

Idaho Division of Vocational Rehabilitation

PY 2016-2019

(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.

(2) the Designated State unit's response to the Council's input and recommendations; and

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

(1) Input Provided by the State Rehabilitation Council

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

The State Plan and Finance Committee reviews state agency expenditures to budget and supports efforts to obtain sufficient revenues to fulfill the mission of IDVR. At the end of each year, the SRC helps the agency review how effectively it performed towards meeting the State Plan goals and its financial performance. The committee will work closely with the Planning and Evaluation Manager and Fiscal Manager in reviewing reports and data that impact the State Plan and fiscal well-being of the agency. The agency continues to provide quarterly written progress reports to the SRC in comparing the agency's financial performance against the budget and compliance with federal regulations. The SRC will continue to develop a depth of understanding of the issues and potential solutions.

The SRC partnered with the Idaho Division of Vocational Rehabilitation (IDVR) in publishing the FFY2015 annual report and elected to use a calendar format. This was well received by various stakeholders.

(2) Designated State Unit Response to the Council's Input and Recommendations

During FFY 2015, the SRC held quarterly meetings per the following dates and locations: October 27, 2014 – Boise, Idaho; February 11, 2015 – Boise, Idaho; May 07, 2015– Boise, Idaho; July 30, 2015 – Lewiston, Idaho.

During FFY 2015 the SRC provided input and made recommendations to IDVR. The following summarizes the State Rehabilitation Council's input and recommendations; response of IDVR; and explanation of input and recommendations.

- 1. SRC Input:** It is suggested that future IDVR and SRC annual reports include customer satisfaction data with a higher emphasis on youth/students, pre-employment transition services, workforce partnerships and connecting with businesses.

IDVR Response: IDVR agrees that a greater level of detail regarding customer satisfaction would be beneficial for program evaluation and improvement efforts and for the annual report. The Planning and Evaluation unit will conduct a more thorough evaluation of the current Customer Satisfaction Survey process and provide more granular results to the SRC and IDVR management regarding these results. This will be a priority for the upcoming year.

- 2. SRC Input:** In the FFY 2013 response to SRC input, IDVR indicated commitment to the implementation of a Business Relations position in FFY 2015 that would serve as a resource to employers statewide. Progress is encouraged in the development of a Business Liaison position to strengthen ties between employers and IDVR, especially for those employers with federal contracts under Section 503 of the Rehabilitation Act.

IDVR Response: IDVR remains committed to hiring a Business Liaison. The goal is to have this position

filled by February/March 2016. IDVR will ensure that this position collaborates with employers who maintain federal contracts. IDVR will inform the SRC of progress related to this position, and employer outreach and engagement efforts.

- 3. SRC Input:** Strategize future public comment meetings regarding what times of day would work best, accessibility of location, and the possibility of doing them electronically or perhaps via video conference.

IDVR Response: IDVR will work with the SRC on continued efforts to increase public engagement regarding the VR program. As part of the public comment process for the VR Services Portion of the Combined State Plan, IDVR intends to hold a statewide teleconference to solicit public comment. Evaluation of this public comment method will help inform the Division regarding future public comment efforts.

(3) the Designated State Unit's explanations for rejecting any of the Council's input or recommendations

IDVR does not reject any of the SRC's input or recommendations.

(b) Request for Waiver of Statewideness

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

- (1) a local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;*
- (2) the designated State unit will approve each proposed service before it is put into effect; and*
- (3) 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 the following entities:

- (1) Federal, State, and local agencies and programs;*
- (2) State programs carried out under section 4 of the Assistive Technology Act of 1998;*
- (3) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;*
- (4) Non-educational agencies serving out-of-school youth; and*
- (5) State use contracting programs.*

(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 a 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 directly 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 maintain cooperative agreements with the four federally funded Tribal VR programs in the state. 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.

IDVR will work with the four Tribal VR programs to update these cooperative agreements to address the requirements of WIOA, specifically to include transition services to students and youth with disabilities.

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.

University of Idaho, College of Education, Department of Leadership and Counseling: IDVR and the University of Idaho (U of I) entered into an agreement to advance the Continuing System of Professional Development (CSPD) for the vocational rehabilitation community of Idaho, in particular the vocational rehabilitation counseling profession. This agreement sets forth the expectations and terms of the partnership to advance the CSPD of Idaho through the only University that provides the vocational rehabilitation counselor program in the state. The vocational rehabilitation counselor program is Administered and delivered through the Leadership and Counseling Department of the College of Education.

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 school 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 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) Non-educational 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) 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.

(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;

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

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

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

The Idaho Division of Vocational Rehabilitation is an agency of the 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), with the State Department of Education (SDE), and the Idaho Commission for Blind and Visually Impaired (ICBVI). In addition to these formal agreements, IDVR has partnered with the SDE to implement a Statewide Secondary Transition Plan which correlates to the Division’s Pre-Employment Transition Plan.

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) currently have a formal cooperative agreement. This 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:

- Roles and responsibilities of each agency, including which agency is state lead
- Financial responsibilities of each agency, including the purchase of Assistive Technology
- Outreach and technical assistance
- Referral process for students with disabilities to the appropriate VR program
- Data release and data sharing

- Planning to include timeframes for development of the IPE
- Service Delivery
- Dispute Resolution
- Training and technical assistance

While comprehensive, the current agreement will be updated to meet the mandatory requirements outlined in WIOA, specifically addressing additional financial criteria to be used to determine which agency is financially responsible for the provision of transition services and the documentation requirements for students who are seeking subminimum wage employment.

Statewide Transition Plan - IDVR, the State Department of Education (SDE), Idaho Parents Unlimited, and Kellogg Schools, a Local Education Agency (LEA), have developed and implemented a statewide secondary Transition Plan with support and assistance from the NSTTAC (National Secondary Transition Technical Assistance Center), now NTACT (National Technical Assistance Center on Transition). The goal of this plan is to increase the connections between families, VR, and LEAs to provide comprehensive services to students with disabilities by providing pre-employment transition services (PETS).

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/advocacy curriculum with VR, and an increase in parent engagement and involvement in the transition planning process.

IDVR Pre-Employment Transition Strategies – IDVR has hired a Transition Coordinator with extensive experience and an established network across Idaho public K-12 education. The Division is developing PETS 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 post-secondary education, workplace readiness training to develop social skills and independent living, and instruction in self-advocacy). The Division will continue to modify and improve these strategies, including the coordinated and authorized services, as service delivery and partnerships evolve. IDVR has numerous pre-employment transition service activities underway, see section o – State’s Strategies for more detailed information.

Idaho Interagency Council on Secondary Transition: In the State of Idaho there is an Interagency Agreement between the Idaho State Department of Education (SDE), Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI). The Interagency Council’s role is to ensure that the secondary transition interagency agreements are coordinated and that the activities the agencies have agreed upon are implemented. 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.

Colleges and Professional Technical Programs in Idaho under the State Board of Education: The cooperative agreements with colleges and universities outline information regarding consultation and technical assistance, roles, responsibilities, including financial responsibilities of each, and procedures for outreach to and identification of students with disabilities who need services. IDVR is working with local institutes of higher education to increase the number of opportunities for students with disabilities to participate in STEM instruction prior to graduation.

(e) Cooperative Agreements with Private Nonprofit Organizations.

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

IDVR does not establish cooperative agreements with private nonprofit vocational rehabilitation service providers, services are purchased on a fee-for-service basis.

To further develop positive working relationships with Community Rehabilitation Providers (CRPs) and to enhance service delivery for customers, IDVR participates in CRP association meetings. Additionally, IDVR holds bi-annual CRP meetings to increase communication with all CRP's; nonprofit, for profit, and those who are unaffiliated with a CRP association.

All new CRP providers must be certified and approved by the Chief of Field Services prior to the delivery of services to customers. All CRP's engaged in the delivery of services with the Division are certified by either the Commission on Accreditation of Rehabilitation Facilities (CARF) or Rehabilitation Services Accreditation System (RSAS). IDVR ensures that accreditation is current.

IDVR policy assures that applicants and eligible customers exercise choice in the selection of service providers. Each region throughout the state provides a comprehensive list of CRP services and expertise available. This, along with some basic CRP performance data, enables the customer to make an informed choice in the selection of a service provider.

IDVR has implemented a CRP monitoring system that evaluates CRP program management and service delivery. This 3 year monitoring, along with accreditation standards, helps to ensure quality of service provision.

(f) Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.

Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment 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, Developmental Disabilities, Adult DD Home and Community Based Services and other appropriate entities to assist in the provision of supported employment services throughout the state.

IDVR manages the Extended Employment Services (EES) program which is funded by appropriations from the state legislature on an annual basis. One full-time employee supports the program and oversees program allocations for eligible participants. Services are delivered by Community Rehabilitation Programs (CRPs) including community supported employment.

IDVR continues to maximize Federal Supported Employment monies through collaborative efforts with other agencies and organizations. IDVR works to ensure that available resources are identified and utilized to increase the availability of services for all customers requiring long-term community supported employment. Included within these collaborative efforts are Medicaid services provided through waiver programs.

IDVR counselors work closely with the state EES program to ensure that eligible individuals are referred and placed on the waiting list to receive long-term community supported employment funding when appropriate. IDVR counselors also assist customers who desire to move from a facility based environment into competitive and community-based supported employment when appropriate.

(g) Coordination with Employers

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

(1) VR Services; and

(2) transition services, including pre-employment transition services, for students and youth with disabilities.

(1) VR Services

IDVR has set aside one FTE to hire a Business Relations Liaison to help meet this new emphasis in WIOA and has collected information from the Job-Driven Vocational Rehabilitation Technical Assistance Center (JDVRTAC) to help inform the competencies required of this position. Additionally, IDVR will take advantage of the JDVRTAC offerings to inform employer engagement efforts. The Division hopes to proceed after the “effectiveness in serving employers” is defined by the US Departments of Education and Labor. IDVR will coordinate business outreach efforts with the Idaho Department of Labor, and their business outreach team.

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

- Work-based learning experiences
- Training employees with disabilities
- Promote awareness of disability-related obstacles
- 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

(2) Transition Services

IDVR has hired a Transition Coordinator with extensive experience and an established network across Idaho public K-12 education system. The Transition Coordinator can provide PETS related training and technical assistance customized for Idaho businesses and coordinate with the Business Relations Liaison to ensure relevant and meaningful interventions are tailored to the needs of businesses, and to address all employer concerns regarding the provision of PETS and work based learning experiences. Employer needs will help inform alignment between PETS and the career pathways/sector strategy outlined in the strategic elements section of Idaho’s combined state plan.

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;

(2) The State agency responsible for providing services for individuals with developmental disabilities; and

(3) the State agency responsible for providing mental health services.

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

(1) The State Medicaid plan under title XIX of the Social Security Act;

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 a 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

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:

(B) Personnel Development. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development:

(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.

(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 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

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

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

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

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

(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.

(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.

(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

Table VR.1: Qualified Personnel

Job Title	Total Positions	Current Vacancies	Projected Vacancies Over the Next 5 years
Qualified Rehabilitations Professionals Vocational Rehabilitation Specialists Vocational Rehabilitation Counselors	72	4	64
Vocational Rehabilitation Assistants	47	1	32
Field Management Staff	8	0	1
HR	1	0	0
Fiscal	5	1	1
IT	5	0	1
Planning and Evaluation	4	0	1
Administrative Assistants	3	0	2
Extended Employment Services	1	0	0
Administrator	1	0	0
Chief of Field Services	1	0	0
IDVR current employs a total of 148 staff. The breakdown of personnel is list 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 1.6 million people, thus a minimum of 80 QRP over the next five years would be required to meet this ratio. IDVR currently has a total of

72 QRP, VRC and VRS, and anticipates needing five additional positions. In addition, two VRA positions 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. In addition, the Division anticipates the creation of a Business Relations Liaison position in FY 2016 to help address the new requirements of WIOA.

(B) Personnel Development. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development

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. Upon graduation, recipients of the scholarships will, in return, agree to work two years for every year 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.

From the current M.Ed./M.S. Rehabilitation Counseling and Human Services Program at the U of I, seven students are expected to graduate from the Boise campus and nine are expected to graduate from the Coeur D'Alene campus in May 2016. The next cohort will begin May of 2016 and they are expecting to have a full capacity of 25 students. It is expected that students who will be graduating in May of 2016 will sit for the CRC exam in the Spring of 2016.

(2) Plan for Recruitment, Preparation and Retention of Qualified Personnel

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, Arkansas State University, Hofstra University, Illinois Institute of Technology, Montana State University, New Mexico Highlands University, Portland State University, San Diego State University, South Dakota State University, Springfield College, Texas Tech University, University of Arizona, University of Arkansas, University of Kentucky, University of Medicine and Dentistry of New Jersey, 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 and the U of I developed an agreement in FFY 2011, to be renewed annually, that outlines the detail of a mutually beneficial partnership. IDVR contributes to the vocational counselor education program in order to ensure a long lasting quality educational program. The U of I Rehabilitation Counseling and Human Services (RCHS) department provides educational opportunities for existing staff and other rehabilitation related organizations and individuals to advance the profession of rehabilitation counseling. Educational opportunities include not only formal university education but activities such as workshops, research projects, and specialty events, summer training conferences in conjunction with the Idaho Chapter of the National Rehabilitation Association, and internship positions within the University structure. Five professional development trainings were held in 2015 on relevant disability-related or rehabilitation issues for IDVR and related rehabilitation professionals to earn CRC CEUs.

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 FFY 2015 unpaid and paid interns were supported. Three interns were hired by IDVR into counseling

positions. 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.

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 FFY 2015 the turnover rate for QRP's was 17%, with the overall turnover rate at 18%. 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

(A) State Standard Requirements

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 new minimum federal requirements for 'Qualified' personnel will be retained.

The VRS with assistance from Regional Manager (RM) and Organizational Development Specialist (ODS) 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 the coursework is completed grades must be submitted to the RM and ODS 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 ODS and send a copy to HR 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 contact your immediate supervisor and/or IDVR's HR department.

IDVR is not obligated and may or may not aid or be financially responsible to the employee for any costs involved in acquiring the needed education/certifications.

IDVR will recognize current standards as outlined in the CRC Certification Guide when determining qualifying degrees, programs, coursework and acceptable employment experience. <http://www.crccertification.com>.

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 testing fee upon verification of achievement of CRC certification.

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

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.

(4) Staff Development

(A) a system of staff development for professionals and paraprofessionals within the designated State unit.

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) 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-V, 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

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 the 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.

(6) Coordination of Personnel Development Under the Individuals with Disabilities Education Act

The Division has created and hired a new Transition Coordinator. 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.

(j) Statewide Assessment

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

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

(B) who are minorities;

(C) who have been unserved or underserved by the VR program;

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

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

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

(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.

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

IDVR published a Comprehensive Statewide Needs Assessment (CSNA) in January 2014. The next CSNA is will be conducted in 2017, however, IDVR intends to conduct a comprehensive statewide needs assessment regarding the provision of pre-employment transition services in PY 2016, as this was not a requirement of the 2014 CSNA.

The number of people with disabilities in Idaho is growing. The ACS (2014) one-year estimates of individuals with disabilities in Idaho increased from 182,264 in 2009 to 204,780 in 2014, representing an increase of 12.4% over five years (Table B18101).

According to data from the American Community Survey, published in the Compendium of Disability Statistics, 13.1% of Idaho civilians living in the community report having a disability, including 11.2% 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 five-years. These estimates are also in line with bordering states with the exception of Utah's rate of 9.5% (the lowest disability percentage in the United States). Rates of reported disability range from the low in Utah of 9.5% to a high of 20.2% in West Virginia. ACS (2007) 1-year estimates suggest 6.3% of working age Idahoans have an 'employment disability'. While eliminated from the ACS questionnaire in 2008, this rate applied to Idaho's current population would suggest a population of individuals who experience difficulty working at just over 102,000.

(A) with the most significant disabilities, including their need for supported employment services

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 2012 the number of Idahoans age 18-64 who received SSDI was 42,382. SSI benefits were received by 19,933 individuals while 6,668 people concurrently received SSI and SSDI during the same period. These 62,315 individuals represent 6.6% of all working age Idahoans.

According to internal data, IDVR took applications on 6,020 cases in FFY 2015 including 914 cases where SSDI benefits were verified and 1052 cases where SSI benefits were verified. This represents a presumptive eligibility rate of 33% at application. The Division anticipates an increase in this rate as PETS 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 91.8% White with no other single race representing over 1.4%. When considering ethnicity, Hispanic or Latino (of any race) is second with 11.7%

Idaho's population is expected to grow by 5.7% between 2014 to 2024, at the same time, Hispanics, the state's largest minority, will grow much faster at 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 interaction with council such as which are further elaborated on in section o, the program specific section of plan for the Division.

(C) who have been unserved or underserved by the VR program

The WIOA Advisory Group has specifically identified rural service provision a traditionally underserved area to address in II.c.1 of this plan. IDVR's current CSNA notes that over 70% of IDVR staff agreed the number and availability of CRPs is adequate to meet the development of customers. Qualitative analysis of this 30% gap noted an expressed need to address issues related to availability and coverage of services in rural areas. 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.

(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 currently occurring including all core partner agencies and numerous One-Stop partners to determine strategies for common intake, reducing duplication of efforts and potential co-location strategies. 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.

(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 Division will be conducting a targeted statewide needs assessment to gauge the specific needs of students and youth with disabilities as a coordinated PETS activity under WIOA.

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 5.3% of individuals aged 5-17 experience disability compared to 11.2% for those aged 18-64, and 33.9% of those ages 65 or more. Because the 18-64 age range is disproportionately large, the variance within that group is large as well: only 13.9% of individuals age 18-44 experienced a disability compared to 26.9% of 45-64 year olds.

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 32.2% of all cases in FY 2013.

IDVR will commission a PETS needs assessment as an authorized coordinated PETS activity to further determine the needs of this population. 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 PETS is detailed in section o of this plan.

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

IDVR is currently conducting a Request for Proposal (RFP) for work-based experience PETS activities. As a PETS activity, the results of this RFP will, in part, inform the Division of current capacities and existing need to develop or improve CRPs in this area.

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.

Additionally, IDVR holds biannual meetings with all accredited CRPs to discuss statewide themes in service delivery and engage these critical stakeholders in an open forum.

(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 Division will be conducting a targeted statewide needs assessment to gauge the specific needs of students and youth with disabilities as a coordinated PETS activity under WIOA. Strategies surrounding transition services and PETS are covered in more depth in section o of this plan.

(k) Annual Estimates.

Describe:

(1) The number of individuals in the State who are eligible for services.

(2) The number of eligible individuals who will receive services under:

(A) The VR Program;

(B) The Supported Employment Program; and

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

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

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

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

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 Federal Fiscal Year (FFY)

- FFY 2013 – 7658
- FFY 2014 – 8487 (11% year over year increase)
- FFY 2015 – 9158 (8% year over year increase)

(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 15%+ of program funds. Therefore the Division feels that a projected range of 8,000-11,000 individuals to be served for FFY 2016 is reasonable. Future projections will need to rely on data occurring under the actual conditions of WIOA.

(B) The Supported Employment Program; and

580 participants were served through the Supported Employment program in FFY 15. The Division cannot speculate on how WIOA will impact these numbers, however since this population is most likely MSD they would also continue to receive services under an Order of Selection. Furthermore, the new provisions for informed consent surrounding subminimum wage increases the likelihood that at least some of these individuals will seek the Division’s services to move toward competitive integrated employment. Therefore the Division feels that a range of 580-650 is reasonable for an FFY 2016 projection.

(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 both service volumes and service costs increase. There has been a six to seven percent increase in cost of services year-over-year for the past three years. IDVR sees no reason to expect a change in this trend in the immediate future. This increase in volume and cost, coupled with the redistribution of funds for PETS could accelerate the need for 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: 11,885. 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	\$8,783,000	9158	\$959
Title VI Part B (above and beyond above numbers)	\$297,000	580	\$512
Totals	\$9,080,000	9738	\$932

(l) State Goals and Priorities:

The designated State unit must:

- (1) Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.
- (2) Identify the goals and priorities in carrying out the VR and Supported Employment programs.
- (3) Ensure that the goals and priorities are based on an analysis of the following areas:
 - (A) the most recent comprehensive statewide assessment, including any updates;
 - (B) the State’s performance under the performance accountability measures of section 116 of WIOA; and
 - (C) other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

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

There is substantial agreement between the combined plan goals and priorities and the established goals and priority of the State Rehabilitation Council (SRC) and the Idaho Division of Vocational Rehabilitation (IDVR).

Relevant goals that were jointly agreed to by IDVR and the SRC have been updated to reflect changes resulting from WIOA and alignment with 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.

The goals and priorities identified by the Combined Plan partners include:

- Targeting key industries using a sector strategy (Goal 1, Priority 1)

- Enhancing opportunities for lifelong learning by expanding delivery options (Goal 2, Priority 2)
- Supporting a comprehensive education system for all students K-16+ that includes rigorous school-based learning and relevant work-based learning (Goal 2, Priority 2)
- Rural service provision (Goal 1, Priority 1)
- The recruitment, retention and training of qualified staff (Goal 2, Priority 4)
- Alignment of Career Pathways with Target Sectors (Goal 3, Priority 1)
- Connecting with youth and students (Goal 1, Priority 2)

(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, agency staff, the State Independent Living Council (SILC), the Client Advocacy Program (CAP), Tribal VR representatives, findings and recommendations from monitoring activities conducted under Section 107, the Field Services Employee Council (FSEC) 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.

Again, the goals and priorities established by the combined plan partners and informed by FFY 15 SRC goals and priorities are as follows:

- Targeting key industries using a sector strategy (Goal 1, Priority 1)
- Enhancing opportunities for lifelong learning by expanding delivery options (Goal 2, Priority 2)
- Supporting a comprehensive education system for all students K-16+ that includes rigorous school-based learning and relevant work-based learning (Goal 2, Priority 2)
- Rural service provision (Goal 1, Priority 1)
- The recruitment, retention and training of qualified staff (Goal 2, Priority 4)
- Alignment of Career Pathways with Target Sectors (Goal 3, Priority 1)
- Connecting with youth and students (Goal 1, Priority 2)

IDVR will work in concert with the SRC to help transition FFY 15 goals to WIOA relevant goals in the first program year. These three identified goals are detailed below:

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.

Priority #2: Increase employment successes for transition age youth.

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

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

Goal #2: To provide organizational excellence within the agency.

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

Priority #2: To comply with State and Federal regulations.

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

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

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.

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

Priority #3: To provide information to partners and stakeholders regarding the VR process and comprehensive referral information when applicable.

(3) Ensure that the goals and priorities are based on an analysis of the following areas

(A) the most recent comprehensive statewide assessment, including any updates;

IDVR's current CSNA was not informed by WIOA modifications and is subsequently somewhat anachronistic. Regardless, an analysis of the CSNA turned up no direct conflicts with the goals and priorities of the combined state plan, and alignment is retained with the already established goals and priorities shared by the Division and the SRC. The spirit of the CSNA is in alignment with these newly established goals and priorities.

IDVR will conduct a coordinated pre-employment transition services (PETS) needs assessment as soon as it is feasible. This will be an essential step in bringing goals and priorities into alignment with new WIOA mandates. Additionally, IDVR is due to conduct a general CSNA in FFY 2017.

(B) the State's performance under the performance accountability measures of section 116 of WIOA; and

The goals and priorities of the combined state plan are directly informed by section 116 performance accountability standards. The operationalization of the goals and priorities stated by the SRC in FFY 2015 will have to be brought into alignment with new performance accountability standards, however, many of the new standards will be better indicators of these goals and priorities (e.g. goals and priorities surrounding transition/PETS and business relations).

(C) other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107

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

(2) The justification for the order.

(3) The service and outcome goals.

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

(5) How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and

(6) 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.

(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

(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.

IDVR received \$297,000 in Title VI, Part B funds in FFY 2015. 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 focuses Title VI, Part B funds on direct case service provision including situational assessment, job placement, and job coaching, as well as supportive services.

Approximately 580 individuals received SE services, using both funds allotted under Title I and Title VI, Part B in FFY 2015. IDVR's Title VI, Part B funds have not been adequate to meet service delivery costs. In addition to the Title VI, Part B funds allotted in FFY2015, \$89,338 of Title I grant funds were needed to satisfy the gap in service funds to serve all SE individuals. The Division has and will continue to supplement Title VI, Part B funds when needed with Title I grant fund.

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 cannot speculate on how WIOA will impact the number of individuals being served through SE funds, however since this population is most likely MSD they would also continue to receive services, even in the event that IDVR implemented an Order of Selection. Furthermore, the new provisions for informed consent surrounding subminimum wage increases the likelihood that at least some of these individuals will seek the Division's services to move toward competitive integrated employment. Therefore the Division feels that a range of 580-650 is reasonable for an FFY 2016 projection. Additionally, IDVR continues to experience challenges for securing long term support funds in the State of Idaho.

IDVR is currently evaluating the merits of the 48 months extension of supported employment for youth with the most significant disabilities.

(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.

(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.

(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.

(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).

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

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

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

(8) How the agency's strategies will be used to:

(A) achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

(B) support innovation and expansion activities; and

(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.

(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, FFY 2016 will see a substantial increase in innovation pilot projects to support transition services and will monitor these pilot programs for model fidelity and outcome. 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. To this end, IDVR has set aside one FTE to hire a Business Relations Liaison to help meet this new emphasis in WIOA and has engaged, in part with the Job-Driven Vocational Rehabilitation Technical Assistance Center to help inform the competencies required by this position. The Division hopes to proceed after the 'effectiveness in serving employers' is defined by the US Departments of Education and Labor. IDVR will coordinate business outreach efforts with the Idaho Department of Labor.

(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.

Additional AT resources for staff training include the Idaho Training Clearinghouse (<http://www.idahotc.com/>), 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

The Hispanic population is by far Idaho's largest minority group at 11.7%; however, this group represents only 7.4% of individuals served by IDVR. While no other minority group in Idaho exceeds 2.4%, 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. IDVR has had representation at the 2015 Idaho Conference on Refugees. The Division maintains contact with Family Medicine, a medical provider to newly arrived refugees in the Treasure Valley 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 maintains regular meetings with qualified interpreters for a variety of languages to better serve VR clients with limited English proficiency.

Finally, with the changes to subminimum wage in WIOA, IDVR is establishing a process to provide career counseling, information and referral, and document informed choice with individuals who are in or considering subminimum wage employment.

(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)

IDVR has hired a Transition Coordinator with extensive experience and an established network across Idaho public K-12 education.

Our Transition Coordinator has operationalized Goal 1, Priority 2 thusly: 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 (PETS). 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 PETS service gaps.
- Develop and survey LEAs, families, and students on PETS.
- 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 “Moving On” informational binder for transition students:
<http://www.icdd.idaho.gov/pdf/Publications/Moving%20On%20Binder%202013%20FINAL.pdf>
- 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 PETS implementation strategies will provide services at the following levels:

- Three tiers of service
 - Tier 1: Universal (Potentially eligible)
 - Tier 2: Strategic (Individualized PETS services)
 - 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 PETS 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

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.

Second, an initial interview 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 customer 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 each 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.

Finally, 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.

(6) Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA

IDVR has no baseline data from which to determine whether performance is degrading, maintaining or

improving per 116 standards. Once regulatory guidance is issued to determine exactly what variables will inform section 116 performance accountability measures, and once an understanding of these baselines emerge, IDVR will be well positioned to develop strategies to improve upon these yet to be determined outcomes.

The Division is currently working with core partner agencies to establish the open exchange of information which surround these performance measures, and is attempting to predict and establish baselines for negotiation with RSA based upon existing data. However, since the core group of people we serve will fundamentally shift as we implement WIOA, the error introduced into these predictions is unknown.

IDVR implements a counselor performance dashboard system through the Tableau software suite. This allows counselors real time access to a variety of measures including open and closed case statistics, progress toward yearly goals and caseload authorization statistics.

IDVR has employed a Program Evaluation Analyst to review reporting outcomes, ensure more agency wide interventions are based upon trends instead of unique circumstances and provide recommendations to administration on service delivery. In addition, the Analyst works closely with the Division's Information Technology Department to ensure data are reliable and valid, and that reported results both are significant and meaningful.

(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 be 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. This collaboration will include the establishment of stand-alone informational products, tailored face-to-face trainings and informal consultation as needed.

IDVR's administration is advocating for a position on Idaho's Workforce Development Council. While currently represented through State Board of Education leadership, the Division's position is that our mission is somewhat diluted through the representation of multiple organizations by that sole committee member.

The Division's Organization Development Specialist represents IDVR on the Ada County Employer Association's advisory board and uses that position to advocate for and educate the board on the untapped talent pool of individuals with disabilities.

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.

(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 2014 IDVR CSNA reported that the Division has improved its outreach services to unserved, underserved and minority populations. 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.

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

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

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

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

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

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 4th 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 PETS expenditures in FFY 2016.

Additional efforts to address this goal include the hiring of a Transition Coordinator to assist with the coordination of PETS. 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 3rd 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. The Division began issuing a series of business rules to help inform staff of upcoming changes. The Field Services Policy Manual (FSPM) which contains the policies of IDVR is encoded in state rule. This is an inherent barrier that makes changes to the manual difficult. IDVR is currently in the process of removing aspects of the FSPM from rule. The Division feels this process will allow more flexible, innovative approach in the future.

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.

(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.

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

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.

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

This plan is filed at a transitional period for standards and indicators in vocational evaluation. This section addresses traditional standards and indicators which were required throughout FFY 2015.

Evaluation Standard 1: Employment Outcomes

Performance Indicator 1.1:

The Number of Individuals Achieving Employment Outcomes During the Current Performance Period Compared to the Number from the Previous Performance Period.

FFY 2015: 2,186 Rehabilitations - Indicator Passed

Performance Indicator 1.2:

The Percentage of Individuals Receiving Services Under an Individualized Plan for Employment Who Achieve Employment Outcomes.

Federal Minimum: 55.8%

FFY 2015: 56.60% - Indicator Passed

Performance Indicator 1.3:

Competitive Employment Outcomes as a Percentage of all Employment Outcomes.

Federal Minimum: 72.6%

FFY 2015: 99.95% - Indicator Passed

Performance Indicator 1.4:

Competitive Employment Outcomes for Individuals with Significant Disabilities as a Percentage of all Individuals with Competitive Employment Outcomes.

Federal Minimum: 62.4%

FFY 2015: 84.26% - Indicator Passed

Performance Indicator 1.5:

The Ratio of the Average VR Hourly Wage to the Average State Hourly Wage.

Federal Minimum: .52 ratio

FFY 2015: .66 - Indicator Passed

Performance Indicator 1.6:

The Percentage of Individuals Achieving Competitive Employment Outcomes Who Report Their Own Income as the Primary Source of Support at Application Compared to at Closure.

Federal Minimum: At least 53.0

FFY 2015: 55.103 - Indicator Passed

Evaluation Standard 2: Equal Access to Services

Performance Indicator 2.1:

Access to Services for Minorities as Measured by the Ratio of the Minority Service Rate to the Non-Minority Service Rate.

Federal Minimum: .80 ratio

FFY 2015: 0.801 - Indicator Passed

Section 116 of WIOA establishes six new performance measures 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 PETS 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. Core program partners are in discussions to draft a collaborative data sharing agreement which will establish an umbrella of partner agencies that can access performance related data across WIOA programs. Progress toward baseline establishment is included with corresponding performance measures below.

Performance Measure 1: Employment rate 2nd quarter after exit

RSA has identified the RSA-911 data element "Type of Closure" as a proxy for this measure. Also noted is the disagreement between this proxy and the actual measure of employment rate 2nd quarter after exit. IDVR has worked with IDOL to access data from a three year window to help estimate longitudinal rates of employment. This dataset does not address federal employment or self-employment with additional limitations for out-of-state employment. IDVR further anticipates that these baselines will be significantly influenced by the mandatory shift of 15% of total funds into pre-employment transition services.

Requirements for this measure to be included in the state plan were formalized by a modified Information Collection Request (ICR) released December 23, 2015. This ICR is currently undergoing a 30 day comment period and any comments will have to be addressed by the US Departments of Education and Labor prior to finalization. The content of this section may be added or updated to reflect any changes adopted in the final federal guidance.

Performance Measure 2: Employment rate 4th quarter after exit

RSA has stated there is no proxy for this measure. IDVR has worked with IDOL to access data from a three year window to help estimate longitudinal rates of employment. This dataset does not address federal employment or self-employment with additional limitations for out-of-state employment. IDVR further anticipates that these baselines will be significantly influenced by the mandatory shift of 15% of total funds into pre-employment transition services.

Requirements for this measure to be included in the state plan were formalized by a modified Information Collection Request (ICR) released December 23, 2015. This ICR is currently undergoing a 30 day comment period and any comments will have to be addressed by the US Departments of Education and Labor prior to finalization. The content of this section may be added or updated to reflect any changes adopted in the final federal guidance.

Performance Measure 3: Median earnings 2nd quarter after exit

RSA has identified the RSA-911 data element “weekly earning at closure” and “hours worked in a week” at closure as proxies for this measure. Also noted is the disagreement between these proxies and the actual measure of median earnings 2nd quarter after exit. IDVR has worked with IDOL to access data from a three year window to help estimate longitudinal rates of employment and wage information. This dataset does not address federal employment or self-employment with additional limitations for out-of-state employment. The labor dataset additionally is not sensitive to full or part-time employment, as it is reported by quarter, making it difficult to interpret these wages as ‘weekly or hourly earnings’. IDVR further anticipates that these baselines will be significantly influenced by the mandatory shift of 15% of total funds into pre-employment transition services.

Requirements for this measure to be included in the state plan were formalized by a modified Information Collection Request (ICR) released December 23, 2015. This ICR is currently undergoing a 30 day comment period and any comments will have to be addressed by the US Departments of Education and Labor prior to finalization. The content of this section may be added or updated to reflect any changes adopted in the final federal guidance.

Performance Measure 4: Postsecondary/diploma credential rate within 1 year of exit

RSA has established “Level of education attained at closure” and “Level of education attained at application” as proxy data for this measure. IDVR has reservations that these elements are reliant on the self-report, and that traditionally customers have not offered this information past closure, let alone ‘up to one year after exit’. The Division requires regulations to fully define ‘credential’ before a more precise baseline can be established.

Requirements for this measure to be included in the state plan were formalized by a modified Information Collection Request (ICR) released December 23, 2015. This ICR is currently undergoing a 30 day comment period and any comments will have to be addressed by the US Departments of Education and Labor prior to finalization. The content of this section may be added or updated to reflect any changes adopted in the final federal guidance.

Performance Measure 5: Measureable skills gains rate

RSA has established “Level of education attained at closure” and “Level of education attained at application” as proxy data for this measure. IDVR has reservations that these elements are traditionally reliant on the self-report. The Division feels the established proxies are far worse fit for measurable skills than they are for credential rate, as skills gains remain undefined and milestones are achieved more frequently than the aforementioned rate. IDVR requires regulations to fully define ‘credential’ before a more precise baseline can be established.

Requirements for this measure to be included in the state plan were formalized by a modified Information Collection Request (ICR) released December 23, 2015. This ICR is currently undergoing a 30 day comment period and any comments will have to be addressed by the US Departments of Education and Labor prior to finalization. The content of this section may be added or updated to reflect any changes adopted in the final federal guidance.

Performance measure 6: Employer services indicator

No guidance has been established for this indicator. The Division does anticipate hiring a business relations liaison to help maintain and promote employer relations/satisfaction. RSA does acknowledge “No data

available with existing data". IDVR awaits further definition in the forthcoming regulations and will attempt to formulate a baseline for performance at that time.

The December 2015 ICR draft release has classified the Employer Services Indicator as a baseline measure for the first two program years under WIOA. While IDVR will collect and report data on this indicator, the initial purpose will be to establish baseline performance on employer services for the first two years. The guidance defines baseline indicators as those indicators "for which States will not propose an expected level of performance in the plan submission, will not be used in end of year performance calculations, and will not be used to determine failure to achieve adjusted levels of performance for the purposes of sanctions".

(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.

(2) The timing of transition to extended services.

(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 Community Supported Employment Services (CSE) to those Vocational Rehabilitation (VR) eligible customers with the most significant disabilities, who require extended services to maintain employment.

Once an appropriate Community Supported Employment position is identified for an individual, IDVR provides supported employment appropriate services to assist in the stabilization of employment for a period of six months and extended by another six months if determined appropriate by the IDVR in collaboration with the customer and other involved parties.

Community Supported Employment Services provided to individuals are coordinated through an Individualized Plan for Employment (IPE) that includes a description of the services needed, the identification of the state, federal, or private programs that will provide the continuing support; and the basis for concluding that continuing support is available.

Community 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 non-VR extended supports, which is to be provided by the long-term support provider following the termination of time-limited services by IDVR.

Current Idaho Division of Vocational Rehabilitation (IDVR) policy and the Federal regulations require a third party commitment in writing, to designate the long-term support provider. Since 07/01/2004, the Extended Employment Services (EES) Program under the IDVR is one of the two main providers of long-term supports. Customers who qualify for the DD waiver can use Medicaid funds, the primary source of long-term support funds in Idaho. A CSE 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 Community Supported Employment Services is making satisfactory progress for consumers while participating in the VR program, prior to transition.

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.

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 is still evaluating the merits of expanding youth SE services.

IDVR is currently evaluating the merits of the 48 months extension of supported employment for youth with the most significant disabilities. Extended services may be provided to youth with MSD for a period not to exceed four years with the funds reserved under §363.22. The Division requires a third-party commitment to designate a long-term support provider. Since 2004, the Extended Employment Services (EES) Program under the IDVR is one of the two main providers of long-term supports. Customers who qualify for the DD waiver can use Medicaid funds, the primary source of long-term support funds in Idaho. Due to limited state funds, the EES waitlist has been in place since at least 2004; however EES is currently moving individuals off this list for service provision. 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 CSE services is making satisfactory progress.

Attachment 1
IDVR Proposed Policy
Participation of Customers in Cost of Services Based on Financial Need

SECTION 8.0 PARTICIPATION OF CUSTOMERS IN COST OF SERVICES BASED ON FINANCIAL NEED

In order to further IDVR's mission to help customers move towards independence and self-sufficiency, IDVR encourages customers to be personally invested in and contribute financially towards the cost of their VR plan, when possible. The extent of the customer's participation in the cost of Vocational Rehabilitation services is based on their income and other factors. The Financial Participation Assessment is an effective tool for identifying customer resources as they relate to VR planning and implementation, regardless of the amount contributed by the customer.

Reminder: Financial need and/or participation status are not factors in the eligibility determination.

Financial Participation is assessed using IDVR's Financial Participation Assessment (FPA) form.

1. After eligibility, during plan development, while exploring comparable benefits, AND
2. Every twelve (12) months or if financial circumstances change significantly, whichever occurs sooner.

Services Exempt from Financial Participation:

A Financial Participation Assessment will be applied as a condition for providing vocational rehabilitation services, EXCEPT for the following: (34 CFR 361.54(b) (3))

1. Assessment for determining eligibility and vocational rehabilitation needs.
Note: Assessment services for determining eligibility and vocational rehabilitation needs, which are not diagnostic in nature and are provided in the trial work period (i.e., transportation), are subject to financial participation.
2. Vocational rehabilitation counseling and guidance and referral services;
3. Any auxiliary aid or services (e.g., interpreter services or reader services) that an individual with a disability requires in order for the individual to participate in the vocational rehabilitation program. Auxiliary aids and services do not include personally prescribed devices such as eye glasses, hearing aids, or wheelchairs;
4. Personal assistance services;
5. Job related services, including job search and placement assistance, job retention services, follow-up services, and follow-along services, i.e., Community Based Work Adjustment, Job Site Development (CBWAJSD), Community Based Work Adjustment (CBWA), Placement and Follow Along Job Site Development (P&FJSD), and Placement and Follow Along (P&F).

Upon completion of the FPA and the determination of services to be included on the IPE the counselor and customer will identify the specific IPE services that will be paid for by each party.

It should be emphasized to the customer and vendor that IDVR will not be responsible for the customer's debts, under any circumstances. If the customer's debts to a vendor inhibit the provision of services necessary to achieve the employment goal, IDVR will work with the customer to explore options for the continuation of services.

Exemption from Required Participation

Customers who receive SSI and/or SSDI are exempt from financial contribution. However, to ensure a customer qualifies for this exemption, written proof of SSI or SSDI qualification must be received. *It should be noted that customers who receive Social Security benefits from retirement, spouse of retired worker, child of a retired worker, child of deceased worker, widow, parent of deceased worker, spouse of disabled worker, or child of a disabled worker would not be eligible for this exemption.*

Factors for Determining Customer Financial Participation

Several factors are considered to determine a customer's level of financial participation, including the customer's and/or spouse's income, estimated annual plan costs, exclusions such as impairment related work expenses, and available financial resources which exceed the HHS Federal Poverty Guidelines.

The following steps are taken to identify the level of participation:

The applicable income is subject to two calculations. The first calculation will determine the required participation by comparing income category and expected plan costs.

The second calculation identifies an annual maximum percentage of the applicable income that the customer will be required to contribute toward their plan costs and will not exceed 25% of the applicable income.

The lower amount of the two calculations above will determine the customer's expected annual contribution. All service costs anticipated or purchased during the twelve (12) month period covered by the FPA are to be considered in aggregate rather than individually calculated.

In exceptional cases, circumstances may occur where rigid adherence to the Financial Participation Policy could seriously jeopardize the customer's opportunity to achieve rehabilitation objectives and an employment outcome. In such cases, exceptions to the policy may be considered by the Regional Manager and Chief of Field Services.

The customer, parents or legal guardian completing the Financial Participation Form will be required to provide financial documentation for verification. If the customer has a financial participation requirement, it will be applied to purchases prior to assessing any caps from the Agency Payment Policy (Section 12.2).

Attachment 2
IDVR Proposed Business Rule: Financial Participation Assessment

Idaho Division of Vocational Rehabilitation Business Rule	
Subject: Financial Participation Assessment	
Policy: 8.0 Participation of Customers in Cost of Services Based on Financial Need	Effective Date: July 1, 2016
Related To: Financial Participation Assessment Guidelines	

Rationale:

Prior to delivering services under an Individualize Plan for Employment (IPE), an assessment of a customer’s ability to participate in the cost of services will be conducted by completing the division’s Financial Participation Assessment (FPA) form in Gemini. The VRC and customer will complete the FPA while the customer is in eligible status to identify the customer’s ability to financially participate in the cost of their rehabilitation services.

Staff will estimate the cost for rehabilitation services every 12 months of the IPE or when modified. Calculate the amount of participation to be provided by both the customer and IDVR for each 12 month time period covered by the FPA.

Refer to the division’s policy for more information and guidance, including benefit exemption and those VR services which are exempt from the FPA consideration.

This business rule provides the detailed criteria and instructions for completing the FPA in Gemini.

FPA Instruction:

I. Exemption Status:

Customers who receive SSI and/or SSDI are exempt from financial contribution. Written proof of SSI or SSDI verification is required. This information will be used to complete the FPA.

The VRC must complete the top portion of the FPA certifying that the customer is exempt and will also note on the IPE and subsequent plan amendments, in the appropriate section, explaining the reason for exemption.

Note: Customers who receive Social Security benefits from retirement, spouse of retired worker, child of a retired worker, child of deceased worker, widow, parent of deceased worker, spouse of disabled worker, or child of a disabled worker are not eligible for this exemption.

II. Dependency Status:

If the individual is a dependent of the family unit; the entire income of the family unit should be considered, or a justifiable reason why the entire family income should not be considered, explained in the case record. For purposes of determining financial participation, an individual will be considered

a dependent if he or she is single, living at home with parents/legal guardian and is claimed as a dependent on the current family federal income tax.

For purposes of financial need determination, an individual is considered independent when the individual's own earnings constitute a majority of his or her financial support, is single and will not be claimed as a dependent on the parents/legal guardian US income tax return in the current year. If the individual is married, regardless of age, financial assessment of need will be based on the combined income of the individual and spouse.

If the individual is self-supporting, claims his or herself on tax forms, is not claimed on anyone else's income tax return, only the individual's resources are inventoried. If the individual is claimed as a dependent on his or her parent's or guardian's tax return, the parent's or guardian's financial status is inventoried.

III. Income Data (Customer Income Information):

All projected gross income of the family unit shall be considered in the FPA.

The family unit includes the individual, dependents, spouse, and/or parents who contribute economically to the family unit. The income data is intended to reflect the current income of the family unit. It is important to include gross wages as opposed to "take home pay" or net income.

Customer's income verification (and spouse's if married) may include:

- Most recent year IRS tax filings,
- Employment Security Wage or Unemployment Benefit Reports,
- Employer generated pay stubs,
- Retirement program documents, or
- Documentation from public or private income support programs.
(TANF and food stamps are examples that are not considered income)

Income Exclusions:

This figure includes the Income Exclusion based on family size which is 200% of the Federal Health and Human Services (HHS) Poverty Level, disability related costs and any impairment related work expenses (IRWE). IDVR uses the Social Security Administration's definition of impairment related work expenses (IRWE). An impairment (disability) related work expense is an expense for an item or service, which is necessary for an individual with an impairment to work, and which is incurred because of a physical or mental impairment. To qualify as an IRWE, the expense must be paid by the customer. Expenses paid by sources such as health insurance, vocational rehabilitation and the employer are not considered an IRWE.

Examples of IRWE's include, but are not limited to:

- The cost of attendant care services provided in the work setting or to assist the customer to get to and from work is considered an IRWE, however attendant care provided on non-work days or those performed at any time which involves shopping or general homemaking are not considered an IRWE. Additionally, attendant services performed for other family members such as babysitting, are not considered an IRWE.

- Durable medical equipment which can withstand repeated use, is used to serve a medical purpose, and is generally not useful to a person in the absence of a disability, such as wheelchairs, hemodialysis equipment, respirators, and pacemakers are considered an IRWE.
- The cost of vehicle modifications (but not the cost of the vehicle) in order to drive or be driven to work, where the modification is critical to the vehicle's operation or its accommodation of the customer is considered an IRWE. The modification must be directly related to the impairment (without the modification the customer would either be unable to drive or ride in the vehicle).
- Prosthetic devices that replace internal body organs or external body parts are considered an IRWE however a prosthetic device which is primarily for cosmetic purposes usually is not considered an IRWE.
- The cost of prescription medications and medical services necessary to control the disabling condition, thereby allowing the customer to work (medications and medical services used for minor physical or mental conditions not resulting in any significant loss of function are not considered an IRWE, which might include yearly routine physical or dental examinations, optician services or eyeglasses when unrelated to a disabling visual impairment).
- Work equipment/assistance required to accommodate the impairment and perform the job (e.g., one-handed typewriter, telecommunications device and/or a job coach paid for by the customer) are considered an IRWE.

IV. Applicable Income:

This section enables IDVR to determine the customer's expected financial participation toward the anticipated cost of services during the subsequent 12 months.

Applicable income is the gross income minus the income exclusion allowance, which is adjusted annually and is set at 200% of federal HHS poverty level and disability related work expenses.

V. Determination of Required Participation

Gemini will automatically calculate the customer's level of participation through an automated process based upon the income and exclusion information entered into the appropriate fields. The calculations are explained below.

How Customer Participation is Determined:

The applicable income is subject to two calculations.

1. To determine the required participation by comparing income category and expected plan costs.
2. The second comparison identifies an annual maximum percentage of the applicable income that the customer could contribute toward their plan costs, which will not exceed 25% of the applicable income.
 - The lower of these two calculations will determine the customer's expected annual contribution.
 - Customer participation gradually increases as the customer's available income increases.

- All service costs anticipated or purchased during the 12 month period covered by the FPA are to be considered in aggregate rather than individually calculated.

Financial Participation Table

Applicable Income categories	Participation as % of Plan Cost	Maximum % of applicable income
0-4,999	5	5
5,000-9,999	7.5	7.5
10,000-14,999	10	10
15,000-19,999	20	12.5
20,000-24,999	30	15
25,000-29,999	40	17.5
30,000-34,999	50	20
35,000-39,999	60	22.5
40,000-44,999	70	25
45,000+	80	25

Calculation Illustration:

- Federal HHS Poverty Level = \$11,700 (2015 - adjusted annually)
- 200% x \$11,700 = **\$23,400**
- Income for family size of 1 = **\$40,000**
- **\$500** IRWEs

$$\$40,000 - \$23,400 - \$500 = \mathbf{\$16,100} \text{ (Applicable Income)}$$

In this scenario will be use a \$2,000 annual plan cost and an Applicable Income of \$16,100, using the table above, the two calculations would be:

1. 20% x \$2,000 = \$400
2. 12.5% x \$16,100 = \$2,012.5

The customer's financial participation using this scenario will be \$400.

Second scenario will use a \$15,000 annual plan cost, all other conditions remain the same:

1. 20% x \$15,000 = \$3,000
2. 12.5% x \$16,100 = \$2,012.5

VI. Certification:

The customer, parents or legal guardian completing the form will be asked to verify, by signature, that the information provided is correct. The customer, parents or legal guardian should be advised that he/she will be asked to document the financial information provided from external sources, such as the most recent year IRS tax filings, Employment Security Wage or Unemployment Benefit Reports,

employer generated pay stubs, retirement program documents, or documentation from public or private economic support programs. The form will then be signed by the VRC.

Modifications to the FPA may be requested by the customer or their representative as needed to adjust for changes in income or other circumstances (e.g., disability related costs and number of family members). If modification is requested, the customer, parent or guardian must provide income verification from the sources listed above.

Exceptions to the FPA may be requested only when rigid adherence to the Financial Participation Policy could seriously jeopardize the customer's opportunity to achieve rehabilitation objectives and an employment outcome. In such cases, the VRC may elect to seek an exception to the policy by reviewing the case with the RM who will then seek an exception approval by the Chief of Field Services or designee who will render a decision within ten (10) business days.

Applying customer contribution to service delivery/purchases. If the customer has a financial participation requirement, it will be applied directly to purchases prior to assessing any caps from the Agency Payment Policy (Section 12.2). IDVR will not accept any monies from the customer.

A Financial Participation Assessment Worksheet will be used to explain the calculations with customers to increase customer FPA understanding.