

## PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION

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

### (a) Input of State Rehabilitation Council.

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

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

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

1. the PaRC annual report (Federal Fiscal Year (FFY) 2018 - 2019);
2. OVR Customer Satisfaction Surveys;
3. review of items in 2018 State Plan Attachment (description a);
4. comments received at 2018 State Plan Meetings;
5. participation in the Rehabilitation Services Administration (RSA) Monitoring (2019);
6. Comprehensive Statewide Needs Assessment (CSNA) FFY 2016 - 2018 OVR/Institute on Disabilities at Temple University;
7. local Citizen Advisory Committees (CAC) meetings and/or minutes; and
8. quarterly reports received from OVR at PaRC Council meetings.

**Commendation: The Council supports OVR in their efforts to open the order of selection as soon as possible for the benefit of Pennsylvanians with disabilities seeking employment services through OVR.**

### 1. The Closure of the Order of Selection (OOS) for All Categories

**Issue:** The closure of the Order of Selection (OOS) for all categories represents a significant challenge to people with disabilities having access to employment services when they are needed. OVR must develop appropriate internal controls and other adjustments in order to re-open the OOS as soon as possible and update the PaRC regarding progress on at least a quarterly basis.

### RECOMMENDATIONS/MEASURABLE GOALS:

- A. OVR provides quarterly reports (at a minimum) to the PaRC on how many people were added to and removed from the waiting list in each category each quarter.

**OVR Response:** OVR will provide quarterly reports to the PaRC during the quarterly council meetings to address how many people were added to and removed from the OOS waiting list in each category per quarter.

- B. OVR provides quarterly reports (at a minimum) to the PaRC and the State VR Board on new application response times.

**OVR Response:** OVR numbered memo 17-200.02, *Essential Procedures for the Vocational Rehabilitation Program* establishes the 15-day standard for persons referred to OVR for services to be contacted and the 30-day standard for an intake appointment to be scheduled. OVR is currently not tracking these timeline statistics. OVR appreciates the importance of this recommendation and will explore how tracking of this information can occur within the Commonwealth Workforce Development System (CWDS). In addition, during PaRC quarterly meetings, OVR will report on progress related to this recommendation and share statistical information on the number of individuals who were determined eligible for services and had eligibility completed within 60 days per quarter.

- C. OVR establishes a clear deadline for reopening the OOS with intermediate steps and goals to re-open the OOS on time. OVR provides quarterly reports (at a minimum) to the PaRC on progress and factors affecting progress toward achieving the goal of re-opening the OOS on a permanent basis by the deadline.

**OVR Response:** The goal of OVR is to open the OOS as soon as possible. RSA has approved OVR to review and evaluate the ability to open the OOS on a quarterly basis. OVR will report to the PaRC quarterly on plans to reopen the OOS and factors affecting progress toward achievement of this goal.

- D. Identify resources and opportunities outside of OVR for organizations to provide employment services to OVR customers on the waitlist.

**OVR Response:** OVR will seek opportunities to leverage other public and private resources that may provide employment services to OVR customers on the waitlist. During a closed OOS, information and referral services will remain available. Individuals will be given information and referrals to other appropriate Federal and State programs, including programs carried out by other components of the Statewide Workforce Development System, such as the one-stop centers known in the Commonwealth as PA CareerLink®.

## **2. Hiram G. Andrews Center (HGAC)**

**Issue:** OVR's current fiscal problems require a review of HGAC's return on investment.

### **RECOMMENDATIONS/MEASURABLE GOALS:**

- A. OVR should conduct a study at a minimum of every 3 years and report on the return on investment (compared to community-based VR services) for students attending HGAC. HGAC's yearly budget averages approximately \$23 million, which includes staff, operations, brick and mortar and other costs. Overall, the cost per customer is reported as significantly higher at HGAC than that of non-HGAC customers. The report must include:
  - (1) an analysis on return on investment;
  - (2) an impact statement on customer choice;
  - (3) a review of the extent to which its programs are provided in an integrated setting;
  - (4) an assessment of the availability of HGAC programs in the community; and

(5) a determination of what other partners like the Pennsylvania Department of Education (PDE) should be paying/contributing.

**OVR Response:** OVR will conduct a regular review of HGAC and provide data and information that illustrates the viability, value, and uniqueness of HGAC from multiple perspectives (customer satisfaction, Comprehensive Statewide Needs Assessment, Fiscal, programmatic outcomes, diversification initiatives of student populations and revenue streams). This information will be shared with the PaRC during their quarterly meetings.

### **3. Conduct a review of OVR’s statutory and regulatory obligations to obtain public comment and/or consult with stakeholders, providers, VR staff, and individuals with disabilities in the development, implementation and amendment of OVR’s policies and procedures.**

**Issue:** Pursuant to 34 CFR 361.20, OVR is required to solicit public participation when it proposes to develop, amend or otherwise modify substantive policies/procedures affecting OVR services.

#### **RECOMMENDATIONS/MEASURABLE GOALS:**

A. OVR should provide quarterly information on the number and names of new/amended policies, such as a college policy or vehicle modification policy, being developed or in consideration for future development/modification, including how they differ from any existing policy and the potential number of customers impacted by the policy.

**OVR Response:** During each PaRC quarterly meeting, OVR will continue to report on the number and names of new/amended policies being developed or in consideration for future development/modification.

B. Inclusion of the Council in the development/amendment of the policy/procedure, the proposed timeline of implementation, including schedule of public comments and plans to educate stakeholders on the new/amended policy/procedure.

**OVR Response:** When a substantive policy/procedure change is being considered, OVR will continue to consult with RSA to confirm that a public comment period is necessary. OVR will continue to invite Council members to participate in any planned workgroup. OVR will continue to provide subsequent drafts of new and revised policies to the appropriate PaRC committees and full council. OVR will keep the PaRC informed of any training plan developed to educate stakeholders on policy changes.

### **4. Strengthen Collaboration and Partnerships with Stakeholders**

**Issue:** OVR has made significant changes to services without including key stakeholders throughout the change development process. OVR needs to make sure that those changes will not unnecessarily reduce the achievement of outcomes in terms of quantity and quality.

## RECOMMENDATIONS/MEASURABLE GOALS:

- A. Before OVR makes any substantive changes, the PaRC will be informed of what needs to change and why, and what affected stakeholder representatives are being included in the change development process.

**OVR Response:** OVR will continue to inform the PaRC before making any substantive changes to policy and identify which stakeholders may be affected by any change.

- B. OVR provides (at a minimum) quarterly reports to the PaRC on all substantive changes either anticipated or currently in development with information on progress, including key stakeholder representative involvement and contributions to the process.

**OVR Response:** When a substantive policy/procedure change is being considered, OVR will continue to invite Council members and stakeholder representatives to participate in any planned workgroup. Workgroup progress will be provided during quarterly PaRC meetings.

- C. OVR provides annual reports (at a minimum) on feedback survey information from key partners.

**OVR Response:** Anytime OVR initiates a survey of key partners, the results will be shared during quarterly PaRC meetings.

- D. OVR provides quarterly progress reports with measures of quality and quantity of outcomes for partnerships, programs, and services, including pre-employment transition services, local workforce development boards, supported and customized employment, business services, and PA CareerLinks®.

**OVR Response:** OVR provides quarterly reports on Act 26, Work Experience for High School Students with Disabilities, which is shared with the PaRC and available publicly on OVR's website. This report includes information related to pre-employment transition services as well as information on supported employment outcomes. OVR developed an Excel document that identifies connections between OVR District Offices with workforce development boards and PA CareerLinks®. This document can be shared with the PaRC on an annual basis. OVR Business Services information is regularly included in the Executive Director quarterly report to the PaRC.

## **5. Review of OVR Policies and Procedures**

**Issue:** Clarification is required regarding public participation in the adoption or amendment of OVR policy, and OVR's obligation to consult with the PaRC, among others, on matters of general policy arising in the administration of the VR services portion of the State Plan.

## RECOMMENDATIONS/MEASURABLE GOALS:

- A. OVR reports to the PaRC on a quarterly basis substantive policies and procedures under review which are subject to public meetings, non-substantive administrative changes, and policies on matters of general

administration of the VR program which require consultation. Additionally, include quarterly reports on workgroups.

**OVR Response:** Pursuant to 34 CFR 361.20, OVR will report to the PaRC on any substantive changes to policies or procedures governing the provision of vocational rehabilitation services that would require OVR to conduct public meetings and/or directly impacts services provided to individuals with disabilities. As requested, OVR will also report during quarterly PaRC meetings on any active workgroups.

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

OVR did not reject any of the PaRC'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;*

OVR requests a continuation of its waiver of statewideness for its Intergovernmental Agreement (IGA) with the Berks Career and Technology Center (BCTC) and its IGA with the School District of Lancaster (SDoL). Through each of these programs, transition age students with disabilities are provided with enhanced activities and services that lead to employment or career-related postsecondary education or training.

OVR entered into an IGA with BCTC effective October 1, 2014, to provide school-to-work transition services to OVR eligible students with disabilities who are enrolled in approved training programs at BCTC and attend one of 16 public school districts within Berks County. The most recent IGA with BCTC was approved by the BCTC Board of Directors on December 10, 2018, signed by the school's authorized representative, and then fully executed by the Commonwealth on March 7, 2019. BCTC provides 21.3 % of project funding which serves as the required local/state match. OVR provides the remaining 78.7 % from federal VR funds.

BCTC's program, named "Work Partners Program," provides for joint funding (including salary & benefits) of two positions which did not previously exist at BCTC:

1. School-to-Work Coordinator (Professional); and
2. Job Trainer (Paraprofessional).

Services to be provided through the Work Partners Program include:

1. workplace readiness instruction;
2. work-based learning experiences which include job shadowing, internships, and paid work experiences;

3. job development and placement services including employer contacts, job site analyses, job task analyses, facilitation of job accommodations, coordination of job interviews, and on-the-job supports;
4. career training supports to address employment related concerns on and off the job; and
5. independent living skills related to employment.

## Goals and Deliverables of the Work Partners Program

During fiscal years 2018-2023, it is expected that:

1. 60-65 OVR eligible and potentially eligible students with disabilities will participate in the Work Partners program each year;
2. 100% of OVR eligible and potentially eligible students in the program will receive workplace readiness instruction prior to graduation;
3. 100% of OVR eligible and potentially eligible students with disabilities in the program will participate in at least one form of work-based learning experience prior to graduation;
4. 80% of OVR eligible and potentially eligible students with disabilities in the program will receive job development & placement services and career training services prior to graduation; and
5. 60% of OVR eligible and potentially eligible students with disabilities who graduate from the program shall be placed in competitive, community-integrated employment or post-secondary education consistent with their Individualized Educational Plan, related Transition Plan, and their Individualized Plan for Employment (IPE), if available.

BCTC served 68 students to date in FFY 2019: 100% of these students received workplace readiness instruction; 84% of the students participated in at least one form of work-based learning experience prior to graduation; 100% of the students received job development & placement services and career training services prior to graduation; and 89% of the graduates were placed in community-integrated employment or post-secondary education.

A second IGA was developed between SDoL and OVR to provide school-to-work transition services for OVR eligible students with disabilities enrolled in education supports at SDoL.

The IGA provides SDoL with funds to create two programs, named “Employability and Career Readiness” and “College and Career Readiness.” The IGA allows for joint funding (including salary & benefits) of three positions which did not previously exist at SDoL:

1. Program Coordinator (Professional);
2. Vocational Special Education Teacher (Professional); and
3. Job Trainer (Paraprofessional).

The two programs are considered to be two separate paths for transition services. Pathway One is identified as “Employability and Career Readiness” and Pathway Two is identified as “College and Career Readiness.”

Services in the Employability and Career Readiness program include:

1. workplace readiness instruction;
2. work-based learning experiences which include job shadowing, internships, and paid work experiences;

3. job development and placement services including employer contacts, job site analyses, job task analyses, facilitation of job accommodations, coordination of job interviews, and on-the-job supports;
4. career training supports to address employment related concerns on and off the job; and
5. independent living skills related to employment.

The goals of the Employability and Career Readiness program are:

1. to provide employment skills, career readiness training and transition services to 50 OVR eligible students with disabilities;
2. to provide at least one form of work-based learning experience to 50 OVR eligible students with disabilities during FFY 2019 – 2020; serve 60 OVR eligible students with disabilities during FFY 2020 – 2021;
3. to establish a minimum of 4 student-employee (job positions) with employers that afford small group training opportunities for OVR eligible students with disabilities during FFY 2019-2020 and 5 student-employee (job positions) with employers during FFY 2020-2021;
4. to establish a minimum of 4 student-employee (job positions) with employers that afford on-site employment training opportunities for OVR eligible students with disabilities identified by the school district as having a need for a high level of support during FFY 2019-2020 and 5 student-employee (job positions) with employers during 2020-2021;
5. to have 25 OVR eligible students with disabilities receive job coaching services for FFY 2019-2020 and FFY 2020-2021; and
6. to have 20 OVR eligible students with disabilities shall be placed in competitive, community integrated employment consistent with their Individual Education Plan (IEP). Same goal expectation for FFY 2020-2021.

The College and Career Readiness program incorporates college and career readiness supports on a college campus. This Pathway is designed to assist students with disabilities acquire skills necessary in transitioning from high school to a post-secondary education program. Students enrolled in the College and Career Readiness program have identified employment goals which require post-secondary training to secure employment.

The goals of the College and Career Readiness program include:

1. during fiscal years 2019-2020, and 2010-2021, this project will provide college and career readiness instruction to 12 OVR eligible students with disabilities each year; and
2. as a result of the services provided through this agreement, it is expected a minimum of 5 OVR eligible students with disabilities shall be placed in post-secondary educational programs consistent with their Individualized Education Plan. Goal expectation is increased to 8 OVR eligible students with disabilities for FFY 2020-2021.

The IGA was approved by SDoL and signed by the school's authorized representative. SDoL provides 21.3% of project funding which serves as the required local/state match. OVR provides the remaining 78.7% from federal VR funds.

During the past two school years (2017-18 and 2018-19) of the Employability and Career Readiness Program: 83 OVR eligible students with disabilities received employability skills, career readiness training and transition

services; 47 students participated in at least one form of work-based learning experience; 5 student-employee (job positions) with employers that provide small group training were developed and 5 student-employee (job positions) with employers were available for individual high needs students cases; 39 students participated in extended work site training (job coaching); and 15 students were placed in competitive, community integrated employment consistent with their IPE.

The College and Career Readiness Program during the past two school years provided 24 OVR eligible students with college/career readiness training and transition services, and 17 of these students were placed in post-secondary education consistent with their IEP.

Statewide replication of these programs could provide OVR with opportunities to braid funding, address the needs of OVR eligible students with disabilities, and to collaborate with the Departments of Education and Human Services more effectively.

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

OVR approves each proposed service before it is provided by requiring BCTC and SDoL to submit budgets listing service costs for pre-approval. The IGAs were drafted to state that the parties to the agreements shall provide the services as specified and described in Appendix A of each of the Agreements, consistent with the submitted budgets as described in Appendix B of said Agreements. These terms are continued after the first-year term of the IGA, when the renewal process of the IGA requires the provider to submit statements of work including descriptions of the proposed services, a timeline for the provided services, and expected student outcomes, which OVR then approves or requests revisions on, prior to the execution of the renewal. Further, since the budgets are proposed and approved prior to the provision of the services, any changes to service provision must be requested by the provider and approved by OVR prior to implementation.

*(3) requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.*

All other State Plan requirements of the VR services portion of the State Plan will apply to the services approved under the waiver.

**(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;*

Current agreements include the following:

1. The Pennsylvania Department of Health (DOH), Department of Labor & Industry (DLI), PDE, and DHS entered into an MOU in 1999, with a 2006 Addendum, and a Transition MOU addendum in 2010, to

devote staff and other agency resources to promote successful post-school outcomes for youth/young adults with disabilities in transition. Per WIOA amendments to the Rehabilitation Act, an updated MOU is being developed between the parties as both OVR and PDE share responsibility to prepare students with disabilities for successful community employment. DHS transfers funds to OVR for programs under this MOU, which enables OVR to draw additional match funds and further our partnerships to our mutual customers.

2. A Data Sharing Agreement between OVR and ODP has been finalized to exchange information on the services delivered to individuals enrolled in DHS ODP programs who also receive or received services through OVR. OVR and ODP are sharing data between the CWDS and the Home & Community Services Information System.
3. OVR and ODP issued a joint bulletin that dictates when an individual receiving Supported Employment (SE) services can move to ODP-funded extended services and documentation requirements.
4. An MOU was initiated between OVR and the DHS Office of Mental Health and Substance Abuse Services (OMHSAS) in 2017, which ends on June 30, 2022. The MOU allows for a funding transfer from DHS to OVR, which allows opportunities for customers with serious mental illnesses and serious emotional disturbances to participate in the Certified Peer Specialist (CPS) training opportunities to achieve competitive integrated employment.
5. An MOU has been developed between OVR and DHS, Bureau of Juvenile Justice Services (BJJS). The MOU was established in May of 2017 to provide pre-employment transition services to adjudicated students and youth placed in Pennsylvania Academic Career Technical Training (PACTT) affiliate locations. The MOU was amended in July 2019 to also include dependent students and youth. OVR has collaborated with the PACCTT affiliates to provide the 5 required pre-employment transition services to this vulnerable population to expose them to as many employment and post-secondary options as possible. OVR has provided group and individual services to these affiliates through pre-employment transition services provider agreements with the PACTT affiliate, OVR staff, or an outside provider. OVR has also collaborated with local community colleges to provide post-secondary educational opportunities to residential, community-based, and secure facilities throughout the state.
6. OVR has entered into Institute of Higher Education Agreements with the 14 State owned Universities referred to as the Pennsylvania State System of Higher Education. The Institute of Higher Education Agreements will remain in effect through January 31, 2020. This will be re-initiated by OVR grants in 2020. This has also included agreements with all community colleges.
7. OVR partners with Pennsylvania Centers for Independent Living (CILs) by executing grants and contracts to provide services and outreach projects to individuals with disabilities within community settings.
8. OVR has entered into IGAs with BCTC, the SDoL, ODP, BJJS, and OMHSAS for the provision of VR services and referrals.

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

PA-OVR utilizes the following agreements to address the assistive technology needs of customers seeking employment services:

1. Pennsylvania's Initiative on Assistive Technology (PIAT), a program of the Institute on Disabilities at Temple University, is Pennsylvania's statewide program under section 4 of the Assistive Technology Act. Activities that are provided by PIAT are: device demonstrations; device lending; device reuse; public

awareness activities; and trainings to raise awareness and knowledge of assistive technology (AT) topics. Any of these activities are available to OVR staff and clients, mostly at no charge.

2. OVR has multiple AT providers on the fee schedule for customer services; some providers have Letters of Understanding (LOUs) or Administrative Memoranda (AM) agreements for the provision of services.
3. OVR establishes an annual contract via an Invitation for Bid with an AT provider for staff services.

*(3) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;*

Currently, OVR does not have any agreements with the US Department of Agriculture.

However, in 1997, OVR and the Pennsylvania State University, College of Agricultural Sciences, Penn State Extension approved an LOU for the AgrAbility program. Since that time, the LOU and the associated fees were updated in 2002 and 2014. In 2017, two new fees were added to the LOU. Currently both agencies are developing a new AM. The AgrAbility Project is a statewide project whose staff provides direct services for farmers and farm family members with a disability or long-term health condition who want to remain in production agriculture. This agreement does not guarantee a specific amount of total funds or total number of participants to be funded by OVR. OVR has modeled this agreement and payment structure after existing rates and services where applicable.

*(4) Non-educational agencies serving out-of-school youth; and*

OVR has numerous Provider Agreements and AMs with a variety of service providers serving all populations, including out-of-school youth.

1. OVR has developed an On-the-Job Training (OJT) initiative specifically targeting youth. This was entitled "Jobs for All" and allowed a Youth in plan status to who starts a non-permanent summer job to have their employer reimbursed for their wages. One occupational sector, large scale amusement and theme parks such as Hershey Park in Derry Township Dauphin Co., DelGrosso's amusement Park and Laguna Splash Water Park in Tyrone, PA., and Dorney Park in Allentown have offered summer youth served by OVR hundreds of hours of work. These initial employment experiences have helped to build soft skills, a work ethic and work record. Other employers have included municipalities, seasonal retailers and food service/fast food employment. This included over 230 employers.
2. OVR continues to develop more programs to partner with community service providers to target transition aged youth. This includes access to summer jobs through shared employer contacts such as Lowe's, Fed Ex., Fenner Drives, Giant Eagle, McDonalds and Walmart.

*(5) State use contracting programs.*

OVR uses a number of statewide contracts through the Pennsylvania Department of General Services (DGS), the agency responsible for the majority of Commonwealth contracting programs. The Business Enterprise Program (BEP) and DGS created the "Randolph-Sheppard Retail Sales" Invitation to Qualify (ITQ) which is solely revenue based. This ITQ pre-qualifies contractors to provide vending machine and micro-market services for locations not operated by BEP Licensees. When a vending facility is available and there is no BEP licensee to operate the

facility, a Request for Quote (RFQ) is developed and sent to the ITQ qualified contractors. An ITQ qualified contractor will be awarded a contract to provide necessary services based on the best value, meaning the best service with an appropriate commission remitted to the BEP. DLI procurement then creates a contract with the awarded contractor. Commissions are sent to the BEP based on the awarded proposal.

OVR and ODP have developed a Training Services ITQ through DGS for Specialized Professional Skills Development Training. This ITQ seeks contractors to administer Supportive Employment Certification Trainings for OVR and/or ODP Community Rehabilitation Provider (CRP) agencies, who support individuals with the most significant disabilities, and who provide supportive employment services. Contractors will provide training for CRP agencies for the following two certifications: The Association of Community Rehabilitation Coordinators (ACRE)'s Certificate Training Program; or the Association of People Supporting Employment First (APSE) Certified Employment Support Professional (CESP) Certification.

DGS developed a statewide Invitation for Bid to establish a contract to provide Sign Language Interpretation and Transliteration Services for all agencies in the Commonwealth requiring the services of an interpreter or transliterator for business functions. OVR uses this contract to secure interpreter services for daily business proceedings, meetings, workshops, public presentations, and conventions.

DGS developed a statewide Request for Proposal to establish a contract for Information Technology Hardware for Commonwealth executive agencies. OVR uses this contract to purchase computers, monitors and peripherals for staff.

DGS developed a statewide Information Technology (IT) Services ITQ to qualify responsible and responsive contractors to address IT service requirements of the Commonwealth of Pennsylvania's executive agencies. This contract is for fixed price, deliverables-based IT services projects. OVR uses this contract to purchase IT Training-Classroom/Non-Classroom for OVR staff.

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

*Describe:*

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

WIOA, which amended the Rehabilitation Act of 1973, 29 U.S.C. § 701 *et seq.*, places significant emphasis on the provision of services to students and youth with disabilities. Federal mandates require that OVR, in collaboration with local educational agencies (LEAs), offer to transition age high school students with disabilities (ages 14-21) pre-employment transition services using a minimum of 15% of OVR's federal allocation on an annual basis. OVR has reviewed existing policies and procedures to ensure compliance with this emphasis.

OVR's School to Work Transition Policy, which was updated in 2013, is currently being updated to reflect the WIOA amendments to the Rehabilitation Act, and the OVR Pre-Employment Transition Services Continuum Model is under development in 2019. OVR is receiving ongoing training and technical assistance from RSA to ensure that OVR is effectively providing pre-employment transition services to students with disabilities who

are eligible or potentially eligible for VR services. OVR, in turn, provides training and technical assistance to the approximately 155 pre-employment transition service providers.

The current OVR pre-employment transition service provision process provides for the following:

- outreach to youth and young adults with disabilities and their families/advocates to provide information on OVR services and vocational planning beginning at age 14, or the age of onset of disability, if later;
- accepting referrals of students with disabilities at least two (2) years prior to graduation, or earlier, on a case by case basis when appropriate;
- providing consultation to students with disabilities, youth with disabilities, parents/families/advocates, LEAs, and other transition partners on vocational issues, the Rehabilitation Act, and other legislation that affects youth and young adults with disabilities, other partners, and other resources;
- referring cases from OVR's Bureau of Blindness and Visual Services (BBVS) Specialized Services to BBVS VR when the students with disabilities reach transition age and eligibility is determined; and
- developing an IPE for eligible customers before students with disabilities graduate or exit high school.

OVR provides these services in group and individual format, through internal OVR staff services and contracts with external community providers, to both potentially eligible students with disabilities and students with disabilities eligible for individual VR services. Pre-employment transition services include:

- job exploration counseling;
- work-based learning experiences;
- counseling on opportunities in comprehensive transition or enrollment in postsecondary educational programs;
- workplace readiness training; and
- self-advocacy instruction.

OVR estimates that there are over 130,000 students with IEPs between the ages 14 and 21 (transition age in Pennsylvania) that are eligible for transition services and pre-employment transition services in 2019. OVR is actively collecting data and is currently updating its case management system, CWDS, to continue to improve the capture of delivery of pre-employment transition services. It is estimated that 27,000 students will receive pre-employment transition services in 2019.

OVR's Systems and Evaluation Unit has updated OVR's CWDS to account for all the new federal reporting requirements. OVR is in the process of developing a new framework for documenting pre-employment transition services in CWDS so that the system will become a more efficient data processing and capturing system. This redesign will produce complex functionality within CWDS to enable the continuum of services to be visible and continuous. Ongoing development and design of future CWDS enhancements remains a significant undertaking for the agency which will require system testing, multiple staff trainings, and the creation of reference materials and forms.

OVR has allocated approximately \$20 million in FFY 2019 to provide pre-employment transition services to high school students. To achieve the federal expenditure goal of 15% of our allocation, each OVR district office

forecasts how many students they will be able to serve and develops a yearly plan. To reach those goals, each OVR office maintains strong relationships with the local school districts and the local workforce development boards.

Effective Fall 2019, schools are to complete a School Profile for OVR, to identify their current transition resources and request pre-employment transition services from OVR each year. OVR will then use the School Profile to assess and determine student needs and ensure that OVR services are supplementary to services provided by schools under the Individuals with Disabilities Education Act (IDEA). Pre-employment transition services will be provided to students on a continuum, beginning with general, introductory services and progressing until a Transition IPE can be developed with a career goal and VR services outlined. VR counselors (VRCs) will work with students to determine the appropriate time to complete an application for VR services prior to graduation. Best practice is to complete an application two years prior to graduation, but applications may be completed earlier if necessary.

Each district office has identified transition staff, and works to ensure that each school has a point of contact. Many front-line transition staff, such as social workers, vocational counselors, and HGAC staff provide pre-employment transition services. In addition, OVR has approximately 150 agreements with providers for the provision of pre-employment transition services. Guidance to staff and all pre-employment transition service providers includes the mandatory entering of student information into CWDS per RSA 911 requirements. CWDS entries must also indicate the total number of days and hours that a student has attended pre-employment transition services so OVR can provide accurate payment for services and track the services a student receives. OVR conducts regular monitoring with its contractors to review service documentation.

Various initiatives have been developed to implement pre-employment transition services using increased interagency collaboration. Summer work experiences, workplace readiness training to develop social and independent living skills, and work-based learning experiences have been implemented and continue to expand, as the population of high school students OVR serves increases. OVR also provides ongoing technical assistance, agency cross-training, and resource sharing to assist LEAs to end utilization of sub-minimum wage employment. Discovery and customized employment are utilized to assist the students with the most significant disabilities to exit secondary school with the goal of achieving competitive, integrated employment. OVR awaits, based on the most recent monitoring visit outcomes, updated RSA guidance and recommendations that are expected in 2019.

Another initiative during the FFY 2019-2020 was The Mobile FABLAB. The Mobile FABLAB experience, which OVR contracted for, brought a rewarding experience to OVR customers, including students and youth with disabilities, across the Commonwealth through June 2019. The experience used off-the-shelf, industrial-grade fabrication and electronic tools to demonstrate a hands-on-approach to Science, Technology, Engineering & Math (STEM) applications. This gave students exposure to this area of study, and allowed them to explore STEM as a career path. The OVR sponsored FABLAB contract has given over 2500 youth, students, parents and transition staff the ability to participate in the program. OVR field offices collaborated with the school districts to nominate students and to provide transportation to offsite locations such as HGAC, Carnegie Science Center, community colleges and OVR District Offices. Teachers were provided with the opportunity to attend and learn about the STEM activities and FABLAB. School personnel were also there to assist with students assigned to or needing a paraprofessional. FABLAB held sessions at the PA Community of Transition Annual Conference in

State College. Parents, professionals, students and OVR personnel were able to learn about FABLAB in multiple sessions held during the conference. FABLAB also presented at the PADES conference where the conference planners invited school districts to bring their students to the conference and participate in the FABLAB activities.

The Project SEARCH High School Transition Program is a business led, one-year, school-to-work program that takes place entirely at the workplace. Total workplace immersion facilitates a seamless combination of classroom instruction, career exploration, and hands-on training through worksite rotations. Project SEARCH began in Pennsylvania through an RSA grant and 10 sites were started over the five-year grant period. Over the next few years, two of the original sites were expanded to create two new Project SEARCH sites and two additional sites were developed through local collaboration. During the 2018-2019 school year, OVR had 17 student sites and 4 adult sites. The three additional student sites that were added since the last state plan are the Education Center with the School District of Philadelphia, Penn State Health St. Joseph Regional Health Network, and Wayne Memorial Hospital. Specifically, OVR has two sites dedicated to serving those on the autism spectrum (Drexel University and Mercyhurst University). In the future, OVR may consider the development of additional Project SEARCH sites.

Project SEARCH statistics kept by the Cincinnati Hospital indicate that as of the close of the 2016-2017 school year, OVR had placed 129 interns, 100 of who were employed for a total placement rate of 78%. For the 2017-2018 school year, OVR placed 143 interns, 93 who were employed for a total placement rate of 65%. The placement rate is determined at the end of the Project SEARCH yearly program. It does not reflect those students who were placed after they had completed the Project SEARCH program. Nine of OVR's sites were recognized at the 2018 National Project SEARCH Conference for obtaining 70% or higher employment outcomes for 2016-2017.

*(2) Information on the formal interagency agreement with the State educational agency with respect to:*

PDE, DOH, DLI and DHS entered into an MOU in 1999, with a 2006 Addendum and a Transition MOU addendum in 2010, to devote staff and other agency resources to promote successful post-school outcomes for youth/young adults with disabilities in transition. Specifically, the intent of this agreement is to:

- define the responsibilities of the entities;
- provide for efficient and effective utilization of agencies' resources;
- minimize duplication of services; and
- delineate a basis for continuous, effective working relationships between the two agencies.

The MOU ascribes the following actions to the parties:

- data utilization and adoption of evidenced-based practices;
- strengthen the Pennsylvania Community of Practice Secondary Transition/Interagency;
- appoint agency representation and participation in the Statewide Leadership Team;
- expand cross-stakeholder capacity building efforts for maximum engagement; and
- ensure a seamless system of transition services and supports.

In addition, the MOU's with DHS (ODP, BJS, and OMHSAS) provides for the transfer of funds to OVR for transition services from the other agencies, which allows OVR to meet requirements for federal funding matches.

As a result of the MOU implemented in 1999 and subsequent addendums, OVR has engaged in the following practices to devote staff and other agency resources to promote successful post-school outcomes for youth/young adults with disabilities in transition. OVR continues to collaborate with its agency partners on the Pennsylvania Statewide Leadership Team (Pennsylvania SLT). OVR representatives meet regularly with representatives from PDE's BSE and Bureau of Career & Technology Education to review policies, procedures, initiatives, and projects. The goal of the Pennsylvania SLT is to ensure that eligible students and youth with disabilities are receiving the vocational rehabilitation services that they need to successfully transition from school to work and independence.

The Pennsylvania SLT has recommended that the MOU be revised to incorporate changes in transition services mandated by the Rehabilitation Act of 1973, as amended by WIOA. Revisions to the MOU based on the amendments are currently being drafted. WIOA charges that state VR Agency and Education Officials coordinate the responsibility to prepare students with disabilities for the transition from school to post-secondary education and/or community employment through the facilitation and integration of pre-employment transition services, transition services and other VR services. This shared responsibility is to be adopted formally through the development of a state plan that explains policies and procedures for coordination between the entities.

In addition, OVR also has written agreements with the Commonwealth's public institutions of higher education as required by Section 101(a)(8)(B) of the Rehabilitation Act. This section requires OVR to have a mechanism for interagency coordination in place with public institutions for higher education to ensure the provision of vocational rehabilitation services that:

- identify financial responsibility;
- specify terms and conditions of reimbursement;
- provide a system for resolution of disputes; and
- set forth procedures for coordination of services to individuals with disabilities who are both customers of OVR and students of the institution of higher education.

Agreements have been achieved with the Pennsylvania State System of Higher Education, which is comprised of 14 state universities, and 14 community colleges. OVR continues to review and update agreements as they are necessary. Negotiations continue with the four state-related institutions to include Penn State University, Lincoln University, Temple University and the University of Pittsburgh.

*(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;*

To fulfill the responsibilities of the MOU, technical assistance, agency cross-training and resource sharing continue to assist LEAs in planning for the transition of students with disabilities from school to post-school activities.

OVR worked in partnership with the PDE's Bureau of Special Education, Pennsylvania Training and Technical Assistance Network (PaTTAN) in 2018 and 2019 on trainings and events that focused on agency collaboration, coordination, and assistance to transition age students in accessing available services through a comprehensive review of the many aspects of OVR. The training information included an overview of the VR process, Early Reach services, Business Services, HGAC, and Specialized Children's Services in BBVS.

The 2018-2019 Pennsylvania Community on Transition Webinar Series, Planning for the LifeCourse, was designed to assist individuals of all abilities think about life experiences needed to move ahead in life. A panel consisting of representatives from the OVR, ODP, Pennsylvania Youth Leadership Network, and PaTTAN provided participants with information on what IEP teams and students need to know regarding setting a vision for a meaningful life, identifying how to find or develop supports, and discovering what it takes for students to live the lives they want to live. The webinar series schedule and contents included:

- October 10, 2018 - Planning for the LifeCourse Overview;
- December 5, 2018 - Planning for the LifeCourse - Employment Uses;
- February 6, 2019 - Planning for the LifeCourse - Postsecondary Education and Training Uses; and
- April 1, 2019 - Planning for the LifeCourse - Independent Living.

Charting the LifeCourse™ and LifeCourseTools.com is a project of the University of Missouri–Kansas City Institute for Human Development, Missouri's University Center for Excellence in Developmental Disabilities Education, Research and Services and endorsed by DHS and supported by the Pennsylvania Community on Transition.

OVR participates in, and is a sponsor of, the annual Pennsylvania Community on Transition Conference, hosted by PaTTAN. The conference purpose *"is to expand the capacity of schools, agencies and communities, in partnership with youth, young adults and families, in promoting the successful transition of youth/young adults with disabilities to post-school outcomes of employment, post-secondary education and training, community participation and healthy lifestyles."* The 2018 Pennsylvania Community on Transition Conference: Planning Today for a Winning Tomorrow was held in State College, Pennsylvania July 25-27, 2018. OVR played a major role as part of the planning committee and as presenters at conference sessions. OVR also held a pre-conference for OVR staff, which focused heavily on IEP facilitation and coordination. The 2019 Pennsylvania Community on Transition Conference: Ignite the Future! Sparking Engagement in Career Readiness, was held at the Penn Stater Conference Center & Hotel State College, Pennsylvania on July 17-18, 2019. OVR continued this collaborative relationship by presenting in 18 sessions at the conference and providing outreach through the resource fair via exhibitor table.

As part of the 2019 conference preparation, OVR and PaTTAN collaborated on providing a training to educate conference presenters titled "Designing an Accessible Document," which provided information about creating

accessible presentations and documents for accessible conference sessions for all attendees. This training was held on May 23, 2019.

OVR is also planning a collaborative training for the 2019-2020 school year with PaTTAN for education staff so that the most recent pre-employment transition services information is made available to all LEAs. This training is scheduled to take place in September 2019.

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

In addition to the MOU and WIOA, The Pennsylvania Work Experience for High School Students with Disabilities Act (Act 2016-26) requires OVR to collaborate with local education and public agencies. Act 2016-26 requires:

- OVR to provide pre-employment transition services;
- OVR to facilitate the process of job and career development between local education agencies and public and private employers focusing on: job skills training; job coaching; competitive integrated work-based learning experiences; and counseling on opportunities for enrollment in post-secondary education programs;
- that students with disabilities have pre-employment transition services included in IEPs when appropriate; and
- OVR to report on IEP meeting attendance.

The provisions of the MOU, WIOA, and Act 2016-26 have enabled the following activities regarding transition planning to facilitate the development and implementation of student individualized education plans:

OVR staff have consulted with education partners about developing and implementing local IEP meeting attendance request processes, which has enabled a streamlined system for reception of IEP meeting invitations from schools. Internally, OVR has developed a system in which transition staff support one another in attending IEP meetings for students with disabilities by coordinating schedule availability. OVR attendance at IEP meetings for potentially eligible students and students with open cases continues to rise. This is attributed to successful outreach and coordination efforts by OVR staff, including through the Early Reach Initiative.

As part of the data collection activities ascribed in the MOU, a CWDS enhancement was made to capture Student IEP Meetings in Case Progress Notes. This function was recently added and has improved accuracy of documentation and reporting of IEP meeting attendance. OVR staff continue to develop the infrastructure and procedures to deliver effective services that are allowable under the Pre-employment transition services requirements.

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

LEAs are responsible for the provision of necessary goods and services for students with disabilities to access “a free and appropriate public education”, including the provision of transition services that promote movement from school to post—school activities as outlined in the IEP. Students with disabilities who may not be entitled to special education services under IDEA are entitled to related aids and services under Section 504 of the Rehabilitation Act, as amended. LEAs are also responsible, under the Americans with Disabilities Act (ADA), to ensure that their facilities, resources and technology are accessible to the public.

OVR is responsible for the development of an IPE that promotes or facilitates the accomplishment of short-term, intermediate and long-term VR goals and objectives. OVR will provide pre-employment transition services pursuant to the Rehabilitation Act for eligible or potentially eligible students with disabilities with 15 % of its federal allocation of General Funds to the maximum extent possible. All other services will be provided when necessary to determine eligibility for OVR services and if the services are in the individual’s IPE.

OVR may agree to cover costs if a local interagency agreement exists in which it is indicated that OVR shall do so, or if it is in the best interest of the student. In the latter instance, OVR staff will consider pursuing reimbursement from the LEA utilizing the interagency dispute resolution mechanism outlined in the state MOU.

OVR is the designated agency responsible to promote the employment of individuals with disabilities by providing VR, job training, and placement services pursuant to the Rehabilitation Act, the Vocational Rehabilitation Act of 1988, (43 P.S. § 682.1 *et seq.*) and Article XXII of the Administrative Code of 1929, as amended, (71 P.S. § 580.1 *et seq.*).

OVR representatives will:

- meet with school personnel to discuss OVR transition services whenever possible;
- provide information regarding OVR programs and services available to students with disabilities and youth with disabilities;
- assist transitioning students with disabilities and youth with disabilities, as well as their family/advocate, with applications for OVR services;
- serve as a consultant regarding employment supports and services;
- supply information to students with disabilities and youth with disabilities regarding other relevant agencies and organizations;
- attend school functions (i.e. college fairs, career days, disability fairs, open houses, etc.);
- collaborate with the educational staff in providing career counseling and vocational exploration activities; and
- ensure that students and youth with blindness or a visual impairment are informed of BBVS Specialized Services for Children.

To identify youth and young adults with disabilities who may not be served in public schools under an IEP or 504 Plan, OVR will continue its collaborative relationships through its interagency agreements. This includes students and youth with disabilities covered under DHS regulations regarding Protected Handicapped Students, 22 Pa. Code Chapter 15. Outreach will be conducted to identify youth and young adults with disabilities who are underserved through other community partners, such as, but not limited to:

- Intermediate Units;

- career and technology centers;
- private school;
- home schools;
- student assistance programs;
- summer employment programs;
- Local Workforce Development Boards;
- home school organizations;
- Juvenile Justice System;
- foster youth organizations;
- homeless shelters/programs; and
- medical facilities.

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

In addition to the information above listing OVR’s plan to identify youth and young adults with disabilities who may not be served in public schools under an IEP or 504 Plan, OVR has implemented a structured system for outreach and identification of students with disabilities who need transition services through a number of internal processes and initiatives, born out of the School to Work Transition Policy. There are coordinated levels of outreach from the Central Office on a statewide level, on the regional level through regional transition specialists, and on a local level through transition staff at each District Office. Outreach is provided year-round to entities that serve transition age youth beginning at age 14. These processes and systems are described in the paragraphs below.

In addition to providing pre-employment transition services to students with disabilities, the Early Reach Initiative provides outreach, education and consultation to external stakeholders to raise awareness of OVR VR and pre-employment transition services. These services include IEP meeting attendance, family consultations, and school and community collaborative events and trainings for parents, families and professionals. In 2019, Early Reach Coordinators connected with over 36,000 students, parents and professionals through pre-employment transition services and outreach events. The Early Reach Initiative also has a specific cyber school outreach endeavor to reach students with disabilities who attend these schools.

Each office also has a designated Transition Coordinator. This point of contact is responsible for contacting the appropriate OVR staff person and following up to assure that all questions and issues are resolved. Each OVR District Office has a Blind and Visual Services, Early Reach and Vocational Counselor point of contact to collaborate with LEAs in its service area. This enables each LEA to have productive and supportive liaison relationships with OVR and provides greater access to OVR information and services, as LEAs have assigned OVR staff to foster outreach and service delivery processes based on LEA needs.

Throughout all three outreach levels, OVR transition staff take part in one or more of the following activities:

- providing outreach to youth and young adults with disabilities and their families/advocates to provide information on OVR services and vocational planning beginning at age 14 or the age of onset of disability, if later;

- providing pre-employment transition services to students with disabilities;
- accepting referrals of students with disabilities at least two years prior to graduation, or earlier on a case by case basis when appropriate;
- cooperating with other professionals so that instruction as outlined on a student’s IEP is consistent with the vocational goal on the IPE of a student with a disability;
- seamlessly coordinating programs and supports as students with disabilities and youth with disabilities transition from entitlement to eligibility systems;
- collaborating with LEAs and other community agencies that serve students and youth with disabilities;
- providing consultation to students with disabilities, youth with disabilities, parents/families/advocates, LEAs, and other transition partners on vocational issues, the Rehabilitation Act as amended and other legislation that affects youth and young adults with disabilities, other partners, and other resources;
- referring cases from OVR’s BBVS Specialized Services to BBVS VR when the students with disabilities reach transition age and eligibility is determined;
- developing an IPE for eligible customers before students with disabilities graduate or exit high school; and
- providing cross training for VR staff and LEA staff to provide a better understanding of transition policies and procedures.

**(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.*

OVR maintains negotiated LOUs, as well as AMs and provider agreements with more than 200 community service providers covering more than 1,000 different rehabilitation, independent living and related services. OVR is currently converting LOUs to an AM or a provider agreement. Many of these organizations are private and/or not-for-profit CRPs.

Through these various agreements, OVR defines service programs and the corresponding conditions of purchase, including fees and effective/expiration dates, which exist between a rehabilitation service provider and OVR. An agreement entered into between OVR and a community service provider creates a locally developed, locally negotiated, and locally sensitive response to the rehabilitation service needs of persons with significant disabilities in the diverse areas of the Commonwealth.

These agreements are neither a contract nor a grant agreement, but an agreement between the parties that sets forth the services and rates that will be acceptable for OVR payment. They do not commit either provider or OVR to the sale or purchase of the defined services, or a guarantee of provision or business. The use of an LOU or AM for OVR customer service allows OVR to provide customer choice, to respond to a customer’s satisfaction with the service, to control affordability of service fees, and the ability to provide alternative services when needed.

In addition to the agreements described above, OVR, Pennsylvania Academic, Career and Technical Training (PACTT) team members, and staff from BJS joined together in development of a MOU to leverage state and

federal funding to further support efforts to provide services. The parties work together in partnership with PACTT Affiliate agencies and county juvenile probation offices to assist youth and students with disabilities who are involved with juvenile court. This collaboration provides a wide range of services identified through Agency Support Plans, including but not limited to: the creation of summer programming; increased pre-employment transition services; paid work experiences; joint training programs; outreach to families and community partners focused on employment/education objectives; targeted curriculum & training development; and a host of other opportunities designed to expand innovative programming designs that aim toward improved education and employment outcomes for youth.

**(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.*

OVR has coordinated with other State agencies such as ODP, OMHSAS, Office of Long Term Living (OLTL), and other entities to provide SE services and extended employment services. In February 2019, a joint bulletin between OVR and ODP was issued outlining referral processes for SE cases in which a customer is eligible for OVR services and waivers through ODP. OVR will continue to communicate and collaborate with these agencies to provide quality SE services and provide referrals and information regarding mutual customers. OVR will provide current information and training to State agencies and other entities to ensure the provision of services and extended services.

OVR has been diligently working with interested service providers to convert short-term Innovation & Expansion (I&E) projects into ongoing fee-for-service program options for customers based on customer need. The revisions in the definition and requirements of SE brought about by WIOA, have necessitated a more comprehensive and thorough review and assessment of long standing employment support programs such as OJT and other adaptive work training programs utilizing both wages and stipends.

One program initiative that OVR has focused on, in collaboration with ODP, has been the employment program staff certification programs through the Certified Employment Support Professional (CESP™) credentialing process. This training credential recognizes individuals who have demonstrated a sufficient level of knowledge and skill to provide integrated employment services to a variety of populations. OVR will continue to support the provision of quality supportive employment services by adequately trained and properly credentialed staff either directly, through other state and local government agencies, or private service agencies, as appropriate.

DLI and the DHS are in the process of developing an MOU for SE Services. The MOU for SE services will guide a partnership to establish the collaborative framework for OVR and DHS to develop, expand, and improve opportunities for competitive employment for individuals with disabilities, including individuals with the most significant disabilities. OVR and DHS will fund SE services, including Customized Employment, by committing to the implementation of complementary programs to assist with the provision of these services to individuals with the most significant disabilities, including youth with the most significant disabilities, to enable them to

achieve an employment outcome of SE in competitive integrated employment. This MOU will ensure a smooth transition from SE services to extended 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*

OVR routinely engages with employers and businesses to better understand their workforce needs so OVR can prepare individuals with disabilities with industry skills to best meet industry skill demands required by businesses and employers to be successful in competing in the global marketplace. OVR has Central Office staff who are available to meet with an employer to listen and explore their organization’s unique culture to learn about the services or products they produce, to learn about employee skill needs, and how the leadership of a company or organization envisions their future workforce succession planning and the inclusion of VR talent throughout all levels of their organization. Where possible, OVR will coordinate business outreach with local workforce boards, CareerLinks®, economic development partners, community rehabilitation agencies, DHS ODP, OMHSAS, OLTL and other DLI Bureau of Workforce Partnership & Operations (BWPO) multi-employer workforce partnerships.

1. In response to an organization’s workforce talent needs, OVR can suggest a recruitment process to bring qualified pre-screened individuals with a disability into their organization.
2. OVR will work with each business to target career ladders and pathways for quality competitive integrated employment in career pathways matched to each VR consumer customer’s financial needs, unique aspirations, capacities and the talent succession plans of an employer.
3. OVR will keep the process simple by using a SPOC approach modeled after the Council of State Administrators of Vocational Rehabilitation (CSAVR) use of a national Points of Contact network when a business with multi-county or state operations seek VR talent across several states and Pennsylvania workforce regions.

**Partnering with Workforce Agencies to Align with Regional Employment Sectors**

OVR Business Services and Outreach Division (BSOD) staff and District Office business services teams will participate in regional planning processes in partnership with local workforce development boards. Within each of Pennsylvania’s workforce development areas, data analysis will be conducted to identify employment sectors that are most likely to account for job growth and expansion in the next five years.

OVR and Workforce partners will target employers in the key expansion sectors for the highest level of business engagement, which will include discussions around establishment of work-based learning experiences. In addition, all OVR business services staff will utilize and share Labor Market Intelligence (LMI) published monthly from DLI’s Center for Workforce Information and Analysis (CWIA) with their district office VR Counselor’s (VRC’s) to promote career based IPEs likely to lead to successful employment and skill training to prepare for expansion or ‘super’ sector jobs in each region of Pennsylvania.

The following are OVR employer outreach and networking strategies to work with employers to increase competitive integrated employment and career exploration opportunities:

1. national and in-state outreach to employers/businesses to recruit and hire people with disabilities will consistently be encouraged through engagement or registration with CWDS, CSAVR, National Employment Team (VR–NET), and the VR–NET Talent Acquisition Portal;
2. employer outreach by BSOD Western and Eastern Specialists through in-person meetings, regional and statewide RSA allowable Chamber of Commerce membership, networking, and Society of Human Resource Manager statewide and local organization involvement;
3. outreach to employers to recruit and hire people with disabilities through local combined agency District Offices and HGAC. HGAC business services staff will identify and coordinate with the district referring VRCs to find a suitable job match for customers. This will include identifying any measurable skill gains that result from the customers acquisition of an industry recognized credential. Local combined agency business teams will actively coordinate employer recruitment, work-based learning experiences, internships, apprenticeships and pre-apprenticeships, OJT and other on-boarding supports for any qualified pre-screened OVR new hire. Local office business services staff, in consultation with VRC’s, will monitor successful job performance and follow-up with the OVR customer and employer to ensure job retention;
4. no-cost consultation to employers will be provided on disability etiquette, accessibility, and accommodation needs by BSOD specialists, HGAC staff or combined bureau staff upon request. Referral assistance to help retain an employer’s workforce following an injury or the onset of a disability will also be provided. OVR staff trained in the mid-Atlantic TransCen, ADA Leadership models from Cornell University and a BSOD specialist trained on the use of the Misericordia University, Comprehensive Accessibly Kit, and the Americans with Disability Act Architectural Guidelines standards, will provide non-legal, best practice disability etiquette training, and on-site accessibility compliance reviews;
5. BSOD specialists will provide no-cost compliance consultations to CRPs of 14C Federal Ability One, or State operated Inspiritec set aside vendors, to ensure work settings are fully integrated before federal VR funds are used in placement supports or on-boarding;
6. OVR business services will conduct bi-annual employer/business satisfaction surveys to measure effectiveness in business engagement; and
7. BSOD specialists and combined local bureau staff will continue to promote and support National Disability Employment Awareness Month events. These events will include employer champions who actively recruit and retain persons with disabilities in their workforce.

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

OVR continues to expand its collaboration with employers, industry partnerships, and other multi-employer workforce partnerships to provide students and youth with disabilities opportunities for career exploration to promote competitive, integrated employment. Students and youth with disabilities will be given opportunities to complete work-based learning experiences to develop soft skills and work-related skills. Students and youth with disabilities may be afforded opportunities to complete mock interviews with employers, job shadowing experiences, career days, disability mentoring days with employers, and other pre-employment transition services to prepare students for competitive employment.

## **(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;*

In Pennsylvania, the Department of Human Services (DHS) is the agency responsible for administering the State Medicaid plan under title XIX of the Social Security Act. OVR collaborates with this department on a number of initiatives. First, OVR is a key member of the Pennsylvania Employment First State Leadership Mentoring Project (EFSLMP), a project initiated in 2014 and sponsored by a grant administered by the Office of Disability Employment Policy within DHS. The goal of the project is to ensure that the employment needs of individuals with disabilities are met, that cost services are comprehensive, effective, innovative and not duplicative, and that every individual with a disability who wants to work to achieve self-support will be given the opportunity to do so. An OVR representative also participates in the provider VOICE Community of Practice conference calls and monthly webinar series developed by the EFSLMP project for partner agencies.

Secondly, since 2014 OVR has collaborated with ODP, OMHSAS, OLTL, and the Bureau of Autism Services, all within DHS, to develop the interagency training program titled “Experience the Employment Connection (EEC).” PDE’s Office of Special Education has also been a key partner in the planning committee. The first training program was initiated in 2014 as an inter-agency in-person training for all partner agency employees, supports coordinators, providers, families, educators, and individuals with disabilities. In 2017 in-person sessions were suspended due to funding limitations and the interagency planning committee has been in the process of planning for a possible video recorded training series that may be utilized by all involved organizations to promote competitive integrated employment and interagency collaboration. A useful interagency tool developed from earlier sessions was a graphic “roadmap” specific to School-to-Work Transition. This tool continues to be updated annually by the planning committee, remains an important resource for all partner agencies, and is available through a link for EEC on the OVR website.

Thirdly, OVR participates in cross agency collaboration and coordination with DHS as part of the Pennsylvania Employment First Act (Act 2018-36). This is a Governor inspired initiative to ensure individuals with disabilities have the opportunity to achieve economic independence through competitive integrated employment. Cross-agency collaboration between OVR and OLTL demonstrate continued partnership and commitment to Act 2018-36, where competitive integrated employment, including self-employment, shall be the first consideration and preferred outcome when serving persons with disabilities who are of working age. This cross-agency collaboration between OVR and OLTL is important because agencies may have shared customers who are seeking/receiving employment services to obtain or maintain competitive integrated employment, and overall will increase efficiency and effectiveness across programs. OLTL may fund extended services for customers receiving waiver services through OLTL to assist with long term SE services to maintain competitive integrated employment.

The Office of the Governor, in collaboration with the Governor’s Cabinet for People with Disabilities, have developed an initial three-year plan of which OVR and DHS are key participants, along with PDE. A few of the

priorities of Act 2018-36 include promoting a vision of Employment First for all Pennsylvanians, promoting paid work experiences, ensuring effective use of transition funding, promoting self-advocacy, offering professional training, increasing pre-employment skill development, promoting Discovery and Customized Employment opportunities, and encouraging case information sharing among agencies. OLTL, within DHS, is one of the key agencies, along with OVR, helping to implement the Pennsylvania Employment First Act.

Fourth, since the Center for Medicaid and Medicare Services Technical guide (Version 3.5, January 2015) was published, OLTL, under DHS, has added Employment Services to their menu of available services. The OLTL program is charged with implementing the new Community HealthChoices (CHC) delivery, a capitated Medicare managed care program for adults eligible for Medicaid and Medicare (dual eligible), older adults and individuals with physical disabilities. The Commonwealth is rolling out CHC in three (3) regional phases, to be fully implemented by January 2020. Cross-agency collaboration will be vital for a successful transition. OVR is in the discussion stage with DHS/OLTL about development of a training program for OVR staff to further inform them about the CHC program, potential dual customers with DHS/OLTL, and how OVR can support these individuals to seek and receive employment services to obtain or maintain competitive integrated employment.

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

DHS ODP, is the agency responsible for providing services for individuals with developmental disabilities. OVR and ODP have developed an updated joint bulletin which went into effect on February 15, 2019, that enhances the employment outcomes for individuals with intellectual disabilities and autism. The bulletin provides updated guidance regarding requirements for when individuals must be referred to OVR to align with the requirements in the current Consolidated Waiver, Person/Family Direct Support Waiver, Community Living Waiver, and Adult Autism Waiver (the ODP Waivers), and WIOA, and clarifies that the guidance in this bulletin applies to employment-related services funded through base-funding provided for by the Mental Health and Intellectual Disability Act of 1966 (50 P.S. §§ 4101-4704). OVR and ODP will deliver training and technical assistance to direct service employees to implement the coordination policy on a statewide basis through virtual and face-to-face methods of training. The intended result is for a more seamless entry into employment for individuals with intellectual disabilities and autism as well as for the coordination of extended services to allow individuals to maintain long-term employment. This is important because many of the SE services assist individuals with intellectual disabilities and autism to gain, stabilize and maintain successful employment.

OVR also collaborates with DHS/ODP through Section 511 of the WIOA. Section 511 of WIOA amends the Rehabilitation Act, and has added new requirements that place limitations on the payment of subminimum wages by entities holding special wage certificates under Section 14(c) of the Fair Labor Standards Act, 29 U.S.C. § 201 *et seq.* The provisions of Section 511 require more involvement from OVR with individuals working in Section 511 subminimum wage jobs and services for those under 24 years old prior to placement in a Section 511 employment position. DHS/ODP provides the license to the facilities that OVR must visit and monitor. Section 511 of WIOA requires that certain criteria must now be satisfied before an entity hires individuals with disabilities who are age 24 or younger (youths) at subminimum wage or continues to employ individuals with disabilities of any age at the subminimum wage level. OVR's role is to ensure that individuals with disabilities have access to information and services that will enable them to achieve competitive integrated employment.

OVR provides services to individuals working in Section 511 subminimum wage jobs in the form of Career Information and Referral Sessions. OVR's Section 511 Career Information and Referral Sessions focus on: reassuring individuals that they do not need to make any changes; promoting informed choice and independent decision making about competitive integrated employment; increasing awareness of OVR services; and providing information about other agencies that can help them to achieve their goals for personal growth and independence.

Since December 2016, OVR's successful implementation of Section 511 services has been accomplished by providing Career Information and Referral Sessions to all persons engaged in subminimum wage employment in Pennsylvania. In addition, Section 511 Specialists and clerical support tracks Section 511 data and issues letters of attendance documentation to the participants. OVR is developing within CWDS a function to track Section 511 activities as well as referrals to OVR that are generated as a result of Section 511 trainings. To date, over 160 facilities have been visited on an annual basis and more than 3,000 Career Information & Referral Sessions have been delivered to more than 10,000 participants.

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

DHS's OMHSAS is responsible for providing mental health services in Pennsylvania. OVR uses many avenues to ensure collaboration and partnership in the delivery of SE and extended services with OMHSAS. An MOU was initiated in November 2017 between OVR and OMHSAS. This MOU provides a goal to increase Certified Peer Specialist (CPS) training opportunities for individuals with mental health conditions. Through the MOU, OVR and OMHSAS will expand training opportunities to those individuals who are deaf and hard of hearing with a mental health condition. These trainings will allow those individuals to obtain competitive integrated employment as a CPS. OVR and OMHSAS agree that assisting individuals with serious emotional disturbances and serious mental illnesses to secure and maintain competitive integrated employment includes: paid work experiences; training; postsecondary education; seamless transition from secondary education to adult life; outreach and awareness activities targeted to individuals, families, and businesses; pre-employment activities; and other programs and initiatives that lead to or result in competitive integrated employment. Individuals with mental health impairments continue to comprise a large percentage of the impairment cause in our open cases on an annual basis. OVR will continue to offer, through IPEs, services for restoration, guidance and counseling, training, placement assistance, and employment supports to help individuals with mental health impairments achieve a competitive integrated employment outcome.

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

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

*(1) Data System on Personnel and Personnel Development*

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

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

The OVR Recruitment and Retention Specialist collects and analyzes, on an annual basis, data on qualified personnel needs and personnel development. OVR works through the Pennsylvania Office of Administration Human Resources Division for managing personnel issues and filling vacant positions. In addition, an annual training needs assessment is completed by the OVR Training Director, to identify focus areas for personnel development activities for the upcoming year. Information collected from this assessment is also used for planning the budget requirements of staff training and development.

As of May 1, 2019, OVR had 930 filled salaried positions and 115 vacancies. This figure includes 153 filled salaried positions at the HGAC. Statewide, OVR had a total of 363 filled VRC positions, 17 Vision Rehabilitation Therapist positions, and 13 Orientation and Mobility Specialists positions. We continue to evaluate each salaried position prior to posting for hire to ensure that it is essential to operations before approving the position. The current complement of VRCs requires that OVR maintain an OOS and implement a waiting list for all new individuals determined eligible to adequately serve and meet the needs of eligible VR customers as of July 1, 2019.

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

OVR is continuing to closely monitor hiring, with an evaluation of each position prior to posting for hire as part of cost containment measures given our current fiscal situation. OVR is further challenged since the demand for VR services exceeds available and projected resources. OVR regularly reviews staffing patterns and caseload size to determine coverage needs. Projection data indicates that there is an existing population of students with disabilities transitioning from school to post-secondary activities, including work, that may require additional staff to adequately serve. These requirements will be monitored and adapted to meet any changing needs. OVR anticipates needing the following personnel:

- VRCs: 363 positions
- Vision Rehabilitation Therapists: 17 positions
- Orientation and Mobility Specialists: 13 positions
- Early Reach Coordinators: 28 positions
- Business Service Representatives: 22 positions

*(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.*

Projections by personnel category are as follows:

- VRC: 71 projected vacancies in next 5 years;
- VRC Deaf and Hard of Hearing: 0 projected vacancies in next 5 years;
- Vision Rehabilitation Therapist: 2 projected vacancies in next 5 years; and
- Orientation and Mobility Specialists: 4 projected vacancies in next 5 years.

OVR projects that in the next five years, approximately 71 VRCs will become eligible to retire. This will be an average of 18 VRCs retiring per year, in addition to an unknown number of counselors who leave as part of general turnover. If the number of customers seeking VR services remains the same, or slightly increases or decreases, OVR projects that an average of 20-25 new VRCs will need to be hired per year over the next 5-10 years. OVR realizes the need for continued recruitment and training of qualified personnel. Succession planning is a necessary part of OVR's preparation to address projected hiring needs and is included within the annual analysis of qualified personnel needs and personnel development.

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

The OVR Recruitment Specialist maintains regular contact with the institutions of higher education within Pennsylvania who offer programs to develop VR professionals and annually collects information on student enrollment. There are four Pennsylvania Universities that are accredited by the Council on Rehabilitation Education (CORE) and the Council Accreditation of Counseling and Related Educational Programs (CACREP): Pennsylvania State University, University of Pittsburgh, University of Scranton, and Edinboro University of Pennsylvania. When these universities are combined, these programs graduate approximately 42 students per year with a Master’s Degree in Rehabilitation Counseling. See chart below.

**Table 1: CORE & CACREP Universities: Enrollment and Graduate Numbers**

<b>Institutions</b>	<b>Students Enrolled</b>	<b>Graduates sponsored by RSA</b>	<b>Graduates from the previous year</b>
Penn State University	20	6	9
University of Pittsburgh	44	0	20
Edinboro University of PA	23	0	7
University of Scranton	18	0	6

A student successfully achieving graduation from one of these universities would be eligible to apply for the Commission on Rehabilitation Counselor or CRCC certification exam, a nationally recognized professional certification in the field of vocational rehabilitation.

*(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.*

## OVR Counselor Recruitment

In addition to the available students graduating from in-state programs, OVR's Recruitment Specialist can recruit students from CORE/CACREP-approved universities that offer a Master's Degree in Rehabilitation Counseling nationwide. OVR has obtained permission from the Pennsylvania Office of Administration to have Pennsylvania residency requirements waived under the State Civil Service system for the VRC Internship position and other VRC classifications in OVR. This waiver provides OVR with an opportunity to recruit students nationwide and offer paid VRC Intern positions to interested master's degree students who are in their final semester of graduate school. The paid internship allows OVR to attract and recruit candidates for VRC positions who have a Master's Degree in Rehabilitation while they are still in school and before they are recruited by other agencies. The residency waiver and the paid Internship position also assist in OVR's efforts to recruit and hire individuals with disabilities and those from diverse and minority backgrounds.

OVR's Counselor Internship program continues to serve as an example among state VR agencies that seek to attract rehabilitation counseling students for employment. While surrounding states offer internship opportunities to students with competitive compensation, none in the northeastern region offer permanent positions to interns upon satisfactory completion of the probationary period and/or successful completion of the rehabilitation counseling graduate degree.

Through collaborative initiatives with higher education institutions, OVR will continue to expand recruitment and outreach to students with disabilities for entry-level VRC positions. Collaboration with universities on federal RSA grant applications that seek to provide scholarship opportunities for students with disabilities will further this initiative. This includes supporting the efforts of university programs to apply for and implement Long Term Training Grant programs to train VRCs to work for the public VR program in Pennsylvania. In addition, OVR will continue the following activities as part of its overall VRC recruitment initiative:

- continuing to build and maintain relationships with all CORE/CACREP program coordinators at graduate training programs, including Historically Black Colleges and Universities (HBCUs) that offer rehabilitation counseling disciplines, with campus visits, onsite presentations, use of telecommunication technology, and one-on-one meetings with students;
- maintaining appointed membership on Coppin State University and the University of Maryland Eastern Shore Rehabilitation Counseling Program Advisory Committees. Both are HBCUs in the Mid-Atlantic

region that prepare increased numbers of minority individuals for careers in the public VR program. OVR will also maintain a membership commitment to local advisory committees with Edinboro University;

- maintaining active membership with the National Association of Multicultural Rehabilitation Concerns and the National Council on Rehabilitation Education; and
- visiting colleges, universities, and appropriate job fairs in conjunction with the DLI Office of Equal Opportunity to recruit potential job applicants who are from diverse cultural backgrounds and applicants with disabilities.

## Orientation and Mobility Specialists and Vision Rehabilitation Therapists

OVR recruits from accredited university programs in Pennsylvania that train Orientation and Mobility (O&M) Specialists and/or Vision Rehabilitation Therapists (VRTs), including: Salus University, the University of Pittsburgh's Vision Studies Program, and Kutztown University. These programs graduate a combined total of approximately 35 students per year. Graduates of these approved university programs are eligible for certification in Vision Rehabilitation Therapy or in O&M from the Academy for the Certification of Vision Rehabilitation and Education Professionals. In addition, OVR is able to recruit and hire VRTs and O&M Specialists who are being trained at universities nationwide and who reside outside of Pennsylvania.

OVR worked with the State Civil Service Commission to make test announcements for the O&M Specialist Intern and VRT Intern positions available as of July 22, 2015. BBVS continues to offer paid internships for O&M and VRT students during their last semester of study. The O&M and VRT hourly wage is equivalent to the VRC Intern at Group 5 Step 1. This initiative will continue to increase the candidate pool of available O&M and VRT professionals who are available for employment with OVR BBVS upon successful completion of their academic training.

## VRC Trainee

OVR collaborated with Human Resources, the Office of Administration and Bureau of Talent Acquisition (former Pennsylvania State Civil Service Commission) to launch the VRC Trainee position in December 2017. As of May 2019, OVR has hired 27 VRC Trainees; currently, eight trainees have successfully completed their one year training program and been promoted to an entry level VRC, in addition to 19 trainees presently in the process of completing this training. Regarding this position, OVR continues to hire candidates with Master's Degree in social work, clinical mental health counseling, community counseling, career counseling, psychology, disability and human development, special education, or rehabilitative science, which includes three graduate credits in theories and techniques of counseling.

In December 2018, due to a small candidate pool, OVR began the process in expanding the minimum education and training requirements (MeTs) for the VRC Trainee position to include 5 additional master degrees: Counseling, Rehabilitation Services, Human Services, School Counseling, and Substance Abuse and Behavioral Health Disorder Counseling. These master degrees are currently in the process of being reviewed and approved by the Office of Administration and the Service Employees International Union. Once completed, the Office of Administration will move forward in adding these changes to the current VRC Trainee posting.

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

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

Section 101(a)(7) of the Rehabilitation Act, Comprehensive System of Personnel Development (CSPD), requires State VR agencies establish personnel standards for rehabilitation staff, including VRCs, that are consistent with any national or state-approved or recognized certification, licensing or registration that applies to a particular profession. The purpose of an agency's CSPD is to ensure the quality of personnel who provide VR services and who assist individuals with disabilities to achieve competitive employment outcomes through the VR program.

#### New VRCs

In 2002, OVR raised the entry-level requirements for VRC positions to reflect the requirements established by the Commission on Rehabilitation Counselor Certification (CRCC) for Certified Rehabilitation Counselors (CRC). Specifically, all newly hired VRCs are required to possess a Master's Degree in Rehabilitation Counseling, Rehabilitation Administration or Rehabilitation Education, or CRC credentials or documented proof from CRCC of eligibility to obtain CRC credentials. The revised Civil Service Announcement for VRC positions became effective on October 4, 2002. As of May 2019, a total of 846 VRCs and VRC Interns were hired under the new entry-level requirements. All 846 new VRCs and Interns met CSPD standards for qualified rehabilitation professionals upon being hired.

On July 1, 2017, all CORE programs merged under CACREP. The intent of this merger is to assure students receive appropriate counseling coursework, streamline state counseling licensing processes, and increase skill development while improving employment opportunities. Currently, universities are increasing graduation requirements from 48 credits to 60 credits to include Traditional Rehabilitation Counseling, Clinical Rehabilitation and Clinical Mental Health counseling. The students graduating from these programs should have better developed skills in counseling techniques and applications which will lead to increased employment opportunities in both public and private sectors of vocational rehabilitation. This benefit for the student may have unintended negative consequences for the state VR agencies if more graduates from these programs consider applying their skills in the private sector vs. public sector.

Currently, OVR is maintaining its primary standards in hiring candidates with a Master's Degree in the mentioned fields; however, OVR is strongly considering a review of the current MeTs for the entry level VRC as it relates to the CACREP standards.

Therefore, OVR continues to provide the following recruitment incentives for VRCs:

- A Designated Recruitment Specialist actively recruits qualified VRC's, including those with disabilities, diverse cultural backgrounds and underrepresented groups, from all CORE/CACREP programs nationwide. The Recruitment Specialist has developed a plan that will continue to be proactive in

adequately supplying VRC's trained to provide services to specialty caseloads such as Counselors for the Deaf and Hard of Hearing and Counselors for the Blind and Visually Impaired.

- OVR continues to support and utilize its salary-based internship program, that includes in-state and out-of-state candidates currently enrolled in a CORE/CACREP accredited master's degree program in Rehabilitation Counseling, Rehabilitation Administration and Rehabilitation Education.
- OVR continues to support the recruitment and hiring incentive for the southeastern district offices in Norristown and Philadelphia regarding the increase in pay scale for VRC Interns and Counselors at a Pay Scale 5, Step 9 for interns and Pay Scale 7, Step 5 for counselors.

*(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.*

OVR ensures that personnel have a 21st-century understanding of the evolving labor force and the needs of individuals with disabilities through staff training, professional development and continuing education on LMI and trends. Training and continuing education is also provided on assessment, rehabilitation technology, Social Security work incentive programs, including programs under the Ticket to Work and Work Incentives Improvement Act of 1999, facilitation of informed choice under this program, and improving provision of services to culturally diverse populations.

OVR continues its plan to enhance professional growth and skills of staff on emerging practices relevant to job readiness/soft skill competencies, job search skills, transferrable skills, when to disclose a disability to an employer, how to address criminal history, how to request an accommodation, tax credits, OJT, and resources that focus on developing effective relationships with employers in the public and private sectors. To train and retain qualified personnel, OVR will continue to provide training by university faculty, experts in the field of rehabilitation, and statewide and nationally known speakers on understanding the medical and psychosocial aspects of various disabilities, case management, best practices on developing effective relationship with employers, and understanding the effective utilization of rehabilitation technology.

To increase understanding of the needs of individuals with disabilities, OVR will continue to work collaboratively with local community colleges, career and technical schools to explore the development of training programs that are implemented with universal design to train individuals with disabilities for competitive integrated employment in jobs that meet local labor market demand. In addition to VRCs, OVR's expanded rehabilitation team includes Business Services Representatives (BSRs) and Early Reach Coordinators (ERCs). ERCs promote successful outcomes for students and youth with disabilities by increasing awareness of OVR services and the benefits of early career planning beginning at age 14. BSRs represent OVR and our customer talent during outreach to employers and businesses throughout the geographic area of their assignments to develop job opportunities and foster good working relationships with the business community. A subset of BSRs focus on employer engagement related to transition and pre-employment transition services.

*(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*

OVR is committed to offering a plan for a comprehensive system of staff development and training. The goal is to ensure staff development for OVR personnel in areas essential to the effective management of OVR's program of VR services. OVR will continue to provide for the training and development of personnel necessary to improve their ability to provide VR services leading to employment outcomes for individuals with disabilities, especially those with the most significant disabilities.

With the implementation of WIOA amendment to the Rehabilitation Act, overall training areas include: (1) Functional Limitations, Employment Implications, and Accommodations; (2) Vocational Assessment: Tools, Interpretation, and Application; (3) Counseling and Guidance; (4) Caseload Management, Case Practices, and Service Planning; (5) Employer Engagement, Job Development and Job Placement; (6) Diversity, Inclusion, and Multicultural Competency; and (7) Leadership Development.

OVR continues to offer a regularly scheduled monthly Virtual Training Series to update staff on a variety of topics of interest, as well as policy and procedural updates. In 2019, OVR initiated an additional bimonthly Virtual Training Series focused entirely on Business Services and Placement. OVR will complete an internal survey to determine additional training needs identified by professional and paraprofessional staff. OVR is committed to focusing on certain priorities identified as "Customer Service," "Ethics," "Confidentiality," and "Transition" as they relate to the primary training topics outlined by WIOA.

OVR continues to collaborate with Penn State University on the 2018-2020 Diversity & Inclusion Project. The research for this initiative has been completed as of March 3, 2019. All focus groups, key informant interviews and statewide assessments have been concluded as of December 2018. All data has been reviewed and compiled, and a written report with recommendations was submitted to the OVR Executive Team and prospective unions in early April 2019. The recommendations will serve as a framework for professional trainings for advancing OVR's diversity and inclusion goals. These trainings will define: the concept of diversity and inclusion; understanding barriers for underrepresented/underserved populations; an outline of the value and importance of diversity and inclusion; and provide substantial resources for our staff in providing services to the communities we serve.

OVR has developed and implemented a structured training program for employees hired under the VRC Trainee classification. It involves a combination of archived in-house virtual training sessions, readings from the Disability Handbook, direct instruction from VR Supervisors, and online modules from CRCC e-University, VR Development Group, MyODP, Mississippi State University's National Technical Assistance Center of Blindness and Visual Impairment, and Hadley. Training from additional community resources is also utilized.

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

OVR will capitalize on the in-house expertise offered by existing agency staff to share policy and procedure updates and information about best practices with their colleagues through webinar training opportunities. OVR supports various training opportunities and coordinates efforts with various professional associations such as the Pennsylvania Workforce Development Association, Pennsylvania Association of Rehabilitation Facilities, National Association of Multicultural Rehabilitation Concerns, Pennsylvania Rehabilitation Association and the Association for Education and Rehabilitation of the Blind and Visually Impaired to train and retain qualified personnel.

OVR continues interagency training efforts through “EEC: Possibilities in Action(EEC).” EEC is a joint training initiative between OVR, ODP, OMHSAS, and PDE’s Bureau of Special Education. Driven by the Governor’s Executive Order on Employment First, EEC’s goal is to increase competitive, integrated employment for Pennsylvanians with disabilities by connecting professionals across systems. Participants learn about staff roles, policies, procedures, funding requirements, emerging practices.

In addition, OVR is committed to focus on certain priorities identified as “Customer Service” and “Multicultural Competency,” in addition to the priorities included with the implementation of WIOA amendments to the Rehabilitation Act of providing business services, transition services, and SE. Particular attention will be devoted to offering training on assessment, vocational counseling, job placement, and rehabilitation technology. As in past years, as part of developing a training plan, OVR will complete an annual internal survey to determine the training needs of professional and paraprofessional staff.

*(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.*

Most OVR district offices have at least one Rehabilitation Counselor for the Deaf and Hard of Hearing population. Entry-level requirements for Rehabilitation Counselors for the Deaf and Hard of Hearing require that candidates pass the Sign Language Proficiency Interview before offered a formal interview for employment. OVR district offices, in geographic areas where there are large numbers of individuals who speak Spanish, recruit and hire VRC who can speak both Spanish and English. In instances where there are no VRCs who can communicate with a customer in his or her native language, an interpreter is hired to assist with communication.

To illustrate inclusivity, OVR employees can access services through a language line-phone service that provides interpreting and translation services in more than 200 languages. When a customer is identified as needing translation services, the OVR employee will contact the translation service organization to arrange for services to begin and inform the customer of how the service will work. This service is utilized as a resource for customers and staff who serve a high concentration of underrepresented/underserved populations.

OVR plans to continue efforts to work with the blind and deaf communities to recruit and hire qualified individuals who are deaf, blind, deaf-blind and hard of hearing. This includes recommendations and assistance provided by the OVR Advisory Committee for Persons who are Deaf and Hard of Hearing and the Advisory Committee for the Blind of Pennsylvania. In addition, OVR has a Rehabilitation Specialist assigned to coordinate

the Deaf, Hard of Hearing and Deaf-Blind Program in OVR. This specialist assists with recruitment and outreach to these special populations to attract qualified OVR candidates for employment.

Additionally, OVR will incorporate 2016-2018 CSNA recommendations and strategies to develop stronger awareness among OVR staff of the cultural and linguistic differences and needs for individuals with disabilities from cultural and ethnic minorities. Specifically, OVR will increase training in culturally competent strategies for serving these communities. OVR will strive to provide more staff, materials, resources and services in languages other than English, which may be the dominate languages of some individuals with disabilities from cultural and ethnic minority communities, as well as refugee communities.

*(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.*

Transition Counselors and ERCs within OVR work regularly with educators in local school districts who are working under IDEA. Training on OVR's Transition policy is provided for the benefit of new counselors and ERCs with the intention of helping them to understand their role within both VR and IDEA. The OVR Transition Resource Manual supports this policy and is available as a reference for all OVR staff. Updates and additions are made as necessary.

As a way to coordinate under IDEA and offer information to education professionals, new OVR transition brochures are planned to be posted on the PaTTAN website, [secondarytransition.org](http://secondarytransition.org). Future updates to new and existing brochures and informational handouts will be developed and posted as necessary.

Any OVR employee entering a school and working with youth, is required to complete the Mandated Reporter Training, which is available online through DHS and the Rehabilitation & Community Providers Association. The training is required for any personnel working with youth.

OVR Counselors regularly participate in local Transition Council meetings. This is an important connection between professionals and allows for collaboration between priorities of VR and IDEA so that students and their families receive the best available services.

**(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:*

OVR contracted with the Institute on Disabilities, Pennsylvania's University Center for Excellence in Developmental Disabilities, to conduct and interpret the CSNA required for FFY 2015-2018. The purpose of the CSNA is to inform OVR and PaRC regarding issues and needs of the disability community in the Commonwealth. Specific requirements of the CSNA can be found in the Rehabilitation Act of 1973, at Section 101(a)(15) and at federal regulation 34 CFR § 361.29. The CSNA is required to be completed every three years and assists OVR and PaRC in the development of the State Plan. Section 361.29 of the regulations outlines the specific topics to examine, including specific populations and the cooperation of stakeholders and providers.

A steering committee comprised of OVR staff, members of PaRC, and the Client Assistance Program participated in an initial meeting to review and approve customer satisfaction surveys. These participants remained as vital collaborators in the development and review phases of the CSNA process.

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

### Comparison of Pennsylvania to National Population Statistics

Table 1, taken from the CSNA report, represents the estimated percentage of individuals in various age, sex, and race/ethnicity categories that have generalized disability identifications in Pennsylvania and across the nation in 2014 and 2016 (2014 and 2016 1-Year Estimates of the American Community survey).

**Table 2: Disability Identification Across Demographic Variables, PENNSYLVANIA vs. U.S.**

(2015-2017 American Community Survey 1-Year Estimates)

<b>Disability Identification across demographic variables</b>	<b>U.S. % Est (2014)</b>	<b>U.S. % Est (2015)</b>	<b>U.S. % Est (2016)</b>	<b>U.S. % Est (2017)</b>	<b>PA % Est (2014)</b>	<b>PA % Est (2015)</b>	<b>PA % Est (2016)</b>	<b>PA % Est (2017)</b>
Total civilian noninstitutionalized population	12.6	12.6	12.8	12.7	13.8	13.9	14.2	14.1
Population under 5 years	0.8	0.8	0.7	0.7	0.6	0.7	0.5	0.9
Population 5 to 17 years	5.4	5.4	5.6	5.5	7.1	6.8	7.1	7.0
Population 18 to 34 years	10.5	6.0	6.3	6.4	11.2	6.9	7.3	7.0
Population 35 to 64 years	10.5	13.0	13.1	12.7	11.2	13.8	14.2	13.9
Population 65 years to 74 years	36.0	25.4	25.3	25.0	34.6	24.0	24.6	24.0
Population 75 years and older	36.0	49.8	49.5	48.7	34.6	47.9	48	47.9
Male	12.5	12.5	12.7	12.6	13.6	13.4	14.1	13.8
Female	12.8	12.7	12.9	12.8	14.0	14.3	14.4	14.4
White alone	13.1	13.1	13.4	13.3	13.8	13.8	14.3	14.1
Black or African American alone	13.8	14.0	14.1	14.0	15.5	16.6	16.0	16.6
American Indian and Alaska Native alone	16.3	16.8	17.0	17.3	24.6	24.8	23.8	20.8
Asian alone	6.9	6.9	7.1	7.1	6.3	7.1	7.0	7.0

<b>Disability Identification across demographic variables</b>	<b>U.S. % Est (2014)</b>	<b>U.S. % Est (2015)</b>	<b>U.S. % Est (2016)</b>	<b>U.S. % Est (2017)</b>	<b>PA % Est (2014)</b>	<b>PA % Est (2015)</b>	<b>PA % Est (2016)</b>	<b>PA % Est (2017)</b>
Native Hawaiian and Other Pacific Islander alone	-	10.6	11.1	10.3	-	27.7	N	N
Some other race alone	8.2	8.0	8.3	8.0	16.0	13.6	14.0	12.7
Two or more races	11.1	10.9	11.3	11.1	13.5	11.4	13.5	13.0
White alone, not Hispanic or Latino	13.9	13.9	14.1	14.0	13.8	13.8	14.4	14.2
Hispanic or Latino (of any race)	8.8	8.8	9.1	9.0	14.3	14.1	14.0	12.7

Compared to the estimated national rate of disability identification in 2014 (12.6%), 2015 (12.6%), 2016 (12.8%), and 2017 (12.7%), Pennsylvania has a slightly higher rate of disability identification in its total civilian population (13.8% in 2014, 13.9% in 2015, 14.2% in 2016, and 14.1% in 2017). Up until 2014, the Census reported upon disability identification for those 18-64 years old (10.5% in U.S. and 11.2% in Pennsylvania) and 65 and older (36.0% in US and 34.6% in Pennsylvania). Beginning in 2015, the Census began reporting disability identification rates for 18-34 years old, 35-64 years old, 65-74 years old, and 75 years and older. In 2015, Pennsylvania civilians ages 18-34 and 35-64 years had a slightly higher than national average rate of disability identification (Pennsylvania: 6.9% and 13.8% vs. U.S.: 6.0% and 13.0%). This trend continued in 2016, with Pennsylvania civilians ages 18-34 years old (Pennsylvania: 7.3% vs. US: 6.3%) and 35-64 years old (Pennsylvania: 14.2% vs. U.S.: 13.1%) and in 2017 with, Pennsylvania Civilians ages 18-34 years old (Pennsylvania: 7.0% vs. US: 6.4%) and 35-64 years old (Pennsylvania: 13.9% and US:12.7%).

The estimated percentage of individuals who identified as having a disability in the labor force was 40.7% nationally, compared to 40.9% in Pennsylvania. The national average of individuals identifying as having a disability who were employed in 2014 was 34.5%, and 34.7% in Pennsylvania. The rate of unemployment for individuals with disabilities across the United States was 14.9%, compared to 15.1% in Pennsylvania in 2014 (American Community Survey, 2014).

Customer satisfaction surveys were developed as part of the CSNA to determine future VR needs of those customers with the most significant disabilities and their need for SE services. These surveys were designed and used to elicit feedback from customers in Status 26 Closed Rehabilitated, Status 28 Closed after IPE Initiated, Transition Services for youth and students with disabilities, and for those currently undergoing job coaching. Data collected from these surveys will be used to demonstrate successes in, and barriers to, receiving OVR services and gaining and retaining employment for individuals with the most significant disabilities. Unfortunately, the CSNA does not detail the current needs of individuals with the most significant disabilities or their need for SE services. It will be up to OVR to review these surveys on a regular basis to gather this information. Data collected from these surveys is currently reviewed on a quarterly basis between OVR and

PaRC to determine successes in, and barriers to, receiving OVR services and gaining and retaining employment for individuals with the most significant disabilities.

*(B) who are minorities;*

According to the 2010-2014 American Community Survey 5-Year Estimates, and evaluated as part of the CSNA, 81.8% of Pennsylvanians with disabilities identify as Caucasian or white; 12.4% of Pennsylvanians with a disability identify as African American; 6.2% of Pennsylvanians with disabilities identify as Hispanic or Latino; 0.3% of Pennsylvanians with a disability identify as American Indian and Alaska Native; and 1.4% Pennsylvanians with a disability identify as Asian/Pacific Islanders.

Qualitative data was collected as part of the CSNA through site visits to district offices and face-to-face interviews with VR administrators. During these interviews, OVR staff suggested that lack of English fluency has not presented significant barriers to ethnic and cultural minorities in receiving services and supports. Administrators and VRCs at multiple district offices cited familiarity and access to, but little utilization of, Language Line interpretation services. According to the October 2015 Census Report “Detailed Language Spoken at Home and Ability to Speak English for the Population 5 Years and Over for Pennsylvania: 2009-2013,” about four percent of those individuals reportedly speak English less than “very well.” Consequently, lack of utilization of interpretation services may align with statewide language demographics, but may also signal a population underserved by OVR. Attention to this potential disparity is imperative as multiple VRCs identified that they served refugee communities, many of which come from countries with official languages other than English. Findings were that OVR staff could benefit from trainings oriented to cultural competency regarding the Pennsylvania Dutch, Amish, and Quaker populations, as well as refugees.

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

Individuals with disabilities that are considered unserved and/or underserved include those with multiple disabilities (such as deaf/blind), those in rural areas, transition age youth, individuals with disabilities that are concurrently customers of other state systems (such as corrections, educational, and/or other human services systems), minorities, and veterans. Survey results from CRPs indicated that the most underserved communities, in order of significance, are customers with dual diagnoses, followed by aging customers, those in the criminal justice system (victims, defenders or parolees), those with low socioeconomic status, immigrants, and non-English speaking or English as a second language customers. Youth were ranked as the least underserved, followed by veterans, rural communities, racial or ethnic minorities, and finally state center residents. Transportation barriers were identified throughout the research as presenting the greatest challenge to the unserved or underserved communities in seeking employment.

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

OVR staff work closely with our CareerLink® partners in the State Workforce Development System. CareerLinks® are one stop facilities in Pennsylvania that assists individuals seeking Commonwealth and employment services, and where workforce development professionals focus on employment with an emphasis on high demand occupations. Data gathered from site visits to district offices suggests that OVR is working collaboratively with

the CareerLinks®, but that that VRCs may benefit from receiving cross-training on high demand occupations as a way to better serve their customers. BCOD staff have recommended that dual customers may benefit from collaboration across organizations to improve the referral process.

Unfortunately, OVR and workforce development customers were not interviewed as part of the CSNA to determine their specific needs. This missed opportunity will be given greater attention in the next CSNA developed.

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

OVR, in collaboration with PaRC, developed and began using a customer satisfaction survey for transition age youth in mid-2017. These surveys are sent out to randomly selected transition age youth monthly. OVR will need to develop a more formal plan to capture and summarize the results from these surveys. Future analysis of these results can reveal the extent to which transition age youth are being served satisfactorily or unsatisfactorily by OVR. An informal review of the responses is currently being done on a quarterly basis by OVR staff and PaRC during PaRC Policy and Customer Satisfaction Committee meetings. Recent information received highlights the important role communication plays in the relationship between counselor, student and their family.

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

According to results in the CSNA, through DLI, there are currently 106 certified CRPs operating in Pennsylvania, placing the Commonwealth in the 94<sup>th</sup> percentile of number of established CRPs throughout the United States. As of August 2017, Pennsylvania ranks only below Ohio, Illinois, and California. CRPs are private, community-based, non-profit organizations that provide rehabilitation services to individuals with disabilities. While Pennsylvania is fortunate to have a sufficient of CRPs, there were gaps in services noted from the CSNA. Transportation services, especially in rural communities is one of the greatest needs identified by the CSNA. Barriers for transportation included: lack of flexibility with scheduling and planning for para-transit services; lack of reliability and consistency with para-transit services; lack of cultural competency and awareness for disability on the part of transportation workers; a general assumption that people with disabilities have no interest in employment or being active; and lack of institutional or societal interest or investment in transportation for people with disabilities.

Interagency referrals is another area identified as a problem for individuals with disabilities seeking services from multiple agencies. The referral process for each organization or CRP in Pennsylvania is different and can be overwhelming for individuals with disabilities. There is a workgroup currently facilitated through the PA Workforce Development System, which OVR participates in, that is looking at ways to improve co-enrollment across funding streams.

The HGAC is designated as a CRP within the state, and its continual operation will be critical for OVR to meet the needs of individuals identified under the unserved and underserved category, including individuals with multiple disabilities, students and transition age youth with disabilities, individuals with disabilities who live in the rural part of the state, and individuals with disabilities that are concurrently customers of other state

systems (such as corrections, educational, and/or other human service systems). HGAC provides a comprehensive program of services including the integration of pre-employment transition services, education on campus at the Commonwealth Technical Institute, counseling, vocational evaluation, and physical restoration in a barrier-free environment for individuals with disabilities leaving to competitive integrated employment. The continual maintenance and improvement of HGAC will be necessary to maintain its operation in the most effective and cost-effective manner possible.

*(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.*

Surveys and interviews to identify barriers to and strategies for increasing services and support opportunities for students and youth with disabilities were conducted with workforce professionals. Unfortunately, only ten people responded to this survey. It does not appear from the CSNA that any OVR customers were surveyed as part of this assessment. This is a missed opportunity that will be corrected in the next CSNA assessment cycle. In terms of improving engagement, interviewees reported that pre-employment transition services construction is seen as a complement to the entitlement of school services provided under the Individuals with Disabilities Act. Interviewees also noted that pre-employment transition services introduce eligible and potentially-eligible students to VR services and supports earlier, subsequently students engage in the VR process sooner and often with more direct school support.

As uncovered through the CSNA interviews, OVR plays a major role in pre-employment service efficacy and availability. Interviewees cited that it is essential that schools make the connection between students and OVR. OVR's presence in schools, as part of a network of service providers including the special education coordinator, teachers, paraprofessionals, and aids, and active registration of students, improves student outcomes.

Also learned through the CSNA is that OVR administrators and transition staff were concerned about local school districts understanding the services that OVR could offer to transition age youth that would support services already in place under the IDEA. The CSNA recommended OVR work to develop more holistic and equitable relationships and communication with school districts across the Commonwealth to grow quality, selection, and knowledgeability of pre-employment transition services options and to improve access and connection to the workforce development system under WIOA. OVR has a regular and strong presence of ERCs, Transition Counselors, BSRs, and VRCs visiting local school districts. Since the implementation of WIOA, these relationships have continued to strengthen and OVR is considered an important ally in transition planning. OVR staff attend IEP meetings, meet with students and parents individually, and provide a wide array of pre-employment transition services per the WIOA amendments to the Rehabilitation Act. Pre-employment services to students have significantly increased from the time of the prior CSNA to present, and are expected to continue to be evaluated in more detail in the next CSNA cycle.

**(k) Annual Estimates.**

*Describe:*

*(1) The number of individuals in the state who are eligible for services;*

According to the 2017 Disability Status Report for Pennsylvania published by Cornell University’s Institute on Employment and Disability, more than 855,000 individuals ages 21 to 64 (working age) in Pennsylvania reported one or more disabilities, representing 11.8% of the working-age population in the state (Source: [2017 Disability Status Report – Pennsylvania, Yang-Tan Institute on Employment and Disability, Cornell University](#), using data from the U.S. Census Bureau’s American Community Survey).

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

*(A) the VR program;*

FFY 2020: 46,596

OVR is targeting January 2020 to reopen the OOS for customers who have a Most Significant Disability. The above FFY 2020 estimate is a projection of how many customers are anticipated to receive services during the remainder of FFY 2020 if the Order of Selection remains closed for all priority categories through December 31, 2019. Using historical data, this figure was projected by increasing the number of VR participants who had open cases with IPEs at the end of FFY 2019 by the projected number of new IPEs that will be developed during the period of January 1, 2020 and September 30, 2020.

FFYs 2021-2024, annually: 46,096

*(B) the supported employment program;*

The following estimates project the number of individuals expected to be served annually during FFYs 2021-2024 for each of the priority categories within the SE Program (Title I and Title VI Funds):

Total anticipated to be served annually during FFYs 2021-2024: 7,065

- Most Significant Disability: 7,015
- Significant Disability: 50
- Non-Significant Disability: 0

Annual estimates of the number of SE customers to be served and projected Title VI expenditures during FFYs 2021-2024:

- Anticipated Total Number to be Served via Title VI Funds: 250
- Anticipated Annual Expenditure – Title VI Funds: \$650,000
- Total Number Served under Age 25 via Title VI Funds: 250
- Anticipated Annual Expenditure – Title VI Funds (under age 25): \$650,000

Annual estimates of the number of SE customers to be served and projected Title I expenditures during FFYs 2021-2024:

- Anticipated Total Number to be Served via Title I Funds: 6,815
- Anticipated Annual Expenditure – Title I Funds: \$11,007,500

Since the four-year State Plan submission (2016-20) and the two-year modification State Plan submission (2018-20), OVR’s new SE Policy went in to effect on July 1, 2018. The effort to implement the new SE policy has been

a significant undertaking with many moving parts that impact the financial, provider, and participant subsystems in CWDS, as well as, staff and provider activities at the district level. Some of the main changes included electronic reporting/billing, new service-menu options for customers to assist in obtaining/retaining employment, and provider credentialing. OVR specialists continue to provide regular follow-up webinars for providers and staff alongside continued individual consultation.

*(C) each priority category, if under an Order of Selection;*

FFY 2021-2024, annually:

- Most Significant Disability: 46,084
- Significant Disability: 12
- Non-Significant Disability: 0

(Total = 46,096)

Using both current and historical data, OVR projects that 46,084 individuals categorized as having a Most Significant Disability and 12 individuals categorized as having a Significant Disability will receive services annually during FFYs 2021-2024. OVR also projects that the number of individuals categorized as having a Significant Disability who are receiving services will decline over the next four years as their cases are closed. OVR will continue to conduct outreach and accept applications from individuals who meet the functional limitation criteria of all categories, and projects that 16,961 new customers categorized as Most Significant Disability, 24 new customers categorized as Significant Disability, and 9 new customers categorized as Non-Significant Disability will be added to the OOS wait list annually during FFYs 2021-2024. Worth noting, staff will receive training on OOS determinations and to use OOS more appropriately and effectively.

*(3) the number of individuals who are eligible for VR services, but are not receiving such services due to an Order of Selection;*

OVR closed the OOS for all priority categories effective July 1, 2019. As of the end of FFY 2019, there are a total of 3,010 customers eligible for VR services who are not receiving such services due to the closing of the OOS: 2,097 designated as Most Significant Disability, 100 designated as Significant Disability, and 3 designated as Non-Significant Disability.

*(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.*

Due to a budgetary shortfall in FFY 2019, OVR reevaluated its OOS and determined that the agency's available and projected resources will not be adequate to ensure the provision of the full range of VR services to all eligible individuals. OVR consulted and shared this information with the RSA, PaRC, the State Board of VR, and the Client Assistance Program. OVR met with PaRC on March 3, 2019, and with the State Board on March 3, 2019, at their respective public meetings and informed them of the fiscal situation, outcome data, and the need to close the OOS, and listened to their suggestions and concerns. Both PaRC and the State Board voted to allow OVR to implement the process to close the OOS. Statewide public meetings were held on May 22, 2019, to inform consumers and stakeholders of the closure, and to obtain their comments and feedback. After receiving approval from the RSA, OVR closed all priority categories of the OOS, effective July 1, 2019.

New customers determined eligible and assigned to a closed priority category on or after July 1, 2019, have been placed on a waiting list until the resources are available to provide the full range of services. However, services do continue for all customers with approved IPEs signed and executed by the participant and the VRC prior to the effective date the OOS was closed. Additionally, OVR continues to provide pre-employment transition services to potentially eligible students, as well as to eligible students who began receiving services prior to an eligibility determination and placement in a closed OOS priority category.

OVR's projected annual expenditures and outcomes under the OOS are as follows for FFYs 2021-2024:

1. For the Most Significant Disability category, the number projected to be made eligible annually is 16,961, while the number served will be 46,084. The number rehabilitated will be 7,400, of which 100% will be rehabilitated into the competitive labor market. The total cost of services is expected to be approximately \$64,000,000.
2. For the Significant Disability category, the number projected to be made eligible annually is 24, while the number served will be 12, which will decrease down to 0 as these cases are closed. Expenditures under this category are anticipated to be negligible and isolated to services for the 12 individuals currently receiving services, outreach, processing of new applications, and eligibility determinations.
3. For the Non-Significant Disability category, the number projected to be made eligible annually is 9, while the number served will be 0. OVR does not anticipate opening the Non-Significant Disability category to receive services during the next four years. Expenditures under this category will be negligible and isolated to outreach, processing of new applications, and eligibility determinations.

#### **(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 the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions. Any projections, program continuations, etc. in this description are subject to the availability of supporting funding in the plan year.*

The state goals and priorities for the VR Services Portion of the Pennsylvania Combined State Plan were developed jointly with OVR Executive staff and the PaRC Policy and State Plan committee during a teleconference meeting exchange on May 10, 2019.

- (2) Identify the goals and priorities in carrying out the VR and Supported Employment programs.*

#### **Goal 1: Increase Competitive Integrated Employment Opportunities for Individuals with Disabilities**

1. Expand the availability of apprenticeships, internships and OJT for individuals with disabilities.
2. Partner with the BWPO to ensure programmatic and physical accessibility of the PA CareerLink® centers for equal access for individuals with disabilities.
3. Increase SE and Customized Employment outcomes; evaluate and monitor OVR's SE policy implementation.

## **Goal 2: Improve Transition Services for Students with Disabilities**

1. Revise the model for pre-employment transition services for students with disabilities.
2. Increase opportunities for students to gain workplace skills and community-integrated work experiences.
3. Enhance collaborative relationships with DHS, PDE and higher education institutions.

## **Goal 3: Increase community education and outreach.**

1. Work with PaRC to identify and incorporate best practices and strategies to increase Customer Satisfaction survey response data.
2. Continue to develop stronger awareness among OVR staff of the cultural and linguistic differences and needs of unserved/underserved individuals with disabilities from cultural and ethnic minorities.
3. Promote accessibility and technology based upon universal design principles.

*(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;*

These goals were developed using the 2016-2018 CSNA which included targeted goal areas on: customer satisfaction; increasing services and support opportunities for students and youth with disabilities; identifying barriers and strategies to improve services to the broad spectrum of ethnic and cultural minorities with disabilities; development of more holistic and equitable relationships and communication with school districts across Pennsylvania; and supporting the use of new technology to benefit customer service.

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

These are new performance indicators for the VR program, and because there is insufficient or no historical data available the first two years of the plan, a baseline will be established using the actual performance that will be reported during the 2020-2023 period.

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

OVR underwent RSA monitoring in August 2019 but has not yet received a report on these activities. Once a report is received, interpreted and understood, these findings and recommendations will be implemented and changes to any goals or priorities will be incorporated into the two-year modification of the VR Portion of the Combined State Plan.

OVR received a letter dated May 20, 2019, from PaRC expressing their concern about the closing of the Most Significant Disability category of the OOS. OVR appreciates and understands this position and has a sincere commitment to making necessary programmatic and fiscal changes to open the OOS for the Most Significant Disability category as soon as possible.

**(m) Order of Selection.**

*Describe:*

*(1) whether the designated state unit will implement an Order of Selection. If so, describe:*

*(A) the order to be followed in selecting eligible individuals to be provided VR services.*

During the prior four-year State Plan submission (2016-20) and the two-year modification State Plan submission (2018-20), Pennsylvania OVR reported it remained on an OOS providing VR services only to eligible individuals with Most Significant Disabilities who met the criteria for priority category one. Since this time, OVR has determined available and projected resources have changed and will not be adequate to ensure the provision of the full range of VR services, as appropriate, to all eligible individuals effective July 1, 2019.

OVR received approval from RSA to close all categories under the OOS as described below.

*Priority of Categories to receive VR services under the Order:* First Priority: Most Significant Disability; Second Priority: Significant Disability; Third Priority: Non-Significant Disability.

*Description of priority categories*

First Priority: Most Significant Disability

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

Second Priority: Significant Disability

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

Third Priority: Non-Significant Disability

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

The OOS shall not be based on any other factors, including:

- any duration of residency requirement, provided the individual is present in the State;
- type of disability;
- age, gender, race, color or national origin;
- source of referral;

- type of expected employment outcome;
- the need for specific services or anticipated cost of services required by an individual; or
- the income level of an individual or an individual's family.

#### Pre-Employment Transition Services and the OOS:

Federal regulations allow for the continuation of pre-employment transition services only for those students who received such services prior to an eligibility determination and assignment to a closed OOS priority category (34 CFR §361.36(e)(3)(i)). Once an application and eligibility determination is made, that student would be subject to the OOS for the receipt of VR services, including pre-employment transition services if they had not yet begun.

Therefore, students, families, advocates, and educators are advised to carefully consider the need to begin pre-employment transition services as early as possible in the transition process, and prior to an eligibility determination. Potentially eligible students with disabilities (i.e. students who may or may not have applied for VR services (non-applicants and applicants) that only receive pre-employment transition services) will not be affected by the OOS and will continue to receive pre-employment transition services.

Any individual, including a student, in need of an individualized VR service (34 CFR §361.48(b)) will need to apply and be determined eligible for VR services, to receive such services under an approved IPE.

#### *(B) the justification for the Order.*

The Rehabilitation Act, *as amended*, requires that an OOS for services be instituted any time that limited resources impede the agency from providing services to all eligible individuals. Because OVR does not believe it will be able to serve all eligible individuals with the available resources, it has adopted an OOS. The OOS in Pennsylvania gives priority first to individuals with Most Significant Disability; secondly, to individuals with Significant Disability; and third to individuals with Non-Significant Disability.

OVR has operated under an OOS since March 1, 1994. OVR has provided VR services only to customers who have a Most Significant Disability. With the use of ARRA funds, beginning on October 18, 2010, OVR expanded the OOS to include individuals who have a Significant Disability. Consistent with OVR's policy on the OOS, OVR evaluated its ability to meet the second priority category and, from a fiscal and programmatic standpoint, OVR determined that it was unable to do so. On Monday, April 23, 2012, the Significant Disability and Non-Significant Disability categories were closed to all new customers. OVR has been serving only Most Significant Disability customers since 2012.

The WIOA amendments to the Rehabilitation Act require that the Designated State Unit must expend at least 15 % of a state's federal allocation for VR (which averages approximately \$20 million annually for OVR) to be set aside for pre-employment transition services for students with disabilities between 14 and 21 years of age. This reserve has resulted in decreased funding for other existing programs. This 15% represents the minimum amount that must be utilized for these services. OVR anticipates exceeding the 15% reserve in the current FFY based on current obligations and spending patterns. There are also currently 105,000 Commonwealth students with disabilities who might be eligible to enroll in pre-employment transition services. While OVR regularly

evaluates availability of funds and administers fiscal forecasting, the inability to accurately predict the number of potentially eligible students will make budgeting for the pre-employment transition services and VR programs challenging.

The WIOA amendments to the Rehabilitation Act prohibit restricting the provision of pre-employment transition services, which resulted in Pennsylvania's program enrollment nearly doubling from 13,946 in fiscal year 2016 to 25,601 in fiscal year 2017 – with the cost to provide these services far exceeding the 15 % set-aside. To date, OVR has had to invest approximately \$93 million in the program.

Due to a budgetary shortfall in FFY 2019, OVR reevaluated its OOS and determined that OVR's available and projected resources will not be adequate to ensure the provision of the full range of VR services to all eligible individuals. OVR consulted with PaRC at their March 6, 2019 Full Council meeting and consulted with director of the Client Assistance Program on budgetary concerns, analysis, and the need to seek approval from RSA to close the OOS which will result in the establishment of a waiting list for the VR program. At the March 7, 2019, OVR State Board meeting, the Board voted unanimously to allow OVR to proceed with taking necessary steps to close the OOS.

With approval from RSA, OVR closed Priority Categories Most Significant Disability, Significant Disability, and Non-Significant Disability on July 1, 2019. OVR shared this plan with RSA, PaRC, the OVR State Board & the Client Assistance Program, and at statewide public meetings on May 22, 2019, to inform consumers and stakeholders.

The Pennsylvania Bulletin issued on May 4, 2019, announced a 30-day public comment period from May 4, 2019 to June 4, 2019, on the proposed amendment to close all categories of the OOS in description (m) of the VR Services Portion of Pennsylvania WIOA Combined State Plan. OVR provided the public, including individuals with disabilities, the opportunity to provide input regarding OVR's request to temporarily close the OOS. Interested persons were invited to submit written comments by mail to OVR or by email at [OVRFeedback@pa.gov](mailto:OVRFeedback@pa.gov) until 5:00 p.m. on June 4, 2019. In-person public meetings were held statewide at OVR district offices on May 22, 2019, and individuals who wanted to participate but were unable to attend in-person were offered the opportunity to participate via phone. The total number of participants at the public meetings included 320 in-person participants at the OVR district offices and a total of 150 lines connected for those participating virtually via AT&T phone lines.

When the comment period ended, OVR had received and recorded a total of 150 verbal comments from individuals participating in person at the public meetings and 98 comments that were emailed/mailed. Also, there were articles in two local newspapers on the proposed changes to VR services that would create a waiting list for new customers. The public comment process and resulting dialogue emphasized impacts on current OVR customers, students with disabilities, and external stakeholders/partners that included the following general "themes": communicate with stakeholders to include business, general, OLTL/ODP, providers; funding; OOS Category; parent concerns; provider concerns; pre-employment transition services; question/Frequently Asked Questions; and service disruption to customers, schools, and providers.

New customers determined eligible and assigned to a closed priority category on or after July 1, 2019, will be placed on a waiting list until the resources are available to provide the full range of services. However, services will continue for all customers with approved IPEs with an effective date prior to July 1, 2019. OVR will continue

to provide pre-employment transition services to potentially eligible students and OVR eligible students who began receiving them prior to eligibility determination and placement in a closed OOS priority category.

1. Individuals applying for services after the date the OOS is closed on July 1, 2019, will be interviewed and their eligibility and OOS determination will be made. Eligible customers will be placed on a waiting list per category. When financial resources are available, first priority will be given to customers with a Most Significant Disability, second priority to customers with a Significant Disability, and third priority to customers with a Non-Significant Disability. Rationale for placement will appear in the customers case file.
2. Each customer placed on a waiting list will be notified in writing of the priority categories, his or her assignment to a particular priority category classification, and be informed to alert OVR regarding possible reclassifications due to a change in the individual's circumstances or due to any misclassifications. The individual will also be informed of their right to appeal the category assignment through informal or formal review and of the availability of assistance from the Client Assistance Program.
3. For eligible customers who do not have approved IPEs with an effective date prior to July 1, 2019, and are not in an open priority group:
  - a. information and referral services will remain available. Individuals will be given information and referrals to other appropriate Federal and State programs, including programs carried out by other components of the Statewide Workforce Development System, such as the one-stop centers known in the Commonwealth as PA CareerLink®, best suited to address the specific employment needs of the individual.
  - b. no IPE will be written to provide such services to these individuals until such time their OOS category opens and they receive notification we can serve them.

**Procedure for processing applications:**

1. Upon receipt of referral, counselor meets with applicant to complete application and informs them about OOS and resources that can assist them while they are on the waiting list.
2. Counselor will input data and application date; scan and upload documents in OVR's CWDS database systems and determine eligibility within 60 days from the date of application.
3. After eligibility determinations are made, customers will be assigned to an OOS priority category based on their functional limitations and need for multiple VR services over an extended period of time (currently defined as 6 months).
4. CWDS will add the case to a waiting list in the system, not allowing services to proceed. Notice of such (as outlined above) will be sent to the customer.

**Procedure for putting customers on the waiting list:**

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

## Procedure for taking customers off the waiting list:

1. OVR will determine when to open each category based upon financial availability and will evaluate the ability to open categories quarterly. One priority category will be opened at a time to clear the waiting list for that priority category before opening the next priority category.
2. If OVR is unable to serve everyone in a specific category, customers will be taken off the list by month of application, starting with the customers who have been waiting the longest to receive services.
3. A monthly list will be generated by CWDS. Each quarter, based on financial availability, OVR will determine how many customers will be taken off the waiting list for the recently opened priority category.
4. Notice will be provided to district offices that they can begin developing plans for customers in a certain range of dates, based on the application date.
5. The District Administrator will ensure customers are assigned to counselors.
6. Counselors will complete an IPE within 90 days from the date the client was taken off the waiting list.

*(C) the service and outcome goals.*

As noted above, due to a budgetary shortfall in FFY 2019, OVR reevaluated its OOS and determined that OVR's available and projected resources will not be adequate to ensure the provision of the full range of VR services to all eligible individuals. OVR consulted and informed RSA, PaRC, the OVR State Board and the Client Assistance Program of the fiscal situation, outcome data, and the need to close the OOS. Statewide public meetings were held May 22, 2019, to inform and obtain comments, and feedback from consumers and stakeholders. With RSA approval, OVR moved forward to close Priority Categories Most Significant Disability, Significant Disability, and Non-Significant Disability on July 1, 2019.

New customers determined eligible and assigned to a closed priority category on or after effective date the OOS is closed will be placed on a waiting list until the resources are available to provide the full range of services. However, services will continue for all customers with approved IPEs prior to the effective date the OOS is closed. OVR will continue to provide pre-employment transition services to students with disabilities who were receiving such services prior to being determined eligible for VR services. Each customer placed on a waiting list will be notified in writing of the priority categories, their assignment to a particular priority category classification and be informed to alert OVR regarding possible reclassifications due to a change in the individual's circumstances or due to any misclassifications.

OVR's outcome and service goals under the OOS are projected as follows for **FFY 2019**:

1. For the Most Significant Disability category, the number eligible is expected to be 17,000, while the number served will be 38,061. The number rehabilitated will be 7,900 (from L&I Performance Plan), of which 100% will be rehabilitated into the competitive labor market. The total cost of services is expected to be approximately \$68,000,000 based on expenditures and projected expenditures for the remaining period of FFY 2019 and through FFY 2020.
2. For the Significant Disability category, the number accepted for the remainder of FFY 2019 is expected to remain unchanged with 76 Significant Disability to continue on the waiting list.

3. For the Non-Significant Disability category, the number accepted for the remainder of FFY 2019 is expected to remain unchanged with 6 Non-Significant Disability to continue on the waiting list.

Both Significant Disability & Non-Significant Disability figures above were determined by taking the number of customers currently on the waiting list and adding the number projected to be added to the wait list between now and September 30, 2019. In total, it is projected that 82 Significant Disability and Non-Significant Disability customers will be on the waiting list through the end of FFY 2019. OVR's priority category I and first-priority is MSD, as such it is estimated that minimal funds will be expended for individuals under categories II and III (Significant Disability and Non-Significant Disability) to continue to conduct outreach and process their applications.

OVR's outcome and service goals are projected as follows for **FFY 2020**:

1. For the Most Significant Disability category, the number eligible is expected to be 17,000, while the number served will be 41,961. The number rehabilitated will be 8,000 (from DLI Performance Plan), of which 100% will be rehabilitated into the competitive labor market.
2. For the Significant Disability category, the number accepted is expected to be 100 Significant Disability continue on the waiting list as OVR continues to conduct outreach and accept applications from individuals who would meet category II of the OOS.
3. For the Non-Significant Disability category, the number accepted is expected to be 15 Non-Significant Disability continue on a waiting list as OVR continues to conduct outreach and accept applications from individuals who would meet category III of the OOS.

Using both current and historical data, OVR projects that 76 individuals categorized as Significant Disability and 6 individuals categorized as Non-Significant Disability will be on the OOS wait list for the remainder of FFY 2019 and throughout FFY 2020. OVR will continue to conduct outreach and accept applications from individuals who meet the functional limitation criteria of the Significant Disability and Non-Significant Disability categories, and projects that 24 new customers categorized as Significant Disability and 9 new customers categorized as Non-Significant Disability will be added to the OOS wait list during FFY 2020, making a total of 100 customers categorized as Significant Disability and 15 customers categorized as Non-Significant Disability on the wait list in FFY 2020.

*(D) the time within which these goals may be achieved for individuals in each priority category within the Order.*

The time frame in which goals are to be achieved is approximately 30 months for the Most Significant Disability priority of service category.

*(E) how individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and*

In keeping with federal mandates, it is the policy of OVR to operate on an OOS when the agency is unable to provide services to all eligible individuals in the same state who apply for services. The OOS in Pennsylvania gives priority first to individuals categorized as Most Significant Disability; secondly, to individuals categorized

as Significant Disability; and third to individuals categorized as Non- Significant Disability. All new applicants for services must be notified about the OOS. With all categories closed, it would be expected that Most Significant Disability would be included in these Priority Category breakout on projections listed here for the remaining period of FFY 2019 and through FFY 2020.

The determination of the level of significance is made by the VRC based upon a review of data developed to make the eligibility determination, and to the extent necessary, an assessment of additional data.

Significance of disability is defined based upon the presence of functional capacities and the requirement of multiple VR services, defined as two or more services that are expected to last 6 months from the date of the IPE or be needed on an ongoing basis to reduce an impediment to employment.

With all categories closed, a letter is sent to the individuals who do will be placed on a waiting list for services indicating that they have been determined Most Significant Disability, Significant Disability or Non-Significant Disability. VRCs provide information and referral services regarding the most suitable services to assist the individual on the waiting list and this is documented within a case progress note or the waiting list letter sent to the individual.

Throughout the year, OVR senior management will evaluate the agency's available resources on a quarterly basis to serve all eligible individuals with disabilities. OVR will determine when to open each category based upon financial availability. One priority category will be opened at a time to clear the waiting list for that priority category before opening the next priority category. If OVR is unable to serve everyone in a specific category, customers will be taken off the list by month of application, starting with the customers who have been waiting the longest to receive services. If resources are available, the OVR District Offices will be informed that they can move individuals from waiting into an active status with OVR. A monthly list will be generated by CWDS. Each quarter, based on financial availability, OVR will determine how many customers will be taken off the deferred list for the recently opened priority category.

*(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.*

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

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

3. Immediate risk of losing the job due to the disability does not include economic conditions and non-disability related factors.

**(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.*

OVR provides SE services to eligible customers with the most significant disabilities who have been determined to require on-going support services to maintain employment. OVR has an on-going, over-arching goal of providing quality SE service which are delivered in an effective, efficient and timely manner. To that end, OVR initiated many changes/enhancements to the SE policy and procedures in 2018. The changes included: an expansion of types of SE services to better meet the diverse needs of customers; a move to an entirely online system for more streamlined referral, reporting, billing and tracking of SE cases; and incentives to providers for working with unserved/underserved populations including rural, transition-aged, veterans, Social Security Administration (SSA) recipients and others. Over 160 CRPs have signed a SE Provider Agreement with OVR to render SE services to customers. New credentialing requirements have been put in place for CRP staff to better ensure OVR's goal of a consistent and quality customer experience for those receiving SE services. An emphasis on job stability as the driver of case success, as opposed to only meeting days of employment milestones, was another notable shift in OVR policy designed to meet the goal of improved, long-lasting placements.

*(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*

A determination of the need for extended services for youth with a disability begins during the initial assessment phase of a case. At that time, the rehabilitation team comprised of the youth, the youth's family, OVR staff, Case Manager/Supports Coordinator (if applicable), local education agency staff and others, determine possible long-term support needs and resources. As the case progresses, and the youth obtains employment, the individual's stability on the job informs the determination of the need for extended services and the timing of provision. Those who reach 80% or better independence on the job are considered job stable, and the case is followed for 90 days to ensure the expected progression to full independence with natural supports in place. For those at 80% or lower independence on the job after intensive job supports have been provided, there is an expectation of need for continued coaching and extended support services. If no other source of funding is available for the individual, OVR can provide extended services for up to 48 months for youth with disabilities using federal VR dollars. For cases with alternative funding, OVR must continue to follow-along for a minimum of 90 days after the case transitions to extended services. For those individual's with ODP funding, OVR entered into a joint bulletin that dictates when the case can move to ODP-funded extended services and documentation requirements.

*(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.*

OVR will seek opportunities to leverage other public and private funds to increase resources for extended services and expand SE opportunities for youth with the most significant disabilities. This will be done by exploring innovative partnerships and enhancing service coordination with agencies such as ODP, OMHSAS, OLTL and BJJS, as well as LEAs.

OVR has entered into a MOU with BJJS, in collaboration with PACTT affiliates, that leverages state and federal funding. These funds are targeted to provide a wide range of services such as the creation of summer programming, increased pre-employment transition services, and paid work experiences to promote career pathways in the underserved population of students/youth with the most significant disabilities who are involved with the juvenile justice system.

Funding for extended services is often available for customers eligible for Medical Assistance waiver programs administered through ODP and OLTL. Procedures are now in place for a youth's rehabilitation team consisting of the youth, the youth's family, OVR staff, Case Manager/Supports Coordinator (if applicable), LEA staff and others, to identify these resources at an early point in an OVR case. A joint bulletin between OVR and ODP now details when and how a case moves from OVR to ODP funding, including cases for youth with disabilities.

OVR has initiated an Employer Service Premium (ESP) for providers as an incentive to work with unserved/underserved populations including transition-age youth. Two of the 13 qualifiers for the ESP are the Age Premium Qualifier, which applies to OVR customers under the age of 25, and the Transition Premium Qualifier for customers who become employed within two years of graduation from secondary education.

**(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.*

**Goal #1: Increase Competitive Employment Opportunities for Individuals with Disabilities.**

In June 2018, Pennsylvania adopted the Employment First Act, Act 2018-36, 62 P.S. § 3401 *et seq.*, to ensure that individuals with a disability be given the opportunity to achieve economic independence through jobs that pay competitive wages in community integrated settings. The statute also created the Governor's Cabinet for People with Disabilities and the Employment First Oversight Commission. The Governor's Cabinet for People with Disabilities will review existing regulations and policies to recommend changes to laws, regulations, policies, and procedures that ensure implementation of Employment First. OVR has a key role in this initiative and, through the sub-goals below, will participate fully to increase employment opportunities for Pennsylvanians with disabilities.

1. Expand the availability of apprenticeships, internships and OJT for individuals with disabilities.

OVR's Business Services Division is well prepared to continue outreach to employers to increase opportunities for apprenticeships, internships, and OJTs for individuals with disabilities. OVR will keep the process simple by using a SPOC approach modeled after the CSAVR use of a national Points of Contact network when a business with multi-county or state operations seek VR talent across several states and Pennsylvania Workforce regions. OVR BSOD staff and District Office business services teams will participate in regional planning processes in partnership with local workforce development boards. Within each of Pennsylvania's workforce development areas, data analysis will be conducted to identify employment sectors that are most likely to account for job growth and expansion in the next five years.

In addition, the HGAC in Johnstown, Pennsylvania is consulting with the Pennsylvania Apprenticeship & Training Office to develop a pre-apprenticeship training program. A short-term, pre-apprenticeship training program will be designed to provide the necessary preparatory safety, skills, and certifications to individuals who are interested in entering registered apprenticeships. HGAC will provide the pre-apprenticeship training on site and registered employers will provide the technical training. Specific preparatory skills and certifications will be determined by participating employers, based on their industry's respective needs for skilled workers.

HGAC also offers internship/externship opportunities for credit within nine of the existing CTI programs, and additional externship opportunities with local businesses are in development.

2. Partner with the BWPO to ensure programmatic and physical accessibility of the PA CareerLink® centers for equal access for individuals with disabilities.

The District Administrators and some Assistant District Administrators in OVR's 21 District Offices participate in their local Workforce Development Board meetings regularly to further collaboration of efforts with the goal to lead to increased employment opportunities for Pennsylvanians with disabilities.

To promote programmatic accessibility, the BSOD has developed a comprehensive disability awareness and etiquette training that is delivered across the Commonwealth to interested PA CareerLink® partners and businesses. OVR has also made available to all Commonwealth employees an "Introduction to OVR" training to inform staff about the services OVR can offer to individuals with disabilities. OVR staff has received Leadership Training on the Americans with Disabilities Amendments Act to include strategies and modules for training businesses and customers on the Act.

3. Increase SE and Customized Employment outcomes; evaluate and monitor OVR's SE policy implementation.

A monitoring procedure is being established that will examine both internal and external factors of the SE program with the goal of improving the program and ultimately increasing outcomes. Internal monitoring will look at each OVR district office regarding utilization patterns of SE services: adherence to established procedures for referral; authorizations; report acceptance; invoice processing; and customer satisfaction and customer employment outcomes. Externally, OVR will monitor provider performance regarding timeliness of service provision and billing, adherence to established procedures throughout the process, customer and OVR satisfaction, and customer employment outcomes. Technical assistance and training will be offered by OVR staff to providers based on monitoring outcomes.

Recent changes to OVR's SE policy intended to increase/improve SE outcomes include: requiring provider staff to be credentialed; increasing the communication between OVR and provider staff working with a customer; offering a wider range of services to meet customer needs; and inclusion of extended supports.

## **Goal #2: Improve Transition Services for Students with Disabilities.**

OVR staff will remain at the forefront working with PDE personnel to increase pre-employment transition service opportunities for students with disabilities, as well as increasing opportunities for the development of workplace skills and community integrated work experiences.

1. Revise the model for pre-employment transition services for students with disabilities. Improve the Pre-Employment Transition Services program so that it provides services to students with disabilities in an efficient, documented, and cost-effective manner that aligns with federal regulations.
  - a. Develop internal controls that ensure services are provided to students based on an assessment of need.
  - b. Develop and utilize a continuum of services based on evidence based practices to demonstrate student progress.
  - c. Develop monitoring and program evaluation procedures to identify best practices that can be replicated throughout the state.
2. Increase opportunities for students to gain workplace skills and community integrated work experiences.
3. Enhance collaborative relationships with DHS, PDE and higher education institutions by:
  - a. ensuring that each secondary school in Pennsylvania has a point of contact;
  - b. participating in the Statewide Leadership Team;
  - c. collaborating in the development of the Pennsylvania Community on Transition Conference each year; and
  - d. participating in cross-training and attending partner conferences.

## **Goal #3: Increase Community Education and Outreach.**

1. Work with PaRC to identify and incorporate best practices and strategies to increase Customer Satisfaction survey response data.

OVR will continue to work closely with PaRC on developing ideas and plans to increase customer satisfaction. OVR provides PaRC with a monthly summary of the results from the customer satisfaction surveys. In addition, OVR staff participate in PaRC Customer Satisfaction Committee conference calls on a quarterly basis to discuss the results of these summaries. There have been some technical changes made in CWDS in an attempt to increase customer participation in this process, with minimal improvement. OVR is dedicated to working with PaRC to find additional creative ways to improve customer participation in the survey process.

2. Continue to develop stronger awareness among OVR staff of the cultural and linguistic differences and needs of unserved/underserved individuals with disabilities from cultural and ethnic minorities.

During 2018-2019, OVR conducted research on diversity and inclusion needs of unserved and underserved populations through a contract with the Pennsylvania State University Research Team. The research included three different phases: focus groups with representation from all 21 OVR District Offices; staff surveys; and key informant interviews of individuals who have a special knowledge or perspective on OVR and performance as it relates to diversity and inclusion. The outcome of this research, and associated benchmarks, will be used to guide OVR in the development of in-service training for staff, as well as future programmatic adaptations to stretch OVR's reach to those identified as unserved or underserved in Pennsylvania. A diversity and inclusion webinar training series is being planned for Spring 2020. In addition, recommendations were made by the research team for OVR to create a diversity and inclusion task force to develop a plan for continual implementation and monitoring of diversity and inclusion integration across the Commonwealth. OVR's goals during this next four-year plan will be to complete staff training in diversity and inclusion, and to develop a task force for continued implementation of a diversity and inclusion focus.

### 3. Promote accessibility and technology based upon universal design principles.

An important part of the rehabilitation process is evaluating the accessibility and technology needs of OVR customers. This takes place during the initial intake interview, continues throughout the life of the case, and is most important at the time when the individualized plan for employment is developed. Each customer has individualized needs and although not everyone will require assistive technology, this is an important practice. OVR has an AT Specialist onboard to assist staff with maximizing the use of AT and provide information about how AT can assist OVR customers to achieve their educational and employment goals. This specialist also supports OVR staff who have accessibility needs on-the-job when the organization is transitioning to new software or hardware devices.

The OVR Training Division is committed to ensuring that all training materials for OVR staff or external participants are available in accessible format before being released. In addition, the OVR Training Director schedules a Communication Access Realtime Translation (CART) service for each staff webinar or video conference training. CART service is also provided for any OVR scheduled public meeting, in addition to sign language interpreter services being available at every OVR district office. In the near future, a staff training series is being planned to demonstrate how to create accessible materials, and how to make sure that content and power-point presentations are universally accessible.

In addition, OVR collaborates with the DLI's BWPO via PA CareerLinks® to better assist veterans who have disabilities in obtaining assistive technology (AT) to remove barriers in locating and maintaining employment. OVR staff attends Pennsylvania Cares meetings to learn about AT and training programs offered by various community and state agencies and higher education institutions. OVR staff then disseminate this information statewide to OVR Veteran Coordinators and Veteran Counselors who provide AT equipment and training to OVR customers who are veterans with disabilities.

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

The Center for Assistive and Rehabilitative Technology at the HGAC in Johnstown, Pennsylvania is an available AT resource to OVR customers throughout the Commonwealth. Highly trained professionals evaluate and support people in the following areas of assistive technology: positioning and mobility; computer access; augmentative communication; environmental controls; driver evaluation; vehicle modification; devices for activities of daily living; devices for visual and/or auditory impairment; and home and work modifications. The Learning Technology Program assesses student's needs in the classroom and trains them in the use of assistive technology, if necessary.

PIAT's Lending Library provides the opportunity for any Pennsylvanian to borrow and assess the usefulness of an AT device prior to purchase. Devices may also be borrowed as a temporary accommodation (for employment, post—secondary education, or similar purposes). The centralized inventory for this program is located on the HGAC campus; devices are shipped to/from borrowers at no cost from this location. The regional subcontractors of PIAT facilitate the selection, borrowing, and use of these devices across the state.

Specific AT policies include: the Home Modification Policy, the Vehicle Modification Policy and the Farming and Agriculture Rehabilitation Management policy. These policies provide a wide range of AT evaluation and services detailed to meet the needs of OVR customers in removing environmental barriers to employment.

The VR customer can be provided AT services and devices throughout the rehabilitation process. Most important is that an assessment always precedes use of any AT device or service to ensure provision of such items is appropriate and necessary to meet the vocational needs of the individual.

OVR works with vendors who are Rehabilitation Engineers and AT Specialists on a "fee-for-service" basis throughout the Commonwealth. Most providers, including staff from HGAC's Center for Assistive and Rehabilitative Technology, can travel to the OVR customer's home and/or worksite to provide AT evaluation and training services.

In accordance with OVR's policies, OVR purchases AT devices and services to support its customers in their vocational goals. OVR also provides information and referral services regarding other resources when the agency is unable to provide funding for AT devices and services. OVR's Statewide AT Coordinator regularly distributes information electronically to OVR's District Offices regarding non-VR funded AT services, programs, and resources.

OVR collaborates with PIAT at the Institute on Disabilities at Temple University to participate in training, to maintain the Pennsylvania Assistive Technology Lending Library, to and develop AT resources for Pennsylvanians with disabilities.

Low interest loans are available through the Pennsylvania Assistive Technology Foundation for customers who have a disability or any older or state resident who has need for AT.

OVR also collaborates with BWPO via the PA CareerLinks® to better assist veterans who have disabilities obtain AT to remove barriers in locating and maintaining employment. The Statewide Veterans Coordinator attends Pennsylvania Cares meetings monthly to learn about assistive technology/training programs offered by various community and state agencies and higher education institutions. This information is transmitted statewide to

OVR Veteran Coordinators and Veteran Counselors in each field office who provide AT equipment and training to OVR customers who are veterans with disabilities.

OVR has collaborated with Penn State's AgrAbility Program and the Department of Agriculture in developing a policy to address the rehabilitation needs of farmers/ranchers with disabilities. This policy is known as Farming and Agriculture Rehabilitation Management which is designed to assist farmers with disabilities. VRCs, with technical assistance and guidance from Pennsylvania's AgrAbility Program, are able to assess the rehabilitation needs of farmers/ranchers with disabilities to provide the specialized rehabilitative and assistive technologies they may need to maintain their employment.

*(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.*

OVR, in collaboration with the Pennsylvania State University Research Team (PSRT), launched its 2018-2020 Diversity and Inclusion Initiative that consisted of two phases: research and training. The objective for the research was to consider the demographic shift of ethnic and racial populations within Pennsylvania, identifying the specific ethnic and racial groups representing underserved and unserved populations, as well as recognizing the needed service delivery by OVR. Based upon the research results and recommendations provided by PSRT, OVR will move forward in the training phase of the Diversity and Inclusion Initiative. These trainings for our staff will: define the concept of diversity and inclusion; include understanding barriers for underrepresented/underserved populations; outline the value and importance of diversity and inclusion; and provide substantial resources and strategies for our staff in providing services to the communities we serve.

In addition, OVR will incorporate 2016-2018 CSNA recommendations and strategies to develop stronger awareness among OVR staff of the cultural and linguistic differences and needs for individuals with disabilities from cultural and ethnic minorities. Specifically, OVR will increase training in culturally competent strategies for serving these communities. OVR will continue to strive to provide more staff, materials, resources and services in languages other than English which may be the dominate languages of some individuals with disabilities from cultural and ethnic minority communities as well as refugee communities.

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

OVR will collaborate with LEAs to assist youth in the attainment of competitive, integrated employment by increasing paid work experience opportunities and other career exposure experiences, such as job shadowing, mentoring, and employer mock interviews, in addition to SE services.

OVR has experienced significant growth and interest in customer participation in its Summer Academy programs. What started as an extended "freshman orientation" to college campus life for students with disabilities has evolved into numerous highly specialized, short-term programs for students and youth. The popularity of these programs has led OVR to the point where these programs need to be competitively bid, to

allow specialized service vendors to share with OVR and its customers their specialized programs and curricula to meet OVR customer individual needs in the most community integrated and least restrictive settings as possible.

OVR has also implemented a pre-employment transition services Workflow for the 2019-2020 school year that emphasizes OVR's role in meeting with school districts to assess their resources and the needs of their students. Once it is determined what services are needed by the school, OVR will work to fill that role with our staff. If we do not have the staff available, OVR will seek a provider to complete the service.

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

Starting in 2017, OVR, in collaboration with ODP, investigated and put into place the Certified Employment Support Professional (CESP™) ACRE, a credentialing process that recognizes individuals who have demonstrated a sufficient level of knowledge and skill to provide integrated employment services to a variety of populations. Specifically, ACRE certification endorses competency-based training in 2 areas:

1. Employment Services (basic and professional levels); and
2. Employment Services with an Emphasis on Customized Employment (basic and professional levels).

OVR has been encouraging the use of CRPs through the use of benefit counseling, by finalizing a Benefits Counseling Provider Agreement on March 1, 2018. Benefits counseling services are provided by CRPs across Pennsylvania and are considered an integral component in the development of employment goals. Individuals with disabilities seeking services through Pennsylvania OVR who receive Supplemental Security Income or Social Security Disability Insurance require skilled personnel to assist in the decision-making process. Certified benefits planers are sought to assist customers in identifying the potential impact of employment in the pursuit of independence. Having this type of support and individualized information can help individuals pursue their career goals with a better understanding and less worry about their benefits. These certified benefits planers are employed by CRPs. Information was disseminated to OVR field staff and CRPs through webinar trainings, in an effort to establish these services in additional CRPs across Pennsylvania.

Notations from a May 20, 2019, service review identified 47 service authorizations initiated for Benefits Consultation or Work Incentives Benefits Analysis within CWDS. The review also indicated three community rehabilitation programs have been approved and one community rehabilitation program is awaiting approval. field staff are additionally encouraged to enroll new CRPs and to encourage customer engagement in the process. OVR Comprehensive Assessment at the time of eligibility prompts the VRC to document the discussion concerning the availability of benefits counseling services. VRCs may review benefits counseling services throughout the life of the case and document their actions in a case progress note.

OVR has also been working to improve CRPs through monitoring of contract and grants. The monitoring of VR programs awarded through I&E contracts and/or AMs or provider agreements are routinely monitored by OVR using a standardized process and standardized tool. This process is outlined in the VR Services Manual. Both the vendor, as well as the local District Office, are afforded the opportunity to provide input regarding issues that

have an impact on projected customer outcomes. This monitoring information is used by OVR to establish, develop, improve, and realign community vocational rehabilitation services, and has been used to help with problem situations. This input is also of fundamental importance when OVR reviews and considers programmatic existing service contract renewals, amendments, and new service bids especially at the time of service and/or customer case review.

In addition, a SE Provider Agreement was developed to streamline the approval and onboarding of new SE (including Customized Employment) providers. Regular technical assistance and training calls, an SE provider email list, and SE resource accounts for technical and policy questions have been established and are being utilized for communication with and to support community rehabilitation programs. Efforts will be made to develop a standard monitoring tool and procedure with a timeline so that all of OVR's SE providers can benefit from direct feedback and technical support.

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

OVR has implemented a variety of measures to assist with the employment rate, measurable skills gains, and credential attainment of people with disabilities as indicated in Section 116 of WIOA.

1. OVR has implemented a comprehensive revision of our SE and Customized Employment programs which offers additional assistance, services, and short and long term follow up services to ensure that customers are placed appropriately and are able to maintain their employment.
2. OVR has required that SE and Customized Employment vendors have minimal credentials to provide these services to ensure better quality outcomes for our customers.
3. OVR has developed a comprehensive measurable skills gain training and documentation process within CWDS.
4. OVR routinely invests significant resources in training activities across the Commonwealth to ensure that customers are able to become employed in their chose career field.
5. OVR has partnered with the Office of Administration in offering a Commonwealth Internship program for our students in the Harrisburg area to work in a variety of Commonwealth agencies related to their degree.
6. OVR has partnered with CIL partners to offer internship opportunities at a variety of CIL locations across the state.
7. OVR has partnered with a variety of institutions of higher learning to offer supported education programs for customers on the Autism spectrum to ensure that they are able to successfully complete their college degrees and obtain community integrated employment post-graduation.
8. OVR continues to offer several summer academies that allow our customers to utilize AT, and be better prepared for college life and expectations which enables them to obtain credentials and lead to community integrated employment post-graduation.
9. OVR is partnering with ODP to share data to better track shared services and utilize long term supports to ensure mutual customers that become employed have the supports necessary to stay employed long term.
10. OVR has also introduced a variety of customer satisfaction surveys related to transition, SE, status 26 and status 28 closures to learn from our customers what services or supports were most impactful.

OVR has also implemented a comprehensive business services approach to serving the business community.

1. OVR’s statewide business service team serves as a SPOC for staff and businesses. In this role as a SPOC, business service staff offer training and technical assistance on business engagement, ADA consultation, placement trends, and activities. A SPOC also interfaces with business and industry to provide support and develop programs and partnership locations.
2. OVR has established local business SPOC for businesses for ADA questions and consultations, the placement of customers, and reasonable accommodation consultations, etc.
3. OVR has created multiple partnerships with businesses that are leading to placements and long-term opportunities for training and measurable skill development, or credential attainment for OVR customers.
4. OVR is working on an update to CWDS to track business engagement activities referred to as “indicator” #6 in WIOA Title I-IV. These business engagement activities measure common program effectiveness in serving employers, and are currently being developed by DLI Workforce System partners that include: OVR, PA CareerLinks®, the Statewide Workforce Development Board, CWIA, and Title II Adult Education Programs. See comparison chart below.

WIOA Common Measures of Effective Business Services by WIOA Categories:

- a. Workforce Recruitment Assistance;
- b. Strategic Planning/Economic Development Activities;
- c. Untapped Labor Pools Activities;
- d. Training Services;
- e. Incumbent Worker Training Services:
  - i. Rapid Response/ Business Downsizing Assistance; and
  - ii. Planning Layoff Response; and
- f. Employer Information and Support Services.

**WIOA Title I-IV Performance Indicators**

**WIOA Core Partner Crosswalk of Business & Employer Engagement**

**Table 3: WIOA Title I-IV Performance Indicators (1)**

<b>Service Categories</b>	<b>Reporting Specifications/Instructions</b>	<b>Workforce-Title I &amp; III</b>	<b>OVR- Title IV</b>
<b>Workforce Recruitment Assistance</b>	Enter the total number of establishments that, during the reporting period, received workforce recruitment assistance from staff or remotely through electronic technologies.	Event Attendance Job Development Website Technical Assistance (CWDS) Mass Recruitment	Total number of employers that received OVR assistance with: 1. Contacts regarding OVR talent pipeline for qualified pre-

	<p>Organizing, conducting, and/or participating in job fairs;</p> <p>Providing employers with meeting/work space at the One-Stop Career Center (or an affiliate site) for screening or interviewing;</p> <p>Conducting pre-employment testing, background checks and assistance in completion of the I-9 paperwork; and</p> <p>Providing employers with job and task analysis services, and absenteeism analysis.</p>		<p>screened candidates.</p> <p>2. Job fairs and hiring events for OVR talent in collaboration with One-Stop staff and partners at CareerLinks® and OVR District Offices.</p> <p>3. Coordination of talent acquisition with OVR partners.</p> <p>4. OVR outreach to CSAVR VR-NET out of state partners on talent.</p> <p>5. Job and task analysis.</p> <p>6. ADA accessibility of worksite and accommodation reviews.</p>
<p><b>Engaged in Strategic Planning/Economic Development</b></p>	<p>Enter the total number of establishments that, during the reporting period, were engaged in either workforce investment strategic planning or business growth and economic development strategic planning. These activities could include, but are not limited to, participating in community based strategic planning, sponsoring employer forums, securing information on industry trends, providing information for the purpose of corporate economic development</p>	<p>Job Analysis Job Development</p>	<p>Number of employer planning meetings, outreach events and trainings:</p> <p>1. Promote collaboration for employment of persons with disabilities.</p> <p>2. Business RoundTable discussions on finding talent, meeting business needs for growth, and human capital.</p> <p>3. Overcoming transportation</p>

	planning, and partnering in collaborative efforts to identify workforce challenges and developing strategies to address those challenges.		barriers for persons with disabilities.
<b>Accessing Untapped Labor Pools</b>	Enter the total number of establishments that, during the reporting period, established pipeline activities in partnership with the public workforce system. Activities include, but are not limited to, outreach to youth, veterans, individuals with disabilities, older workers, ex-offenders, and other targeted demographic groups; industry awareness campaigns; joint partnerships with high schools, community colleges, or other education programs to improve skill levels; and programs to address limited English proficiency, and vocational training.	Federal Bonding Prisoner Reentry Programs Veterans Program	Number of inter-agency contacts, meetings, outreach events and trainings: 1. Promote collaboration for student paid work-based learning experiences. 2. Hiring of veterans with disabilities. 3. Hiring of older workers with disabilities. 4. Hiring of ex-offenders served by OVR.
<b>Training Services</b>	Enter the total number of establishments that, during the reporting period, received publicly funded training assistance, including customized training, OJT, and incumbent worker training.	Accessibility Analysis & Solutions Disability Awareness & Diversity Training Programs Information	Consultation or trainings on: 1. ADA as Amended accommodation. 2. Accessibility. 3. Disability awareness. 4. Section 503 Federal Workforce diversity goals. 5. OJT wage reimbursement. 6. Pre-employment transition services

			<p>work-based learning experiences.</p> <p>7. Supported or customized employment and business based models to on-board qualified persons with disabilities.</p> <p>8. Use of Federal Schedule A in federal hiring and on-boarding.</p>
<b>Incumbent Worker Training Services</b>	Enter the total number of establishments that, during the reporting period, received publicly funded incumbent worker training assistance.	TBA	<p>Incumbent worker must be Most Significant Disability and OVR eligible.</p> <p>Consultation to employer on referral to OVR</p>
<b>a. Rapid Response/Business Downsizing Assistance</b>	Enter the total number of establishments that, during the reporting period, received an initial on-site visit or contact to either (a) discuss the range of rapid response services and other assistance available to workers and employers affected by layoff, plant closures, or natural disasters, or (b), as required by WIOA section 3(51) (A), plan a layoff response following notification of a current or projected permanent closure or mass layoff, including natural or other disasters.	Rapid Response Information Service	<p>Consultation and support to any affected business and their employees with a disability who may need OVR assistance.</p>

<b>b. Planning Layoff Response</b>	Of the total number of establishments reported in Row C.6, enter the total number of establishments that received an initial on-site visit or contact, as required by WIOA section 3(51)(A), to plan a layoff response following notification of a current or projected permanent closure or mass layoff, including natural or other disasters.	Trade Information Service Trade Petition Filed WARN Information Service	Consultation on OVR application process for any affected employee with a disability.
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**Table 4: WIOA Title I-IV Performance Indicators (2)**

<b>Service Categories</b>	<b>Reporting Specifications/ Instructions</b>	<b>Workforce</b>	<b>OVR</b>
<b>Employer Information and Support Services</b>	Total number of establishments that, during the reporting period, received staff-assisted services designed to educate them about and engage them in the local job market/economy and the range of services available through the local One-Stop delivery system. Information may be provided in a variety of service interventions including orientation sessions, workshops, or other business consultations (e.g., initial site visits). These services include, but are not limited to, providing information on:	OJT Contract Workforce Apprenticeship Contract Tax Credit Workshop LMI	Number of workshops, presentations to businesses on: 1. State or Federal persons with disabilities hiring Tax Credits (WOTC-VR credit). 2. General availability of OVR talent pipeline on current status 20 job ready customers. 3. OVR local plan to assist businesses in talent acquisition of high volume or high demand positions with One Stop CareerLink® and CRP collaboration.

	State and Federal tax credits or workforce investment incentives.		
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*(7) Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.*

WIOA has mandated that six federally funded programs work together to improve alignment, coordination, cooperation and collaboration in services to businesses. Programs included in this alignment include: Title I Workforce programs for Youth, Adults and Dislocated Workers; Title II Adult Education and Literacy programs; Title III Wagner-Peyser Act of 1933 Employment Services (American Job Centers known in Pennsylvania as PA CareerLink®), and title IV, the public VR program as defined by the Rehabilitation Act of 1973, *as amended*. This has led to a greater emphasis on student/youth career pathways, competitive integrated employment for persons with disabilities, and increased business engagement.

OVR will coordinate business outreach with PA CareerLink® staff, Pennsylvania economic development partners, community rehabilitation agencies, DHS ODP, OMHSAS, OLTL and other DLI BWPO multi–employer workforce partnerships.

OVR BSOD staff and District Office business services teams will participate in regional planning processes in partnership with local workforce development boards. Within each of Pennsylvania’s workforce development areas, data analysis will be conducted to identify employment sectors that are most likely to account for job growth and expansion in the next five years.

1. The employers in these key expansion sectors will be those that OVR and Workforce partners target for the highest level of business engagement, including discussions around establishment of work–based learning experiences.
2. All business services staff will utilize and share LMI published monthly from DLI’s CWIA with their district office VRC’s to promote career based IPEs likely to lead to successful employment and skill training to prepare for expansion or ‘super’ sector jobs in each region of Pennsylvania.

In response to an organization’s demand side workforce talent needs, OVR can suggest a recruitment process to bring qualified pre-screened individuals with a disability into their organization. OVR will work with each business to target career ladders and pathways for quality competitive integrated employment in career pathways matched to each VR consumer customer’s financial needs, unique aspirations, capacities and the talent succession plans of an employer. OVR will keep the process simple by using an SPOC approach modeled after CSAVR’s use of a national Points of Contact network when a business with multi-county or state operations seek VR talent across several states and Pennsylvania Workforce regions.

BSOD specialists or combined bureau staff will provide no-cost consultation to employers on disability etiquette, accessibility, accommodation needs and referral assistance to help retain an employer’s workforce following an injury or the onset of a disability upon request. OVR staff trained in the mid-Atlantic TransCen ADA Leadership models from Cornell University and BSOD specialists trained on the use of the Misericordia University

Comprehensive Accessibility Kit and the Americans with Disability Act Architectural Guidelines standards will provide non-legal, best practice disability etiquette training and on-site accessibility compliance reviews to employers and State agencies, upon request.

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

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

The 2015-2018 CSNA Report, jointly conducted by the Institute on Disabilities at Temple University, along with OVR, and PaRC, was used to develop the goals and priorities for this plan, along with the strategies that will contribute to the achievement of the goals for the 2020-2024 Pennsylvania WIOA Combined State Plan. A steering committee, including seven OVR employees and nine members of PaRC, met to discuss the requirements of the CSNA, and to develop the Statement of Work to guide the focus of the CSNA. An essential factor of this CSNA plan was to encompass the overall rehabilitation needs of people with disabilities throughout Pennsylvania, including those individuals served by other parts of the statewide workforce investment system. The goals and strategies described above align with goals and strategies recommended from the CSNA.

The continued focus on improving transition services for students with disabilities in this plan is consistent with a goal recommended from the CSNA, that OVR work to develop more holistic and equitable relationships and communication with school districts across the Commonwealth. OVR transition staff, including Early Reach Coordinators will continue to participate in activities in local school districts, work with students, and attend transition planning meetings.

OVR's goal to invest in a Diversity and Inclusion project is also supported in recommendations from the CSNA. OVR will use the research from the recently completed Diversity and Inclusion project with Penn State University to develop training for OVR staff beginning in 2020 directed toward: defining the concept of diversity and inclusion; understanding barriers for underrepresented/underserved populations; an outline of the value and importance of diversity and inclusion; providing substantial resources and strategies for our staff in providing services to the communities we serve. In addition, to develop stronger awareness among OVR staff of the cultural and linguistic differences and needs for individuals with disabilities from cultural and ethnic minorities, OVR will increase training in culturally competent strategies for serving these communities. OVR will continue to strive to provide more staff, materials, resources and services in languages other than English that may be the dominate languages of some individuals with disabilities from cultural and ethnic minority communities as well as refugee communities.

Customer Satisfaction continues to be an important topic from the CSNA and as described above in a renewed goal to continue work with PaRC to evaluate and improve on customer satisfaction surveys. OVR, in coordination with PaRC, will continue to evaluate ways the customer satisfaction surveys can be used to identify trends and patterns for service provision, will share this information with PaRC during customer satisfaction committee calls, and will work together to make improvements to the surveys and improve customer response rates.

Finally, the strategies planned through OVR's Business Services and HGAC to increase competitive integrated employment opportunities aligns with goals and priorities in the CSNA and the Employment First Act, Act 2018-

36. OVR's BSOD will continue to develop innovative partnerships with eligible educational and workforce providers beyond what is already established.

*(B) support innovation and expansion activities; and*

OVR will renew two I&E projects serving high school students with the most significant disabilities for another year of operation. These two I&E projects have been very successful in meeting the goals established for the past 3 years, and will be renewed for Year IV. One of these projects provided 39 students with a 90-hour work-based learning experience, which lead to a permanent competitive placement for 23 of those students. The second project developed, and is operating, Project SEARCH with an area hospital and school district. Eleven interns have completed the project and have been competitively employed.

*(C) overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State SE Services Program.*

Transportation rose as the most significant barrier to service provision and employment in the CSNA for both OVR customers and OVR staff. Many OVR customers live in rural counties with limited transportation options and these rural counties present similar difficulty for OVR staff who may have to travel two to three hours to visit a customer. OVR collaborates with employers to adjust work schedules and local transportation authorities to adjust and/or expand service routes that better enable OVR customers to get to work. OVR staff are encouraged to schedule multiple customer visits went traveling to rural counties. A second closely related barrier is the availability and use of technology such as texting and email. Some VR staff reported to still rely on paper mail as their primary form of communication with customers in rural areas. This can be problematic in areas where the postal system has stopped daily delivery of mail. Additional staff training on creative forms of communication and more clearly defined expectations in OVR polices related to communication is being considered. This can also benefit a third barrier related to counselor caseload size. While the average caseload size within OVR is 120 customers, some counselors have caseloads of 200 to 250 customers. With the closing of the OOS, we are recognizing the challenges staff are facing with increasingly complex case-management. Staff training is planned in the near future to begin to address some of these challenges and offer improved case-management strategies. A final barrier identified in the CSNA is related to inconsistent practice among OVR District Offices in the implementation of service provision to customers. Future staff training is again an avenue to improve the delivery of equable and consistent services throughout Pennsylvania.

OVR has seen a significant increase in the provision of pre-employment transition services to potentially eligible and eligible students with disabilities between 14 and 21 years of age (transition age in Pennsylvania). WIOA amendments to the Rehabilitation Act prohibit restricting the provision of pre-employment transition services, which resulted in Pennsylvania's program enrollment nearly doubling from 13,946 in Program Year 2016 to 25,601 in Program Year 2017. OVR is projected to again exceed 25K this year based on existing numbers, with the cost to provide these services far exceeding the minimum 15 % set-aside. To date, OVR has had to invest approximately \$93 million in the program as specified in the Bureau of Central Operations report for the June 2019 Pennsylvania State Board of VR quarterly meeting.

**(p) Evaluation and Reports of Progress:**

*VR and Supported Employment Goals. Describe:*

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

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

**1. Employment Opportunities for Individuals with Disabilities.**

- a. Expand the availability of apprenticeships, internships, and OJTs for individuals with disabilities.

OVR partnered with DLI's Apprenticeship & Training Office to increase apprenticeship opportunities. Over the past 13 months, 21 OVR customers have attended and graduated from the Syncreon Talent Academy. It is anticipated that 4 additional OVR customers will graduate on October 11, 2019. To date, 18 customers were offered employment at Syncreon, and 17 were hired. An additional customer has been offered a job and should start working in a few weeks. The Talent Academy is currently operating a 6-week pre-apprenticeship program.

Two additional OVR customers have entered apprenticeship programs at other employment sites.

Over the past 4 years, 185 OVR customers participated in several internship programs:

- i. **2018 to present: The Commonwealth Summer Internship Program for College Students** was coordinated by OVR and the Office of Administration. In 2018, approximately 18 OVR college students participated; in 2019, approximately 23 students participated. These paid, full-time 10-week summer internships were sponsored by OVR and offered to college students in good standing. Students were paid \$13.56/hour with the goal to provide relevant paid work experiences that matched each student's area of study and exposed the student to employment in public service.

Strategies:

1. In December 2017, the OVR Business Service team met with Human Resource to review a plan to offer OVR customers who have completed their freshman year of college a paid internship in an aligned state position that matches their college major. All participating state agency supervisors received training on disability awareness, accommodations, and effective communication strategies with student interns who are deaf, hard of hearing, low vision or blind, or who have cognitive impairments.
2. Recruitment materials and applications for the Commonwealth Internship Program were shared with all potential OVR customers from the Harrisburg and York district offices.
3. A video conference presentation about the program was offered to the participating district offices to outline how customers can apply and the selection process.

4. OVR Internship Specialist and Office of Administration staff interviewed all applicants. Final selections were made based on a competitive interview scoring.
  5. OVR customers and counselors were notified of their selection and state office internship assignment.
  6. Over the course of the internship, weekly OVR Specialist and Office of Administration staff educational group sessions were offered on topics, including disability disclosure and requesting accommodations, financial management, state civil service careers, OVR business services resources, and job search and placement upon graduation.
- ii. Annual Summer Pennsylvania Outdoor Corps.** The Corps works with Pennsylvania’s Department of Conservation and Natural Resources to conduct land and resource management activities in the State Park and Forest system. Since 2015, this program has been promoted within OVR. Annually, OVR has approximately 5-10 youth customers participate.
- Strategies:
1. Announcement on sites and dates for paid summer internship opportunities were sent to all OVR district office administrators, business services staff, and VR Counselors to share with OVR customers.
  2. Both college and high school aged youth were eligible. If hired, these individuals were supported with OJT wage reimbursement.
  3. These internships can lead to civil service jobs and careers in the PA Park system operated by the Dept. of Conservation and Natural Resources.
- iii. Centers for Independent Living (CIL) paid summer internship.** Starting in 2019, OVR, with the assistance of the Center for Independent Living in Harrisburg, PA, reached out to all CIL’s within Pennsylvania to explore their interest in offering a paid summer internships for OVR customers graduating from high school or in college. Approximately 6 CIL’s participated, offering 6 OVR customers a ten-week paid internship.
1. OVR Business Services Specialist sent information to all regionally aligned OVR district office administrators, business services staff, and VR counselors to share with customers.
  2. Each OVR district office and their regional CIL reviewed and selected customers to participate.
  3. Both college and high school aged youth were eligible. If hired, the individuals were supported with OJT wage reimbursement.
  4. These internships can lead to entrance level jobs in community human services organizations.

Over the past four years, approximately 1,721 customers participated in OJT wage reimbursement employment opportunities that resulted in either:

- i. Acquiring a work experience and job reference.** This has included summer and seasonal time limited employment in retail establishments, amusement parks, health care, municipal maintenance, and clerical positions.
- ii. Starting a permanent job leading to a successful rehabilitation outcome.** These cases are reflected in OVR’s annual 911 report highlighting the number of individuals placed into competitive integrated employment.

OVR's Business Services and Outreach Division staff have supported the Commonwealth Technical Institute/HGAC to explore eligibility of current certification programs and certificate skill trainings to become registered Apprenticeships or Pre-Apprenticeships:

- i. **Department of Labor and Industry Apprenticeship Training Office (ATO) collaboration.** Business Services Specialist, Center staff, and ATO region staff met to review potential registered apprenticeship status for the CVS retail associate and pharmacy technician, welding, logistics, and construction trades programs. Staff have also met with CVS to help promote the opportunity for “stackable skills training” for pre-apprenticeship in pharmacy technician and in building trades. Follow-up meetings between HGAC staff and ATO are on-going.
- b. OVR partnered with BWPO to ensure programmatic and physical accessibility of the PA CareerLinks®.

In 2019, the OVR Business Services Team and OVR District Administrators offered training to all PA CareerLink® sites on Disability Etiquette and ADA Leadership Training. These services were offered and provided by OVR staff trained in the mid-Atlantic TransCen ADA Leadership models from Cornell University, the Misericordia University Comprehensive Accessibly Kit, and the Americans with Disability Act Architectural Guidelines standards. These training programs were provided using a non-legal, best practice on disability etiquette training and on-site accessibility compliance standard to any employer or State agency, upon request.

Actionable items:

1. This plan and offer of support has been communicated by each combined bureau district administrator to their regional CareerLink® site administrator. An approved PowerPoint presentation developed by the OVR Business Services Division staff in collaboration with the Office of Administration is used.
  2. On August 13, 2019, OVR ADA accessibility reviews and assistance to each CareerLink® location was reviewed in a presentation to the quarterly meeting of the State Workforce Development Board on OVR WOIA Title IV services and collaboration with Title III CareerLink® partners.
- c. Create and expand IGAs between OVR and local Career and Technology Centers and other community-based organizations.

OVR entered into an IGA with BCTC effective October 1, 2014, to provide school-to-work transition services to OVR eligible students with disabilities who are enrolled in approved training programs at BCTC and attend one of 16 public school districts within Berks County. The IGA was updated in October 2018 to include specific language regarding pre-employment transition services and services to potentially eligible students. BCTC served 68 students to date in FFY 2019, where 100% of the students received workplace readiness instruction, 84% of the students participated in at least one form of work-based learning experience prior to graduation, 100% of the students received job development and placement services and career training services prior to graduation, and 89% of the graduates were placed in community-integrated employment or post-secondary education.

A second IGA was developed between SDoL and OVR to provide school-to-work transition services for OVR eligible students with disabilities enrolled in education supports at SDoL. Services provided through

this IGA are divided into two separate paths. Pathway One is identified as “Employability and Career Readiness” and Pathway Two is identified as “College and Career Readiness.”

During the past two school years (2017-18 and 2018-19) of the Employability and Career Readiness Program at SDoL: 83 OVR eligible students with disabilities received employability skills, career readiness training, and transition services; 47 students participated in at least one form of work-based learning experience; 5 students were employed by employers and were provided small group training; and 5 students were employed with employers and were available for individual high needs students cases. Of the students who received services, 39 students participated in extended work site training (job coaching), and 15 students were placed in competitive, community integrated employment consistent with their IPE.

During the past two school years, the SDoL College and Career Readiness Program provided 24 OVR eligible students with college/career readiness training and transition services, and 17 of these students were placed in post-secondary education consistent with their IEP.

## **2. Increase/Improve Transition Services for students with Disabilities**

- a. Increase pre-employment transition services for students with disabilities.
  1. OVR continues to approach pre-employment transition services implementation through three avenues: staff, fee-for-service agreements, and contracts. The WIOA amendments to the Rehabilitation Act require that a minimum of 15% of VR Funds must be used for pre-employment transition services, and this results in an increase in the amount of VRC time and responsibilities dedicated to services for transition-age youth. Pre-employment transition funds for the FFY 2019-2020 are estimated to be \$20 million. In the previous FFY, OVR spent more than 15% of its VR funds on pre-employment transition services. OVR has increased pre-employment transition services for students by expanding the number of summer programs since the previous State plan. In addition to the Summer Academies for Visual Impairment, Deaf and Hard of Hearing, and the AACHIEVE Program that is a collaboration with BSE, most of the local district offices offer summer programs for post-secondary training or work experiences. OVR has developed Pre-Employment Transition Services Provider Agreements so that OVR can utilize over 150 providers to ensure as many students as possible are being served, in addition to the services being provided by OVR staff.
  2. Increase opportunities for students to gain workplace skills and community-integrated work experiences. OVR works to increase customer outcomes (26 closures and work-based learning experiences) through: increased engagement with multiple employers; use of permanent and non-permanent OJT's; increased awareness of internships, both paid and nonpaid, and apprenticeships; and involvement with Work Partners at Career and Technology Centers (example: BCTC). BCTC served 68 students to date in FFY 2019: 100% of the students received workplace readiness instruction; 84% of the students participated in at least one form of work-based learning experience prior to graduation; 100% of the students received job development and placement services and career training services prior to graduation; and 89% of the graduates were placed in community-integrated employment or post-secondary education.

- b. Enhance collaborative relationships with DHS, PDE, and higher education institutions.  
**Experience the Employment Connection** – OVR continues interagency training efforts through Experience the Employment Connection (EEC): Possibilities in Action. Continuing in 2019, EEC is a joint training initiative between OVR, ODP, OMHSAS, and PDE’s BSE. Driven by the Governor’s Executive Order on Employment First, EEC’s goal is to increase competitive, integrated employment for Pennsylvanians with disabilities, including students with disabilities, by connecting professionals across these systems. Participants learn about staff roles, policies, procedures, funding requirements, and emerging practices related to improving services to adults and high school students. The Roadmap, developed by the joint agencies, explains available interagency supports for customers, families, and other professionals. Close to 4,000 interagency professional staff have participated in these training sessions aimed at identifying needs, improving services and competitive employment opportunities for adults and students with disabilities.
  
- c. Expand BBVS Overbrook School for the Blind Summer Transition Initiative to create summer employment opportunities for transition age students who are blind.  
The Overbrook Summer Transition Institute served a total of 21 students in 2018 and 2019. This program provided opportunities for students who are blind or visually impaired to engage in paid work experiences not otherwise available to them. The Institute ran for three weeks using braided funding with BBVS and Overbrook funds covering the program costs in 2019. Students participated in various career exploration and work experience activities including a 4-day internship. The students worked at the following 5 locations: Lighthouse Café, Farm to Table Development Office, Couch Tomato Café, Cold Stone Creamery and Weston School. Each student earned \$164.00 for 16 hours of work experiences.
  
- d. Research best practices for the implementation of peer mentoring opportunities.  
As of September 1, 2019, the Pennsylvania Certification Board is overseeing the certification process for Certified Peer Support Specialists. Peer Support Training was provided to 137 individuals who were 18 years old & over during the period of July 1, 2017 through June 30, 2019. OVR is working with OMHSAS to identify formal pathways within which to develop training and implementation of Peer Supports within Pennsylvania.

### 3. Increase Community Education and Outreach

- a. Work with PaRC to share best practices and outreach methods to increase participation in the Citizens Advisory Committee meetings.  
OVR District Office Administrators continue to be involved in supporting the organization and planning for local Citizen Advisory Committee meetings. OVR Central Office representatives participate regularly on the PaRC Citizen Advisory Committee conference calls and follow-up as needed with local planning.
  
- b. Continue to grow OVR’s social media presence.  
In collaboration with DLI’s Press Team, OVR’s Social Media Coordinator works to ensure OVR has active Facebook, Twitter, Instagram and LinkedIn accounts. As of September 2019, OVR has **7,749** followers across all social media channels. From July 1, 2018 to June 30, 2019, OVR’s posts reached **675,695** individuals. OVR’s social media accounts are as follows – Facebook: @PAVocRehab; Twitter: @PA\_OVR; LinkedIn: OVR; and Instagram: @PA\_OVR.

- c. Educate staff on accessibility and technology based upon universal design principles. Within OVR, we continue to promote accessibility by reviewing forms and presentation materials, revising as needed. We've also advocated for, and achieved revisions to, Human Resource forms (e.g., the request for accommodations), continuing to do so as issues are identified. In October 2018, all OVR staff were invited to attend a virtual training session titled "Designing Accessible Presentations: An Ethical Obligation." To extend information beyond just OVR, OVR staff met with the Commonwealth's Web-Based Training (WBT) team in March 2019 to educate and advocate for accessibility of mandatory Commonwealth trainings. Revisions and collaboration have been ongoing, enhancing the accessibility of WBT training products. In May 2019, OVR extended information beyond Commonwealth staff by offering a similar training to all scheduled presenters for the 2019 Community on Transition Conference to enhance conference accessibility. OVR is an active participant in accessibility based reviews of current and upcoming Commonwealth WBTs. Since 2017, OVR has, and will continue to, offer web accessibility consultation to the Governor's Office regarding the development of pa.gov and governor.pa.gov sites and content. In 2019, OVR provided accessibility specific reviews of the employment.pa.gov site that hosts employment opportunities for Pennsylvanians. OVR continues to support the ongoing development of CWDS by working with developers to remediate existing accessibility failures, and provide feedback regarding future developments. OVR continues to support staff who use assistive technology by offering in-house or contracted training opportunities to increase staff proficiency. OVR has also developed a partnership with the Bureau of Administrative Services and the Office of Information Technology to remediate in a timely manner DLI forms identified as inaccessible. Raising awareness of document accessibility is an ongoing need that can be addressed one document, one website, one person at a time. The OVR teams actively seize opportunities to enhance accessibility as they arise.

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

With the low unemployment rate over the past few years, there have been many entry level, lower wage jobs available. However, Supplemental Security Income/Social Security Disability Insurance recipients are reluctant to give up their benefits for a job that will not replace the income and benefits they are currently receiving.

Transportation remains a difficult issue for many job candidates. Since many customers do not have a driver's license or do not own a vehicle, they are dependent upon family and friends, public transportation or other special transportation services to get to and from work. OVR is collaborating with employers to adjust work schedules and with transportation authorities to adjust and/or expand services that better enable OVR customers to become gainfully employed. OVR staff participate on the local transit advisory committees. For example, the Capital Area Transit Persons with Disabilities Advisory Committee has developed a subcommittee related to Travel Training for elderly individuals and people with disabilities. OVR is providing training consultation along with disability knowledge and expertise to this committee. The Secretary of Labor and Industry sits on the Governor's Employment First Cabinet Transportation Committee. OVR staff also attend these meetings to support the need for accessible, affordable transportation across the Commonwealth for persons with disabilities seeking gainful employment.

Staff turnover continues to adversely impact the agency's job placement expertise. OVR has renewed its emphasis on quality employment outcomes by reinstating targeted staff training regarding effective employment strategies. The six-part training webinar series focuses on Basic Business Services, Labor Market Intelligence, Customer Job Readiness, Enhancing the Job Search, Effective Business Outreach, and Business Services and Ethical Considerations. It is intended to quickly advance the skills of newly hired VRCs and reinforce the knowledge skills of more experienced staff.

*(2) An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:*

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

SE services are a vital part of OVR programming. SE services secure employment for individuals with the most significant disabilities who would not experience an employment outcome from less intensive job placement methods. It is anticipated that approximately 7,065 Pennsylvanians with the most significant disabilities will receive SE services in FFY 2020. Of this number, approximately 250 youth with the most significant disabilities will be funded out of the approximate \$650,000 in Title VI Funds anticipated for distribution to Pennsylvania in FFY 2020.

A completely revamped OVR SE policy and related procedures were introduced in 2018. The new policy contains changes designed to address OVR's goals of increasing services to unserved/under-served populations, ensuring successful employment outcomes by emphasizing job stability, increasing communication and partnerships among OVR partners, and ensuring quality service provision by requiring provider credentialing and offering provider incentives. All referral, reporting and billing activities were moved to an online, paperless system for more efficient and streamlined processes.

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

A significant decrease in Title VI funds allocated to OVR impeded the achievement of the goals projected for 2019. Additionally, outcome measures were impacted due to the extensive training and technical assistance that was needed for the changes detailed above, along with converting cases over to OVR's new SE system. As year one of the new process comes to a close, OVR hopes to use the enhanced ability to collect data through the online system to aid in gathering performance feedback for OVR District Offices and CRPs that can be used for future improvements and enhancements.

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

During Program Year (PY) 2018-19, OVR served nearly 70,000 individuals with disabilities, worked with over 6,000 employers, and assisted more than 7,400 individuals with disabilities to obtain or maintain competitive integrated employment. Additionally, OVR and our partner providers continue to deliver an extensive array of pre-employment transition services to over 25,000 students with disabilities annually across Pennsylvania.

In accordance with WIOA Section 506(b), the performance accountability system requirements of WIOA Section 116 took effect July 1, 2016. However, the U.S. Department of Education exercised its transition authority under WIOA Section 503 to ensure the orderly transition from the requirements under the Workforce Investment Act to the requirements under WIOA. As such, the performance accountability system requirements for the WIOA Title IV VR program went into effect July 1, 2017, at which time OVR began collecting and reporting data related to certain performance indicators under WIOA through the quarterly submission of the federal RSA-911 report.

Only one of the six performance indicators is currently being reported and published by the RSA in the WIOA Statewide and Local Performance Reports (WIOA Annual Reports): Measurable Skill Gains. Data driving the remaining five performance indicators will be progressively available and reported as part of OVR's WIOA Annual Report over the next four years. As part of the PY 2018 WIOA Annual Reports, expected to be published by the RSA in Spring 2020, two additional performance indicators under WIOA Section 116 will be reported: Employment During the 2<sup>nd</sup> Quarter after Exit and Median Earnings During the 2<sup>nd</sup> Quarter after Exit.

The RSA published PY 2017-18 WIOA Annual Reports for each state in April 2019, which contained the Title IV performance under the Measurable Skill Gains indicator. For PY 17-18, OVR's published Measurable Skill Gains rate was 15.9% of participants who met the criteria to be included in the indicator.

The 6<sup>th</sup> indicator, "Effectiveness in Serving Employers," will be piloted using 2 of the 3 approaches identified by Section 116 of WIOA. The following 6 Measures will be used to develop the data needed to report on the "Effectiveness in Serving Employers" indicator.

#### **Measure #1. Employer Information and Support Services (future use of CWDS Business Design Tool)**

Total estimated number of employers that received annual OVR assistance with:

1. contacts regarding OVR talent pipeline for qualified pre-screened candidates – 4000;
2. job fairs and hiring events for OVR talent in collaboration with One-Stop staff and partners at CareerLinks® and OVR District Offices - 100;
3. coordination of talent acquisition with OVR partners - 100;
4. OVR outreach to CSAVR VR-NET- 50;
5. job and task analysis - 100; and
6. ADA accessibility of worksite and accommodation reviews - 20.

#### **Measure # 2. Engaged in Strategic Planning/Economic Development**

Estimated number of employer planning meetings, outreach events, and trainings:

1. promoting collaboration on persons with disabilities employment - 100;
2. Business RoundTable discussions on finding talent, meeting business needs for growth and human capital - 8; and
3. overcoming transportation barriers for persons with disabilities - 10.

#### **Measure # 3. Accessing Untapped Labor Pools**

Estimated number of inter-agency contacts, meetings, outreach events and trainings:

1. promoting collaboration on student paid work-based learning experiences - 2888;
2. hiring of veterans with disabilities - 5;
3. hiring of older workers with disabilities - 10; and
4. hiring of ex-offenders served by OVR - 25.

#### **Measure # 4. Training Services**

Estimated consultations or trainings on:

1. ADA as Amended accommodation, accessibility - 50;
2. disability awareness - 50;
3. Section 503 Federal Workforce diversity goals - 10;
4. OJT wage reimbursement - 1241;
5. pre-employment transition services work-based learning experiences - 25,000;
6. supported or customized employment and business based models to on-board qualified persons with disabilities - 4000; and
7. use of Federal Schedule A in federal hiring and on-boarding - 10.

#### **Measure # 5. Incumbent Worker Training Services, Rapid & Layoff Response**

Incumbent workers must be Most Significant Disability and OVR eligible.

Estimated consultation to employer on referrals to OVR - 0.

#### **Measure # 6 Employer Information and Support Services**

Estimated number of workshops, presentations to businesses on:

1. state or Federal persons with disabilities hiring Tax Credits (WOTC-VR credit) - 300;
2. general availability of OVR talent pipeline on current status 20 job ready customers – 300; and
3. OVR local plan to assist business in talent acquisition of high volume or high demand positions with One Stop CareerLink® and CRP collaboration - 1000.

All BSOD specialists and combined bureau staff will be trained in the use of the CWDS business design tool to create a statewide OVR business services case management system to track the following: all employer contacts, consultations on disability issues, ADA accessibility compliance, people with disabilities recruitment, job fairs, job shadowing, development of work-based learning experiences, and development of apprenticeship and pre-apprenticeship trainings. All apprenticeships and pre-apprenticeships will be eligible for local workforce board approved Eligible Training Provider List designation and individual training accounts that are also accessible to CareerLink® served TANF, dislocated workers, veterans, youth, and returning to work homemaker participants.

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

Since January 1, 2016, OVR has awarded more than \$11M to providers to support the development and operation of 24 I&E projects. Of these projects, 23 provided pre-employment transition services to high school students with significant disabilities. The remaining I&E project, supported by joint OVR and ODP funds, provided for staff from 12 community rehabilitation providers to receive training and certification in Discovery and Customized Employment.

To date, 4,801 students with significant disabilities received services through the 23 I&E projects: 302 students entered competitive employment; 74 students entered post-secondary education; and 3 students entered military service. Three I&E Projects provided “transition from school to work” related education, information, support and services through informational sessions and workshops to a total of 4,146 students, parents/family members of transition aged youth, and transition professionals, to facilitate the understanding of and participation in the “school to work transition” process. The informational sessions and workshops were attended by 1,835 high school students with their parents or a transition professional.

Ten I&E projects provided 2,680 high school students with a work-based learning experience and 2,081 students successfully completed a 90-hour work-based learning experience in a competitive employment site in the community. For most of these students, this work experience was their first opportunity to learn work skills, specific job tasks, workplace safety and to interact with employers and co-workers on the job. These 10 I&E contractors exceeded the expectation of providing students with a paid 90-hour work-based learning experience; as successful outcomes, well beyond the scope of these projects, 197 students obtained competitive employment, 55 students participated in post-secondary education and 3 students entered the military.

**(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.*

OVR provides SE services to Pennsylvanians with disabilities through a network of CRPs. Services provided through these vendor partners are described below.

**Background** Beginning in the early 1980s, OVR developed a system of SE services using a fee-for-service payment system. Initially, 17 CRPs of SE services were funded through a 5-year, OSERS, Title III SE State Change Grant. In the 1990s, SE services expanded to include transitional employment for individuals with significant mental health disabilities through the Clubhouse model and the addition of contracts with CRPs fluent in American Sign Language to serve OVR customers who are deaf. In 1999, OVR moved to a milestone SE method called “Performance Based Job Coaching” (PBJC), the format of which was developed based on research OVR did in the mid-1990s to determine best practices for provision of SE services. PBJC went through review and revision in 2013-14 to improve the format. In 2015, OVR piloted Discovery and Customized Employment to further expand the range of SE services to better serve individuals with the most significant disabilities. A complete overhaul of OVR’s SE policy and procedures occurred from 2016-18 brought about by recommendations of a SE Workgroup and new regulations stemming from WIOA. Changes included a revision of the PBJC milestones and pay structure to correspond with a customer’s job stability, a move from LOUs with CRPs to a SE Provider Agreement, the inclusion of Discovery/Customized Employment in SE policy, the addition of new SE services to better meet the diverse support needs of OVR customers, and an enhancement of extended services to align with WIOA regulations and improve long-range outcomes. The entire SE process, from referral to reporting and invoicing, was moved to a computerized system which was rolled out July 1, 2018. There are now more than 160 approved SE providers, with 40 providers approved to render Discovery/Customized Employment services.

**Quality Standards** OVR provides extensive, ongoing training and technical assistance for internal staff and CRP staff on the SE policy and procedures. Trainings are offered in-person and virtually through webinars, videoconferences and conference calls. Since March 2018, 6 in-person presentations, 9 webinars, 3 statewide videoconferences, 3 conference presentations, a series of email information blasts, and on-going internal and external Skype conference calls have been utilized to introduce OVR’s new SE policy and procedures and provide ongoing support.

Previously, CRPs became SE providers for OVR through an LOU. Monitoring of these CRPs was conducted on a two- and four-year cycle by OVR's Contracts and Grants division through the use of provider report cards, staff surveys, and desk and on-site reviews. With the move to the new SE system, procedures are under development for monitoring both internal processes and CRPs. Internal monitoring will involve OVR statewide and District Office "report cards" based on data from electronic tracking of service authorizations and payments and individual case reviews with a focus on SE processes and outcomes. External monitoring will include: provider report cards, a District Office survey of provider performance, and on-site monitoring visits.

**Scope and Extent** SE services include assessment, planning/coordinating, job customization, placement, coaching, mentoring, and retention. All services are provided on an individualized basis and specific vocational goals are determined by the individual's needs and preferences. Populations receiving SE includes individuals with developmental and intellectual disabilities, mental illness, physical disabilities, blindness, deafness, autism and traumatic brain injury. SE services are also available within the special education, mental health and developmental disability service systems. OVR is actively engaged in collaborative relationships with these systems to ensure the provision of effective services, to reduce duplication of efforts, to share resources, and improve employment outcomes for those mutually served by multiple systems.

In Pennsylvania, sources of funding for extended services are available to ensure long term supports for those who require them. For example, ODP and OLTL have funding for extended services for those customers who receive waiver funding through these agencies. Actual funding available from ODP and OLTL varies from county to county. OVR also has a limited amount of funds through state VR money for customers who do not have other sources of long-term funding. Other resources sought for extended service funding are natural supports, SSA work incentives, and private foundations.

*(2) The timing of transition to extended services.*

The determination of an individual's need for extended services begins during the initial assessment phase of a case. At that time, the rehabilitation team – the customer, the customer's family, OVR staff, Case Manager/Supports Coordinator (if applicable), and others – determine possible long-term support needs and resources. As the case progresses, the individual's stability on the job informs the determination of the need for extended services and the timing of provision. Those who reach 80% or better independence on the job are generally considered job stable and the case is followed for 90 days to ensure the expected progression to full independence with natural supports in place. For those at 80% or lower independence on the job, there is an expectation of need for continued coaching and extended support services. If no other source of funding is available for the individual, OVR can provide extended services up to 24 months for adults using only state appropriated funds and 48 months for students with disabilities using federal VR dollars. Regardless of alternative funding source, OVR continues to serve individuals for a minimum of 90 days after transitioning to extended services. For those individual's with ODP funding, OVR entered into a joint bulletin that dictates when the case can move to ODP-funded extended services and documentation requirements.