunities, realized both successes and challenges over FFY 2015; while feedback from the WorkStrides sessions was overwhelmingly positive, enrollment suffered. During the 3rd quarter of FFY 2015 five customer workshops were held throughout the state. IDVR is in the early stages of assessing the future delivery of WorkStrides workshops for customers. Managers were surveyed to obtain information related to the effectiveness, capacity, and challenges of delivering these workshops. More evaluation over the next several months is necessary to determine if possible changes/improvements are warranted.

During the 4<sup>th</sup> quarter of FFY 2015 three WorkStrides workshops were held throughout the state and two modified Teen workshops were held in the Treasure Valley. The curriculums for the two student workshops were developed by VR staff and focused on youth needs and activities. Both Teen workshops were well attended (total of 30 attendees) and well received by the participants. In August a video conference was held with regional managers and interested staff to further assess WorkStrides. The consensus from the meeting was that the regions wanted the opportunity to utilize a workshop curriculum that best fit the unique needs of their region and that the workshops would be better attended if they were condensed into a shorter timeframe. Each region has been tasked with determining their own curriculum and schedule. The regions do have the option of continuing with the WorkStrides curriculum if it best fits their needs. The first workshops will be scheduled during the first quarter of FFY 2016.

Priority 2: Increase employment successes for transition age youth.

IDVR's first benchmark for transition success is the number of successful rehabilitations in the transition age population. These increased slightly from 546 in FFY 2014 to 576 in FFY 2015, representing a 5.5% increase however this is lower than the increase in overall rehabilitation rate of 11%.

The Division's second benchmark for this priority is the number of new transition age youth applications. These increased 9.1% in FFY 2015. The Division anticipates a far greater increase as a result of Pre-ETS expenditures in FFY 2016.

Additional efforts to address this goal include the hiring of a Transition Coordinator to assist with the coordination of Pre-ETS. IDVR is currently conducting a review of various programs across the nation and incorporating a series of new initiatives to address this goal and new federal spending requirements.

Priority 3: To increase customer engagement in the VR process.

Benchmark one for priority three is the number of first-time plans written. First time plans increased 9.6% in FFY 2015. The second benchmark on this priority is the rehabilitation rate which rose from 58.47% to 61.97%.

Priority 4: Offer benefit planning to all customer receiving SSI and/or SSDI entering, during and exiting the IDVR process to include Partnership Plus.

IDVR has made progress toward this priority, however more needs to be done.

WIPA referrals, one of IDVR's benchmarks to meet this priority realized a year over year increase of 40% from FFY 2014-2015. A second benchmark, Social Security reimbursements to VR is difficult to compare due to large fluctuations in the dates cost reimbursements are processed. SSA has developed a new processing system and hopes to phase-in all programs soon. This will make for a more legitimate benchmark as SSA will conduct payment requests in a timelier manner.

IDVR's primary WIPA partner, Disability Rights of Idaho (DRI) did not reapply to administer WIPA in Idaho, consequently we have fewer in state resources to draw from for benefits planning. Montana State University - Billings is now the lead agency for WIPA referrals. DRI has agreed to provide information on Idaho's context to MSU. In the Treasure Valley, Living Independence Network Corporation (LINC) provides benefits counseling in their designated geographical locale.

Goal 2: To provide organizational excellence within the agency.

Priority 1: Increase the focus on customer service within the IDVR delivery system.

Customer service has been measured, in part, through results of the Customer Satisfaction Survey (CSS). While this benchmark had dropped to 80.88% in the 3<sup>rd</sup> quarter of FFY 2015, year-end numbers returned to 87.61%. There is general consensus in the Planning and Evaluation Unit that the CSS process needs to be revisited, the capacity to do so has been lacking.

Priority 2: To comply with State and Federal regulations.

IDVR has not met this benchmark as there have been audit findings resulting from previous FFYs, both financial in nature.

Additionally, a single audit was completed in SY 2014 (7/1/2013-6/30/2014) identifying one financial finding, lack of appropriate certification for a financial report. Corrective procedures have been implemented to prevent this from occurring in the future.

Priority 3: Utilize training to its maximum capacity for effective staff performance.

IDVR continues to provide staff training on policy and procedure changes, however 2015 saw many proposed changes due to WIOA. We will continue to inform staff of WIOA changes relating to performance accountability standards as regulations and sub-regulatory guidance are issued.

Priority 4: Maintain a comprehensive system of personnel development (CSPD) standard for IDVR counselors.

All VRC positions are compliant with CSPD standards. VRS positions that require a current CSPD plan are on track to complete CSPD requirements within the designated timeframe. With the more relaxed requirements for qualified personnel under WIOA, IDVR is in the process of expanding the definition of qualified rehabilitation professional in Idaho to include licensed clinical social worker.

Goal 3: To strengthen relationships with stakeholders engaged in the mission of Vocational Rehabilitation.

Priority 1: To be recognized as the expert in the workforce needs of the business community for individuals with disabilities.

First, the Division is working with Human Resources to create and recruit a business relations liaison position. The competencies for the announcement were, in part, derived from technical assistance provided by the Job-Drive Vocational Rehabilitation Technical Assistance Center. IDVR anticipates posting this position in January, 2016. The Division has engaged in initial talks with IDOL to meet the third benchmark, coordinated service delivery, between IDVR and IDOL business specialists.

A second benchmark, to increase the number of different occupational areas hiring IDVR customers has been determined to be an insufficient measure to address the objective. This indicator is not sensitive to, nor does it measure meaningful engagement with Idaho's employers. The Division feels new Section 116 performance measure provide far more relevant indicators to gauge performance toward this goal (e.g. employer services indicator and measureable skills gains).

One priority, establishing a milestones program, had resulted in the launch of a pilot milestones project in IDVR's Region 1. This project did not have the anticipated results (e.g. an increase in successful outcomes, cost-effectiveness) and has been subsequently suspended.

Priority 2 and 3: Provide ongoing opportunities to stakeholders and partners for effective input and feedback in the VR process.

IDVR continues to issue Consumer Satisfaction Surveys to all customers exiting the VR program. To address changes to the state plan resulting from WIOA, the Division will hold an open comment/meeting process across the state in January, concurrent with the open comment period on the Idaho Combined State Plan.

IDVR meets quarterly with members of the State Rehabilitation Council, and additionally engages SRC members when needed outside of these meetings to advise the direction of the Division.

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

Factors that impeded the achievement of goals and priorities are discussed within the narrative of the preceding section (p)(1)(A).

Relevant excerpts from that narrative are included here, but lack the context found in the narrative of the preceding section.

1. WIPA referrals, one of IDVR's benchmarks to meet this priority realized a year over year increase of 40% from FFY 2014-2015. A second benchmark, Social Security reimbursements to

VR is difficult to compare due to large fluctuations in the dates cost reimbursements are processed. SSA has developed a new processing system and hopes to phase-in all programs soon. This will make for a more legitimate benchmark as SSA will conduct payment requests in a timelier manner.

2. IDVR's primary WIPA partner, Disability Rights of Idaho (DRI) did not reapply to administer WIPA in Idaho, consequently we have fewer in state resources to draw from for benefits planning.

3. There is general consensus in the Planning and Evaluation Unit that while the CSS process needs to be revisited, the capacity to do so has been lacking.

4. A second benchmark, to increase the number of different occupational areas hiring IDVR customers has been determined to be an insufficient measure to address the objective. This indicator is not sensitive to, nor does it measure meaningful engagement with Idaho's employers. The Division feels new Section 116 performance measure provide far more relevant indicators to gauge performance toward this goal (e.g. employer services indicator and measureable skills gains).

5. One priority, establishing a milestones program, had resulted in the launch of a pilot milestones project in IDVR's Region 1. This project did not have the anticipated results (e.g. an increase in successful outcomes, cost-effectiveness) and has been subsequently suspended.

## **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.**

Goal: To maintain current levels of supported employment service provision and performance.

IDVR provides supported employment services for eligible customers with the most significant disabilities. IDVR's Title VI, Part B funds have not traditionally covered all necessary expenditures associated with a supported employment strategy for IDVR customers. The Agency has and will continue to supplement Title VI, Part B funds when needed with Title I grant funds.

An ongoing challenge for IDVR is to maintain the current level of funding for long term supports from the legislature. It should also be noted that WIOA has a new financial requirement for Title VI, Part B funds. IDVR is required to set aside 50% of these funds for service provision to youth with disabilities and provide a 10% state match to these funds. This could impact the Division's goal to maintain current levels of supported employment service provision and performance.

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

An ongoing challenge for IDVR is to maintain the current level of funding for long term supports from the legislature.

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

IDVR is now gathering baseline data from which to determine whether performance is degrading, maintaining or improving per section 116 standards. Once an understanding of these

baselines emerge, IDVR will be well positioned to develop strategies to improve upon these baseline figures.

The Division continues working with core partner agencies to establish the open exchange of information which surround these performance measures, and will be positioned to predict and establish baselines for negotiation with RSA based upon this data. However, since the core group of people continues to fundamentally shift as we operationalize WIOA requirements, the error introduced into these predictions is unknown, but is diminishing over time.

This plan is filed at a transitional period for standards and indicators in vocational rehabilitation.

Section 116 of WIOA establishes six new performance indicators to align these measures across numerous programs in the state. IDVR has not traditionally reported these measures as defined. This in concert with fundamental changes in Pre-ETS service provision further confound the Division's ability to accurately forecast targets for negotiated performance. Furthermore, many of these data elements remain undefined. That said, IDVR has made progress toward establishing baseline targets for a number of these indicators. Current data sharing agreements are not adequate to gather the level of information necessary to establish baseline targets. The Division is currently working on a new array of agreements to ensure the requirements of partner agencies are met.

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

IDVR provided funding support for the State Rehabilitation Council expenditures including travel, lodging, supplies, meeting room rentals, interpreters when necessary, facilitation services.

**Cost: \$23,162**

Funding support for the State Independent Living Council (SILC) was allocated out of Innovation and Expansion funds. Title I funds were used to support the SILC to cover the costs of salary and benefits costs of their fiscal specialist.

**Cost: \$46,510**

#### **q. Quality, Scope, and Extent of Supported Employment Services.**

Include the following:

##### **1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.**

The Idaho Division of Vocational Rehabilitation (IDVR) provides the full scope of Supported Employment Services (SE) to those Vocational Rehabilitation (VR) eligible customers with the most significant disabilities, who require extended services to maintain employment.

Supported Employment Services include the following:

Job development and placement into competitive, community integrated employment. Traditional time—limited services needed to include job coaching and communication with the employers, to support the training in employment.



Any other service that would be identified as requisite to the targeted supported employment outcome.

Each customer's IPE describes the timing of the transition into extended services, which is to be provided by the long-term support provider following the termination of time-limited services by IDVR.

Fifty percent of the Title VI—B (Supported Employment) grant will be reserved for youth with the most significant disabilities; the Division will set aside a 10% non-federal matching fund to meet the requirement of proposed §363.23. For FFY 2018 this amount will be \$0.

Supported Employment Services are delivered by CRPs throughout the State of Idaho. IDVR's CRP quality assurance process is detailed in section (o)(5) of this plan.

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

WIOA extended the SE time period from 18 to 24 months. The Division has created protocols for and is currently delivering Youth Extended Services (YES) as required by WIOA.

Extended services may be provided to youth with MSD for a period not to exceed four years with the funds reserved under §363.22. SE services for adults shall not exceed 24 months, unless an exception is granted. The Division requires a third-party commitment to designate a long-term support provider. Since 2004, the Extended Employment Services (EES) program has been housed under IDVR and along with Medicaid are the two providers of long-term funding for extended services in Idaho. A supported employment participant may only be transitioned to long term support based on an assessment of rehabilitation goal achievement and job stability. Periodic monitoring occurs to ensure that each customer receiving SE services is making satisfactory progress, including twice-monthly requirements to document progress toward these goals.