

Idaho PYs 2020-2023 - Vocational Rehabilitation Program (Combined or General)

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Program-Specific Requirements for Vocational Rehabilitation (Combined or General)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan per Section 102(b)(2)(D)(iii) of Workforce Innovation and Opportunity Act WIOA must include the following descriptions and estimates, as required by Section 101(a) of the Rehabilitation Act of 1973, as amended by Title IV of WIOA, throughout document shorten to Rehabilitation Act

a. Input of State Rehabilitation Council SRC

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

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

The responsibilities of the SRC are outlined in the Rehabilitation Act. The SRC and Idaho Division of Vocational Rehabilitation IDVR changed the input period from a calendar year to a program year with this State Plan, to better align with the VR program reporting period.

The SRC's efforts during PYs 2017 and 2018 can be summarized within four broad areas: 1) strengthening the council overall; 2) providing input on IDVR's vision and mission statements as well as a strategic plan; 3) ongoing guidance on critical IDVR data gathering instrumentation; and 4) participating in conversations on IDVR activities and direction.

SRC Member Focused Work

SRC Input

Understanding a fully staffed, well-informed SRC provides for high quality engagement within the IDVR, SRC partnership, the SRC members requested recruitment tools, updated new member orientation, and training on the role of the SRC.

A recruitment pamphlet was developed by the SRC to provide a base of understanding for potential members.

New member orientation was collaboratively updated with IDVR.

The SRC and IDVR leadership participated in a one-day training by Paul Dzedzic focused on "what VR is", understanding WIOA, and the SRC role, in face-to-face engagement and shoulder-to-shoulder advocacy to ensure IDVR is as strong and effective as possible to serve people with disabilities. This training was both informative and well received. Further, it led to additional conversations and actions around a renewed focus on the SRCs shoulder-to-shoulder policy and advocacy roles, as well as face-to-face opportunities to help inform state plan goals and priorities.

SRC Structure Changes

SRC Input

To better position the SRC to move forward with shoulder-to-shoulder policy and advocacy roles as well as face-to-face engagement in the state plan's goal and priorities; the SRC went through a thorough analysis process to restructure SRC committees and subcommittees with updates to bylaws.

This training was both informative and well received. Further, it led to additional conversations and actions around a renewed focus on the SRCs shoulder to shoulder policy and advocacy roles, as well as face to face opportunities to engage in the state plan's goals and priorities.

SRC National Engagement

SRC Input

Policy and advocacy work continued when an SRC member and IDVR staff attended the 2019 Spring Council of State Administrators of Vocational Rehabilitation and met with Idaho's Congressional delegation and staff for personal stories and facts regarding the impact that IDVR has on Idaho's citizens.

New Mission and Vision Statements

SRC Input

SRC provided input in on IDVR's new Mission and new Vision statements.

Strategic Planning

SRC Input

SRC in concert with IDVR Executive Leadership Team, the Regional Managers, RM, and permanent Assistant Regional Managers, ARM, engaged in strategic planning session to arrive at top three strategic priorities goals and objectives for the upcoming year. It is interesting to note, in working face to face on this opportunity to engage in the state plan's goals and priorities, the SRC and the IDVR staff were much agreed on what rose to the level of a priority.

Customer Satisfaction Instrument

SRC Input

The SRC survey subcommittee, together with IDVR, expressed concerns over low return rates for the Customer Satisfaction Survey. The focus was to increase response, retention, and satisfaction rates. Further, there was a need to revisit the questions, which made up the survey. The SRC was asked to take the draft survey and provide input such as retaining, modifying or eliminating items. Post question updates and changes in the survey platform both the response and retention rates increased dramatically.

Comprehensive Statewide Needs Assessment CSNA

SRC Input

In anticipation of the new CSNA survey cycle, the SRC asked for an overview presentation during the council meeting. The SRC was provided a draft to review and asked to provide input to be incorporated into the final document.

Supported Employment Policy

SRC Input

The IDVR presented Supported Employment under WIOA. There were multiple questions from council members that were answered by IDVR staff.

Pre-Employment and Transition Services (Pre-ETS) Policy

SRC Input

IDVR staff presented to the SRC on Pre-ETS and the emphasis on WIOA structure and 15 percent budget requirements. Further, information was provided on the variety of Pre-ETS services being provided around the state. SRC members indicated the quality and variety of services is commendable.

Closure and Trial Work Policies

SRC Input

The SRC Executive Committee supported the IDVR in changing the closure policy and updated the trial work policy. The changes to the closure policy were made to match the Rehabilitation Services Administration, RSA, guidance. The SRC also assisted with rule making, which will not go into effect in 2020. Only minor changes were made to the trial work policy.

Subminimum Wage Policy

SRC Input

The SRC reviewed the draft Services for Individuals Employed or Seeking Employment at Subminimum Wage policy. The SRC suggested that the agency add a documentation section at the end of the policy.

VR Services Portion of the Combined State Plan

SRC Input

In the January 2020 SRC quarterly meeting, IDVR presented emerging goals and priorities resulting from the current draft CSNA to the SRC at large, compared to previous VR State Plan goals and priorities. The SRC agreed that these were relevant and important goals and priorities and that they remained fairly consistent with the previous state plan and strategic plan goals. In February 2020, several members of the SRC participated in a strategic planning in session with IDVR management staff to jointly develop the goals and priorities for IDVR, which would be included in the VR Portion of the State Plan.

The SRC Vice Chair reviewed the entire VR Portion of the Combined State Plan and acknowledged agreement with the goals and priorities.

The majority of the SRC provided comments were typographical and grammatical in nature. One question asked by the SRC: How will high quality sustainability training be developed and implemented for Customized Employment CE Pilot 2.0?

2. The designated State unit's response to the SRC's input and recommendations; and

During PYs 2017-2018 the SRC provided input and recommendations to IDVR on a variety of subjects. IDVR agreed with and or adopted the SRC's input during PYs 2017 and 2018. The following summarizes IDVR's responses to that input and recommendations.

IDVR Responses

SRC Member Focused Work

IDVR agreed with the SRC that an orientation would assist new and existing members. SRC training materials were provided by the SRC chair and disseminated prior to a two hour meeting held the afternoon prior to the full SRC meeting, and all members were invited to attend. IDVR also contracted with Paul Dziejczak to facilitate a one day meeting to improve collaboration.

SRC Member Changes

IDVR supported the SRC's committees restructure.

SRC National Engagement

IDVR and SRC member engaged with Idaho's Congressional delegation to collaboratively share the impact that IDVR has on Idaho's citizens.

New Mission and Vision Statements

IDVR's new mission and vision statements better reflects the intent of the program and aligns with the dual customer and employer focus which is mandated under WIOA.

Strategic Planning

IDVR included the SRC in a strategic planning session and included their perspective for priorities for the upcoming year. Both the SRC and IDVR have similar interests regarding the goals and priorities for the SRC.

Customer Satisfaction Instrument

IDVR worked collaboratively with the SRC survey subcommittee to improve the overall Customer Satisfaction Survey process and instrument, which has resulted in greater survey response rate.

IDVR provided an overview of the CSNA purpose and surveys to better engage with the SRC and accepted the SRC's input on the draft report.

Policy Input

IDVR presented several draft policies to the SRC; Supported Employment SE, Pre-ETS, Closure and Trial work and Subminimum Wage. IDVR, in general, accepted the SRC's input; adding, deleting, or amending sections to each policy.

VR Services Portion of the Combined State Plan

IDVR worked with the Vice Chair of the SRC regarding comments provided on the VR Services Portion of the State Plan. All of the typographical and grammatical errors noted by the SRC Vice Chair were corrected. IDVR provided a response to the Vice Chair regarding CE sustainable training. IDVR's response acknowledged that this is a concern for IDVR as well and will be addressed as we move forward with CE Pilot 2.0.

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

IDVR considers all SRC input and did not reject 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;

Waiver of Statewideness

IDVR is requesting a waiver of statewideness for cooperative agreements with numerous Local Education Agencies, LEA, across Idaho and with the Idaho Department of Correction, IDOC. All funds made available to IDVR are certified non-federal funds.

IDVR has entered into School to Work Transition, SWT, cooperative agreements through 11 agreements with 50 of the 175 total LEAs across Idaho. The cooperative agreements are solely to facilitate the transition of students with disabilities from K-12 public education into adult life. This transition to adult life may involve any or all of the following goal oriented activities: post-secondary education, training and job placement, direct placement into appropriate employment (to include supported employment if required), advocacy and any other activities that are relevant to the student and within the scope of IDVR's mission and role. Additionally, IDVR agrees to collaborate with LEAs to provide or arrange for the provision of Pre-ETS for eligible and potentially eligible students with disabilities who are in need of these services in accordance with 34 Code of Federal Regulations, CFR, 361.48. IDVR will not provide Pre-ETS that the school customarily provides under IDEA.

All funds allotted to IDVR via these agreements are certified non-federal funds. Each signed individual agreement with participating LEAs provides this assurance.

These agreements promote better understanding and convenient access to VR services, including Pre-ETS, to qualifying students offered through SWT, but do not expand the scope of services available statewide. The services offered under these agreements include:

Job exploration counseling

Work-based learning experiences

Counseling on opportunities for enrollment in postsecondary educational programs at institutions of higher education

Workplace readiness training and

Instruction in self-advocacy

All other traditional VR services

These agreements are revised and renewed on an annual basis.

These agreements increase outreach through stronger relationships between the LEA, VR, and individuals with disabilities promoted by a better understanding of services by LEAs where agreements are in place. Enhanced relationships between all parties to the agreement promote an informed transition to traditional VR services and the opportunity for potentially eligible students to participate in Pre-ETS.

All state plan requirements, including a state's Order of Selection, will apply to all services provided under these cooperative agreements.

Here is data from the agreements by LEA for School Year 2021 details including the LEAs, number of students served, receipt of non-federal funds and VR 110 grant funds (not including match funds). IDVR anticipates serving and expending funds similar to the data used for the projection.

Region 1 Agreement with LEAs numbers 83, 84, 101, and 272 with 41 students services, \$18,522 nonfederal funds and \$45,816 in VR 110 grand funds.

Region 1 Agreement with LEAs numbers 271 and 273 with 67 students services, \$18,522 nonfederal funds and \$86,709 in VR 110 grand funds.

Region 2 Agreement with LEA Lewiston Independent School District numbers 1 with 35 students services, \$18,522 nonfederal funds and \$32,386 in VR 110 grand funds.

Region 3 Agreement number 1 with LEA Boise Independent School District number 1 with 148 students services, \$18,522 nonfederal funds and \$129,962 in VR 110 grand funds.

Region 3 Agreement number 2 with LEA West Ada School District number 2 with 179 students services, \$37,044 nonfederal funds and \$138,636 in VR 110 grand funds.

Region 3 Agreement number 3 with LEA Nampa School District number 131 with 88 students services, \$18,522 nonfederal funds and \$51,503 in VR 110 grand funds.

Region 3 Agreement number 4 with LEAs numbers 133 through 137, 221, 363, 370, 372, and 373 with 91 students services, \$18,522 nonfederal funds and \$48,383 in VR 110 grand funds.

Region 4 Agreement with LEAs numbers 61, 121, 151, 231, 232, 233, 234, 261, 312, 314, 316, 331, 418, and 465 with 151 students services, \$18,522 nonfederal funds and \$125,824 in VR 110 grand funds.

Region 5 Agreement number 1 with LEAs numbers 25, 52, 55, 58, and 381 with 239 students services, \$18,522 nonfederal funds and \$55,443 in VR 110 grand funds.

Region 5 Agreement number 2 with LEAs numbers 21, 33, 148, 149, 150 201, 202, 351 with 52 students services, \$18,522 nonfederal funds and \$157,498 in VR 110 grand funds.

Region Agreement with LEAs numbers 59, 60, 91, 93, 251, and 252 with 134 students services, \$18,522 nonfederal funds and \$73,859 in VR 110 grand funds.

The overall total students service to 1,225, a total of \$222,264 in nonfederal funds and total of \$804,269 in VR 110 grand funds.

IDVR has also entered into two cooperative agreements with the Idaho IDOC which covers six of the seven IDOC Districts in Idaho, excluding District 2. The purpose of these agreements is to provide comprehensive VR services to eligible male and female offenders with disabilities leaving the prison system that have been identified as at risk of revocation, thus needing more intensive reentry services.

These agreements promote better understanding and convenient access to VR staff and services to promote the reentry of the offenders into society, with an emphasis on stability and employment. All relevant VR services may be provided, depending upon the need of the individual. The scope of services provided under these agreements may include:
Vocational Rehabilitation Counseling and Guidance
Assessment

Diagnosis and Treatment

Training services to include, graduate, 4-year college, junior or community college, occupational or vocational, on-the-job, job readiness, miscellaneous, registered apprentice, basic academic remedial or literacy and disability related training

Information and Referral

Short-Term Job Supports

Job Search and Placement Assistance

Supported and Customized Employment

Benefits Counseling

Rehabilitation Technology

Personal Assistance and Technical Assistance Services Including Self-Employment

Reader and Interpreter Services

Extended Services, if applicable and individual meets the eligibility criteria to receive such services

Supportive services to include, maintenance and transportation

Other Services

All state plan requirements, including a state's Order of Selection, will apply to all services provided under these cooperative agreements. Both agreements are revised and renewed on an annual basis.

All funds allotted to IDVR via these agreements are certified non-federal funds. Both signed agreements provide this assurance.

The total receipt of certified non-federal funds is \$178,951 for SY 2021. The total number of individuals served in SY2020/PY2019 by both agreements is 709 individuals with disabilities. IDVR expended \$207,679 with VR 110 grant funds not including match funds. IDVR anticipates similar projections for the number of individuals services and funds expended in SY2021/PY2020 for these agreements.

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

IDVR will approve each proposed service prior to it being provided.

3. Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

All State plan requirements, including order of selection requirements, will apply to all of the cooperative agreements with LEA across Idaho and with the IDOC.

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

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

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

IDVR and the following entities have entered into or are developing formal agreements with programs to outline and 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.

The cooperative agreements with agencies mentioned in this section of the state plan were created to allow for more efficient service delivery to those populations under each cooperative agreement. They have allowed for more efficient referral, eligibility determination and collaborative service provision. Customers have benefited from these cooperative agreements because of the well-established relationships and improved understanding of cross program requirements. Customers also receive more effective referral and expedited service provision because of the established agreements.

IDVR's case management system collects outcome data for individuals served under many of these agreements. IDVR has yet to analyze this information for program improvement purposes.

IDVR has the following cooperative agreements:

The Idaho Industrial Commission, ICC, agreement outlines the relationship between IDVR and the ICC with regard to persons injured on the job who may also have other nonwork related injuries. ICC 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.

The cooperative agreement with ICC benefits customers who have experienced an industrial injury, covered by worker's compensation law. Customers benefit in terms of access and service provision because of the well-developed relationships fostered by this agreement. Customers

receipt of services is generally faster and more streamlined because program staff have strong working relationships and an understanding the requirements of each program.

Currently outcomes are not being tracked in IDVR's case management system. IDVR needs to evaluate a better method for collecting jointly served participants.

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

Individuals with mental health disabilities served under the cooperative agreement by H&W-Behavioral Health and IDVR receive services in a more efficient and timely manner because IDVR staff are located and work in the behavioral health facilities and deliver services through a team approach. IDVR staff are able to engage with customers on a regular, more frequent basis and collaborate with other Behavioral Health staff. Counselors who work with this population better understand the individual's functional limitations and treatment planning requirements and can better identify comprehensive Individual Plan for Employment, IPE, services and goals to increase successful employment outcomes.

Outcomes are tracked in the case management system by caseload. Of those customers working with an IDVR mental health specialist counselor, in PY2018, 105 individual's successfully obtained employment.

Reciprocal Referral Services between the two VR Programs in the State IDVR and the Idaho Commission for the Blind and Visually Impaired, (ICBVI. The two programs have a Memorandum of Understanding 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 interagency communication, and establishes staff cross-training opportunities.

Customers of both VR programs in the State of Idaho receive comprehensive VR services in a timelier manner. IDVR has recently started obtaining coenrollment data across all WIOA programs. This data will help improve our cross-program referrals and other collaborative efforts. As of the most recent performance quarter PY 2019Q3, both VR programs are collaboratively serving 28 individuals.

For Independent Living, IDVR is the Designated State Entity for the Title VII Part B funds distributed by the Administration for Community Living. IDVR currently contracts and allocates a percentage of the total grant funds to the following:

ICBVI 30 percent

State Independent Living Center (SILC) 30 percent

Living Independence Network Corporation (LINC) 20 percent

Disability Action Center – Northwest (DAC) 10 percent

Living Independently for Everyone (LIFE) 10 percent

Part B funds are used to enhance and expand core independent living services.

This agreement is to describe the transfer VR funds for IL activities as outlined in Section 705 and 713 of the Rehabilitation Act. This agreement increases the IL centers ability to provide services to individuals with disability who require independent living services. IDVR does not track services or outcomes as they relate to this cooperative agreement.

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, childcare, 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.

This collaborative agreement describes the roles, responsibilities, and process between all parties involved. Students participate in internships and other Pre-ETS activities in several rotating work sites. Students develop work skills which will increase their employment options at the completion of the program. IDVR maintains employment information on all successful outcomes. Those students who successfully obtained employment after their participation in Project Search is that IDVR needs to evaluate a better method for collecting and reporting data on customers involved in Project Search.

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

The intent of these agreements is to develop and implement a cooperative system for providing vocational rehabilitation services to eligible American Indians with disabilities and to promote and enhance to the greatest extent possible vocational rehabilitation services like that of those provided by the State of Idaho. IDVR has the basic responsibility to provide rehabilitation services to all eligible customers in the State of Idaho. The Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone Paiute and Shoshone Bannock Tribe, through a Federal Section 121 grant, will work cooperatively with IDVR.

American Indian or Alaska Native customers benefit from the enhanced cross program collaboration described in these cooperative agreements. They experience greater access to services in an expedient manner because of the well-developed relationships and increased collaboration fostered by the agreement. IDVR staff are provided cultural awareness and sensitivity training so they are better prepared to engage with

shared customers. Customers also receive a comprehensive array of unduplicated service.

Currently outcomes are not being tracked in IDVR's case management system; IDVR needs to evaluate a better method for collecting jointly served participants.

The U.S. Department of Veterans Affairs Vocational Rehabilitation and Employment, VR&E Program and IDVR cooperative agreement is entered 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 interagency communication, and to establish staff cross-training opportunities.

Veteran customers with disabilities jointly served by VR&E and IDVR receive faster, more streamlined access to services and shared program resources because of the increased collaboration created by this agreement.

Currently outcomes are not being tracked in IDVR's case management system; IDVR needs to evaluate a better method for collecting jointly served participants.

IDVR has established Partnership Plus, PPLUS, agreements with four Employment Networks EN around the state. PPLUS agreements facilitate referrals between IDVR and the EN under the Social Security Administration's SSA Ticket to Work program. The Agreement defines the responsibilities of each party in working with Social Security beneficiaries, those receiving Supplemental Security Income, SSI, or Social Security Disability Insurance, SSDI, benefits. This partnership is created once the beneficiary selects an EN. A referral to the EN is made when the beneficiary is stable in their employment. This agreement establishes the basis for collaboration and coordination between the beneficiary, IDVR and the EN as the beneficiary transitions from the VR program. The EN will provide continued support on the job, for example benefits counseling, job retention services, and other types of ongoing support, at no cost to the beneficiary. The EN can help the beneficiary maintain or advance in employment and increase their earnings.

The Idaho Department of Labor, IDOL, has revised their PPLUS agreement with IDVR. American Dream Employment Network, ADEN,

an administrative EN, has taken over the technical assistance and training of PPLUS for IDOL. The PPLUS agreement describes the referral process between IDVR and ADEN IDOL under the SSA's Ticket to Work program authorized under the Ticket to Work and Work Incentives Improvement Act of 1999 see Public Law Sections 106 t-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 further describes the responsibilities of each agency in working with Social Security beneficiaries those receiving SSI SSDI benefits.

The cooperative agreements with Employment Networks in the state of Idaho, including the agreement with IDOL, assist those customers who could benefit from additional supports and services needed to maintain their employment. IDVR has experienced low volume referrals to ENs across the state, however IDVR continues to reinforce the value of services provided by ENs for customers who could benefit from additional supports to maintain their employment. IDVR continues to educate staff and works with ENs to market their services to increase the number of referrals. Outcomes are not tracked in the case management system but are tracked by the IDVR Central Office Ticket to Work Program Specialist.

Adult Corrections: IDVR in collaboration with the Idaho Department of Correction, IDOC, has two Memorandum of Agreements, MOA, 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, and Region V Pocatello area the opportunity of the full spectrum of IDVR services. IDOC will contribute certifiable non-federal funds towards the case service expenditures.

Incarcerated individuals with disabilities who are ready to transition back into society, receive services in a more efficient and timely manner because IDVR staff are collocated in correction facilities per the cooperative agreement. Staff are able to engage with customers more frequently, prior to release. Counselors who work with incarcerated and ex-offenders better understand the probation and parole requirements

which can assist individuals with their IPE services and goals and reduce potential recidivism.

Outcomes are tracked in the case management system by caseload. Of those offenders working with an IDVR corrections counselor, in PY2018, 83 incarcerated or ex-offenders successfully obtained employment.

In collaboration with Special Education and IDEA, as well as federal initiatives, IDVR 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 these areas of the state, Region I Coeur d'Alene has two projects, Region II Lewiston has one project, Region III Treasure Valley Special Programs has four projects, Region IV Twin Falls has one project, Region V Pocatello has two projects, and Region VI Idaho Falls has one project.

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

In school districts not covered by the cooperative agreements, students continue to receive the same level of service provision; however, referrals to IDVR are made by school counselors, special education teachers, or by word of mouth. All of the traditional and relevant activities and services are provided by a general caseload counselor. There are

no services offered under the cooperative agreements that are not also made available by counselors providing services in the areas not covered by the cooperative agreements. The counselors who only serve students and youth typically are more knowledgeable and specialized in serving this population.

Students with disabilities benefit from the cooperative agreements IDVR has with LEAs across the state because VR staff are collocated in the when practicable, which results in increased accessibility and availability to students, parents, and teachers. This enhanced access has increased Pre-ETS to those potentially eligible students and students who wish to apply for VR services. The cooperative agreements serve as the foundation for improved relationships between VR, students, parents, and teachers.

IDVR is beginning to see more students reach their employment goal because of the early engagement with teachers, parents, and students. IDVRs case management system does capture employment outcomes for students who apply for VR services. Not all potentially eligible students apply for services, however those that do are also being tracked.

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, AT, program for Idaho is the Idaho Assistive Technology Project, IATP, housed 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 IATP.

The collaboration between IDVR and IATP has improved access to AT services and devices for those individuals with disabilities who can benefit from these services. IDVR staff have a linkage directly to AT resources our existing collaborative efforts to include AT assessments,

services, and devices from AT subject matter experts. AT services and devices can reduce barriers to employment, allowing individuals with disabilities the opportunity to be more productive and succeed in employment. IDVR does not currently track outcomes related to services provided under this agreement. IDVR needs to evaluate a method for collecting jointly served participants. The formal agreement with IATP will be completed by the end of FFY 2020.

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

IDVR 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

IDVR does not currently have any agreements with noneducational agencies serving out-of-school youth.

When indicated, IDVR will engage in a co-enrollment strategy with other WIOA Plan partners, to provide general VR services and disability related supports.

Out-of-school youth age 14-24 not enrolled in a secondary program are encouraged to complete their high school education or pursue a formal or self-study GED program whenever possible to increase their options and access to postsecondary opportunities. This includes referral to Idaho Career and Technical Education's Adult Education program available to those over the age of 16. Idaho Job Corps maintains a partnership with the College of Western Idaho to offer a path to a high school diploma or GED for those ages 16 through 24.

The WIOA Youth program under the Idaho Department of Labor focuses on education, training and employment opportunities for out-of-school youth. WIOA Youth provides an array of services to qualifying youth including dropout recovery services, paid and unpaid work experiences, occupational skill training, leadership development opportunities, facilitation of employer connections, interviewing skills, and mentoring.

Idaho Job Corps, IDJC, offers qualifying youth extensive support for up to two years depending on individualized need. This includes career exploration and education assistance.

Idaho's Disability Employment Initiative grants and the formal agreement IDVR had with the IDOC have ended or are near completion.

Regardless of the presence of formal agreements, these past projects have resulted in better knowledge of IDVR services and staff. Referrals to IDVR from IDJC for example continue to be strong.

Numerous regional partnerships take advantage of local resources or serve as referral sources to IDVR to engage out-of-school youth. These resources differ by location with a common theme of providing a mechanism of outreach for out-of-school youth.

5. State use contracting programs.

Through the State Use Contracting program, CRPs provide skill development and training for individuals with disabilities. While many programs providing state use goods do not meet the integrated criteria established under WIOA, the program does generate income for CRPs allowing increased stability of their overall programs with supplemental revenue. Fiscally healthy CRPs are then able to continue operations in their Competitive Integrated Employment divisions. This indirectly benefits those customers of IDVR who require CRP services.

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-ETS, as well as procedures for the timely development and approval of individualized plans for employment for the students.

IDVR Pre-ETS Highlights. IDVR's Transition Coordinator has extensive experience and an established network across Idaho public K-12 education system. IDVR has developed Pre-ETS implementation strategies to provide services at the following levels, including all required Pre-ETS job exploration counseling, work based learning experiences, counseling on opportunities for enrollment in postsecondary education, workplace readiness training to develop social skills and independent living, and instruction in self-advocacy. IDVR has continued to modify and improve these strategies, including the coordinated and authorized services, as service delivery and partnerships evolve. For example, IDVR has developed numerous MOAs with various LEA. These include contracting with educators to provide a Self-Advocacy curriculum for students previously developed through a partnership between Idaho State Department of Education,

SDE, IDVR, a LEA, and National Technical Assistance Center on Transition, NTACTION. IDVR has also developed MOAs to provide students with an opportunity to participate in a paid work experience while earning summer school credit.

IDVR has also improved coordinated activities by having our VR Counselors work collaboratively with local school personnel to develop effective referral and outreach strategies to maximize opportunities for students with disabilities to participate in Pre-ETS activities. These strategies also include opportunities for students who are receiving accommodations under Section 504 of the Rehabilitation Act. VR Counselors are attending numerous Individualized Education Programs, IEP, meetings and are working with districts to develop a better process for inviting VR counselors to IEP meetings. In addition, VR Counselors are working with districts to coordinate Pre-ETS. VR Counselors are working with LEAs to provide career fairs and career mentoring.

IDVR also works with SDE, LEAs, Institutes of Higher Education (IHEs), and the Council for Developmental Disabilities to put on a Transition Institute for LEAs and VR staff. The Institute is modeled after NTACTION Taxonomy for Transition Programming. The Taxonomy for Transition Programming provides solid practices identified from effective programs and evidence-based predictors of post-school success for implementing Pre-ETS and transition focused education. This Institute allows collaborative planning between LEAs and VR. Teams discuss what transition/pre-employment transition services are available to students and what services are needed by students based on each district. Teams then create plans to help increase the necessary services for students with disabilities.

IDVR has strong relationships with education agencies throughout the state, including formal interagency agreements with several LEAs, a comprehensive formal interagency agreement which addresses collaborative service provision with the SDE, and ICBVI.

IDVR and SDE have developed a comprehensive formal interagency agreement which addresses collaborative service provision. This agreement specifies the programmatic and fiscal responsibilities for each agency and identifies the minimum age for service delivery to students with disabilities. The minimum age is currently 15 and upon approval of the 2020 state plan the agreement will be modified to reflect a minimum age of 14 for service delivery to students with disabilities.

Pre-ETS will be provided to students with disabilities who are potentially eligible or eligible for VR services. This agreement was formalized and signed in August 2018. The agreement is reviewed annually for relevance and will be amended by mutual consent as needed.

Additionally, the agreement details that the IPE must be developed, agreed to and signed by the student, or the student's representative, and the VR counselor, as early as possible in the transition process, within ninety days from eligibility and no later than the time the student leaves the school setting, whichever is earlier.

Lastly, IDVR has partnered with the SDE to implement a Statewide Secondary Transition Plan which correlates to the IDVR's Pre-ETS Plan. The goal on the statewide plan is to develop systems for effective collaboration between students, families, secondary and post-secondary educators, rehabilitation counselors, Career and Technical Education (CTE), and service providers to provide quality transition activities and Pre-ETS to students across Idaho go to section 2B to review the plan details.

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

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

The formal interagency agreement with the SDE, IDVR, and ICBVI contains several provisions designed to promote communication and the sharing of technical expertise in transition planning.

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

The agencies agree to:

Encourage staff to work closely with LEAs to ensure coordination between education services, Pre-ETS, and vocational rehabilitation services.

IDVR and ICBVI counselors will provide training and information to school district personnel, students and families on Pre-ETS and VR services, including their role as IEP team members.

IDVR and ICBVI counselors are available to consult with educators concerning pre-employment transition and vocational rehabilitation services for students to assist them toward employment.

IDVR and ICBVI counselors will collaborate with the LEAs in their service area to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs. IDVR and or ICBVI counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and or student's parent or legal guardian. VR counselors may attend either in person or via video or telephone. The IDVR and or ICBVI counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.

IDVR and ICBVI counselors will consult with educators concerning referral of students to IDVR and or ICBVI for rehabilitation services, including pre-employment transition services. Students with blindness or visual impairments should be referred to ICBVI. Students with multiple disabilities may have dual cases with both IDVR and ICBVI to provide rehabilitation services.

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

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 students with disabilities who are actively engaged in postsecondary education, employment, and community activities. Interagency cooperative planning, information sharing, and the collaborative use of resources assist in accomplishing IDVR's mission at the state and local level. Members include the Idaho SDE, IDVR, ICBVI, Idaho Educational Services for the Deaf and Blind, Idaho Parents Unlimited, Council on Developmental Disabilities,

Department of Labor, Boise State University, Idaho State University, The Assistive Technology Project, Idaho Health and Welfare, Juvenile Corrections IDJC, IDOC, and LEAs.

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

IDVR, SDE, Idaho Parents Unlimited, Nampa School District, Lake Pend Oreille School District, and Idaho Falls School District, have developed and implemented a statewide secondary Transition Plan with support and assistance from NTACTION. The goal of the plan is to develop systems for effective collaboration between students, families, secondary and post-secondary educators, rehabilitation counselors, CTE, and service providers to provide numerous transition activities and pre-employment transition services.

Expected outcomes include increased teacher knowledge of agencies and services, increased number of students receiving pre-employment transition services or needed educational transition services, increased student knowledge of agencies and other services, increased families' knowledge of agencies and services, increased collaboration with CTE, increased number of students participating in higher education or competitive employment, and provide more effective Pre-ETS based on student need.

Furthermore, the formal interagency agreement with SDE, the IDVR, and ICBVI contains several provisions designed to facilitate the development and implementation of IEPs. The agencies agree to cooperate in the development of transitioning students' IEPs and any relevant IPEs. Development of the IEP is vested with the IEP team, including the student and his/her parent or guardian. Approval of the IPE is vested with the IDVR or ICBVI, the student and his/her parent or guardian.

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

IDVR has continued to participate in agreements with many LEAs across Idaho, initiated prior to WIOA, however these agreements do not afford unique services to students in these districts. In other words, pre-ETS and transition services offered under these agreements do not increase

services or expand the scope of services over any other political subdivision of the state. All Pre-ETS and transition services are offered statewide to all LEAs regardless of agreement status. IDVR has staff assigned to all public high schools across the state.

IDVR, ICBVI, and SDE agreement ensures a coordinated, comprehensive system focusing on students with disabilities as they transition from secondary school to post-school activities, promoting post-secondary education, vocational training, competitive integrated employment including supported employment, continuing and adult education, adult services, independent living, and community participation emphasizing a team approach to facilitate the transition of students with disabilities from public education into employment.

This agreement addresses the following:

Pre-ETS will be provided to students with disabilities who are potentially eligible or eligible for VR services beginning at the age of 14 (age will change upon state plan approval).

Roles and responsibilities of each agency, including which agency is state lead

Financial responsibilities of each agency, including the purchase of AT Procedures for outreach, consultation, training, and technical assistance
Transition planning

Referral process for students with disabilities to the appropriate VR program

Data release and data sharing

Dispute resolution

Prohibition on entering into an arrangement with an entity holding a 14(c) special wage certificate for the purpose of operating a program where people with disabilities are engaged in work at subminimum wage.

Coordination and documentation requirements under section 511
IDVR has created a Youth Subminimum Wage Document Requirements Checklist which includes the documentation requirements and responsibilities under Section 511. Various requirements are detailed in the top-level checklist for youth, including the requirement for a transition or Pre-ETS service to be completed prior to youth verification of Career Counseling and Information and Referral, CCI&R, under Section 511. The Transition Services Documentation and Checklist details LEA requirements for documenting provision of a transition service. Finally, the Youth Career Counseling Verification Requirements section outlines

areas and responsibilities of IDVR in ensuring regulations are met ahead of providing verification of receipt of CCI&R.

Section 511 Subminimum Youth Checklist

The following steps must be completed before IDVR can provide verification of Career Counseling and Information and Referral to Youth Seeking Subminimum Wage Employment

The provision and documentation of transition services or pre-employment transition services (a. or b. must be completed)

Transition Services Documentation Checklist Completed

Pre-employment Transition Services Documentation Checklist Completed

Application for VR services AND one of the following (a. b. or c. must be completed):

Ineligibility Determination Checklist Completed

Closure after an Approved IPE Checklist Completed

Informed Choice Not to Pursue Competitive Integrated Employment Form Completed

The provision of Career Counseling, and Information and Referral Services, ALL must be completed)

Youth Career Counseling Verification Elements Signed by Counselor Information and Referral Packet Provided to Youth

Career Counseling, Information and Referral Youth Verification Form for Stated Subminimum Employment Goal Completed

Once the all of the preceding steps have been satisfied, verification of CCI&R can be provided to the youth and they would be able to legally work for less than minimum wage. The 511 Subminimum Youth Checklist only has to be completed once. After the youth completes this process, they would engage in group sessions at the 14c to meet ongoing requirements for CCI&R for youth.

Section 511 Transition Services Documentation Checklist and Cover Sheet

34 CFR § 397.30 outlines the responsibilities of local educational agencies to youth with disabilities who are known to be seeking subminimum wage employment. All elements of this form must be completed in order for the checklist to be considered valid evidence of the completion of transition services for the purposes of satisfying Section 511 requirements of the Workforce Innovation and Opportunity Act.

To be completed by the LEA: The documentation of completion of appropriate transition services for a youth with a disability under IDEA This can be transmitted in the form of an IEP, but must contain at a minimum (please verify the following are contained in this release):

Youth's name

Description of the service or activity completed

Name of the provider of the required service or activity

Date required service or activity completed

Signature of educational personnel documenting completion of the required service or activity

Date of signature documenting completion of the required service or activity

Date and method (e.g., hand-delivered, faxed, mailed, emailed, etc.) by which document was transmitted to IDVR

A cover sheet that itemizes the documentation that has been provided to the VR program regarding that youth (completion of the elements above satisfies this requirement)

Verification that the educational agency will keep a copy of all documents sent to the VR program

Signature of the individual transmitting this documentation

(To be completed by Vocational Rehabilitation):

Verification that VR has filed a copy of this information

Verification that this information has been provided to the youth

Youth Career Counseling Verification Elements

Prior to initial verification of CCI&R for youth known to be seeking subminimum wage employment, IDVR must ensure counselors providing the service address the following elements of the VR process including a discussion of competitive integrated employment and services available at VR to assist the individual in making an informed choice whether or not to continue pursuit of employment with a 14(c) certificate holder.

Self-advocacy, self-determination and high expectations

Identify the individual's desires for employment including type, pay, hours, benefits, etc.

Ensure informed choice

Review of any assessment information available

Primary employment factors

Strengths

Interests

Abilities

Capabilities

Resources
Priorities
Concerns
Informed Choice
Person-centered planning
Marketable skills
Soft skills (current and where development is needed)
Use of labor market information
In-demand occupations
Job exploration
Education and experiential requirements
Pay
Hours
Functional capacity requirements
Career pathways
Electronic resources and navigation fundamentals
SSA Benefits Planning

When engaging in career counseling with individuals with disabilities, rehabilitation professionals should ensure that they are aware of cultural differences and that they discuss the available options such as supported or customized employment. A discussion of the need for assistive technology or reasonable accommodation on the job is important to maximize the potential for success. It is helpful to assess the individual's support system and to provide information on available resources for the individual.

A completed signature sheet signed by the customer and VR counselor affirming that the elements of Career Counseling have been discussed with the customer in the course of the provision of Vocational Rehabilitation Counseling and Guidance.

The current agreement establishes the following roles and responsibilities for the involved parties:

SDE agrees to Assume the role of lead agency in facilitating interagency planning with LEAs and implementing educational programs and transition services for students with disabilities from high school to post-high school services.

Support LEAs in their efforts to write IEPs using an outcome oriented focus and to coordinate transition activities for each IEP eligible student, beginning no later than the IEP created before the student turns age 16 years old earlier if appropriate, and to address future student needs in

the areas of post-secondary education, vocational training, employment, and adult living and communication participation, including assistive technology.

Invite IDVR and or ICBVI to provide information regarding their services, including their role as an IEP team member to school district personnel, students, and their families.

Invite IDVR and or ICBVI counselors, with prior consent from adult students or parents or legal guardians, as appropriate, to participate as members of IEP teams for students who have been referred to IDVR and or ICBVI for rehabilitation services, or earlier if appropriate.

Work with IDVR and ICBVI VR counselors to identify a process for such counselors to provide input and participate in the development of a student's IEP, including pre-employment transition services, when appropriate, and identify appropriate school personnel who, with prior consent from adult students or parents or legal guardians, as appropriate, will initiate the referral process of students receiving special education services, and students who have a 504 Plan Rehabilitation Act, or students with disabilities for example physical, medical, or visual, etc. who are not eligible for special education services, to IDVR and or ICBVI for pre-employment transition services and or vocational rehabilitation services.

IDVR and ICBVI agree to establish the age of 14 to begin working with students with disabilities. Encourage staff to work closely with LEAs to ensure coordination between education services, Pre-ETS, and vocational rehabilitation services. IDVR and ICBVI counselors will provide training and information to school district personnel, students and families on pre-employment transition and vocational rehabilitation services, including their role as IEP team members.

IDVR and ICBVI counselors are available to consult with educators concerning pre-employment transition and vocational rehabilitation services for students to assist them toward employment. IDVR and ICBVI counselors will collaborate with the LEAs in their service area to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.

IDVR and or ICBVI counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and or student's parent or legal guardian. VR counselors may

attend either in person or via video/telephone. The IDVR and or ICBVI counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.

IDVR and ICBVI counselors will consult with educators concerning referral of students to IDVR and or ICBVI for rehabilitation services, including Pre-ETS. Students with blindness or visual impairments should be referred to ICBVI. Students with multiple disabilities may have dual cases with both IDVR and ICBVI to provide rehabilitation services.

IDVR and ICBVI counselors will accept referrals for Pre-ETS or VR services, when appropriate, and will work collaboratively with input from the student's IEP team, for service provision and or to develop an IPE. The vocational rehabilitation counselor, student, student's parent or legal guardian, and members of the student's IEP team will collaborate to identify required VR services that will move the student towards their employment goal, and all Vocational Rehabilitation State Plan requirements, including Order of Selection, will apply to all services provision under this cooperative agreement.

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

IDVR, ICBVI, SDE currently have a formal cooperative agreement.

The agreement stipulates that the vocational rehabilitation agency will initiate outreach and work with the LEAs to identify potential students with disabilities who need Pre-ETS and VR transition services for students ages 14 through 21. This involves informing the student, or when appropriate their parent or legal guardian, as early as possible about the vocational rehabilitation program, its purpose, eligibility criteria, application procedures, and the scope of available VR services, to include Pre-ETS.

IDVR has also participated in a series of face to face meetings in communities across Idaho including key stakeholder engagement through a series of regional special educator meetings, presenting at statewide administrator meetings, presenting at Tools for Life to parents, students, and educators, reaching out to Idaho Parents Unlimited, reaching out to the Idaho Interagency Council on Secondary Transition, and providing ongoing discussions with SDE.

IDVR also developed a Transition Leadership Team. This team has members from each of the eight regions. These leaders provide outreach across the state.

Additionally, IDVR counselors have worked with educational counterparts to significantly increase the number of potentially eligible students receiving Pre-ETS and those found eligible for the VR program.

Finally, IDVR staff, SDE, the Idaho Parents Center, Idaho Educational Services for the Deaf and Blind, WINTAC, and NTACT worked to create a strategic plan for Pre-ETS in Idaho. The first goal developed by the team was to increase internal VR staff and external school districts, parents, students, community partners clarity and messaging regarding VR process and how Pre-ETS fits into the overall continuum of VR services. The following action steps were created to achieve this goal:

Create a process to address information sharing between school and VR counselors

Service request form

IEP

504

Develop materials to share information about VR services with parents and schools

Pre-ETS

VR Services

Options for VR Counselors to participate in the IEP process by

Providing information about services

Developing services to address student goals/needs

Creating a timeline for initiating referral/eligibility

Create training and materials that will increase students' understanding about the VR process and services

Complete the internal Guidance Document regarding Pre-ETS to be used by IDVR staff

Accountability Measures- Outcomes for Students

Develop a continuum of services reflective of Pre-ETS and Transition Services

Create opportunities and materials to use with families to increase their understanding of expectation of work and VR Services

The second goal is to strengthen cross agency partnerships to increase collaboration in development and implementation of Transition Services.

The following action steps were created to achieve this goal:

Review and adjust data collection that will improve ability to better inform decision making

Work with SDE to obtain break out of schools, # of students on IEP and 504

Identify additional data points and how to use them

Communicate to the VR field staff how to use the new data points

Share IEPs using a new system

Regional managers are informed and engaged in how they can support VR Counselors in providing Pre-ETS and Transition Services.

Identify strategies to include RMs

Outreach strategies to rural schools are identified with steps to address student participation

Outreach strategies identified for juvenile justice and Foster Care.

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. IDVR does have cooperative agreements with several nonprofit CRPs for the coordination of services provided by Employment Networks for individuals who are Social Security beneficiaries who are Ticket holders. These cooperative agreements describe the coordination between both agencies.

IDVR maintains a CRP portal on IDVR's website. The portal hosts communication relevant to CRPs and IDVR's CRP Manual. This Manual was first issued in January 2019 and incorporates significant input solicited from CRPs. The CRP Manual contains information on:

Service Billing Criteria and Process

Service Definitions

Overview of the On-Site CRP Monitoring Review and Corrective Action Process

Definition of Remote and Underserved Areas where IDVR supports travel due to lack of local services in identified areas

CRP Services Crosswalk to better align services under WIOA

Appendix information on the initial pilot for Customized Employment including rates and milestones for that pilot

The manual is intended to serve as a living document which will be updated over time, as needed, with input from CRP stakeholders. A

new version of the CRP Manual is tentatively slated to be released July 2020. IDVR has already collected CRP comment in late 2019 for Manual improvements. Planned iterations of the guide include:

Examples of completed referrals/sample reports to promote quality referrals from VR staff and reports from CRP staff

Modified monitoring protocol to align with WIOA priorities

CRP onboarding requirements (accreditation, insurance, and prerequisites to ensure a baseline of quality and accountability)

Updated fee schedule to better align service compensation and service complexity

CRPs provide specific services for customers based on a fee-for-service or through a specific invitation to bid on a Request for Proposal, Idaho CRPs must be accredited by either the Commission on Accreditation of Rehabilitation Facilities (CARF) or the Rehabilitation Services Accreditation System (RSAS), follow the process and procedures mentioned in this manual, and undergo periodic monitoring by IDVR to continue a working relationship with IDVR. This manual addresses the IDVR's state-federal program. The CRP Manual outlines the service billing criteria and process required before IDVR will process bills, including prohibitions on billing for multiple customers unless group services are authorized. Group service rates differ from individual service rates and are outlined in IDVR's Fee Schedule. Furthermore, day rates are published for non-community-based assessment where no other options are available in the community. This section also mandates notification in the eventuality of anticipated service discontinuation and prohibits customer abandonment instead requiring at least 30 days notification for a soft handoff to another CRP ahead of CRP closure in a region. A dispute resolution process including an escalation chain is also established in this section of the guide.

IDVR identifies allowable services under Section Two of the CRP Manual CRP Service Definitions, service outlined in this section include the major headings of assessment, job related supports job search activities, short-term job supports, job readiness training, Pre-ETS required activities under 34 CFR 361.48(a)(2), and SE. Additionally, requirements to document fading and or skill acquisition for the continue of SE hours are articulated in this section. IDVR is working with CRPs to strengthen understanding of documented progress toward SE stability, and CRPs have requested additional guidance in this area. IDVR will issue improved guidance in the tentative July 2020 release of the

Manual. Slated improvements include increased guidance on specific services with a potential incorporation of the agency's benefits planning initiative. The manual covers documentation of stability and transition to extended support and outlines the Youth Extended Services option to provide this service to qualifying youth where no alternate funds for extended support are available.

IDVR is in the process of evaluating the CRP fee schedule for allowable costs using WINTAC's "Review of Vocational Rehabilitation Agency Rates, Methodology, & Monitoring of Performance for Purchased Service" which includes an evaluation of rates for similar services paid by other SVRAs, Federal cost principles at 2 CFR 200.405(a) to align costs to relative benefit, accreditation requirements, payment methods fee-for-service, performance, contracts, reporting requirements, and monitoring.

IDVR's 2020 modification of the guide will apply each of these considerations to inform potential fee updates while IDVR's current CRP Manual January 2019 does address each requirement, IDVR's analysis may incorporate innovative practices used by other SVRAs. Currently IDVR does not separate rate by complexity of rehabilitation needs but is seeking to remedy this deficiency. IDVR is enlisting the assistance of the Idaho Division of Purchasing to inform the analysis of service rates. Novel rates for CE and Benefits Planning are expected outcomes of this process, in addition to a reconsideration of the agencies total fee schedule.

Pre-ETS agreements including rates are established under a separate process. In areas where volume is sufficient, IDVR employs bids/contracts. The majority of contracts are filled in regional population centers, however when an area has no contract rural and remote Idaho), or all slots are filled for a contracted group, IDVR employs individual Pre-ETS provision at existing hourly rates to ensure the availability of Pre-ETS.

IDVR issues an annual report of CRP performance, the Community Rehabilitation Partner Employment Report (CRP-R) process which produces these following elements by CRP and region, the number of CRP Provided Employment Services, employment outcomes with CRP involvement in closure, average hourly wage of placements, average hours worked, average annual earnings, percentage of employer sponsored benefits, OES employment outcomes by category, primary

impairments served by percentage of total served, and percentage served within age strata.

The CRP-R is disseminated to CRPs annually and used by VR staff to assist with informed choice of CRP when selecting a provider for planned services.

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.

SE means competitive integrated employment (CIE), including CE or employment in an integrated work setting in which an individual with a most significant disability, including a youth with a most significant disability, is working on a short-term basis toward competitive integrated employment that is individualized, and customized, consistent with the unique strengths, abilities, interests, and informed choice of the individual, including ongoing support services for individuals with the most significant disabilities. SE can be provided by VR for a period of time not to exceed 24 months, unless the Vocational Rehabilitation Counselor, VRC, and customer jointly agree to extend the time to achieve the employment outcome identified in the IPE.

SE service are restricted to those customers assigned to the Most Significant Disability, SD, MSD, category. The Disability Priority Page in AWARE is used to document the justification of priority category assignment. The category assignment is also displayed on the eligibility determination. A brief breakdown of severity categories follows:

Severity of Disability Priority Categories

Priority 1 MSD

Meets criteria for SD; and

Experiences severe physical or mental impairment that seriously limits three or more functional capacities such as mobility, work tolerance, communication, self-care, interpersonal skills, self-direction, and work skills in terms of an employment outcome; and requires multiple primary IPE services over an extended period of time

Priority 2 SD

Receives SSDI or SSI or all of the following:

Meets criteria for D; and experiences severe physical or mental impairment that seriously limits one or more functional capacities such as mobility, work tolerance, communication, self-care, interpersonal skills, self-direction, and work skills in terms of an employment outcome; and requires multiple primary IPE services over an extended period of time

Priority 3 D

Has a physical or mental impairment or one severe physical or mental impairment; and

Has a substantial impediment to employment as a result of the impairments; and

Who can benefit in terms of an employment outcome from the provision of vocational rehabilitation services.

Furthermore, SE is indicated for individuals for whom CIE has not historically occurred, or for whom competitive integrated employment has been interrupted or intermittent as a result of a significant disability; and because of the nature and severity of their disabilities, need intensive supported employment services and extended services after the transition from support provided by IDVR in order to perform this work.

A Comprehensive Assessment of Rehabilitation Needs must contain information supporting a need for SE and ES prior to engaging a customer in SE services

Any additional assessments/evaluations purchased by IDVR to determine this need should be conducted in an integrated setting to the greatest extent possible.

For the purposes of this policy, SE refers to support services like job coaching provided after placement and before the individual reaches initial stability, and prior to utilization of extended services long-term supports.

Extended Services (ES) are those services, including Youth Extended Services (YES), provided after the assessment of initial stabilization when required for an individual to maintain employment (to sustain employment stability). IDVR limits the provision of extended services exclusively to youth.

WIOA requires IDVR to make YES available when youth have no comparable ES resources available in the community. YES can continue to be provided until: Comparable benefits become available external funders are identified or YES is provided for four years or The individual reaches the age of 25 and no longer qualifies under the definition of youth. IDVR does not provide ES to customers 25 or over as this is an explicitly prohibited activity under WIOA. Youth extended services are only available to youth with most significant disabilities using Titles I and VI funding; and supported employment services are only available to individuals with most significant disabilities.

SE services under IDVR are only offered by qualified providers as identified in section (e): Cooperative agreements with private/nonprofit organizations.

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

IDVR utilizes the State's EES program as well as the Medicaid HCBS, and Aged and Disabled (A&D) waivers for long term support. IDVR will continue to work closely with each program overseeing these resources to streamline our referral process and improve utilization of this external source of extended services funding. The following provides more detail on the working relationship between each ES entity and IDVR.

IDH&W provides the following guidance on extended services under IDVR's H&W banner:

SE agency recommendation must be completed by the IDVR when transitioning from vocational rehabilitation services or by the SE agency CRP identified on the plan or addendum. Documentation must include

the amount of Service, the level of Support Needed, employment goals, and the transition plan.

IDVR provides funding for job development services and initial job coaching through a CRP agency. The length of time needed for job development varies depending on the individual. As soon as the person has become employed, it is critical to work quickly to ensure there is no gap in the individual's job coaching support in the workplace. The CRP will communicate to the Service Coordinator plan developer that the participant has been hired so planning for transition to Medicaid-funded Supported Employment services [extended services] can begin. An Employment Agency Recommendation form has been developed to help with the transition process. It includes information from the CRP agency about the participant, their job tasks in the workplace, and a recommended level of service needed by the participant. This information will be used by the plan developer to complete an addendum to the ISP. A transition meeting will be called and facilitated by the VRC. This meeting should include the Service Coordinator Plan Developer, guardian and any other identified members of the Person-Centered Planning team to ensure all parties understand the shift to Medicaid Waiver Supported Employment and any signatures can be gathered as needed for addendum or plan development. IDH&W refers to CARF and RSAS (or equivalent) accreditation requirements in order to receive waiver funding.

EES extended services are provided under EES policy which requires the certification of an extended employment service provider. These providers are approved by the EES program administrator on a case by case basis. All EES approved providers are also CRPs which are initially approved as CRPs under IDVR's accreditation requirement.

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

IDVR has developed policies to ensure that Youth Extended Services (YES) can be provided up to four years as needed for IDVR customers under the age of 25 following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. Upon exhaustion of Title VI funds reserved for youth supported employment, IDVR will continue to support YES with Title I

funds, as required by WIOA, and will continue to leverage other sources of extended services. YES funds are considered only when external sources of extended services funding are immediately unavailable and would unnecessarily interrupt the continuity of services.

IDVR supports the utilization of Natural Supports where available and encourages the development of Natural Supports for all SE customers. Natural Supports are supports and services typically available to other employees or supports created to provide supports through people or other resources typically available in the work, home, and community environment.

Stakeholder commitment for Natural Supports include a Plan for change and IDVR encourages a written commitment by the individual providing NS, including contact information for a soft handoff in the event a support loss is anticipated.

These must be satisfied before VR can close an SE case successfully, the individual must have completed SE services and is no longer receiving VR funded services including extended services for youth under VR those receiving YES remain an open case in the VR system, the individual has maintained employment stability for a period of 90 days after transitioning to extended services, the job meets the definition of CIE. The job is consistent with the vocational goal specified in the IPE. At the end of the 90 days the customer and VRC agree that the customer is performing well in employment a lack of employer agreement would indicate instability and the individual is informed, through appropriate modes of communication, about the availability of Post-Employment Services.

g. Coordination with Employers

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

1. VR Services; and

IDVR hired a Business Liaison in 2016 to oversee the coordination of employer related outreach efforts within IDVR and to coordinate employer contact under the aegis of WIOA through partnerships with Titles I-IV and other combined state plan partners.

Initial efforts illustrated additional staffing was required to advance the vision established for serving Idaho businesses. As a result, in 2017 the Business Engagement Team (BET) was created comprised of at least one to two IDVR staff in each regional office and activities of the BET are directed by the Business Liaison. Regional Management representation is strong on the team, with three of eight RMs participating in an advisory role.

The BET has evolved a mission statement, to intentionally create and maintain long term partnerships with businesses for mutually beneficial outcomes for employers and job seekers with disabilities.

Following the creation of an initial charter, sponsored by IDVR administration, the BET has engaged in a number of preliminary activities, including the creation of a mandatory “Business Basics” online training for all staff, a method for tracking business outreach activities through our internal case management system, updates to IDVR’s external business relations portal, and development of marketing materials for business outreach and education.

Activities for the BET are partly informed by an annual survey. This survey helps the Business Relations Liaison prioritize activities based on input from the field. The latest survey indicated high perceived needs for the following: Disability Awareness training (68 percent), Accommodations and Assistive Technology (65 percent), and Hiring Incentives for Employers (68 percent). Additionally, BET is now active in most of the chambers of commerce across Idaho including representation in each region of IDVR.

A toolbox for members of the BET has now been established and is growing. The toolbox features resources BET and other IDVR staff can use to promote positive employer engagement. There are tools for staff as well as a growing number of tools designed for employers including a new initiative to create a training for employers around disability etiquette. This group will be meeting early in 2020 to draft a formal strategic plan and further refine and articulate goals, strategies, priorities and staff responsibilities under the team. Expanding outreach to employers for students and youth in transition is a primary consideration for the coming year for the BET with a business engagement transition pilot for IDVR Region 1 launching in 2020.

As a part of the BET activities in PY 2018, the team led a presentation at IDVR's annual all-staff Inservice to help explain how they serve as regional resources to promote positive business engagement opportunities.

BET, while new, has engaged in two in-depth activities with major Idaho corporations, WinCo and HP. While talks with WinCo are still preliminary, the HP Spectrum Success Program is a direct result of sustained engagement and partnership with HP and would not have been possible without the help of Washington State Division of Vocational Rehabilitation and Microsoft who had engaged in some trailblazing efforts matching individuals with autism and STEM jobs. The willingness of these partners to provide technical assistance and expertise were instrumental in the program's success and as a result HP is engaging in a second cohort with IDVR beginning in early 2020.

IDVR will continue to coordinate business outreach efforts with the Idaho DOL, and their business outreach team which serves as the central point of contact for WIOA coordinated business outreach activities.

IDVR's Business Liaison is engaged with the National Employment Team (the NET) and attends the national conference in addition to receiving regular updates, conference calls provided through a NET community of practice. IDVR also has a working group through federal Region X (WA, OR, AK, ID) where business engagement leads from each state share best practices and approaches.

IDVR has traditionally engaged in the creation of VR Success Stories to showcase strong annual placements. The Business Liaison and BET have worked to overhaul, expand, and professionalize these segments and will now producing multiple success stories per Region, with two being selected for a full video production which showcases the customer and employer's success with these placements.

IDVR began collecting information related to business services in late PY2017. During this Project Year the Business Liaison and Deputy Administrator began working on an Autism Spectrum Program with HP. This collaborative effort assisted HP to develop a pilot program to hire student interns with disabilities who were interested in pursuing computer science and information technology related careers. This single business engagement activity is currently on-going as HP intends in offering this program on an annual basis. This initial pilot development

took over six months of collaborative engagement with IDVR and HP. To view a summary of the HP program and application procedures visit <https://www8.hp.com/us/en/hp-information/about-hp/diversity/spectrum-success.html>

In PY2018 IDVR began earnest efforts to capture data on business engagement activities using our case management system. In PY2018 the BET made contact with over 350 business across the state. Of those business contacts, approximately 14 percent, 49 BET staff had consistent two or more contact with the employer. IDVR anticipates that data collection and business engagement activities will continue to advance in the upcoming years.

Additionally, IDVR's marketing and website development efforts recently yielded benefits. Norco, a local home health durable medical equipment company, submitted an inquiry through our website. The Business Liaison is now working on business development activities with the company and also working with staff across the state as Norco is interested in hiring people with disabilities, as they are federal contractor.

2. Transition services, including Pre-ETS for students and youth with disabilities.

The age requirement for a student with a disability who can receive Pre-ETS for Idaho Title IV WIOA programs is 14 years old to not older than 21 up to the individual's 22nd birthday, effective this state plan. In prior plans, the lower age was 15.

IDVR works with employers to provide the five required Pre-Employment Transition Services and Transition services to both students and youth with disabilities in a competitive integrated setting. IDVR provides a coordinated set of transition activities that are outcome oriented and promote movement from school to post-school activities; including postsecondary and vocational training, career exploration, in competitive integrated employment. Other transition services we provide include working with employers to provide job-related services, job search and placement assistance, job retention services, and follow-up and follow along services.

IDVR provides transition services as "group services" or as "individualized services". Group transition services are provided to potentially eligible students; group transition services may also be

provided to eligible students and youth with disabilities. Individualized transition services are only provided to students and youth who have been determined eligible and have an IPE.

In the past, Zoo Idaho worked with students who attended Academy NextT. Academy NextT is an IDVR project where students spend one week on the Idaho State University campus to participate in job exploration, career counseling, practice interview skills in a simulated environment using an avatar, self-advocacy, independent living skills, community integration, and college life. Students learn to budget; experience college classes; learn to use technology to support note taking including the use of Livescribe pens, Chromebooks, and iPads; tour campus; and with meet disability services staff to better understand services and resources available to them. In the future, IDVR will consider making this service available to youth, when appropriate.

IDVR has also coordinated with Idaho Parents Unlimited to offer the Work of Art Program. Idaho Parents Unlimited offered numerous programs to students where students work with employers to secure a job to create corporate art; Human Rights Education, Cultural Alliance, and Lineberry Orthodontics are a few examples of employers participating in this program during the last year. Students were paid minimum wage by Idaho Parents Unlimited for their work on the project. The program connected students with disabilities to employers in the community and provided them with a meaningful employment opportunity. HP provided the students, their families, and agency partners with a reception following the experience where they could display their creations. The reception was a way to thank the students for their hard work and dedication to the project. In the future, IDVR will consider making this service available to youth, when appropriate.

IDVR has also worked directly with employers to provide students with 100 hours of paid work-based learning experiences. Early efforts have focused on services available to students with disabilities. In the future we will make this service available to youth, using the new RSA911 service category: Work-based learning experience.

IDVR is currently developing a curriculum for employers to use with groups of students and youth to provide career exploration and to understand employment opportunities and career pathways in specific career clusters. This will promote relationships with businesses, and between business, students, and youth.

Additionally, we are working on piloting a reverse job fair followed by a work-based learning experience in northern Idaho. The program will begin during the student's senior year of high school. Students will complete their senior project with a specific employer to prepare for the reverse job fair. Following graduation, the student or youth will then complete the work-based learning experience with the employer.

h. Interagency Cooperation

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

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

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

IDVR has collaboratively developed a draft agreement with H&W as it relates to Title XIX of the Social Security Act.

There currently is no formal agreement. IDVR's collaboration with H&W has been significant in the area of supported employment. We have a process that easily and conveniently identifies what services customers are eligible for through approved Medicaid Waivers. This occurs through an individual release of information, but the process is agreed upon by both agencies and is very timely. This provides IDVR with timely understanding of services that can assist an individual with the VR process, employment needs and a funding source if extended services are necessary to maintain employment. Additionally, IDVR has participated over the past 2 years with a Health and Welfare driven "Community Now" engagement with all stakeholders and individuals that access services through Health and Welfare. The focus was on expansion of services through Medicaid that supports living and working in their community. IDVR has been able to provide significant input to ensure that the two programs complement each other and support successful employment services and outcomes. IDVR and H&W have also had trainings to support the VR staff on Medicaid services and benefits. This training assist IDVR VR staff to assist customers and

families identify how those services can support success in an employment outcome.

The formal cooperative agreement has not been finalized but is anticipated to be signed by the end of FFY 2020. The agreement outlines joint responsibilities, eligibility criteria, referrals, financial responsibilities, confidentiality provisions, and accountability and controls for IDH&W and IDVR.

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 (ADDS) program under the Department of H&W. There currently is no formal agreement. IDVR's collaboration with H&W has been significant in the area of supported employment. A significant portion of the SE population are individuals with developmental disabilities. IDVR and ADDS has a process that easily and conveniently identifies what services customers are eligible for through Medicaid Waiver. This occurs through an individual release of information, but the process is agreed upon by both agencies and is very timely. This provides IDVR with timely understanding of services that can assist an individual with the VR process, employment needs, and a funding source if extended services are necessary to maintain employment. Additionally, IDVR has participated over the past two years with a Health and Welfare driven "Community Now" engagement with all stakeholders and individuals that access services through Health and Welfare. The focus was on expansion of services through Medicaid that supports living and working in their community. IDVR has been able to provide significant input to ensure that the two programs complement each other and support successful employment services and outcomes. IDVR and H&W have also had trainings to educate VR staff on Medicaid services and benefits. This training allows IDVR staff to better assist customers and families to explain how those services can support success in an employment outcome.

3. The State agency responsible for providing mental health services.

The IDVR and H&W-Behavioral Health update this agreement annually for the purpose of better serving Idahoans experiencing severe and persistent mental illness. A team approach will be used to ensure that the Idahoans served by this agreement will benefit as to remaining de-

institutionalized and successfully integrated into their respective communities from a psychological, psychosocial, and employment perspective. Those customers who have a severe and persistent mental illness deemed not eligible for this program will be referred to the general IDVR counselor. Those customers who have a severe and persistent mental illness deemed ineligible for IDVR services will be referred to other appropriate resources for assistance. A designated VR counselor and staff member are assigned to an H&W Behavioral Health Region to better serve customers. The Department of Health and Welfare provides certifiable non-federal monies for IDVR services per explained in the interagency cooperative agreement.

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

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

1. System on Personnel and Personnel Development

A. Qualified Personnel Needs

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

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

IDVR currently employs a total of 148 staff. Total positions for qualified Rehabilitation Professionals VRC and ARM is 41 with three current vacancies and 35 projected vacancies over the next five years. Total positions for vocational rehabilitation specialist, VRS, is 26 with one current vacancies and 16 projected vacancies over the next five years. Total positions for qualified vocational rehabilitation assistants is 48 with no current vacancies and 10 projected vacancies over the next five years. Total positions for field management staff is eight with no current vacancies and five projected vacancies over the next five years. Total positions for

human resources is two with one current vacancy and no projected vacancies over the next five years. Total positions for fiscal is five with one current vacancy and one projected vacancies over the next five years. Total positions for staff trainer is one with no current vacancies and no projected vacancies over the next five years. Total positions for planning and evaluation is five with no current vacancies and one projected vacancy over the next five years. Total positions for transition coordinator is one with no current vacancies and no projected vacancies over the next five years. Total positions for business liaison is one with no current vacancies and no projected vacancies over the next five years. Total positions for administrative assistants is three with no current vacancies and two projected vacancies over the next five years. Total positions for deputy administrator is one with no current vacancies and no projected vacancies over the next five years. Total positions for administrator is one with no current vacancies and no projected vacancies over the next five years. Total positions for chief field services is one with no current vacancies and no projected vacancies over the next five years.

IDVR 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 1.75 million people, thus a minimum of 87.5 QRPs over the next five years would be required to meet this ratio. IDVR currently has a total of 41 QRP is VRC and ARM and anticipates needing 50.5 additional positions. This shortfall in part will be addressed by employing VRS with the understanding that they work toward VRC QRP status which includes the CRC designation. IDVR currently has 26 VRS positions filled leaving a shortfall of 24.5 QRP positions across Idaho. IDVR does not anticipate all VRS positions will achieve QRP status, leaving IDVR to supplement QRPs with VRS position in the short and intermediate term. Furthermore, numerous factors, including shifting Idaho working-age demographics and WIOA workload increases will require a reassessment of the 1 in 20,000 staffing model. In addition, one VRA position would be necessary to support the QRP to meet the demand for IDVR services. The anticipated number of vacancies expected due to retirements or individuals leaving the Agency over the next five years are noted in the above chart. Finally, IDVR's

financial projections for FTE availability illustrate that we will not be able to fully staff to meet the 1:20,000 ratio to match record growth rate in Idaho. The Governor is currently focused on austerity measures to prepare for an imminent recession and will not support any increase of FTEs for non-K-20 educational programs. Current FTE allotment has been reorganized since the 2018 plan. This includes the addition of Permanent ARM positions, who are CRCs and carry a caseload, a Human Resources Associate, a VRC Senior Trainer position, an Aware Specialist, and two specialized VRA positions. These positions were necessitated by WIOA changes.

ARMS for each our eight regional offices were created to provide more consistent oversight and training to VRS and VRC. The goal is to provide consistent statewide training for all field staff. A HR Associate was added to focus on recruitment efforts and to enhance relationships and improve recruitment efforts at Universities with Rehabilitation Counselor Education programs. The VRC Senior Training position was created to identify training needs and to design focused trainings that address requirements of WIOA for VRC and VRS positions.

The Governor's initiative to consolidate Information Technology Services across Idaho state government agencies has substantially impacted and reduced our staff composition. With the loss of our internal IT staff, we identified the need for an Aware Specialist position to oversee all aspects of our internal case management system, Aware. We have added two new VRA positions, one to assist the new VRC trainer and one to assist the transition coordinator position.

An evaluation of staff resulted in no increase in VR caseloads but an increase in potentially eligible student cases, thus necessitating additional support for our transition coordinator. Both new VRA positions are located at IDVR Central Office.

- ii. The number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and the current vacancies broken down by personnel category, found
- iii. Projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant

disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

B. Personnel Development

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

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

The University of Idaho, U of I, is currently the only institution of higher education in the State that offers a VR program in Idaho. However, in 2020 the University will be sunsetting this program.

The U of I Rehabilitation Counseling Program did not have any graduates this past academic year since they accept applications for students every other year and the current cohort started Summer 2018. One student from the 2016 cohort changed to part-time and is on track to graduate with the current cohort. U of I received a record number of applications for the current cohort of students and expect to have 19 graduates Spring of 2020. Several of the current students are employed fulltime with IDVR. All students are registered to take the Certified Rehabilitation Counselor Exam the Spring of 2020.

Idaho State University was approved by SBOE in November 2019 to begin a new Masters of Counseling specialty program Clinical Rehabilitation Counseling. This program will begin in the fall of 2020 and will be offered in two Idaho locations (Meridian and Pocatello). The program will accommodate 24 fulltime students.

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

The U of I Rehabilitation Counseling Program did not have any graduates this past academic year since they accept applications for students every other year and the current cohort started Summer 2018. One student from the 2016 cohort changed to part-time and is on track to graduate with the current cohort. U of I received a record number of applications for the current cohort of students and expect to have 19 graduates Spring of 2020. All students are registered to take the CRC Exam the Spring of 2020. No further students will graduate as the program is ending.

iii. The number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

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

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

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

Additionally, IDVR supports paid and unpaid internships for master's level students in Rehabilitation or related fields. 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 increased wages for QRP's and classified personnel in PY 2018. IDVR will continue to build a compensation package which will be competitive with other states and agencies contingent upon available funding.

To enhance recruitment and retention, IDVR has increased wages for QRP's and classified personnel in PY 2018. IDVR will continue efforts to build a compensation package which will be competitive with other states and agencies contingent upon available funding.

Furthermore, all IDVR's RMs, Central Office Management, and other leadership personnel are involved in recruitment activities. Development of recruitment materials and marketing plans continue to be a priority for IDVR. IDVR participates in career fairs around the state to encourage and seek individuals from diverse backgrounds including individuals with disabilities.

IDVR conducts exit interviews with staff, when possible, to determine whether there are areas of concern affecting staff retention. The current trend suggests counselors are leaving VR for positions which do not require a Masters degree and or are paid more per hour. Recent changes in our compensation structure seem to have reduced the rate of turnover for the agency, however, more time is needed to confirm the effect.

For PY 2018 the turnover rate for QRP's was 10.9 percent, down from 16.1 percent in PY 2016.

3. Personnel Standards

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

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

The State of Idaho does not have a state licensure for rehabilitation counseling. IDVR's personnel standards satisfy Federal requirements as outlined in 34 CFR 361.18(c).

IDVR has established two QRP levels: VRC and VRC Senior. The standards that satisfy IDVR's policy for VRC positions are a current CRC designation obtained through the Commission on Rehabilitation Counselor Certification, CRCC; or confirmed eligible from CRCC to take the exam to become a CRC; or graduation from a program accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP) with a master's degree in Rehabilitation Counseling; or a current Licensed Professional Counselor (LPC), Licensed Clinical Professional Counselor (LCPC) or Licensed Clinical Social Worker (LCSW) 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.

The standard for the VRC senior position that satisfies IDVR's CSPD policy is a current CRC designation obtained through CRCC. The LPC

or LCPC designation does not meet the CSPD requirement for a VRC senior.

Requirements to meet CSPD for staff hired at VRS level and maintain employment eligibility include the following:

The VRS will be required to meet IDVR's CSPD standard within five years of the staff member's hire date.

1. The VRS, with assistance from RM, will develop a CSPD Plan within six months of hire date to be reviewed for approval by Human Resources.

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 Human Resources within one month upon completion of term.
 - c. Employment internship or work experience requirement necessary to complete CSPD if applicable.
 - d. Official acceptance documentation should be submitted to RM and Human Resources.
 - e. Acceptance of RSA scholarship if applicable.
 - f. Estimated cost of tuition and books.
 - g. Outline of timeline for completion from the university.
2. CSPD will be evaluated for progress as part of the VRS overall performance requirements as outlined in the VRS job description each year.
 3. The VRS is expected to meet periodically with their manager until the CSPD plan is implemented. The manager will submit a monthly report to HR, which will provide a summary of progress.
 4. Staff members at VRS level will be required to produce adequate semester progress to Human Resources for their personnel file.

When IDVR experiences a limited number of recruits for a QRP positions the agency will consider hiring individuals into the VRS classification.

IDVR requires a CRC for all RM or ARM positions.

IDVR will reimburse the cost of the CRCC application and testing fee upon verification of achievement of CRC certification, when funds are available.

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/>.

The agency will annually review and evaluate if financial assistance can be provided to support VRS that are working towards meeting CSPD. HR will notify all VRS at the time IDVR determines that financial assistance is available. The notification will specify the time frame and process on how to obtain the financial assistance offered.

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

IDVR is committed to providing all employees with professional development opportunities which will enhance employee job performance; support IDVR's mission, values and goals; and lead to successful employment outcomes for individuals with disabilities.

IDVR has established education and experience requirements for each position in the Agency with a focus on alignment of requirements contained in section 101(a)(7)(B)(ii) which meet or exceed the standards required in 101(a)(7)(B)(ii)(I)-(II) including a requirement for a master's or doctoral degree in vocational rehabilitation or a related field to be recognized as a qualified rehabilitation professional at IDVR. When unable to hire VRCs, IDVR supports a Vocational Rehabilitation Specialist position with fewer requirements as explained under 3(a) in the preceding section, but requirements which are specifically outlined to meet the conditions of the 21st century workforce understanding.

IDVR hires with a preference for people who have experience working with people with disabilities, particularly around advocacy and providing direct support.

With the increased WIOA emphasis on workforce development IDVR will also concentrate on providing training to strengthen business relationships and increase knowledge of labor market relevance and employer needs. IDVR will establish ongoing requirements to participate in continuing education around a 21st century understanding of the workforce including periodic updates on LMI and career pathways and evolving regional labor trends and expectations.

Through an increased emphasis on data driven decisions, IDVR will increase utilization of the most recently available labor market information to best inform customer vocational decisions.

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

IDVR tracks and monitors each employee's individual training and development. Special emphasis is placed on training in those areas of need as indicated by the case file review and emerging field needs and as prioritized by the executive leadership team and the SRC. Additional priorities include training required to maintain CRC and or LPC certification. Training for staff also includes the following topics: ethics, disability related 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 to provide effective services to special populations, and to meet job demands. Information gathered from employee performance evaluations; supervisory feedback, employee exit interviews, and internal monitoring results also assist the IDVR with identifying areas of need.

In October 2019 IDVR held a statewide in-service. Topics for our general session included Contemporary Ethics in Vocational Rehabilitation and WIOA Performance and Reporting. Breakout sessions included Idaho Medicaid Overview, Traumatic Brain Injury and Vocational Rehabilitation, Medical Director's Overview, Idaho's One-Stop Service Delivery System, Pre-Employment Transition Services, the Ever-Changing Landscape, Navigating the Supported Employment Labyrinth: EES and Medicaid Waiver Programs.

A four day Motivational Interviewing training for new employees occurred on August 6 through 7, 2019 and September 4 through 5, 2019. A refresher option for current staff occurred July 30-31, 2019. Providing Motivational Interviewing training for staff continues to be an Agency priority.

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, counseling theories and techniques, assistive technology, Programmatic and Physical Accessibility, disability specific trainings, and annual Rehabilitation Professionals conferences.

Succession planning and leadership development continue to be a focus for IDVR. All Central Office and Field Services Managers complete a Supervisory Academy offered by the Idaho Division of Human Resources, DHR. The academy includes ten 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 IDVR supports staff in the Emerging Leaders series. IDVR utilizes permanent ARM positions throughout the state to support succession planning and leadership development.

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

5. Personnel to Address Individual Communication Needs

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

IDVR provides or purchases interpreter or language services required to access the program.

IDVR is currently working with DHR to determine a process and standards to assess staff competency in Spanish or other foreign languages. If staff meet competency standards, they may work with and interpret for customers who's primarily language is other than English.

IDVR has created a statewide counselor position for the deaf. This position will better serve individuals who are deaf and increase the overall effectiveness of our service delivery for this underserved population.

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, but instead refers customers who require braille to ICBVI.

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

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

The Transition Coordinator will facilitate the required coordination with the SDE and provision of Pre-ETS as required under WIOA.

The Transition Coordinator has extensive knowledge of IDEA personnel qualifications, under 34 CFR 300.156. Training and education will be identified for staff regarding service provision, coordination and best

practices in serving students with disabilities. The Transition Coordinator is assigned as an active member of the Idaho Interagency Council on Secondary Transition and the Special Education Advisory Panel, which promotes interagency cooperative planning, information sharing, and the collaborative use of resources at the state and local level. This Council works to ensure that training needs are adequately identified and then addressed through shared training opportunities.

Training opportunities offered by IDVR which are relevant to both educators and vocational rehabilitation professionals will be opened to school staff for participation when practicable. For example, in the fall of 2019, IDVR brought together public educators and VR Transition staff at the Transition Institute. The Transition Coordinator facilitates monthly Transition Leadership team meetings where changes are shared with the Leadership Team. The Team takes the information from the meeting and shares it with their regions. The Transition Coordinator also provided In-Service breakout session on Pre-ETS available to all staff. The Transition Coordinator also presented at all the regional special education directors' meetings in the Fall 2019. Finally, the Transition Coordinator participates in Special Education Advisory Panel for the SDE.

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;

The number of people with disabilities in Idaho is growing. The American Community Survey (ACS) one year estimates of individuals with disabilities in Idaho increased from 204,780 in 2014 to 224,887 in 2016, and 233,494 in 2018 representing an increase of 3.8 percent over two years, and 14 percent over the past four years ACS Disability Characteristics, 2014, 2016 and 2018 1 year Estimates.

According to data from the ACS 2018, 13.5 percent of Idaho civilians living in the community report having a disability, including 11.6 percent of residents of working age 18 through 64. The prevalence of disability in Idaho roughly corresponds to that of the United States. A more extensive profile of Idahoans with Disabilities is contained in section

II(a)(1)(B) Workforce Analysis portion of the combined section of this plan.

IDVR commissioned a CSNA beginning late summer of 2019, including an assessment of the rehabilitation needs of youth with disabilities in transition and student need for Pre-ETS.

The independent CSNA identified the following themes in the area of needs of individuals with the significant disabilities including their need for SE is a necessary service for people with the most significant disabilities and needs, which IDVR has been successfully providing for many years. Changes due to WIOA has created some challenges in implementing new practices, but overall IDVR excels in this area; participants expressed that there is a need to improve the quality of employment outcomes for individuals with the most significant disabilities; CE is seen as an important employment strategy for individuals with the most significant disabilities. Training in CE has been completed in partnership with the WINTAC, but it has not been sustainable to date. Many participants indicated that they are looking forward to the implementation of CE 2.0 after IDVR revamps the training, expectations and fee structure; and the rehabilitation needs of individuals with the most significant disabilities that were cited the most frequently beyond SE and CE include transportation, job skills, training, job coaching, and soft skills.

For the individual survey Barriers to Obtaining or Keeping a Job, respondents were presented with a list of 16 barriers to obtaining employment and asked to indicate whether the item had been a barrier that impacted their ability to obtain or keep a job. The most frequently stated barriers to obtaining or keeping a job and the percent reporting barriers are 55.3 percent employer concerns about my ability to do the job due to my disability, lack of education or training is 53.6 percent, mental health concerns 46.3 percent, lack of job skills 44.8 percent, lack of job search skills 32.3 percent, lack of reasonable accommodations at work 29.9, lack of assistive technology 24.2 percent, concern over loss of Social Security benefits due to working 22.1 percent, substance abuse 12.2 percent. The respondents were presented with a list of barriers and asked to identify the three most significant barriers that they have faced specifically toward getting a job.

The summary of the top three ranked barriers identified by a total of 1,116 respondents and the frequency of identification is lack of education or training with 43.7 percent that is 488 respondents, employer concerns about my ability to do the job due to my disability is 39.2 percent that is 437 respondents, lack of job skills 32.1 percent is 358 respondents, mental health concerns 28.6 is 319 respondents, lack of available jobs 25.6 percent is 286 respondents, criminal record 18.2 percent is 203 respondents, lack of job search skills 14.6 percent is 163 respondents, lack of reasonable accommodations at work 13 percent is 145 respondents, concern over loss of Social Security benefits due to working 12.3 percent is 137 respondents.

A total of 1,116 respondents answered the question. Lack of education or training, employer concerns about my ability to do the job, and lack of job skills were the three top items selected by respondents, matching two of the top three responses in the previous and the last 5 items in this list also resemble the last five items on the previous list as well.

Individual survey respondents were asked a yes-no question asking whether they had suggestions to improve IDVR to help people with disabilities to get a job or move to a better job. There were 285 yes responses 23.6 percent from the 1,206 respondents.

Respondents were asked a subsequent open-ended question and given the opportunity to provide suggestions on how IDVR can improve in assisting people with disabilities to get a job or move to a better job. Responses to this question that were grouped into the following themes to provide services in a timely manner; improve VR counselors' communication and customer service; increase medical aspects of disability training to understand a wide variety of disabilities; and increase awareness of IDVR and services for customers and employers.

Individual survey respondents were asked an open-ended question to provide any additional comments that they would like to share regarding IDVR services. There were 393 narrative responses. Two-hundred two comments were appreciative and positive toward IDVR services and counselors. Themes within the remaining narrative responses noted delays in communication, counselor attitudes, wait times for services, and clarification of services available.

There is a strong correlation between those individuals requiring SE services and presumptively eligible participants in the VR program. To

approximate the potential need for SE services, IDVR will utilize counts of SSDI and Supplemental Security Income SSI beneficiaries.

Individuals who qualify for SSI SSDI are by law presumptively eligible for Vocational Rehabilitation services. SSA estimates that as of December 2018 the number of Idahoans age 18-64 who received SSDI was 47,608. SSA estimates that as of December 2018, SSI benefits were received by 26,241 individuals age 18-64 while 6,219 Idahoans concurrently received SSI and SSDI. These 73,849 individuals represent 7.2 percent of all working age Idahoans.

According to internal data, IDVR took applications on 4,006 cases in PY 2018 including 1,271 cases where SSI and or SSDI benefits were verified. This represents a presumptive eligibility rate of 31.73 percent at application, an increase of 2.5 percent over FFY 2016.

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 continues to trend to a minority service ratio of 1.00, IDVR remains committed to expanding outreach to minority populations.

The last available five-year ACS data (2018) indicates Idaho is 89.9percent White with no other single race representing over 1.5 percent (Asian). Two or more races are reported by 3.0 percent of Idahoans. When considering ethnicity, Hispanic or Latino (of any race) is second with 12.7percent

Idaho's population is expected to grow by on average 1.1 percent annually between 2019 to 2026:

- “for both Hispanics and non-Hispanics, growth rates in Idaho are higher than the nation as a whole. However, population growth has slowed over the last five to ten years. While average annual growth rates among Idaho's Hispanics were 9.0percent in 1990s, they slowed to 7.3percent in the 2000s and 1.5percent since 2010. At the national level, average annual growth rates among Hispanics declined from 5.6percent in 1990s to 4.3percent in the 2000s and 1.2percent in the 2010s. While Hispanic growth has slowed, this group continues to grow faster than the

non-Hispanic population.” (Hispanic Profile Data Book for Idaho, 4th Edition, 2017).

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

C. Who have been unserved or underserved by the VR program;

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

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

IDVR utilizes telephone-based translation services when necessary to bridge language barriers presented by Idaho’s growing refugee population.

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

American Indian and Alaska Native alone are estimated to represent 1.1 percent of Idahoans while IDVR provided services to this group at a rate of 4.4 percent. The latest available statistics indicate this population is overserved, however these data should be interpreted with caution as estimates of error can skew these results. IDVR notes that the intersection of rural service provision and tribal affiliation can present substantial barriers to obtaining employment in these rural communities and will continue to view this population as underserved. IDVR will continue outreach efforts accordingly for this population.

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

IDVR co-locates with the IDOC but has ended our agreement with the IDJC. However, IDVR will maintain relationships with IDOC and IDJC and will continue to engage with these entities to further efforts to reach youth and adults in the corrections system across Idaho.

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

According to the latest CSNA, here are the most common themes that emerged in this area based on the perceptions of respondents, overall, partnerships within the Idaho Workforce Development System are regarded as positive and helpful, especially at the administrative level. Positive collaboration and partnership aspects include IDVR inclusion in statewide workforce development listening sessions; collaborative work on the combined state plan; IDVR administrator is member of the workforce development council and chairs the one-stop committee; IDVR provides consultation (e.g., physical and programmatic accessibility) with the American Job Centers.

The level of local partnership between IDVR and the American Job Centers was described as varying across the State at the local level. Some felt that co-enrollment was of no concern as it is a common occurrence in small communities, while others felt as though there was no active level of co-enrollment where participants would be served by multiple agencies through strategic partnerships.

IDVR could improve its collaboration with the Workforce Development System through sharing data, increased cross-referral, leveraging resources, sharing participants, and developing youth program partnerships

The themes described above are informed by VR staff and other partner respondents.

Conversely, the following themes are expressed by individuals with disabilities. The CSNA asked individuals with disabilities several questions regarding the American Job Centers, including accessibility, access to training and employment, the value of and the effectiveness of the services available through the AJC. The results from individuals with disabilities using the Job Center for seeking training and employment is

68.2 percent responding Yes to the question Did you go to the Center to find a job and 31.9 percent responded no of 314 responses.

Two-hundred and three respondents answered the question Did they help you find employment with 60.6 percent indicating that they did not receive assistance in finding a job and 39.4 percent responding yes.

The ratings for the helpfulness and the value of the American Job Centers by individuals with disabilities from the 308 that responded to the survey are 105 that is 34.1 percent responded yes, they services were very valuable, 122 is 39.6 percent who agree the services were somewhat valuable with the 81 respondents, that is 26.3 percent is no, the services were not valuable.

Almost 74 percent of respondents found the services available at the American Job Centers to be either somewhat or very valuable. Just over one-fourth of the respondents indicated the services were not valuable.

Here is the break down reflecting the reported effectiveness of the American Job Center by individuals that responded to the survey starting with very effective 65 is 20.7 percent, somewhat effective 81 is 25.8 percent, somewhat ineffective 40 is 12.7 percent, very ineffective 37 is 11.8 percent and no opinion is 91 is 29 percent.

Only 46.5 percent of the 314 respondents that answered the question indicated that the American Job Center was effective, while roughly 25 percent of the respondents indicated that the Centers were not effective in serving people with disabilities and 29percent did not have an opinion.

The CSNA provided IDVR several recommendations based on the results of the Needs of Individuals with Disabilities served through other Components of the Statewide Workforce Development System including IDVR should develop regular opportunities for cross-training among local level WIOA core partner staff to learn about available services and increase the level of co-enrollment across workforce programs to leverage resources and better serve Idahoans with disabilities. IDVR is encouraged to identify effective ways to share client data and develop joint opportunities to increase the level of partnership at the local level. IDVR should continue efforts to improve services for people with disabilities in the larger Idaho workforce system by maintaining partnerships and the level of engagement of IDVR within the WIOA core programs. For example, IDVR can provide ADA training, disability

awareness and etiquette training, community accessibility, etc. to workforce agencies as well as community partners. IDVR is encouraged to develop more formal partnerships with the Title I youth program to increase the array of services available to youth in Idaho.

The WIOA Advisory Group, in collaboration with the Workforce Development Council's One-stop Committee will continue to engage in a series of ongoing meetings to identify common and unique strategies which are in need of improvement on a statewide level. IDVR engaged in the second strategic planning meeting with all WIOA Advisory Group and the One-Stop Subcommittee members. The purpose of the meeting was to identify the shared goals, priorities, and strategies for this Combined State Plan. While collaborative work in this area has begun, more work in this area is still needed.

Meetings at the local-area level are ongoing which include all core partner agencies and numerous One-Stop partners to determine and advance strategies for common referral and orientation, reducing duplication of effort and potential increased levels of co-enrollment. These meetings will help inform a better understanding of the needs of individuals with disabilities served by agencies external to VR in the One-Stop system.

The Administrator of IDVR currently chairs the WDC's One-Stop Subcommittee.

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

The percentage of Idahoans who experience disability varies significantly by age. While this variance can be attributed to several 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 5.6 percent of Idahoans aged 5 through 17 experience disability compared to 16.2 percent for those aged 18 through 64, and 36 percent of those ages 65 or more.

Idaho has a higher percentage of workers aged 24 and younger than the nation as a whole, this is historically reflected in the percentage of transition age youth served by IDVR. Students and youth under 25 represented 29.3 percent of all new cases in PY 2018.

IDVR's 2019 2020 CSNA noted several major recurring themes relating to Pre-ETS and Youth needs. Overall, IDVR has successfully implemented pre-employment transition services and has increased opportunities for youth with disabilities to prepare for meaningful employment. Work-based learning experiences have been a particular strength of pre-employment transition services developed through contracts across the state. Although the implementation of Pre-ETS has been successful, IDVR will need to monitor the increasing demands of students, educators and families across the State to ensure that there are adequate resources available to meet the demand. IDVR has implemented services to meet the needs of students with the most significant disabilities. Youth with less significant disabilities for example specific learning disabilities, need to have access to IDVR services, with varying levels of support to meet their specific needs. These include disability related services, training and educational opportunities and support, work readiness and job exploration skills. A growing number of relationships with educators have been established resulting in increased access to IDVR and other workforce system partners for students and youth. However, a continued lack of understanding and support by parents persists, indicating a need for IDVR to increase direct communication with parents and families of students and youth with disabilities.

In the transition-age youth survey the three most important services for obtaining and keeping desired job, there was no limit to the number of services respondents could choose. Help finding a job was picked by 156 respondents at 50.6 percent, college education by 116 respondents is 37.7 percent, transportation 110 respondents 35.7 percent, help with employment preparation activities like writing a resume, completing an application and interviewing 103 respondents 33.4 percent, support on the job like a job coach 102 respondents 33.1 percent, vocational training 86 respondents 27.9 percent, affordable housing 53 respondents 17.2 percent, mental health counseling 35 respondents 11.4 percent and assistive technology 19 respondents 6.2 percent.

Help finding a job, college education, and transportation were the most frequently selected items in response to the question regarding the three most important services needed to obtain and keep a desired job by transition-age survey respondents. When compared to the previous question, note that results are different college education is the top item,

help finding a job ranked fourth, and transportation is in the sixth position in.

Transition-age survey respondents were asked an open-ended question regarding any other comments about the services that would help to prepare for, obtain and retain employment. Seventy-nine narrative responses were received. Three comments were positive in regard to IDVR transition services and seventeen were critical of services.

The recommendations from IDVR's 2019 2020 CSNA related to the needs of youth with disabilities in transition is IDVR is encouraged to continue efforts to identify needs and programs for implementing pre-employment transition services. It should consider adding some tiered approaches that will enhance the delivery of pre-employment transition services to students with disabilities that have differing functional capacities. In addition, IDVR is encouraged to develop strategies, either through direct or contracted services, to increase the delivery of pre-employment transition services to all areas of the State. IDVR is encouraged to focus outreach efforts to students and youth with disabilities that are not traditionally known to IDVR through collaboration with special education services. It should consider increasing marketing and outreach to mainstream educators, 504 coordinators, school counselors, school nurses, and pediatric medical providers in the community. As outreach results in increased referrals and applications by these populations, IDVR is encouraged to tailor services to meet the diverse needs of these individuals. IDVR is encouraged to increase marketing, communication and expectations directed toward parents and families of youth with disabilities. IDVR should consider assessing the availability of IDVR services and making them more accessible across the state, particularly in the remote areas of high concern for youth.

IDVR will continue to increase our efforts to deliver services to students with disabilities in response to WIOA mandates. The IDVR's proposed activities to address Pre-ETS and youth is detailed in Section o of this plan.

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

In the 2019 2020 CSNA the most common themes that emerged recurring from the individuals interviewed for this assessment in the area of the need to establish, develop or improve community rehabilitation

programs serving individuals with disabilities in Idaho is overall, IDVR has strong partnerships and access to CRPs in the more populous areas of the state, however provider coverage and range of available services becomes more irregular in the rural and remote areas of Idaho. There were concerns about the quality and quantity of employment outcomes for IDVR consumers that receive CRP services. CRP employment services were generally described as in need of improvement. There are varying perspectives on why employment services provided by CRPs are not as successful as they can be. Pre-employment transition services have created additional opportunities for CRPs. This is seen as a great opportunity for all involved, but the level of quality varies. Some view contracted services versus fee for service as a practice which promotes differing outcomes.

Depending on the lens of those interviewed, there are a variety of CRP services needing attention or improvement. These include, but are not limited to improvement in CRP evaluations to include a wider variety of community-based evaluation sites; concerns of conflict of interest when CRPs are recommending continued services in their program with no measurement for when success or skill levels will be achieved; partners of IDVR are not generally pleased with the outcomes or services provided through CRPs. There is a need for improved consistency across IDVR regions related to policy, forms and expectations of CRPs, participants indicated that CRPs are not clear on their role under WIOA. The learning curve has been challenging for all parties and training/communication to CRPs could improve. Implementing fading options for IDVR participants was a positive change in services but understanding of the concept and expectations has been challenging. Additional guidance has been requested by CRPs. Both CRPs and IDVR need training in employment opportunities in today's labor market. Use of LMI and strategies for finding non-traditional types of employment are not possible without additional training and support.

Largely, CRPs seem to be confused on the difference between IDVR and EES, a separate state funded program under IDVR. This appears to be an area of confusion that needs to be addressed. CRPs are faced with high turnover and this instability of staff affects the quality of services. The perception is that low pay of many CRP staff is the major cause of turnover. The quality of job coaches is highly questionable. Many have little more in the way of credentials than a high school diploma. There is a need for more effective and standardized quality

assurance monitoring and evaluation of CRPs. CRPs have a questionable capacity to serve individuals with language barriers. There is a need for increased communication between VR and CRPs to gain clarity on expectations and coordination of services. CRPs should devote more time in training individuals with disabilities on life skills such as hygiene, budgeting, etc.

There are two primary areas where needs are present to establish, develop, or improve CRPs within the state of Idaho the first is meeting the need of emerging/novel requirements of WIOA and expanding the statewide capacity of CRPs to deliver these services with fidelity, for example CE, Pre-ETS, and similar services to youth, Youth Extended Services and monitoring and improving Community Rehabilitation Program performance through a collaborative iterative learning process.

The continuous improvement of CRPs is an ongoing function of IDVR: The establishment, development and improvement of CRPs within the state fall under the purview of IDVR's Planning and Evaluation team. One of Planning and Evaluation'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.

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

As previously mentioned earlier in Section e, IDVR commissioned a CSNA beginning late summer of 2019, including an assessment of the rehabilitation needs of youth with disabilities in transition and student need for Pre-ETS. Detailed information is provided in Section e.

IDVR is an agency of the Idaho State Board of Education and partners with other agencies under the Board through coordination and collaboration.

IDVR has strong relationships with Education agencies throughout the state, including formal interagency agreements with a number of LEAs, a comprehensive formal interagency agreement which addresses collaborative service provision with the SDE, and ICBVI.

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

As a result of that need, IDVR is coordinating with educational officials and other state agencies to provide an annual Transition Institute last held in fall of 2019. The third annual Transition Institute is scheduled for fall 2020.

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

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

k. Annual Estimates

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

This estimate includes the number of the individuals in Idaho who experience disabilities, ages 16 and over who are in the labor force according to the American Community Survey 5-Year Estimates (Table S1811, 2014, 2015, 2016, 2017, and 2018) . Forecasting suggests there will be 67,087 eligible Idahoans in FFY 2020 and 68,893 FFY 2021.

FFY	Estimate	Forecast	Lower Confidence Bound	Upper Confidence Bound
2019	64328	64327.89	62505.03	66150.75
2020	67087	67086.93	65207.08	68966.77
2021	68893	68892.30	66956.27	70828.32
2022	71652	71651.33	69660.71	73641.95

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

A. The VR Program;

The number of customers served by IDVR is diminishing. Historic rates of low unemployment across Idaho and new mandates created by WIOA are likely factors in this recent downturn. However, it is obvious that unemployment will not remain at this level. April 2020 preliminary data suggest Idaho's unemployment rate has risen from 2.5 percent to 11.5 percent. Consequently, IDVR believes the downward trend in applications and plans will end and we can expect an unknown increase in applications for VR services. IDVR's fiscal unit conducts forecasts using increases of one, three and five percent service volume increases to project various cost scenarios and their potential impact on grant funds. For the purposes of this section (K.2-K.4), IDVR will utilize the three percent volume of services increase for FY 2020 and the five percent volume of services increase for FY 2021.

IDVR has 3895 participants in plan and receiving services in the most recently fiscal projection model. This includes 1724 participants under MSD, 1374 participants under SD, and 797 participants classified under the D severity categories.

Estimates of Customers in Plan Status (Receiving Services) for IDVR

	MSD	SD	D	Total in Plan
Current 100 percent	1724	1374	797	3895
FFY 2020 103 percent	1776	1415	821	4012
FFY 2021 (105 percent)	1810	1443	837	4090

B. The Supported Employment Program; and

April 2020 preliminary data suggest Idaho's unemployment rate has risen from 2.5 percent to 11.5 percent. Consequently, IDVR believes the downward trend in applications and plans will end and we can expect an unknown increase in applications for VR services. IDVR's fiscal unit

conducts forecasts using increases of one, three and five percent to project various cost scenarios and their potential impact on grant funds. For the purposes of this section (K.2-K.4), IDVR will utilize the three percent volume of services increase for FY 2020 and the five percent volume of services increase for FY 2021.

Estimates of SE Customers in Plan Status (Receiving Services) for IDVR and Average Annual Cost of SE Services for Customers in Plan Status)

	SE Participants in Plan	Total Annual Cost	Anticipated Title VI Funds	SE Title I Funds
Current 100 percent	470	\$554,553	\$300,000	\$254,553
FFY 2020 103 percent	484	\$571,189	\$300,000	\$271,189
FFY 2021 105 percent	494	\$582,280	\$300,000	\$282,280

IDVR expects to receive \$300,000 in Title VI Supported Employment funds for PYs 2020 and 2021. As projected expenditures exceed Title VI funds, IDVR will supplement Title VI SE services utilizing Title I VR funds. IDVR does not anticipate any issues expending the \$150,000 set aside for SE services, and Extended Services to students and youth.

Note: This section includes estimates for SE qualifying services only (i.e. job coaching). Supportive services, or services beginning prior to job placement are not included in this section.

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 D, 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.

April 2020 preliminary data suggest Idaho’s unemployment rate has risen from 2.5 percent to 11.5 percent. Consequently, IDVR believes the downward trend in applications and plans will end and we can expect an unknown increase in applications for VR services. IDVR’s fiscal unit conducts forecasts using increases of one, three and five percent to project various cost scenarios and their potential impact on grant funds. For the purposes of this section (K.2-K.4), IDVR will utilize the three percent volume of services increase for FY 2020 and the five percent volume of services increase for FY 2021.

Additionally, IDVR’s fiscal unit conducts fiscal projections using two models. One is a scenario using the five year average cost per customer, and the second is a scenario using current YTD average costs per customer.

As IDVR has substantially modified policy post WIOA on SE, IDVR has selected the current year average costs for projections in this state plan. As additional time elapses under the current SE provision model, IDVR will consider switching these estimates to the five-year projections. For the purposes of this plan IDVR believes the YTD projections represent the best model to project expenditures under current conditions.

FFY 2020 Service Cost Estimates	MSD	SD	D	Total
Estimated in Plan Status	1776	1415	821	4012
Estimated Cost per Plan	\$1,533.84	\$1,410.48	\$1,579.56	\$1,499.69
Estimated Customers on SE Plan	484	N/A	N/A	
Average SE Services Cost	\$1179.90			
Estimated SE Annual Expenditure	\$571,189.38			\$571,189.38

Non-SE Plan Expenditure	\$2,152,480.98	\$1,995,829.20	\$1,296,818.76	\$5,445,558.42
Total Estimated Annual Plan Cost	\$2,723,670.36	\$1,995,829.20	\$1,296,818.76	\$6,016,747.80
FFY 2021 Service Cost Estimates				
	MSD	SD	D	Total
Estimated in Plan Status	1810	1443	837	4090
Estimated Cost per Plan	\$1,533.84	\$1,410.48	\$1,579.56	\$1,499.69
Estimated Customers on SE Plan	494	N/A	N/A	
Average SE Services Cost	\$1179.90			
Estimated SE Annual Expenditure	\$582,280.44			\$582,280.44
Non-SE Plan Expenditure	\$2,194,276.73	\$2,035,322.64	\$1,322,091.72	\$5,551,691.09
Total Estimated Annual Plan Cost	\$2,776,250.40	\$2,035,322.64	\$1,322,091.72	\$6,133,664.76

I. 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 SRC, if the State has a SRC, and jointly agreed to any revisions IDVR and SRC revised modified the goals and priorities based on the recently completed CSNA. New program goals and priorities reflect and align with program changes resulting from

WIOA, the results from the latest CSNA, and the goals and strategies of the combined state plan.

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

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

The goals and priorities for IDVR are reviewed annually and revised as necessary based on input from a variety of sources including the SRC, combined plan partners, SILC, CAP, Tribal VR representatives, findings and recommendations from monitoring activities conducted under Section 107, and the IDVR management team, including management at the regional level. Additionally, the goals and priorities are informed by the CSNA which is conducted every three years. Goal 1 is to Provide quality, relevant, individualized vocational rehabilitation services to individuals with disabilities to maximize their career potential. Priority 1 is to expand, monitor, and improve Pre-ETS to students with disabilities and similar services to youth. Priority 2 is to provide a comprehensive array of services to individuals with disabilities, including individuals with MSD. Priority 3 is to hire and retain qualified staff to deliver quality vocational rehabilitation services. Priority 4 is to improve usage of Labor Market Information Career Pathways to inform customer career choice. Priority 5 is to improve overall quality of CRP services.

Goal 2 is to improve VR program efficiency through continuous quality improvement activities. Priority 1 is to meet or exceed negotiated targets on Primary Performance Indicators 1 through 6 established by the US Department of Education, RSA. Priority 2 is to monitor IDVR's Customer Satisfaction Survey in collaboration with the State Rehabilitation Council and work together on strategies to increase the overall satisfaction rate. Priority 3 is to maximize the utilization of comparable benefits. Priority 4 is to continue efforts to align IDVR activities with the workforce development system. Priority 5 is to evaluate IDVR assessment expenditures. Priority 6 is to continue the implementation of a monitoring strategy which is adaptive to changing risk conditions, aligns with WIOA requirements, and meaningfully informs the continuous quality improvement cycle. Priority 7 is to evaluate customer access to and timeliness of services.

Goal 3 is to improve outreach and services to IDVR business customers. Priority 1 is to increase business utilization of IDVR expertise and services.

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 commissioned a CSNA in Summer 2019 which includes an assessment of Pre-ETS and youth need as well as considering the needs of business.

IDVR's goals and priorities reflect those areas where the IDVR plans to focus efforts for improvement and are directly informed by the CSNA. IDVR worked closely with SRC using the results of the latest CSNA and have updated these goals and priorities with language that meets the direction provided by the SRC.

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

Title IV Vocational Rehabilitation programs are using a phased-in approach to set levels of performance for all primary performance indicators under this Combined State Plan. RSA-TAC-18-01 released January 18, 2018 provides guidance on the requirements for these indicators. IDVR is still collecting baseline information on most of these indicators. As a result, performance levels are being reported for only Measurable Skill Gains at this time. The remaining indicators will be coming online in the next two years and IDVR anticipates being able to report performance across all indicators in the next plan Employment in the 2nd quarter, Employment in the 4th quarter, Median earnings, Credential attainment, Measurable skill gains, and Effectiveness in serving employers.

IDVR has updated our data sharing agreement, including signing the State Wage Interchange System (SWIS) Agreement as a non-access PACIA. While, IDVR has requested access to Idaho's Data Management Council to gain access to Idaho's Statewide Longitudinal Data System, the current data exchange environment does not allow for this information to be exchanged in time for reporting purposes. IDVR is working closely with other core WIOA partners on a Workforce Development Quality Initiative (WDQI) grant which seeks to remove

barriers through automation and reduce the time required to access this data.

IDVR continues to improve our data validation and accuracy efforts by working with Aware, testing data validation and accuracy checks with the field and implementing strategies which provide strong automatic internal control and quarterly data check to detect anomalies and errors. IDVR's Information and Communication strategy promote compliance and learning by informing staff each quarter of errors and anomalies detected by this strategy and working with staff to fix errors and fix or certify anomalies. The expectation is that errors and anomalies for staff working through these corrections will diminish over time.

IDVR will continue to collect and analyze data to inform initial baseline thresholds to establish levels of performance to use for future negotiations with RSA. Thusly, the IDVR looks forward to negotiating targets with RSA.

C. Other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under Section 107.

IDVR has worked closely with RSA on their data dashboard information and utilizes the dashboard to identify and fix inaccuracies in the data collection process and for performance improvement.

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 IDVR continuing to expand its continuous improvement activities.

m. Order of Selection

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

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

IDVR is not currently in order of selection.

B. The justification for the order

IDVR is not currently in order of selection.

C. The service and outcome goals

IDVR is not currently in order of selection.

D. Time within which these goals may be achieved for individuals in each priority category within the order; and
IDVR is not currently in order of selection.

E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities
IDVR is not currently in order of selection.

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

IDVR is not currently in order of selection.

n. Goals and Plans for Distribution of title VI Funds

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

IDVR received \$300,000 in Title VI, Part B funds in FFY 2020. These funds are made available for all Supported Employment cases statewide. IDVR focused Title VI, Part B funds on direct case service provision for job coaching exclusively, including \$150,000 for SE youth. IDVR has established a process to provide Youth Extended Services using Title I funds after exhausting Title VI funds.

IDVR anticipates that adult SE funds and youth SE funds will be exhausted annually and IDVR will continue to provide these services under general Title I funds.

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

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

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

IDVR reserves 50 percent of Title VI Part B funds for the provision of Supported Employment and Extended Services to youth. IDVR's expenditures on SE services far outstrips the funds allocated under Title

VI Part B. IDVR does not anticipate any problems expending these funds as authorized.

IDVR has developed policies to ensure that YES can be provided up to four years as needed for individuals under the age of 25 following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. IDVR will continue to support YES with Title VI or Title I funds, as required by WIOA, and will continue to leverage other sources of extended services. Youth Extended Services are only for individuals who are MSD and have completed SE services.

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

IDVR utilizes the State's EES program as well as the Medicaid Home and Community-Based Services (HCBS), and Aged and Disabled (A&D) waivers for long term support. IDVR will continue to work closely with each program overseeing these resources to streamline our referral process and improve utilization of this external source of extended services funding.

o. State's Strategies

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

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

IDVR's Statewide Assessment (j) outlines an array of potential priorities to expand and improve services to Idahoans with disabilities. Initial innovation and expansion activities under WIOA were focused primarily on establishing new and modified services to conform with the requirements of the regulations. While IDVR will continue to expand these services in some areas, there will be an increasing focus on raising the quality of services to customers under all priorities listed under Goal 1 in section (l) of this plan.

IDVR will continue to maintain the two ongoing primary innovation activities, supporting the activities of both SRC and SILC. The SRC

serves as IDVR's advisory council and together with IDVR and CSNA inform the goals, priorities, and strategies for agency.

Additionally, IDVR in PYs 2020-2021 will continue limited pilot projects under Pre-ETS while continuing to monitor and refine those programs now being offered at a statewide level. More detail on plans for improving services to students and youth can be found under part four of this section.

IDVR will engage in a sustained campaign to improve frontline services to individuals with disabilities offered by Idaho's Community Rehabilitation Providers.

Following the creation of new policy on SE under WIOA to address regulatory changes pertinent to SE and an initial wave of internal staff training, IDVR conducted multiple activities to collect input on services to individuals with MSD.

Expansion of service delivery options is an expressed need in more rural and remote areas of Idaho, while improvements were indicated for traditional CRP and Pre-ETS services including a need for more relevant community-based assessment options, stronger local area collaboration between IDVR and providers, and timeliness to CRP service initiation. More detail on plans for CRP improvement can be found under part five of this section.

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. IDVR has an ongoing partnership with the Idaho Assistive Technology Project (IATP) housed at 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 Council.

Current challenges to meet this need include the procurement of devices that students with disabilities have used through IDEA entitlements. IDVR has an agreement as of FFY 2015, with SDE outlining shared responsibilities and implementing a program which allows IDVR to purchase some AT devices at 50percent of original cost from individual school districts, keeping familiar assistive technology in the hands of

transitioning students; and shares responsibilities with the SDE where IDVR will purchase vocationally relevant AT for students with an IPE. Per WIOA guidance, the SDE retains responsibility for providing AT they have traditionally had the responsibility for.

IDVR anticipates updating this agreement for PY 2020.

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

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

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

IDVR is trending toward a ratio of minority service rate to non-minority service rate of 1.00. Significant gains in service outreach, an emphasis on accurate coding of race and ethnicity status, and Pre-ETS expansion and outreach have raised the current (PY 2018) ratio to .961, up from .924 in PY 2017. Current estimates indicate a slight regression in this rate for PY 2019.

The identification and service estimates for minority populations in Idaho are derived from contrasting population estimates with internal agency data on applicants and plans developed for each minority population.

The Hispanic population is by far Idaho's largest minority group at 12.7 percent (2018 ACS Demographic and Housing 1-Year Estimate) and represents 9.1 percent of applicants and 8.6 percent of plans served by IDVR in PY 2018 to date. This is contrast with the corresponding figures of a 12.0 percent population estimate and a 10.5 percent of applications in PY 2016. Additionally, over 16 percent of plans two years ago served individuals with Hispanic ethnicity. IDVR is aware of the increasing gap in both applications and plans and has included an initiative in this plan to explore expand Spanish language options for customers across Idaho.

Further analysis of outreach and service delivery by race is confounded by substantial error margins present in the ACS estimates due to low populations in remaining categories: While the error margin presented

for White alone in Idaho is around one-half of one percent, the error present in each of the remaining categories is substantial, ranging from 9.6 percent for Asian alone, and 52.5 percent for Native Hawaiian and Other Pacific Islander alone. In other words, the margin of error for all racial minority categories could place any of these categories in over or underserved status. Disregarding this limitation, outreach efforts as illustrated by applicants suggest all racial minority categories are being overserved with the exception of 'Asian alone' which has a population estimate of 1.5 percent and an application rate in PY 2018 of 1.1 percent.

Idaho's demographics are changing, and Idaho was the fastest growing state relative to population in the United States in 2017, experiencing 2.2percent annual growth. Idaho is a major state for resettlement and has experienced a significant influx of refugees in Regions 3, 4, 7 and 8. In order to best understand the needs of this population, IDVR conducts joint staff training in conjunction with the Agency for New American's. IDVR works maintains regular contact and outreach with staff at the International Rescue Committee refugee organization and all three resettlement agencies in the Treasure Valley and Magic Valley regions. IDVR maintains contact with Family Medicine, a medical provider to newly arrived refugees in the in these regions to coordinate referrals.

Additionally, IDVR conducts ongoing outreach activities to meet the needs of the Spanish speaking population statewide. A number of these individuals engage in migrant seasonal farm work. IDVR works collaboratively with IDOL, the Community Council of Idaho (a rural-centered, nonprofit serving Latinos in Idaho, and the Idaho Division of Hispanic Affairs to identify these individuals and processes to best conduct outreach activities.

IDVR 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 BSU'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; participation in the multi-partner Refugee Employment Networking and Training group hosted by the IDOL.

Collaboration with the College of Southern Idaho Refugee Center for referral for refugees with disabilities needing VR services

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 a representative on the Sho-Ban Job Fair and Hiring Event committee in partnership with Shoshone-Bannock VR, IDOL, tribal leadership and employers which connects prospective employees to employers. The last event drew 40 employers and over 500 job seekers.

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

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

Idaho currently has eight Community Rehabilitation Programs who hold 14(c) special wage certificates serving under 350 customers statewide. IDVR has developed a Career Counseling and Information & Referral process which is delivered multiple times per year at each certificate holder sites. As a part of obligations under 397, IDVR encourages individuals with MSD to engage with IDVR if interested in Competitive Integrated Employment as a part of their informed choice.

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-ETS.

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

The Transition Coordinator will also use the district plans that are created at the Institute to identify specific transition service needs of each district. This will allow VR to target districts who need intensive

levels of support as priority districts. VR will also continue to provide targeted and universal support to districts who have identified lower levels of need.

Our Transition Coordinator also developed a transition needs assessment that was sent to every school district regarding transition and pre-employment transition services needs in order to target districts and expand VR services.

VR will track which Pre-ETS individual students received over the past couple years and the educational goal attainment and or if the student has achieved his or her employment outcome.

Toward these ends, expected outcomes include an increase in student participation in Pre-ETS, an increase in the number of students participating in Pre-ETS based on student need, an increase in the number of students achieving his or her employment outcome.

IDVR is evaluating Post-secondary partnerships, Summer paid work experience, Local Education Agency partnerships, Idaho Educational Services for the Deaf and Blind partnership, and Idaho Parent Unlimited partnership

IDVR would still like to develop a partnership with the state independent living centers for Pre-ETS.

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

IDVR is committed to engaging in innovation and expansion activities designed to establish, develop and or improve CRP across Idaho. Based on sustained demonstrated need highlighted in the past two CSNA and aligned with the joint goals of IDVR's administration and IDVR's SRC the IDVR is currently exploring a number of potential initiatives to promote quality CRP outcomes including but not limited to promoting the Professionalization of CRP Staff; an exploration of established training models used by CRPs and other DSUs to promote initial competence when providing services to people with disabilities; an exploration of continuing education requirements used by CRPs and other DSUs to promote career-long learning and quality outcomes; formalization of initial and on-going education requirements for providers who want to serve IDVR customers; reconciling IDVR's CRP Fee Schedule for WIOA Expectations meaning evaluation of rates for services to include an assessment of potential new competency and training requirements and

formalizing new rates for services based on enhanced education and competency requirements.

Clarifying Expectations/Information and Communication:

Establishment of new requirements and guidance around IDVR expectations for individualized service provision, documentation, and more tailored/personalized community-based evaluations.

Explore a potential streamlining of requirements to serve rural and remote communities, allowing more potential providers with a lower barrier to entry in underserved/unserved areas.

Due to persistent confusion in the CSNA: Work with Extended Employment Services to help CRPs, customers, and parents/guardians understand Competitive Integrated Employment requirements of IDVR and how the programs intersect.

Strengthen the Feedback Loop with CRPs:

Work with partners to clarify agency expectations and requirements through continued development of the CRP Manual.

Overhaul IDVR's CRP Monitoring Protocol to align with the requirements of WIOA and increase relevance to frontline staff and CRPs

Continue to engage with CRP partners to address ongoing and emerging issues

Explore performance accountability options following implementation of heightened requirements

Targeted Evaluation of CRP Services for Effectiveness:

Work to understand quality of assessments conducted by CRPs

Evaluate quality of assessment sites (where applicable) to the individualized personal/vocational needs of customer

Evaluate documentation of fading and stability

To further develop positive working relationships with CRPs and to enhance service delivery for customers, IDVR participates in CRP association meetings or hosts alternate meetings when necessary.

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.

IDVR generates annual CRP employment reports for each vendor who provided services in the past fiscal year. The tool provides information to customers in order to enhance informed choice while they are selecting a CRP. These reports contain aggregated data gathered from our case management system. 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.

As a function of its consumer satisfaction survey, IDVR collects information on the satisfaction of consumers who received services from CRPs through an enhanced section of the instrument. IDVR continues to explore options to improve this instrument.

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

Vocational Rehabilitation programs are using a phased-in approach to set levels of performance for all primary performance indicators under this Combined State Plan. RSA-TAC-18-01 released January 18, 2018 provides guidance on the requirements for these indicators. No new guidance has been received to date; however, IDVR does have baseline data for the Measurable Skill Gains (MSG) rate indicator and will enter into negotiations with RSA for PYs 2020 and 2021. Once an understanding of baselines emerge, IDVR will be well positioned to develop strategies to improve upon these baseline figures for all performance indicators.

The Department of Labor is a recipient of a Workforce Data Quality Initiative (WDQI) grant and is working with the core programs to develop policy and methods to automate data sharing to help all programs for performance reporting purposes.

IDVR has an agreement to access Idaho's Statewide Longitudinal Data System (SLDS) in order to pull education related data elements, unfortunately, the SLDS education data received to this point has not been current enough to use.

IDVR has used the RSA Data Dashboards as an interim tool to better understand reporting under Section 116. IDVR will continue to collect and analyze data to inform initial baseline thresholds to establish levels of performance to use for future negotiations with RSA for indicators coming off baseline in the near future. We expect to have more complete baseline data by the next plan submission and will then be

able to articulate strategies for performance improvement based upon emerging trends and data for all WIOA primary performance indicators.

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

IDVR is involved in numerous strategies to increase and improve services to individuals with disabilities being served through the statewide workforce development system. The information below describes some of those initiatives, which are ongoing.

The WIOA Advisory Group has agreed that both IDVR and the ICBVI will serve as lead agencies in addressing the continuing education and technical assistance needs of workforce partners in best serving individuals with disabilities. Both VR programs have evaluated VR offices for physical and program accessibility, as well as participated in the One-Stop Committee's assessment of programmatic and physical accessibility of the two comprehensive One-Stop Centers in Idaho, and numerous affiliate sites across Idaho. These assessments were completed in PY 2018.

IDVR and ICBVI each conducted a CSNA which included surveys of core workforce partners.

IDVR's Administrator is an official, voting member of Idaho's Workforce WDC, and IDVR's Administrator currently serves as the One-Stop Chair for the WDC. This appointment followed a major reorganization of the WDC which was mandated by the Governor's Executive Order.

Maximization of External Resource Utilization IDVR in concert with other workforce partners will be discussing areas for improvement within the American Job Centers. Appropriate referral and co-enrollment are top priorities in order to reduce duplication of services and maximize the array of services people with disabilities can leverage.

IDVR will continue to participate in cross-training activities with mandatory One-Stop partners which will include sharing program contact information, eligibility criteria, and training on program services and mission.

Core program partners are participating in a three-year Workforce Data Quality Initiative (WDQI) grant, secured by the IDOL, to enhance and automate data sharing across core programs. The shared data will include performance indicator data (e.g., wage information) as well as

co-enrollment information across core programs, which will be useful to help facilitate cross-agency collaboration and service delivery.

Participants will be encouraged to co-enroll in applicable services at the local One-Stop to ensure participants can benefit from the full range of services available to them.

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

The WIOA Advisory Group is discussing strategies in the following areas: improving public awareness and access to the workforce system, coordinating business services across partners, serving rural and remote communities and developing a career pathways/sector strategies with core program partners. The following briefly describes these strategies. More detailed information can be found in Section II(b)(1) and (2)(A)(B) of the Combined Plan.

Improving Public Awareness and Access to the Workforce System, the public listening sessions conducted by the Council and partners show several gaps that allow various opportunities for system improvement. This includes actionable messaging of the services and benefits available to both job seekers and employers. Also, increasing referrals and service coordination among programs will help to improve outcomes for those in need. The VR programs will specifically:

Work to improve program visibility including improved marketing tools for both employers and people with disabilities.

Continue to work with one-stop partners to provide guidance on programmatic and physical accessibility to increase quality of services for people with disabilities.

Continue to partner with the “Live Better Idaho” local community resource portal to market services to targeted populations.

Coordinate activities with One-Stop partners by sharing program contact information, eligibility criteria, and training on program services and mission for each core program.

Comprehensive information and training will be provided to outside organizations, especially Community Rehabilitation Partners.

Coordinating business services across partners to ensure delivery of streamlined and high-quality solutions. As previously noted, statewide listening sessions brought to light that employers are seeking services and information in a coordinated and targeted fashion. Based on this feedback, the system must clearly identify the services each program has to offer, develop a coordinated approach to visit/serve employers, and utilize a continuous improvement approach to better serve employers. In addition, an information portal needs to be developed to include information on services available from WIOA and non-WIOA partners. The VR programs will track business services provided/delivered by staff and report this information to IDOL on a monthly basis.

In our activities analysis, nearly every core and partner program identified service to rural and remote areas as a significant challenge. Idaho is largely a rural state, so the importance of this priority cannot be understated. Some WIOA partners have modified service delivery strategies to better reach rural and remote Idahoans and the system is interested in evaluating the success of the model and expanding it as appropriate. The VR programs will collaborate with One-Stop partners, including libraries, to establish information and referral procedures for serving individuals with disabilities in rural communities, where VR lacks a physical presence.

Career Pathways/Sector Partnerships - Our economic analysis revealed that many of Idaho's in-demand and high-growth occupations are in industries such as manufacturing, trades, retail and service, construction, and health care. SRC, in partnership with the SBOE and the state's Chamber of Commerce, is beginning to evaluate skills and certifications that are valued across industries to transform the delivery of workforce training and education. The VR programs will specifically contribute to the sector approach established by the IDOL, train staff and expand utilization of the career pathways established by ICTE, including the Career Atlas tool, explore the development of similar tools for pathways common to quality VR outcomes, and continue to focus on and train staff to use IDOL or other sources of local area LMI, for instance, Career Index Plus, CIS, to better inform customers' employment goal selection.

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

A. Achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

IDVR has completed the latest CSNA process which will be published in 2020. This CSNA has been used to inform our latest goals and priorities and to develop strategies to achieve the goals and priorities within IDVR's four-year work plan.

IDVR's goals and priorities have been outlined in section I state goals and priorities. This Section o has addressed the program specific strategies to achieve the goals and priorities and related these 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

IDVR will continue to maintain the two ongoing primary innovation activities, supporting the activities of both SRC and SILC. SRC serves as IDVR's advisory council and together with IDVR and the CSNA inform the goals, priorities, and strategies for agency.

Additionally, IDVR is particularly interested in designating funds for the purpose of improving the quality of CRP services to individuals with disabilities. IDVR will evaluate the best approach for improvement, including input from the CRP community, and allocate resources to begin this innovative activity. It is expected that IDVR will begin this process in PY2020 and continue efforts into PY2021.

These innovation activities are driven by WIOA regulatory changes and information derived from the past two CSNA's.

The expansion of Benefits Counseling services to individuals who are SSI SSDI recipients:

IDVR historically has used the services provided by Montana State University, Billings, Work Incentives Planning and Assistance Program (WIPA), however, this service is only for those individuals with disabilities who are employed. IDVR is prioritizing the delivery of benefits counseling to customers who receive Social Security Disability benefits to promote better informed decisions regarding work, and to resolve any ambivalence/anxiety about losing benefits, as early in the VR process as

possible. Few individuals are certified to deliver benefits counseling in Idaho. IDVR plans to assess the number of current qualified benefit counselors (Community Work Incentives Coordinators (CWIC) and develop a plan to increase the number to adequately address the Benefits Counseling needs of individuals with disabilities served by the program. IDVR intends to designate funds for this expansion activity in PYs 2020 and 2021.

The expansion of CE services through a pilot relaunch (Pilot 2.0):

IDVR engaged in an initial pilot program to launch CE services in three pilot sites across Idaho. IDVR worked closely with WINTAC and our CE training provider, Griffin-Hammis Associates to train educators, CRP staff and IDVR staff including five-days of face-to-face instruction and distance and in-person technical assistance. Ultimately, the CRPs who participated in the training were unable to retain the staff trained in the pilot, and subsequently IDVR was left without the capacity to deliver CE or expand CE delivery statewide. Staff turnover continues to be a significant issue for CRPs, and IDVR is exploring potential changes to the structure of the pilot to include expanding the array of providers who are recognized as qualified CE providers as well as evaluating sustainable CE training delivery models. IDVR will continue efforts in the CE Community of Practice as well as continued engagement in the intensive technical assistance agreement with WINTAC. A CE Pilot 2.0 is planned to be developed and implemented in PYs 2020 and 2021. IDVR intends to designate funds for this expansion activity in PYs 2020 and 2021. IDVR personnel are slated to attend the CE National Forum on May 19-20 in Washington, DC to better understand where other programs are gaining traction in the launch of their own CE initiatives.

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 2020 IDVR CSNA reported that IDVR has improved its outreach services to unserved, underserved and minority populations.

IDVR is trending toward a ratio of minority service rate to non-minority service rate of 1.00. Significant gains in service outreach, an emphasis on accurate coding of race and ethnicity status, and Pre-ETS expansion and outreach have raised the current (PY 2018) ratio to .961, up from .924 in PY 2017.

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 IDVR will address equitable access and participation as it relates to this section, including coordination of outreach efforts with combined plan partners at IDOL and DEI.

p. Evaluation and Reports of Progress: VR and SE Goals

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

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

Goal 1 is to provide quality, relevant, individualized vocational rehabilitation services to individuals with disabilities to maximize their career potential. Priority 1 is to expand, monitor, and improve Pre-ETS to students with disabilities and similar services to youth. IDVR began collecting new baseline data for the number of students receiving Pre-ETS and has initial data in PY 2016 with the first full year of data in PY 2017 with 1,180 students receiving at least one Pre-ETS activity. PY 2018 number dipped 19.7 percent to 947 students receiving at least one Pre-ETS activity. IDVR requires more data to determine whether this is due to natural regression, or other yet to be determined factors. Additionally, IDVR has experienced a wide decrease in overall applications for all services. This overall trend of fewer applicants statewide may have a relationship to the overall reduction in Pre-ETS cases across Idaho. IDVR will continue to monitor these indicators and will respond accordingly as the baseline numbers solidify.

IDVR continues to evaluate and improve services to students. The transition coordinator, along with other transition staff, developed a strategic plan in Fall 2019 with the goal of systematically advancing IDVR forward with the delivery of Pre-ETS. This new strategic plan for Pre-ETS expansion and improvement is detailed in section L of this plan.

Priority 2 is to provide a comprehensive array of services to individuals with disabilities, including individuals with MSD.

IDVR has engaged in a determined expansion of SE services, including a heightened focus on employment stability prior to the transition to long-

term supports. As a result, IDVR has seen the cost of SE cases increase year-over-year from \$1218 per case in PY 2016 to \$2,345 in PY 2018, an increase of 92 percent spent per SE case. This increase helped promote initial stability through additional hours of Job Coaching for individuals to master the essential function of the position to employer satisfaction.

IDVR has introduced stronger guidance, for staff and CRPs, on fading and appropriate reduction of support over time to ensure strategies are in place to either address current issues on the job or determine a base level of ongoing support required prior to transition to ongoing support services. These efforts are ongoing, and IDVR is currently working through public comment to enhance this guidance in a new iteration of the IDVR's CRP Manual. Enhanced guidance on fading and documenting progress necessary to justify the continuation of SE services will be major components of the PY 2020 iteration of the manual.

Additionally, IDVR has completed phase one of its CE pilot. The three-site pilot intended to determine appropriate rate, capacity and inform policy development around the delivery of CE statewide. While CE can be offered to individuals who require SE, components of CE are valuable to individuals with the most significant disabilities as well. The initial phase of the pilot illustrated significant challenges to provider turnover and sustainable training to achieve fidelity to the CE model IDVR has selected. IDVR is currently structuring a second pilot to address challenges experienced in phase one. IDVR anticipates a relaunch of CE 2.0 sometime in PY 2020.

IDVR has received intensive TA from WINTAC and is currently engaged in WINTAC's Community of Practice (CoP) on both SE and CE

IDVR has included Benefits Planning on its Strategic Plan for PY 2019 but has pushed this initiative to PY 2020. Benefits Planning has been identified as a priority by SRC and IDVR's field management.

YES has been established as a service category and is now available in cases where no alternative external source of extended services is available.

Priority 3 is to hire and retain qualified staff to deliver quality vocational rehabilitation services. IDVR has accomplished several initiatives to increase retention and attract new hires for counselor and management

level positions, including Marketing materials update to highlight VR career path, meaningful work, and benefits offered to State Employees, Increased outreach to universities, CRCC, and through attendance at NCRE to expand candidate reach, Streamlined the recruitment process and updated job postings to make them more jobseeker focused, Created internship program to build talent pipeline and continue collaboration with neighboring universities, Updated CSPD policy to offer financial support to employees working towards their VR credentials, Created permanent ARM positions to support the coordinated development of staff with an emphasis on new staff, increase potential for career growth, and for succession planning purposes Continuously supporting managers and their employees in performance management process, Restructured onboarding processes to engage new hires, standardize training, and foster a positive experience for new employees, Partner with IDVR's VRC Trainer to increase and align skill set of agency personnel, and Updated pay structure for all IDVR position classifications to hire at the minimum of 80 percent policy rate.

Priority 4 is to improve usage of Labor Market Information/Career Pathways to inform customer career choice. IDVR engaged with the Career Index Plus and IDOL in various ways:

The Career Index Plus (TCI+) training was offered to frontline staff statewide to provide additional options for staff when exploring LMI with customers. IDOL came to IDVR's Inservice to provide training on local labor markets and how to use the tools provided by IDOL including accessing local labor economists to better understand local area conditions. Training on Comprehensive Assessment incorporating local labor market data was emphasized in a major statewide training on quality case documentation, an area of focus for PY 2018.

IDVR included an evaluation of LMI present in Comprehensive Assessments in its 2019 Case File Review Season and will be promoting greater utilization of local (or anticipated) labor market for the vocational goal of choice. Additionally, IDVR imposed a ban on the utilization of generic 'all other service workers' type goals outside of Pre-ETS cases (where a vague vocational goal is allowable while student/youth career exploration solidifies).

Goal 2 is to improve VR program efficiency through continuous quality improvement activities. Priority 1 is to Meet or exceed negotiated targets

on Primary Performance Indicators 1 through 5 established by the US Department of Education, RSA.

Initial efforts to utilize targets first require the establishment of data agreements and subsequent baseline data. IDVR, through an initial ad-hoc data agreement, was able to secure in-state wage data through IDOL, however only aggregate out-of-state data were available through IDOL's WRIS-2 due to constraints imposed by the agreement. As of September 2019, Idaho's core program partners have all signed on to the State Wage Interchange System (SWIS) and will now be able to gather additional out-of-state data from other SWIS states. IDVR is well positioned to enter target negotiation with RSA. It is worth noting that there are significant out-of-state overlaps with local labor markets, particularly in north Idaho with estimates that approach 12 percent out-of-state placement.

IDOL secured a Workforce Data Quality Initiative WDQI grant from US DOL with expressed support from IDVR. IDVR is working with the WDQI lead and other core WIOA programs to leverage the WDQI resources to improve and automate the exchange of secure co-enrollment data and other critical shared elements of importance to the group. As a result of efforts identified in the WDQI, core programs should realize more efficient and secure data exchange of required WIOA data elements needed by multiple core partners.

Outcomes of Primary Performance Indicators are preliminary. Currently complete data is only available for Measurable Skill Gains, while employment/wage data continues to come online.

A critical focus of the new Case File Review Protocol was the verification of documentation of educational goals. Preliminary findings indicate that while IDVR staff are doing an exceptional job of collecting educational verification, we are challenged with entering MSGs in all cases for performance reporting purposes. IDVR currently has an understanding of areas it can improve on from PY 2018 performance. IDVR will champion an effort to report more complete MSG data in PY 2019. IDVR will also use information gained in the review of PY 2018 performance to establish and improve an MSG anomalies data validation check to better promote field entry of educational goals where they are currently lacking. Further identification of core performance elements for improvement are dependent on the future exchange of this data to solidify baselines.

Priority 2 is to Revise IDVR's Customer Satisfaction Survey in collaboration with the SRC to increase the response rate, retention rate, and overall satisfaction rate.

IDVR has completely revamped the Customer Satisfaction Survey based on feedback from Idaho's SRC and SRC Survey Subcommittee. As a result, IDVR realized major gains in completion rates (from 40 to 98 percent) and response rates (from five to 15 percent). Moving forward, IDVR will focus on an increase in satisfaction and maintain a focus on keeping a solid response rate.

Regarding satisfaction, the foundational questions have been changed, and data are not directly comparable. However, IDVR has seen a seven percent drop in the 'satisfaction' construct with the change in language, and a change in method in calculating overall satisfaction (87 percent to 80 percent satisfied or very satisfied). Additional variance in this rate may be explained by a modification of the IDVR's Financial Participation Agreement, which coincided with the change in CSS survey and substantially increased customer financial involvement in their plans. General impacts of WIOA implementation may also play a role in explaining the reduced satisfaction rate.

Priority 3 is to maximize the utilization of comparable benefits. Preliminary attention has been given to this priority and understanding comparable benefit utilization and documentation was a focus of IDVR's 2019 Case File Review. Emerging data suggests a need to further information and communication activities to not only maximize the utilization of comparable benefits and services, but also to better document these benefits on the plan when they are used.

IDVR is increasing appropriate referral to American Job Center Network Partners in local areas: IDVR's administrator is Idaho's Workforce Development Council One-Stop chairperson, and in this capacity has increased local area engagement between WIOA combined plan partners and other stakeholders. This is accomplished via multiple monthly in-person meetings to facilitate better understanding of programs and increase utilization of available resources and expertise. This should have an impact on volume and validity of referrals to comparable services and resources and a corresponding increase in co-enrollment between combined plan partners.

IDVR has also issued recent guidance clarifying the scope of comparable benefits and included procedures for better documenting comparable benefits on the IPE.

IDVR is using RSA's data dashboards as a part of its data validation strategy. In this analysis IDVR has uncovered a flaw in how these are represented in the report through the Aware case management system. IDVR is working hand-in-hand with Aware to better understand and rectify this reporting error.

Priority 4 is to increase IDVR integration with the workforce development system. The IDVR Administrator is the WDC One-Stop Committee Chair. The Committee has prioritized numerous activities since the last State Plan, including formalizing Idaho's One-Stop/American Job Center structure: two comprehensive centers (Idaho Falls and Lewiston), designating affiliate sites, and network partners. Negotiating a cost-sharing agreement. Conducting both physical and programmatic accessibility of comprehensive, affiliate, and network partner sites. Advancing data sharing to obtain co-enrollment information.

Priority 5 is to evaluate IDVR assessment expenditures. While the evaluation of assessment expenditures remains a priority for the agency, progress on this priority was minimal this PY.

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

Priority 6 has been met with a complete revision of the internal case review process which now aligns with RSA's Internal Control and data validation requirements and is periodically informed by the MTAG and emerging and existing agency priorities and progress. An annual review season pilot of this protocol is focused on high risk areas as identified by compliance objectives, agency personnel, CSNA, SRC and other sources. Additionally, more complex or ad hoc topics will be addressed through a series of targeted reviews which will rotate based on administration prioritization.

The result of the revision has been a substantial increase in meaningful information that can be easily translated into action for program improvement. Emerging data from the 2019 case file review season indicated numerous areas for immediate training and improvement statewide, and at a regional level. As a result, this protocol will be institutionalized and completed annually as a part of addressing IDVR's

overall internal control monitoring requirements. The Planning and Evaluation unit will continue to iterate to improve on this process, but can now focus on incremental improvements versus the transformational system overhaul that is now complete.

Priority 7 is to collaborate with Community Rehabilitation Program partners to improve the quality of services. IDVR is in the middle of fundamentally shifting how we communicate with and work with our CRPs. Fundamental to these changes was the establishment of a formalized CRP Manual articulating and clarifying expectations and requirements around billing, service delivery, monitoring, pilot CRP projects, rural and underserved areas and frequently asked questions. IDVR is in the middle of a revision phase and is currently collecting comment from internal field staff and CRPs to make incremental improvements to the guide and will continue to do so over time.

IDVR partnered with three Idaho CRPs to launch phase one of the CE pilot. While ultimately unsuccessful, the pilot indicated many potential changes for improvement in phase two and identified areas for clarification in expectations. The second phase is being developed with input from national technical assistance centers, Idaho pilot CRPs and field staff who were a part of the original training series. The second pilot phase is expected to launch in PY 2020.

Customer Satisfaction Survey results for CRP services (including assessment services) are particularly low and indicate a strong need to elevate this priority in the coming PY.

IDVR realizes a need to further enhance collaboration with CRPs to work on a variety of services from assessment, to job development and placement and to include supported and customized employment. Data from the 2016 CSNA and preliminary results from the 2019-2020 CSNA (in process) strongly indicate a need to utilize Innovation and Expansion funds to elevate the quality of CRPs in the coming state plan. This will be a primary emphasis for IDVR in this plan.

Priority 8 is to Evaluate Customer Access to Services and was de-emphasized following a risk assessment and prioritization activity held with frontline management staff and members of the SRC. This element was a product of a prior SRC priority, but after a shift in member composition the priorities changed.

Goal 3 is to meet the needs of Idaho businesses. Priority 1 is for IDVR to be recognized by the business community as the disability experts in the workforce system.

IDVR Business Liaison oversees the coordination of employer related outreach efforts within IDVR and to coordinate employer contact under the aegis of WIOA through partnerships with Titles I through IV and other combined state plan partners.

In 2017 BET was created comprised of at least one-to-two IDVR staff in each regional office and activities of the BET are directed by the Business Liaison. RM representation is strong on the team, with three of eight RMs participating in an advisory role. The BET has evolved a mission statement, “To intentionally create and maintain long term partnerships with businesses for mutually beneficial outcomes for employers and job seekers with disabilities”.

Following the creation of an initial charter, sponsored by IDVR administration, the BET has engaged in a number of preliminary activities, including the creation of a mandatory “Business Basics” online training for all staff, a method for tracking business outreach activities through our internal case management system, updates to IDVR’s external business relations portal, and development of marketing materials for business outreach and education.

Activities for the BET are partly informed by an annual survey. This survey helps the Business Liaison prioritize activities based on input from the field. The latest survey indicated high perceived needs for Disability Awareness training (indicated by 68 percent of BET staff as a need), Accommodations and Assistive Technology (65 percent), and Hiring Incentives for Employers (68 percent). Additionally, the BET is now active in most of the chambers of commerce across Idaho including representation in each region of IDVR.

A toolbox for members of the BET has now been established and is growing. The toolbox features resources BET and other IDVR staff can use to promote positive employer engagement. There are tools for staff as well as a growing number of tools designed for employers including a new initiative to create a training for employers around disability etiquette. This group will be meeting early in 2020 to draft a formal strategic plan and further refine and articulate goals, strategies, priorities and staff responsibilities under the team. Expanding outreach to

employers for students and youth in transition is a primary consideration for the coming year for the BET with a business engagement transition pilot for IDVR Region 1 launching in 2020.

As a part of the BET activities in PY 2018, the team led a presentation at IDVR's annual all staff Inservice to help explain how they serve as regional resources to promote positive business engagement opportunities.

BET, while new, has engaged in two in-depth activities with major Idaho corporations (WinCo and HP). While talks with WinCo are still preliminary, the HP Spectrum Success Program is a direct result of sustained engagement and partnership with HP and would not have been possible without the help of Washington State Division of Vocational Rehabilitation and Microsoft who had engaged in some trailblazing efforts matching individuals with autism and STEM jobs. The willingness of these partners to provide technical assistance and expertise were instrumental in the program's success and as a result HP is engaging in a second cohort with IDVR beginning in early 2020.

IDVR will continue to coordinate business outreach efforts with the Idaho Department of Labor, and their business outreach team which serves as the central point of contact for WIOA coordinated business outreach activities.

IDVR's Business Liaison is engaged with the NET and attends the national conference in addition to receiving regular updates, conference calls provided through a NET community of practice. IDVR also has a working group through federal Region X (WA, OR, AK, ID) where business engagement leads from each state share best practices and approaches.

IDVR has traditionally engaged in the creation of VR Success Stories to showcase strong annual placements. The Business Liaison and the BET have worked to overhaul, expand, and professionalize these segments and will now producing multiple success stories per Region, with two being selected for a full video production which showcases the customer and employer's success with these placements.

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

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

2. An evaluation of the extent to which the SE 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

IDVR would anticipate serving approximately 128 individuals with the \$300,000 available in the SE Supplemental grant at an average cost of \$2,346.

Goal is to promote quality SE services through stability as demonstrated through higher second and fourth quarter employment rates for customers who received SE services.

Per customer expenditures for SE cases are up 92 percent as IDVR places more support behind achieving quality, long term stable SE outcomes.

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. IDVR has and will continue to supplement Title VI, Part B funds when needed with Title I grant funds.

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 percent of these funds for service provision to youth with disabilities and provide a 10percent state match to these funds. IDVR anticipates it will spend these funds and more in the coming year on students and youth.

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

The current labor market and fiscal conditions make recruitment and retention significant ongoing challenges for many of Idaho's Community Rehabilitation Programs: In this PY, two major CRPs have shuttered their programs as a result of fiscal conditions, many others reported difficulties in staffing, and realized a decline in referrals. Record sustained unemployment across Idaho has created an environment where CRP staff can often receive nominal wage increases to work entry

level positions in their local labor markets. CRPs are in many cases unable to compete for these staff.

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

IDVR is continuing to gather baseline data from which to determine whether performance is degrading, maintaining or improving per section 116 standards. Once an understanding of these baselines emerge, IDVR will be well positioned to develop strategies to improve upon these baseline figures. IDVR currently has is MSG with a rate of 35.3 percent for the 915 gains reported. IDVR also has preliminary median earnings of \$3,733.93 reported in PY 2018.

IDVR is hesitant to rely too strongly on the current MSG rate as recent file reviews have illustrated an opportunity for IDVR to initiate improvements which can further advance performance on this rate. That said, IDVR is ready to engage in the initial MSG target negotiation and has developed a competitive benchmark process to help inform negotiations.

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

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

Section 116 of WIOA establishes six new performance indicators to align these measures across numerous programs in the state. IDVR has not traditionally reported these measures as defined. This in concert with fundamental changes in Pre-ETS service provision further confound IDVR'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. IDVR is currently working on a new array of agreements to ensure the requirements of partner agencies are met.

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

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

Cost: \$22,414

IDVR funds the SILC for the purpose of Innovation and Expansion activities. Title I funds reserved for the SILC were used to support personnel and functions necessary for the operation of the SILC.

Cost: \$134,379

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

IDVR provides the full scope of SE Services to those VR eligible customers with the most significant disabilities, who require extended services to maintain employment. SE services are available to individuals with the most significant disabilities, including youth with the most significant disabilities.

SE Services include the following:

Time limited services needed to include job coaching and communication with the employers, to support training while the individual is employed. Continued funding of SE cases is contingent upon progress toward learning the essential functions of the job and or fading hours of ongoing support to the level of employer satisfaction immediately prior to the assessment of initial stability.

Any other service that would be identified as requisite to the targeted supported employment outcome after placement ahead of transfer to externally funded ongoing support services.

SE may also include CE elements, after placement.

YES are available for qualifying youth in the absence of other ongoing support services available in the community.

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

Fifty percent of the Title VI-B SE grant will be reserved for youth with the most significant disabilities; IDVR will set aside a 10percent non-federal matching fund to meet the requirement of subsection 363.23. For FFY 2018 this amount will be \$15,000 Title VI-B Youth. The corresponding adult SE grant does not require a set aside.

SE 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. IDVR has created protocols for and has made YES available for youth who are MSD when needed as required by WIOA. As Idaho has external funders of ongoing support services through multiple avenues, IDVR does not currently have to expend YES funds.

Extended services may be provided to youth with the most significant disabilities for a period up to four years, or until the individual turns 25 and no longer meets the definition of a youth with a disability, whichever comes first. SE services for adults shall not exceed 24 months, unless an exception is granted. IDVR requires a third-party commitment to designate a long-term support provider. Since 2004, EES program has been housed under IDVR and along with Medicaid are the two providers of long-term funding for extended services in Idaho. A supported employment participant may only be transitioned to long term support based on an assessment of rehabilitation goal achievement and job stability. Periodic monitoring occurs to ensure that each customer receiving SE services is making satisfactory progress, including twice-monthly requirements to document progress toward these goals.

Vocational Rehabilitation (Combined or General) Certifications

States must provide written and signed certifications that:

1. The (enter the name of designated State agency or designated State unit, as appropriate) is authorized to submit the VR services portion of the Unified or Combined State Plan under Title I of the Rehabilitation Act[14], and its supplement under Title VI of the Rehabilitation Act[15];

Enter the name of designated State agency or designated State unit, as appropriate

Idaho Division of Vocational Rehabilitation

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency) [16] agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[17] , the Rehabilitation Act, and all applicable regulations[18] , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Enter the name of designated State agency

SBOE

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[19] , the Rehabilitation Act, and all applicable regulations[20] , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;

4. The designated State agency and or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

7. The (enter the name of authorized representative below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;

Enter the name of authorized representative below

Jane Donnellan

8. The (enter the title of authorized representative below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;

Enter the title of authorized representative below

Administrator

9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

Footnotes

[14] Public Law 113-128.

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

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

[17] No funds under Title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.

[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

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

Signatory information	Enter Signatory information in this column
Name of Signatory	[Jane Donnellan]
Title of Signatory	[Administrator]
Date Signed	[03/04/2020]

Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement assurances:

The State Plan must include	Include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: Administration of the VR services portion of the Unified or Combined State Plan:	
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	

3.b.(A) "is an independent State commission" (Yes/No)	No
3.b.(B) "has established a State Rehabilitation Council" (Yes/No)	Yes
3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	
3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	
3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	Yes
3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	

3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	
4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	Yes
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	
4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act	
4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment	

under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act	
4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs	
4.j. With respect to students with disabilities, the State,	
4.j.i. Has developed and will implement,	
4.j.i.i. Strategies to address the needs identified in the assessments; and	
4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and	
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	
5. Program Administration for the Supported Employment Title VI Supplement:	
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act	
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act	
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	
6. Financial Administration of the Supported Employment Program:	
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal	

contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act	
7. Provision of Supported Employment Services:	Yes
7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act	
7.b. The designated State agency assures that:	
7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act	
7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act	

Vocational Rehabilitation Program Performance Indicators

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction

with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

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

For PYs 2020-2023 Plans, Title I programs Adult, Dislocated Worker, and Youth and the Title II program Adult Education and Family Literacy Act will have two full years of data available to make reasonable determinations of expected levels of performance for indicators for PY 2020 and PY 2021 Employment (Second Quarter after Exit); Employment (Fourth Quarter after Exit); Median Earnings (Second Quarter after Exit); Credential Attainment Rate; and Measurable Skill Gains.

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by Title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021 is Employment Second Quarter after Exit; Employment Fourth Quarter after Exit; and Median Earnings Second Quarter after Exit.

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

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation

Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the indicators as baseline for the VR program for PY 2020 and PY 2021 are Employment Second Quarter after Exit; Employment Fourth Quarter after Exit; Median Earnings Second Quarter after Exit; and Credential Attainment Rate

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

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

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

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	37.8	38.5	40.3	41.0
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

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