

VOCATIONAL REHABILITATION

Program-Specific Requirements for State Vocational Rehabilitation Services Program

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of the Workforce Innovation & Opportunities Act (WIOA).

(a) State Rehabilitation Council.

All VR agencies, except for those that have an independent, consumer-controlled commission, must have a State Rehabilitation Council (Council or SRC) that meets the criteria in section 105 of the Rehabilitation Act. The designated State agency or designated State unit, as applicable, (select A or B):

(A) is an independent State commission.

(B) has established a State Rehabilitation Council.

In accordance with Assurance 3(b), please provide information on the current composition of the Council by representative type, including the term number of the representative, as applicable, and any vacancies, as well as the beginning dates of each representative's term.

Table 1: Current Composition of the Council

Council Representative	Current Term Number/ Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	2 nd Term	07/12/2023
Parent Training & Information Center	1 st Term	10/11/2022
Client Assistance Program	2 nd Term	07/12/2022
Qualified VR Counselor (Ex-Officio if Employed by the VR Agency)	1 st Term	10/11/2022
Community Rehabilitation Program (CRP) Service Provider	1 st Term	09/21/2021

Council Representative	Current Term Number/ Vacant	Beginning Date of Term Mo./Yr.
Business, Industry & Labor	1 st Term	4/10/2023
Business, Industry & Labor	2 nd Term	07/12/2022
Business, Industry & Labor	1 st Term	08/28/2023
Business, Industry & Labor	Vacant	N/A
Disability Advocacy Groups (Physical Disabilities)	2 nd Term	07/12/2022
Disability Advocacy Groups (Sensory Disabilities)	1 st Term	9/21/2021
Disability Advocacy Groups (Mental Health)	2 nd Term	07/12/21
Disability Advocacy Groups (Sensory Disabilities)	2 nd Term	07/12/2021
Disability Advocacy Groups (Intellectual Disabilities)	1 st Term	07/21/2022
Current or Former Applicants for, or Recipients of, VR Services	2 nd Term	07/12/2023
Section 121 (AIVRS) Project Directors in the State (as applicable)	N/A	N/A
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	2 nd Term	07/12/2023
State Workforce Development Board (WDB)	Vacant	N/A
VR Agency Director (Ex Officio)	1 st Term	N/A

If the SRC is not meeting the composition requirements in section 105(b) of the Rehabilitation Act and/or is not meeting quarterly as required in section 105(f) of the Rehabilitation Act, provide the steps that the VR agency is taking to ensure it meets those requirements.

The PA Rehabilitation Council (PaRC) does not currently have a representative from the State Workforce Development Board (WDB);

however, the Executive Director of the WDB is aware of the vacancy and supportive of filling it. He regularly reaches out to WDB members to encourage volunteers, as he is not able to serve due to the nature of his position with the Commonwealth. In the absence of an official member, the WDB Executive Director regularly assigns staff members from workforce-related Commonwealth agencies to attend PaRC committee meetings and share relevant information. OVR, PaRC and the WDB are in regular communication regarding the need to fill this position and will continue to pursue a representative. The PaRC is also actively seeking a fourth representative for Business, Industry & Labor.

In accordance with the requirements in section 101(a)(21)(A)(ii)(III) of the Rehabilitation Act, include a summary of the Council's input (including how it was obtained) into the State Plan and any State Plan revisions, including recommendations from the Council's annual reports, the review and analysis of consumer satisfaction and other Council reports.

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

1. PaRC Annual Report (State Fiscal Year [FY] 2021-2022)
2. OVR Customer Satisfaction Surveys
3. Review of items in the 2022 State Plan Attachment (Description A)
4. Comments received at 2022/2023 State Plan Meetings
5. Comprehensive Statewide Needs Assessment (CSNA) Program Years (PY) 2019-2022 OVR/Institute on Disabilities at Temple University
6. Local Citizen Advisory Committees (CAC) meetings and/or minutes
7. Quarterly reports received from OVR at PaRC Full Council meetings

Provide the VR agency's response to the Council's input and recommendations, including an explanation for the rejection of any input and recommendations.

Commendation: The Council commends OVR for reopening the Order of Selection (OOS) and their work on the Financial Needs Test (FNT) and College Policy, thus providing many more opportunities for people across the Commonwealth to participate in VR and secure Competitive Integrated Employment (CIE).

Recommendations:

1. Empower Individuals paid subminimum wages through 14(c) Waivers to obtain CIE.

Issue: Many individuals who are paid subminimum wages through employers that hold certificates issued under section 14(c) of the Fair Labor Standards Act have stated a desire to receive the supports necessary to move into CIE. Potential barriers may include lack of contacts available outside of the workshops for families and individuals, communication between workshops and families, family resistance or decisions being made by families on behalf of individuals, individuals determined in-eligible for services, and a lack of benefits counseling during initial contact with providers.

Recommendations/Measurable goals:

1. Expedite the Integrated Vocational Engagement & Support Team (InVEST) Project to assist individuals with disabilities, families, and community businesses with CIE engagement, supports and services/resource coordination.

OVR Response: Year One is in progress to establish foundation according to the proposal submitted to RSA in preparation for Year Two when the InVEST Project will begin implementation.

2. Upon availability, OVR shares reports and data identifying the main cause of individuals remaining in 14(c) workshops.

OVR Response: Currently, there is no report as to why individuals choose to remain in 14(c) facilities; however, our Section 511 VR Specialists continue to conduct informational presentations to those individuals within the 14(c) facilities and complete applications for those interested in OVR services.

3. It is imperative that people with disabilities are: 1) included in the process of identifying how these barriers are removed, and; 2) provided creative solutions/presentations from people with full professional and lived experiences to ensure better outcomes for participants.

OVR Response: Our Section 511 VR Specialists will continue to provide information on how a person in a 14(c) facility can transition to CIE. They will also provide referrals to District Offices for any person interested in CIE. Through in InVEST Project, OVR is running advisory committees and will use the feedback to implement further strategies to help Customers in 14(c) facilities exit to CIE.

2. Leverage resources, heighten understanding, and provide additional staff trainings in OVR District Offices to better serve Customers with mental health needs

Issue: According to the findings listed in the CSNA, people with mental health needs have been identified as one of the most underserved communities in the Commonwealth of Pennsylvania (PA) because, “many individuals with mental health needs do not recognize themselves as part of the disability community and understand that they can access VR services. This lack of understanding coupled with stigma results in individuals not getting access to necessary accommodations. There is also a lack of training and funding for providers to support individuals with mental health needs.”

Recommendations/Measurable Goals:

1. All OVR District Offices will collaborate with local mental health providers and obtain resources within their region to:
 - a. Provide necessary accommodations for people with mental health needs seeking VR services.
 - b. Perform community outreach and inform people with mental health needs about their rights to VR services.
 - c. Provide training, information, and resources to OVR counselors, staff, and VR providers to help identify behaviors that may exhibit the need for mental health services.

OVR Response: OVR will continue to provide outreach and onboard new providers to enhance services to those with mental health disorders. OVR will make training available to all staff through in-service trainings and outsource trainings as appropriate and collaborate with the PA Office and Mental Health & Substance Abuse Services (OMHSAS).

3. Recovery Efforts from the many impacts of COVID-19

Issue: Since March 2020, when physical distancing protocols began in PA, issues with VR services have been exacerbated on all sides, including those who have experienced the lasting effects from COVID-19 or long-COVID, delayed VR services, disruptions to Pre-Employment Transition Services (Pre-ETS), and the lack of communication, interaction, and response for those seeking services.

Recommendations/Measurable Goals:

1. Expedite all VR services/cases that have been delayed since March 2020 due to the impacts of COVID-19.

OVR Response: Currently all cases on the waitlist have been served and those who were not able to participate in OVR services during the pandemic for health, personal, or other reasons, will be encouraged to apply. The OVR OOS is open to all three categories based on internal priority selection policies.

2. Provide a timeline for expedited services for those who have experienced delays with Pre-ETS due to the impacts of COVID-19.

OVR Response: Rapid Engagement initiatives have been put into place since October 2022 to expedite the referral, application, and eligibility processes. OVR's referrals and Pre-ETS participation rates continue to increase steadily. OVR will continue to outreach to schools and other stakeholders to generate other referrals.

3. Within 30 days of the adoption of the State Plan, interact personally at least one time with individuals whose cases have been delayed or inactive since March 2020 either by phone, in-person meeting, or virtual meeting.

OVR Response: Through the months of April-June 2023, OVR conducted a Lean 5S Project requiring all staff to reach out to existing customers and ensure they are actively engaged. If they were not actively engaged, staff updated those cases to reflect current goals or closed cases when they were unable to connect with a customer. Customer engagement remains a central piece of OVR's Rapid Engagement strategy and staff will continue to make sure customers are continuously engaged with our system. Staff are also responsible for maintaining continued Rapid Engagement strategies to ensure cases progress timely, and office managers and supervisors have been tasked with developing monitoring and supervisory procedures to ensure compliance with federal service provision timeframes.

4. Strengthen Collaboration between Bureau of Vocational Rehabilitation Services (BVRS) and Bureau of Blindness and Visual Services (BBVS)

Issue: VR services that provide job readiness, training, education, and a pathway to competitive employment are not fully accessible to all customers, particularly BBVS customers.

Recommendations/Measurable goals:

1. OVR will provide a heightened level of cross training and resources between BBVS and BVRS staff to meet the capabilities of all customers.

OVR Response: OVR has initiated mandatory monthly in-service staff trainings which include topics that provide cross training and resources for staff in all Bureaus.

2. OVR will increase BBVS and BVRS staff to focus on providing additional services, programs, and resources for students and customers.

OVR Response: OVR continues to submit employment postings supported by existing complement positions and works with the

Governors' Office of Talent Acquisition to assist with talent recruitment.

3. OVR will consult with credible sources outside the Agency to provide training related to specific disabilities to enhance current training provided by OVR.

OVR Response: OVR has initiated mandatory monthly in-service staff trainings which include topics that provide cross training and resources for staff in all Bureaus. Within these topics, outside presenters are often included to ensure staff are aware of the most current information.

4. OVR will provide Innovation & Expansion grant opportunities to entities interested in providing specific blindness skills training to Pre-ETS and BBVS customers enrolled in VR services.

OVR Response: OVR will explore the need for Innovation & Expansion opportunities and will also continue to do community outreach to encourage additional providers to work with OVR and provide services to customers.

5. Promoting Competitive Integrated Employment Workplace Settings

Issue: Organizations located within PA with the goal to hire a majority of employees with disabilities may be implementing hiring initiatives and policies detrimental to the continued development of competitive, integrated workplace settings, thus negatively impacting existing employment models.

Recommendations/Measurable goals:

1. WIOA defines CIE as work that is performed on a full-time or part-time basis for which an individual is: 1) compensated at or above minimum wage and comparable to the customary rate paid by the employer to employees without disabilities performing similar duties and with similar training and experience; 2) receiving the same level of benefits provided to other employees without disabilities in similar positions; 3) at a location where the employee interacts with other individuals without disabilities; and 4) presented opportunities for advancement similar to other employees without disabilities in similar positions. OVR will provide education and outreach to organizations that it partners with to help ensure PA's workplace settings align with the WIOA definition of CIE.

OVR Response: OVR's policy and review process is aligned with WIOA's definition of CIE and OVR's Business Services & Outreach Division (BSOD) will be providing information and education materials to new employers with whom they engage. When necessary, OVR goes

conducts site visits with employers to ensure they are compliant with the CIE policy.

2. OVR will collect and analyze customer data such as wages, location/interaction, natural supports, advancement opportunities, and equal pay and benefits to measure the competitive environments and economic opportunities for people with disabilities.

OVR Response: OVR utilizes RSA's data when analyzing pay and areas of placement. OVR's Business Services staff work to ensure the placement of persons with disabilities meets the above requirements. OVR collects data in accordance with requirements of the RSA-911 file. OVR can use this information to analyze this type of information to ensure OVR customers are obtaining sustainable employment opportunities that provide a living wage and career advancement opportunities.

3. OVR will inform and educate their partner organizations on the importance of, and opportunities for, upward mobility, career advancement, best practices, location with interaction, collaboration within the workplace, natural supports, and equal pay and benefits to ensure the workplace is maintaining CIE.

OVR Response: Provider trainings and other regularly scheduled meetings are held on an ongoing basis. Local District Offices maintain contact with their partner organizations to ensure they are aware of the above measures.

6. Customer Satisfaction Surveys

Issue: The PaRC reviews OVR Customer Satisfaction Surveys monthly to assist with developing the State Plan and evaluate and make recommendations regarding the effectiveness of PA's VR services; however, efforts to rectify concerns regarding low response rates and the lack of accessibility for customers to provide input on their experiences with VR services and programs remain insufficient.

Recommendations/Measurable goals:

1. OVR will increase Customer Satisfaction Survey accessibility and response rates by 10% each year.

OVR Response: OVR will continue to evaluate its Customer Satisfaction process and look for creative ways to increase the response rate.

2. To increase response rates, OVR will consider using Summer Interns to call customers and complete the surveys using the communication method which best meets the needs of the customer.

OVR Response: OVR currently has a devoted staff member who handles the above but will certainly consider additional resources to complete these tasks.

7. Identification of populations served by BVRS and BBVS.

Issue: There is no discrimination between employment outcomes specifically defined for customers of BVRS and BBVS, or separate fiscal reports provided for each Bureau.

Recommendations/Measurable Goals:

1. OVR will provide separate lists of employers for each BVRS and BBVS Bureau.

OVR Response: OVR District Offices work with employers that provide career services for all Pennsylvanians with disabilities. Each placement is unique to the individual's strength and abilities.

2. OVR will provide a fiscal report for each BVRS and BBVS Bureau outlining the expenditures for customers in their respective VR programs.

OVR Response: OVR will provide a fiscal report regarding expenditures of services.

(b) Comprehensive Statewide Needs Assessment (CSNA).

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

- (1) The VR services needs of individuals with disabilities residing within the State, including:

(A) Individuals with the most significant disabilities and their need for Supported Employment (SE).

OVR contracted with the Institute on Disabilities at Temple University, PA's University Center for Excellence in Developmental Disabilities, to conduct and interpret the CSNA required for PY 2019-2021. This is the most recently completed assessment. The purpose of the CSNA is to inform OVR and PaRC regarding issues and needs of the disability community in PA. 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.

OVR initiated a new CSNA project for PY 2022-2024, again with Temple University’s Institute on Disabilities. With the waning of the COVID-19 pandemic and more relaxed physical distancing protocols, this new project should mark a return to traditional in-person interviews, focus groups and site visits. The projected deadline will be for a final report expected in December 2025. This is also a collaborative effort with the PaRC, whose members received quarterly updates on the progress of the project, along with OVR leadership, and the OVR State Board members. Findings from this new CSNA project will be included in the development of the next VR Services Portion of the Combined State Plan expected to be drafted in 2027-2028.

Comparison of Pennsylvania to National Population Statistics

Information in the chart below, 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 PA and across the nation in 2017-2019.

Table 2: Comparison of Pennsylvania to National Population Statistics

Disability Identification across demographic variables	U.S. % Est (2017)	U.S. % Est (2018)	U.S. % Est (2019)	PA % Est (2017)	PA % Est (2018)	PA % Est (2019)
Total civilian noninstitutionalized population	12.7	12.6	12.7	14.1	14.1	14.0
Population under 5 years	0.7	0.7	0.7	0.9	0.9	0.5
Population 5 to 17 years	5.5	5.5	5.6	7.0	7.0	7.4
Population 18 to 34 years	6.4	6.4	6.7	7.0	7.6	7.9
Population 35 to 64 years	12.7	12.5	12.4	13.9	13.7	13.6

Disability Identification across demographic variables	U.S. % Est (2017)	U.S. % Est (2018)	U.S. % Est (2019)	PA % Est (2017)	PA % Est (2018)	PA % Est (2019)
Population 65 to 74 years	25.0	24.4	24.1	24.0	23.3	22.6
Population 75 years and older	48.7	47.5	47.1	47.9	46.5	45.3
Male	12.6	12.5	12.6	13.8	13.6	13.7
Female	12.8	12.7	12.8	14.4	14.5	14.3
White alone	13.3	13.2	13.2	14.1	13.9	13.8
Black or African American alone	14.0	13.8	14.1	16.6	16.7	17.0
American Indian and Alaska Native alone	17.3	16.9	17.2	20.8	24.0	20.6
Asian alone	7.1	6.9	7.2	7.0	7.3	6.9
Native Hawaiian and other Pacific Islander alone	10.3	11.1	10.6	N	8.6	16.1
Some other race alone	8.0	8.4	8.4	12.7	18.1	17.8
Two or more races	11.1	10.7	11.0	13.0	12.2	13.2
White alone, not Latinx	14.0	14.0	14.1	14.2	14.0	13.9
Latinx (of any race)	9.0	9.0	9.1	12.7	13.9	13.8

Source: 2018 and 2021 American Community Survey 1-Year Estimates

Compared to the estimated national rate of disability identification in 2017 (12.7%), 2018 (12.6%), and 2019 (12.7%), PA has a slightly higher rate of disability identification in its total civilian population (14.1% in 2017, 14.1% in 2018, and 14.0% in 2019). In 2017, PA civilians ages 18-34 and 35-64 years had a slightly higher than national average rate of disability identification (PA: 7.0% and 13.9% vs. U.S.: 6.4% and 12.7%). This trend

continued in 2018, with PA civilians ages 18-34 years old (PA: 7.6% vs. US: 6.4%) and 35-64 years old (PA: 13.7% vs. U.S.: 12.5%) and in 2019 with, PA Civilians ages 18-34 years old (PA: 7.9% vs. US: 6.7%) and 35-64 years old (PA: 13.6% and US:12.4%).

The estimated national average of individuals identifying as having a disability who were employed was 24.0% in 2018 and 25.9% in 2021, and in PA, the estimated average was 24.1% in 2018 and 25.1% in 2021. The rate of unemployment for individuals with disabilities across the United States in 2018 was 2.8%, compared to 3.0% in PA in 2018, and in 2021 across the United States and in PA it was 3.8% (American Community Survey, 2018 and 2021). The Bureau of Labor Statistics, Census Bureau, and other relevant data sources calculate employment and unemployment rates based on those conceived as among the civilian labor force. Some people with disabilities may be perceived by themselves or others as not in the civilian labor force but may desire employment; this is sometimes referred to as joblessness rather than unemployment.

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 Individualized Plan for Employment (IPE) Initiated, and Transition Services for Youth and Students with Disabilities. 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. 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 (during Customer Satisfaction Committee meetings) to determine successes in, and barriers to, receiving OVR services and gaining and retaining employment for individuals with the most significant disabilities.

(B) Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program.

Evaluation of the VR needs of individuals with disabilities who remain unserved or underserved was conducted via primary and secondary data collection and analysis. Secondary data included state and federal agency reports and evidence-based research. Through the "Information about your Employment Services" mixed methods survey (August 2021), Community Rehabilitation Program (CRP) staff indicated that the most underserved communities in PA, in order of significance, were:

- People in rural areas

- People with mental health needs
- People who are blind or visually impaired
- People with Autism Spectrum Disorder
- People involved with the justice system (victims, defenders, or parolees)
- People who are deaf or hard of hearing
- Racially or ethnically marginalized people (Described in the survey as “racial or ethnic minorities”)
- People with intellectual disabilities
- Non-English speakers or English non-dominant speakers
- People with developmental disabilities
- People with physical disabilities
- People with neurological disabilities
- People with substance use disorder
- Seniors
- Transition-age students or youth
- Veterans.

In addition, the CSNA identified a few additional hidden communities, including state center residents, people with immigrant or non-citizenship status, parents with disabilities, people living with HIV/AIDS, children engaged in the foster care system, individuals experiencing homelessness, and people who require assistive technology (AT). It should be noted that people who are unserved or underserved by OVR may identify with multiple unserved or underserved communities and face compounding marginalization.

(C) Individuals with disabilities served through other components of the workforce development system; and

WIOA was built upon decades of workforce development legislation and reauthorized the workforce investment system. WIOA has mandated that 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 PA as PA CareerLink®), and Title IV, the public VR program as defined by the Rehabilitation Act of 1973, as amended, work together to improve alignment, coordination, cooperation and collaboration in services to businesses. This has led to a greater emphasis on student/youth career pathways, CIE for persons with disabilities, and increased business

engagement. Consequently, the sections below detail the needs of the customers and constituents of these agencies as well as the efforts of these agencies to partner to best serve their mutual customers.

The PA Governor's Policy Office established the Employment First Commission task force to include representatives of all agencies who administer workforce development programs. The group was tasked with increasing collaboration and communication across state agencies and with providing recommendations to the Governor's Office to improve workforce development programs and activities in the Commonwealth.

The core workforce system partnership consists of:

- Department of Labor & Industry (DLI)
 - CareerLink
 - Office of Vocational Rehabilitation (OVR)
 - Office for the Deaf & Hard of Hearing (ODHH)
 - Bureau of Blindness & Visual Services (BBVS)
 - Bureau of Disability Determination
- Department of Community & Economic Development
- Department of Education (DOE)
- Department of Human Services (DHS)
 - Office of Children, Youth & Families
 - Office of Developmental Programs (ODP)
 - Office of Long-Term Living (OLTL)
 - Office of Mental Health & Substance Abuse (OMHSAS)
- Department of Aging

Other programs engaged in the statewide workforce investment system and interagency work group include:

- Department of Agriculture
- Department of Military & Veterans Affairs
- Department of State
- Department of Corrections
- Governor's Office

The interagency workforce investment work group is coordinated by the PA WDB. In PA, workforce investment is managed across 23 regional Local Workforce Development Areas (LWDA), each of which has a WDB. WDBs are

comprised of a board of governor-appointed workforce development stakeholders which develops locally responsive workforce policies and strategies and oversees their region's PA CareerLink® centers.

Interagency referrals greatly affect who learns about OVR and accesses services. While individuals may self-refer, many learn about OVR through county/administrative entities, supports coordination organizations and agencies, providers of employment-related services, high schools, universities and colleges, doctors and health agencies, and many other community organizations. Effective cross-agency collaboration requires that services are coordinated and unduplicated. PA ensures this through utilization of a statewide data system Commonwealth Workforce Development System (CWDS) and associated workgroup.

OVR also participates with many advisory committees that rely on the expertise of community leadership. OVR has continued to reach out to include the people and organizations that work for the VR community. The following are just a few committees with whom OVR collaborates:

- Advisory Committee for the Blind
- Advisory Committee for the Deaf & Hard of Hearing
- Business Leadership Networks
- PA Chambers of Commerce
- PA Council on Independent Living
- PA Developmental Disabilities Council
- PA Initiative on Assistive Technology (PIAT)
- PA Rehabilitation Council (PaRC)
- Pennsylvania Assistive Technology Foundation (PATF)
- Pennsylvania Client Assistance Program (CAP)
- Pennsylvania Rehabilitation Association (PRA)
- Rehabilitation & Community Providers Association (RCPA)
- Society for Human Resource Management (SHRM)
- Statewide Independent Living Council (SILC)

In the summer of 2021, the PA Workforce Coalition was established to address the needs of businesses and employment of people with disabilities. The PA Workforce Coalition is comprised of key PA state agencies and state business leadership including OVR:

- PA Association of People Supporting Employment First (APSE)
- PA Office of Developmental Programs (ODP)

- PA Office of Long-Term Living (OLTL)
- PA Office of Mental Health & Substance Abuse Services (OMHSAS)
- PA Department of Labor & Industry (DLI)
- PA Workforce Development Board (WDB)
- PA Chamber of Commerce
- PA Chamber of Black Owned Business
- PA Training & Technical Assistance Network (PaTTAN)
- PA Advocacy & Resources for Autism & Intellectual Disability (PAR)
- PA Rehabilitation & Community Providers Association (RCPA)

Survey data captured by the PA Workforce Coalition in September of 2021 revealed that:

- 50 of 77 (65%) employers are not tapped into the disability community for talent acquisition.
- 65 of 77 (84%) employers have not connected to OVR.
- 26 of 77 (34%) employers have not connected with a PA CareerLink®.
- Only 9 of 77 (12%) employers have a connection with a disability employment provider.

The leading needs of the individuals with disabilities served by the agencies/programs engaged in the statewide workforce investment system and interagency work group is provided below.

Needs of Individuals Served by the Department of Labor & Industry (DLI)

The needs of individuals with disabilities served by DLI include:

- Information about high demand employment opportunities that match their career interests.
- Employment resources from PA CareerLink® and OVR to be made accessible to them in more coordinated ways by these offices.
- Clear pathways to apprenticeships through direct support from trained professionals within OVR and/or DLI's Apprenticeship & Training Office (ATO).
- More apprenticeship opportunities to be made available to them through organizations that work with their communities.

Needs of Individuals Served by the Department of Human Services (DHS)

The needs of individuals with disabilities served by the Department of Human Services (DHS) include:

- Increased opportunities for competitive employment.
- Training and continued education throughout their careers.
- Screening mental health and substance use disorders as part of employment services .
- Mental health and substance use disorder treatment offered alongside employment services.
- Assistance navigating the joint services offered through Experience the Employment Connection (EEC).

Needs of Individuals Served by the Department of Community & Economic Development

The needs of individuals with disabilities served by the Department of Community & Economic Development include:

- Access to employers who have been trained in strategies to hire and retain individuals with disabilities.
- Increased awareness and action from PA businesses on issues related to the Americans with Disabilities Amendments Act (ADAA) and employment.
- Access to employment services, job training, and other related supports throughout their career.
- Focused efforts to serve those individuals who are unemployed for 27 weeks or longer.

Needs of Individuals Served by the PA Department of Education (PDE)

The needs of individuals with disabilities served by the PA Department of Education (PDE) include:

- Increased post-secondary education opportunities that provide accommodations for individuals with disabilities.
- Greater opportunities for continuing education throughout careers and employment.
- Outreach to local business and organizations through the Department of Community & Economic Development to increase apprenticeship, internship, training, and other employment opportunities.
- Access to affordable post-secondary education.

- Targeted outreach and support of those individuals with less than a high school degree and those who have completed only some post-secondary education.

Needs of Individuals Served by the Department of Aging

The needs of Seniors 65 and older with and without a disability served by the Department of Aging include:

- Affordable prescription medications.
- Access to in-home care and services.
- Available and affordable housing options.
- Available and affordable transportation.
- Dementia-capable and dementia-friendly communities.
- Access to mental health services.
- Expanded employment opportunities.
- Person-centered planning that fosters independence and self-sufficiency.
- Support (health care, paid employment, affordable transportation, and affordable housing) when released from Department of Corrections.

Needs of Individuals Served by the Department Of Agriculture

The needs of individuals with disabilities served by the Department of Agriculture include:

- Improved transportation infrastructure.
- Access to affordable and reliable transportation.
- Outreach about employment and career opportunities in the agricultural industry.
- Increased representation in the department of agriculture reporting and planning.

Needs of Individuals Served by the Department of Military & Veterans Affairs

The needs of individuals with disabilities served by the Department of Military & Veterans Affairs include:

- Direct support to navigate access affordable housing to avoid experiencing homelessness.
- Pathways out of homelessness and into stable housing situations.

- Coordinated resources between the OVR and the Veterans Administration (VA) to reduce overlap, wait time, and miscommunications about services.
- Services for mental health diagnoses and substance use disorder diagnoses that are offered and coordinated along with their employment services.

Needs of Individuals Served by the Department of Corrections

Needs of individuals with disabilities served by Corrections include:

- Employment services that mitigate and work past the prejudices held by employers against individuals with criminal justice records.
- Available and affordable housing, transportation, and health care.
- A reduction of the length of time a minimal infraction remains on their criminal background check.
- Services for mental health diagnoses and substance use disorder diagnoses that are offered and coordinated along with their employment services.

(D) Youth with disabilities, including students with disabilities and their need for Pre-ETS. Include an assessment of the needs of individuals with disabilities for transition career services and Pre-ETS, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act (IDEA).

As part of the 2019-2021 CSNA, Temple University's Institute on Disabilities researchers used surveys and interviews with workforce professionals to identify barriers to and strategies for increasing services and support opportunities for students and youth with disabilities. The primary needs identified for Pre-ETS are:

- Summer programming to prepare for workforce and further education.
- More collaboration with employers on "soft skill" training.
- Increased expectations among family members for the future of their students and youth.
- Access to affordable and reliable transportation.
- Access to digital resources and technology needed for employment and education.
- Increased OVR presence at schools.

(2) Identify the need to establish, develop, or improve CRPs within the State.

According to CRP staff surveyed for the CSNA in 2021, the primary obstacles facing CRPs in their provision of employment services, in order of significance, are:

- Transportation issues.
- Staff turnover or being short-staffed.
- Loss of benefits or concern thereof.
- Inadequate ongoing/long-term supports or funding.
- Lack of cross-agency collaboration/coordination (e.g., referral process).
- Employer perceptions.

Transportation was identified as the most significant barrier to service provision and employment of people with disabilities in the 2021 CRP survey, the 2014-2016 PA CSNA, and became a Target Goal of the 2016-2018 CSNA. Lack of accessible transportation impact rural communities in particular.

Individuals with disabilities need:

- Flexibility with scheduling and planning for paratransit services.
- Reliable and consistent paratransit services.
- Transportation workers with cultural competency and disability awareness.
- The general assumption that people with disabilities are interested in employment or being active.
- Institutional or societal investment in transportation for people with disabilities.

Specific strategies and best practices for reducing transportation barriers to employment for people with disabilities include:

- Developing transportation alternatives and support networks specific for people with disabilities who want to be or are currently employed.
- Training people with disabilities to interact with transportation workers in effective ways to receive the information and services they need.
- Expanding community involvement in transportation initiatives.

As mentioned above, the lack of reliable transportation continues to be identified as the most significant barrier to both employment and employment services. To combat the barrier of transportation, some CRPs provide transportation, secure alternative transportation including natural supports when possible, and partner with the transit system. These efforts make a difference at the individual level. However, more work can be done

at the community level and system-wide level to assure individuals with disabilities have access to reliable transportation. This work must be done with individuals with disabilities in order to be successful. Per the 2016-2018 CSNA report, the most successful transportation and employment initiatives included:

- Involvement of people with disabilities in the committee work being done within transportation authorities throughout PA.
- Inclusion of people with disabilities in the development of current transportation initiatives.

The Statewide Provider Partnership (SPP) has described changes to supported employment and Pre-ETS policies as “unsustainable” for CRPs. The situation has been exacerbated by the COVID-19 pandemic. CRPs feel unable or ill-equipped to provide services as required by OVR (consequent of WIOA, Employment First, etc.) due to procedural, temporal, and financial constraints. Providers cited several challenges related to the Performance-Based SE (PBSE) payment model. Rather than establish additional CRPs, it is recommended that OVR focus on retaining existing CRPs. According to the SPP, retention would require OVR to follow up and act on the issues discussed during the productive convenings held between providers and OVR on January 13, 2020.

Many providers are interested in receiving more referrals and recommend more regular communication with OVR. 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 CRPs.

A majority of CRPs surveyed advised that intake and service provision could be significantly improved if providers received more information about the potential customer in the initial report (such as reports or records from other VR services, employment goals, etc.). Providers would benefit from a more standardized approach to the types and time frames of relevant documents attached to the referral. Similarly, providers stated that more timely transition from a Community Based Work Assessment (CBWA) and waitlists for services would have a positive impact on placing individuals in employment. Providers noted that virtual meetings have helped speed the intake process. A majority advised that intake and service provision could be significantly improved if the customer received greater explanation of potential services in plain language.

The Hiram G. Andrews Center (HGAC) is the State-owned and operated comprehensive rehabilitation center in PA, a CRP providing necessary VR services to individuals with disabilities. HGAC provides a comprehensive program of services including the integration of Pre-ETS, education on campus at the Commonwealth Technical Institute (CTI), vocational

counseling, vocational evaluation, and physical restoration in a barrier free environment for individuals with disabilities leading to CIE. The PA DLI's Center for Workforce Information & Analysis lists welders, cutters, solderers and brazers as High Priority Occupations (HPOs) for PA's industry-driven approach to workforce development. The purpose of the HPO lists is to align workforce training and education investments with occupations that are in demand by employers, have higher skill needs and are most likely to provide family sustaining wages. HGAC's expansion of services, involving expanding the welding program, will help prepare workforce needs in HPOs such as welding services and opportunities for welding employment in the State. In order to keep the Center operational and ensure continuity of service provision, at times it is necessary for the State to repair or replace systems and equipment within the center, including, but not limited to: electrical, plumbing and hot water, fire prevention, ventilation, sewage, etc., that go beyond ordinary repairs and maintenance. The State will submit requests for prior approval to RSA for related costs that exceed the capital expenditure threshold used by the State.

(c) Goals, Priorities, and Strategies.

Sections 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and SE programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under section 107 of the Rehabilitation Act. VR agencies must—

(1) Describe how the SRC and the VR agency jointly developed and agreed to the goals and priorities and any revisions; and

The state goals and priorities for the VR Services Portion of the PA Combined State Plan were initially developed jointly with OVR Executive Staff and the PaRC Policy & State Plan Committee during a teleconference meeting exchange on March 20, 2023. Any projections, program continuations, etc. in this description are subject to the availability of funding in the plan year.

(2) Identify measurable goals and priorities in carrying out the VR and SE programs and the basis for selecting the goals and priorities (e.g., CSNA, performance accountability measures, SRC recommendations, monitoring, other information). As required in section 101(a)(15)(D), (18), and (23), describe under each goal or priority, the strategies or methods used to achieve the goal or priority, including as applicable, description of strategies or methods that—

(A) Support innovation and expansion activities;

(B) Overcome barriers to accessing VR and SE services;

(C) 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, post-secondary education, employment, and Pre-ETS); and

(D) Improve the performance of the VR and SE programs in assisting individuals with disabilities to achieve quality employment outcomes.

Goal 1: Increase Competitive Integrated Employment (CIE) Opportunities for Individuals with Disabilities

1. Explore the utilization of alternative transportation services, not limited to Lyft or Uber, for job placement services.
 - a. Conduct outreach to all transportation services within PA to identify interested vendors, targeting rural areas.
 - b. Develop a provider agreement that offers a competitive rate to potential vendors.
 - c. Enroll vendors into case management system.
2. Increase VR services and outcomes for the blind/visually impaired.
 - a. Conduct staff training to ensure all OVR program information is provided to this population (individuals who are blind/visually impaired).
 - b. Increase awareness of OVR programming for customers who are blind/visually impaired via outreach events targeted for this population.
 - c. Monitor District Offices that serve individuals who are blind/visually impaired to ensure this population has equal access to all services.
3. Promote accessibility and technology based upon universal design principles.
 - a. Conduct outreach to AT vendors within PA to identify interested vendors.
 - b. Conduct staff training on AT and universal design principles.
 - c. Utilize all existing resources within PA to ensure staff are equipped with the necessary tools to provide education to all customers.
4. Expand training for CRPs and increase services for customers with mental health disabilities.

- a. Identify the most up to date evidence-based practices for individuals with mental health disabilities seeking employment.
- b. Expand partnerships with community agencies to increase awareness and effectiveness of service provision to people with mental health disabilities.
- c. Monitor efficacy of and outcomes for customers with mental health disabilities.

Goal 2: Increase Transition Services for Students with Disabilities

1. Develop and expand summer, during, and after school Pre-ETS programming to prepare students with disabilities for a seamless transition from secondary school to CIE.
 - a. Continue to expand upon already established successful programming to include all populations served by OVR in order to prepare students with disabilities for a seamless transition from secondary school to CIE.
 - b. Conduct research to identify evidence-based practices for during and after school curriculum and programming to prepare students with disabilities for a seamless transition from secondary school to CIE.
 - c. Implement and monitor programming to prepare students with disabilities for a seamless transition from secondary school to CIE.
2. Increase statewide collaboration with the Bureau of Special Education (BSE) and the Office of Developmental Programs (ODP) to expand Pre-ETS across Departments.
 - a. Continue to build upon already established Memorandum of Understanding (MOU) with BSE to enhance and expand Pre-ETS across Departments.
 - b. Continue to build upon the already established MOU with ODP to enhance and expand Pre-ETS across Departments.
 - c. Establish consistent and regular communication with BSE and ODP to identify the potential for new pre-ETS programming.
 - d. Implement and monitor programming to prepare Students with Disabilities for a seamless transition from secondary school to CIE.
3. Identify School Districts and/or Charter Schools with low Pre-ETS outcomes and assist to increase positive outcomes during transition.
 - a. OVR will evaluate the data available within CWDS to determine what school systems are not actively participating in Pre-ETS activities.

- b. Based on the available data, OVR will develop specific outreach activities for those schools.

Goal 3: Increase Community Education and Outreach

1. Increase outreach to Department of Corrections to establish contact with reentrants and reduce recidivism.
 - a. Identify a single point of contact (SPOC) for all State Correctional Institutions to begin collaboration on re-entry programming.
 - b. Provide training to all OVR staff on re-entry initiatives.
2. Increase social media and alternative outreach methods.
 - a. Increase social media postings in order to highlight OVR success stories and positive outcomes of all OVR programming.
 - b. Utilize additional media outlets to provide community outreach and education on OVR services.

Goal 4: Initiate and Complete Capital Improvement Projects at HGAC

1. Increase opportunities for students through capital projects, including improvement of student training areas and development of new classrooms and other updated campus features.
 - a. Through the enhancement of student training areas, begin outreach to attract new students.
 - b. Through the enhancement of technology and infrastructure, begin outreach to populations traditionally underserved by HGAC.
 - c. Through the enhancement of campus features, improve the collegiate experience for current and potential students.
2. Promote accessibility and technology through capital improvements based on universal design principles.
 - a. Remodel outdated accessibility in restrooms, classrooms, and dormitories due to age of facility.
 - b. Evaluate current technology available on campus and update as needed.
 - c. Conduct staff training on AT and universal design principles.
3. Phased renovation of the dormitories at HGAC.
 - a. Work with design team to optimize available space, increase accessibility to current standards, and add modern features.
 - b. Coordinate current and incoming enrollment with construction schedule to maximize facility utilization during renovation phases.

Goal 5: Increase Usage Opportunities At HGAC/CTI.

1. Expand outreach to non-traditional referral sources including increase of online presence.
 - a. Strategize marketing events and efforts to target non-traditional referral sources.
 - b. Strategize use of social media, website, virtual tour and other on-line marketing tools.
 - c. Continue to improve application and payment options for non-traditional students.
2. Expand opportunities for individuals who are blind/visually impaired.
 - a. Continue to partner with BBVS to evaluate/update current technology and program accessibility.
 - b. Conduct staff training to improve HGAC/CTI service delivery to this population of customers.
 - c. Continue to evaluate satisfaction surveys and feedback from stakeholders.
3. Expand the availability of services and education offered, including virtual learning opportunities.
 - a. Continue to conduct feasibility studies and evaluate labor market trends for new training programs and credentials.
 - b. Continue to research and develop virtual services specific to driver education, vocational assessment, and career preparation.

Goal 6: Increase SE/VR Outcomes

1. Expand training for CRPs.
 - a. Identify the most up to date evidence-based practices for SE.
 - b. Expand partnerships with community agencies to increase awareness and effectiveness of service provision to people with mental health disabilities.
 - c. Monitor efficacy of and outcomes for customers with mental health disabilities.
2. Expand training for VR staff.
 - a. Provide staff with training on evidence based best practices for supporting customers in obtaining CIE.
 - b. Support staff through ongoing workshops and in-service trainings to ensure all OVR programming is being discussed with all populations served.

- c. Monitor efficacy and outcomes of trainings to identify knowledge gaps.
- 3. Conduct outreach to employers to increase CIE.
 - a. Provide employers with disability related work incentives/tax credits/employment supports.
 - b. Educate employers on OVR employer specific services.
 - c. Conduct disability etiquette training, ADAA evaluations, and on-going support during the onboarding process to enhance the relationship between the employer and OVR.

(d) Evaluation and Reports of Progress: VR and Supported Employment Goals.

For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

(1) Progress in achieving the goals and priorities identified for the VR and Supported Employment Programs.

Goal 1: Increase CIE Opportunities for Individuals with Disabilities

- 1. Expand the availability of apprenticeships, internships, and On-the-Job Training (OJT) for individuals with disabilities.
 - a. Apprenticeship achievement:
 - i. During PY 2022, two OVR field staff began a one-year Registered Apprenticeship Navigator course provided through Keystone Development Partnership (KDP) where they physically participate in an apprenticeship geared towards the development of registered apprenticeships. The knowledge gathered from this course will be used to assist OVR in employing new strategies to developing future apprenticeship opportunities.
 - ii. During PY 2022, OVR continued to partner with the PA DLI's Apprenticeship & Training Office (ATO) to increase apprenticeship opportunities. An example of this strategy was with PeopleShare. PeopleShare is a staffing service that employs individuals in temporary to permanent, contracted, and temporary positions. With the assistance of the OVR Apprenticeship Navigators, PeopleShare developed the Sourcing Recruiter Registered Apprenticeship Program. OVR's BSOD Specialists refer OVR customers to the

apprenticeships and other open job positions with PeopleShare.

- iii. OVR's BSOD staff continued to support CTI/HGAC to explore eligibility of current certification programs and certificate skill trainings to become registered Apprenticeships or Pre-Apprenticeships.
- b. Internship achievement: OVR's State Employment Internship Program highlights the importance of state VR agencies partnering with other state entities to promote employment opportunities for individuals with disabilities. In PY 2022, in collaboration with the PA Office of Administration (OA), 30 OVR customers completed a 10-week paid summer internship in various state agencies in the Pittsburgh, Harrisburg, and Philadelphia regions. This experience afforded college students with disabilities the opportunity to experience state employment while at the same time gaining real-life work experience in addition to their college studies.

OVR also partnered with eight different Centers for Independent Living (CIL) to provide internships during the summer of 2022. These internships were aimed at OVR college students pursuing degrees related to social services. A total of six OVR customers completed the CIL internships with great successes reported, including one intern participating in his first ever work experience.

- c. OJT achievement: In program year 2022, approximately 292 customers participated in OJT wage reimbursement employment opportunities that included permanent, temporary, summer, and seasonal time-limited employment in retail establishments, amusement parks, health care, municipal maintenance, customer service, clerical positions, and more.
- d. Strategies related to the achievement of Part 1 of Goal 1:
 - i. Demonstrating OJT value to businesses and for those not interested in wage reimbursement, OVR offered other services such as supported employment, customized employment (CE), ADA consultation, etc.
 - ii. Not applying an FNT to the provision of OJT as a placement service affords all customers the benefit of OJT wage reimbursement services to an employer regardless of their financial status.
 - iii. Demonstrating the value of internships to both employers and customers through statewide, regional, and local means

using the Single Point of Contact (SPOC) model and business service connections.

- iv. Establishing a SPOC model for statewide hiring initiatives to serve the needs of both our employers and our customers.
2. Partner with the Bureau of Workforce Partnership & Operations (BWPO) and individual local CareerLink administration bodies to ensure programmatic and physical accessibility of the PA CareerLink centers for equal access for individuals with disabilities.
 - a. A strategy related to achieving this goal in PY 2022 consisted of the virtual participation of OVR staff in WDB meetings both at a statewide and local level.
 - b. OVR continued to partner with workforce development partners by conducting comprehensive ADA A accessibility reviews of the one-stop service system's primary PA CareerLink centers across PA. Reviews are intended to help partners ensure programmatic and physical accessibility of the centers for equal access for individuals with disabilities. This required OVR Business Services staff across the state to visit the primary PA CareerLink centers, take necessary measurements, document AT available, compile evaluation reports, and share with center administrators. Evaluation information has already been used by many centers to begin making modifications to physical buildings, parking spaces, offices, cubicles, etc. along with the procurement of AT to be fully ADA A accessible. During this program year, OVR completed 60 reviews of PA CareerLink centers across PA. Private businesses have utilized OVR to provide ADA A Accessibility reviews, including the Junior Achievement Center in western PA and MobilityWorks in Allegheny County.
 - c. BSOD staff continue to promote programmatic accessibility, through delivery of a comprehensive disability awareness and etiquette training to interested PA CareerLink partners and businesses.
 - d. OVR has also made available to all PA 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 ADA A to include strategies and modules for training businesses and customers on the Act.
 3. Increase SE and Customized Employment (CE) outcomes; evaluate and monitor OVR's SE policy implementation.
 - a. Implementation is monitored and evaluated through the formal VR case review process along with routine reports of information

reviewed by Central Office Specialists in BSOD. This includes the use of performance “report cards” generated through the case management system and other custom reporting measures to evaluate outcomes.

- b. Under the umbrella of OVR’s current SE policy service options, an increase of 851 participants received services. Specifically, 566 more participants received supported employment services (as it is defined in WIOA) in PY 2022.
- c. Despite more customers receiving SE services, successful SE and CE outcomes decreased in PY 2022 by 440 participants. OVR is reviewing the efficacy of the current policy and has been working on a draft revision in light of decreased outcomes.

Goal 2: Increase Transition Services for Students with Disabilities

1. Develop summer and after school Pre-ETS programming to prepare students with disabilities for a seamless transition from secondary school to CIE.

JJS/PACTT Collaboration

OVR and the Bureau of Juvenile Justice (BJJS) began a partnership in 2017. This collaboration has grown over the years, and enables us to provide work experiences, summer programming, and post-secondary training counseling to students from a variety of backgrounds. In the last SFY, OVR spent \$1,071,929 Pre-ETS dollars on services or staff time in developing and implementing Pre-ETS programs for PACTT Affiliates and PACTT Affiliated students. As of last quarter, OVR had interacted with 979 BJJS-affiliated students documented, 79 of them having a VR case open.

Early Reach Programming

Early Reach assists youth with disabilities in becoming better prepared for the transition from high school to the world of work and independence. Early Reach is intended to promote successful employment outcomes for youth with disabilities, beginning at age 14, by increasing awareness of OVR services and the benefits of early career planning. The Early Reach initiative employs a team of Early Reach Coordinators (ERCs) to provide group and individual outreach, education, and consultation services to youth with disabilities and their parents, local schools and agencies that serve them. ERCs provide creative and engaging group workshops and presentations to help students build essential work and life skills in the areas of self-advocacy, workplace readiness, independent living, job exploration and post-secondary options. In the 2022-2023 State Fiscal Year, OVR’s ERCs provided a combined total of 7,587 Outreach Events and Pre-ETS

to 21,068 students with disabilities. 2,335 of those services were IEP meetings. ERCs most frequently provided Workplace Readiness Training, Instruction in Self-Advocacy, and Independent Living Skills Training.

Mobile Fab Lab

OVR was excited to reignite the partnership with Carnegie Science Center to offer Fab Lab to students across the state. During a Fab Lab session, students use 3D printers and laser cutting to create digital design projects. OVR District Offices have taken the opportunity to offer these engaging services to students across PA, and the Carnegie Science Center has been offering sessions regularly.

BBVS

Our BBVS offices are continuing to build Pre-ETS programming for our students who are blind or have a visual impairment. Summer programs, specifically for students who have a visual impairment, offer the unique chance for many students to be in a group with peers who face similar barriers when it comes to accessing their community and finding employment.

While we had several BBVS students participate in summer employment last year, we now have every BBVS office with a student applying to participate in a MY Work summer employment program. Each BBVS office has students participating in the BBVS Summer Program being held at Penn State Main Campus. This is in addition to the summer programs students are participating in throughout the state (i.e., IDEAL, Overbrook, EnVision, etc.).

DHSA

The Deaf & Hard of Hearing Summer Academy was held from July 16-26, 2023, at Penn State University. Seventeen students from across PA participated in programming on vocational development, counseling and exploration on post-secondary options and resources, and self-advocacy instruction. OVR staff from Allentown, Johnstown, Pittsburgh, New Castle, Pittsburgh, and OVR's Central Office volunteered to provide onsite support.

2. Increase opportunities for students to gain workplace skills and community-integrated work experiences.

Professional Connections Experience (PCE)

The Professional Connections Experience (PCE) is an OVR program available to students with disabilities as early as age 14, that begins to prepare them for community employment. It includes a combination of group instruction on workplace readiness and job exploration, along

with community experiences such as job shadows, mock interviews, workplace tours, and/or assistance in obtaining prerequisite work documents such as photo ID or work permits. Sixteen out of OVR's 21 District Offices have PCE programs and several District Offices offer multiple programs.

Professional Connections Foundation (PCF)

The Professional Connections Foundation (PCF) was rolled out for the 2022-2023 school year. PCF is similar to PCE, but is more flexible to allow students to participate during the school year. A PCF is a 30-hour program, where students receive 15 hours of group instruction on workplace readiness and job exploration and 15 hours of employer interaction in the areas of job shadowing, informational and mock interviews, tours, and assistance with work documents. Students are eligible for a stipend upon completion of the program. There are currently 20 provider agencies who offer this service across the state.

Project SEARCH

Project SEARCH is an internationally recognized model of a combined training and work experience for youth and adults with significant intellectual and developmental disabilities. It prepares students and young adults for CIE through internships hosted at employers like UPMC Hospitals and the Bucks County Government Center.

OVR currently collaborates on 21 Project SEARCH sites across the state and will be opening four new sites for the 2023-2024 school year:

- LIFE Lawrence (adult site) with New Castle BVRs
- Wind Creek (student site) with Allentown BVRs
- Aramark (student site) with Philadelphia BVRs
- Lehigh Valley Health Network – Pottsville (student site) with Reading BVRs

The following sites achieved a 70-90% employment outcome for the 2021-2022 program year and earned an Excellent Outcome Award:

- County of Bucks Government Center, Doylestown
- Cumberland Perry County Government, Carlisle
- Drexel University, Philadelphia
- Lehigh Valley Hospital – Cedar Crest, Allentown
- Lehigh Valley Hospital – Muhlenberg, Bethlehem
- Penn State Health St. Joseph's, Reading
- Phoenixville Hospital, Phoenixville

- UPMC Mercy, Pittsburgh
- WellSpan Health- York Hospital, York

The National Project SEARCH conference was held July 10-14, 2023, in Milwaukee, WI.

- The PA Statewide Coordinator along with 19 additional OVR staff attended.
- At the Opening Ceremony, the following PA sites earned a 100% Outcome Award for the 2021-2022 program year:
 - Penn State Health Milton S. Hershey Medical Center, Hershey
 - UPMC Hamot, Erie
 - WellSpan Health Gettysburg Hospital, Gettysburg
- The following breakout sessions were offered at the conference that involved PA sites/partners/past intern and OVR staff:
 - Employment Planning Meetings (Bucks County Government site)
 - Ryan's Journey: Early Intervention, Education, Transition, Project SEARCH, Employment, Adulthood, Independence (UPMC Hamot)
 - A Perfect Fit: Implementing the Project SEARCH Model in a Hospitality Setting (Kalahari Resorts and Conventions)
 - Technology Supports for Success (Drexel University and School District of Philadelphia at 440)

Youth Ambassador (YA)

Our first Youth Ambassador (YA) was employed starting in June 2022 and completed his duties at the end of February 2023. Some specific YA duties have included job shadowing and informational interviewing with Intermediate Unit (IU) staff; observing/assisting with the IU6 Summer Program classrooms including the Multiple Disabilities, Life Skills and Autism Support classes; exploration through the PA Secondary Transition website curriculum including topics of disability awareness training, soft skills and executive functioning skills training, self-advocacy training, and decision making skills/informed choices training; coordinating transportation; maintaining a daily journal; and developing a professional portfolio.

Because of staffing shortages in schools, we have made the program requirements more flexible, to include expanding the qualifications to students attending post-secondary education in addition to being in

their last two years of high school. The provider requirements have also been expanded to include public and private schools and private/non-profit agencies, in addition to IUs, special education professional development/technical assistance programs, and local education agencies (LEAs). Ongoing marketing efforts have been in place targeting IUs, school districts, and private organizations to recruit upcoming YAs.

For the 2023-24 school year, there will be at least 11 YA positions available across the state at a variety of agencies and locations. District Offices are currently working with providers to recruit students to fill the positions.

3. Enhance collaborative relationships with the PA DHS, PDE, higher education institutions, the PA Employment First Oversight Commission, and CRPs.

N-TACT C Capacity Building Institute

Members of the Transition Division attended the N-TACT: C Capacity Building Institute from May 16-18, 2023, in Charlotte, NC.

Representatives from 49 states and territories attended the Capacity Building Institute. This provided the OVR Transition Division with the opportunity to work as a team with PA stakeholders as well as network with representatives from other state VR programs on best practices to better serve PA students with disabilities.

The PA Team had 20 stakeholders in attendance who attended breakout sessions on evidenced based practices for Transition Services for students with disability. Members of OVR's Transition Division alongside representatives from PaTTAN, IU staff, PA college and university partners, parents, Parent Education & Advocacy Leadership (PEAL) Center representatives, PA Youth Leadership Network (PYLN), and the PA Office of Long-Term Living (OLTL) spent three days reviewing survey results from Transition Discoveries, data, and input from the PA Community of Practice on Transition and coming to a consensus on goals and action steps for the PA team. This work will be developed into a state plan to direct the collaborative efforts to serve students with disabilities and advance rates of CIE.

PA Career Technical Education Special Populations (PACTESP) Specialists from the OVR Transition Division BSOD presented the PA Association of Career & Technical Education Special Populations (PACTESP) conference in Spring 2023 in Harrisburg, PA. General OVR Pre-ETS information and summer programming options were shared with various stakeholders in Career & Technical Education (CTE).

Future work with CTE programs is planned with the PA Community of Practice.

Connecting 4 Employment (C4E)

Connecting 4 Employment (C4E) is a partnership between OVR, BSE and ODP. The goal of C4E is to ensure a seamless human services delivery system that can be effortlessly entered and navigated by individuals with disabilities and their families, should they choose to seek formal supports and maintain CIE. Leadership from OVR, BSE, ODP, and PaTTAN continue to meet weekly to further this initiative. From this regular collaboration, regional teams based on IUs were developed and have been meeting regularly, assessing resources, and building relationships.

Three regional trainings (West, Central & East) were conducted in October 2022 and March 2023 to help keep the momentum going among OVR, ODP, BSE and the IUs. At the 2023 PA Community of Practice on Transition Conference, a pre-conference was held collaboratively between OVR, ODP, and BSE. The pre-conference was an in-person networking opportunity that included presentations on collaboration and celebrated the teams' accomplishments.

Disability Innovation Fund Pathways to Partnership Grant Application OVR has submitted and received the Disability Innovation Fund (DIF) Pathways to Partnership grant in collaboration with federally funded CILs, ODP, LEAs, and PDE/PaTTAN for a total amount of \$9,990,688. This is a five-year grant that will run from October 2023-September 2028.

Grant Abstract: The Pennsylvania Transition Partners: Pathways to Partnership Demonstration Model is an innovative three-component model of transition services that will be implemented with support and engagement across all partners to provide both intensive training and program development support. **Pathways to Partnerships—Professional Development, Capacity Building and Training** will provide all partners with shared trainings in Charting the LifeCourse from the PA Office of Developmental Program and the Transition Discoveries framework, an evidenced based transition planning program and will also train and provide employers with Inclusive Model Employer Credential. **Pathways to Partnership—Transition Discoveries** implements a “trainer the trainer” model at the IU and LEA level to support dissemination of Transition Discoveries to increase student outcomes through individualized transition

planning. **Pathways to Partnership—Work Based Learning Experience** supports development and implementation of work-based learning programming at the LEA level. Formative and summative program evaluation informs project implementation, refinement, and upscaling within additional sites in Pennsylvania. Planned comparisons to prior outcomes within targeted regions for the intervention, as well as matched regions within the state, will provide for the evaluation of the project relative to control regions. Fidelity of implementation, project outcomes measures, and psychometrically valid measures will provide for a thorough evaluation of the impact of the project toward dissemination and replication to other agencies. Strategies and interventions, implementation considerations, evaluation metrics, and related information will form the basis of a toolkit to promote high fidelity of application of the Pathways to Partnership programs across the Commonwealth, sustainability of those efforts, and replication by other state vocational rehabilitation agencies.

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 conducts monthly outreach to customers to understand their experience of services from OVR. The current Customer Satisfaction Surveys were developed prior to 2022 with PaRC input and guidance. The basic method of outreach is through CWDS case record customer e-mail addresses. The surveys go to all customers of BVRS and BBVS based on their case services progress to status 26, employed. This includes those entering status 26 for one, six, and twelve months. A similar process is conducted for all customers who exit OVR in status 28. All customers in status 28 are only surveyed once during the month they appear in CWDS case records. Personally identifying information is redacted. This information is then shared with PaRC, and OVR Bureau Directors and managers. Customers who have requested follow-up are contacted on a case-by-case basis by OVR Central Office staff assigned to the surveys. Customers who request a follow-up by their VRC are shared with the Bureau District Office Administrator and VRC. To date, OVR averages approximately a 3% return on an average of one thousand surveys sent each month.

Lastly, all students in either transition status or Pre-ETS status are surveyed on their experiences with OVR. To date, OVR has had no responses to these surveys.

OVR has surveyed other state DSU survey models and results to look for ways to improve the survey process. This information has been

shared with the OVR Executive Team and PaRC. PaRC has a committee that is exploring with OVR Central Office staff strategies and future improvements to improve the response rates.

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.

The Administrative Officer 3 for HR, Recruitment & Diversity has worked to create a Hiring Manager Resource Folder. This folder contains a variety of resources related to HR, Recruitment, and Diversity, Equity, Inclusion and Accessibility (DEIA). This folder and subfolders are designed for clerical assistants and managers (Executive Director, Bureau Directors, Bureau Managers, Division Chiefs, District Administrators, Assistant District Administrators, etc.). The resource folder provides informational fact sheets and statistics related to unserved/underserved populations, communication guidance and support, and information on our foreign language line (Propio). Some examples of these resources include articles, documents on person-first language, etiquette for working with individuals with disabilities, EEO information, saying basic phrases in other languages, and information related to other topics including: accessibility and awareness. OVR hopes to foster an environment of inclusivity and belonging and continues to reflect upon programs and resources to support our staff and customers from cultural and ethnic minorities.

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

Within OVR, we continue to promote accessibility by ensuring all documents and communication are usable and accessible for all. 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. Within OVR, staff has access to virtual accessibility trainings that provide instruction on document accessibility. To extend information beyond just OVR, OVR staff assist the PA Office of Administration with creating a usable and accessible website which staff accesses to complete mandatory trainings. Revisions and collaboration have been ongoing, enhancing the accessibility of WBT training products. OVR is an active participant in ensuring the accessibility-based reviews continue on an ongoing basis for all Commonwealth web-based trainings. 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. 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 AT 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 DLI forms identified as inaccessible. Raising awareness of document accessibility is an ongoing need that is being addressed by ensuring new staff learn how to develop and disseminate accessible content. OVR actively participates in opportunities to enhance individual knowledge and understanding of the critical need for accessibility for all.

Goal 4: Initiate and Complete Capital Improvement Projects at HGAC

1. Invest in the replacement and repair of end-of-life systems and structure within HGAC, including but not limited to, building automation replacement, security cameras replacement and upgrade, phone system upgrade, campus-wide public restroom remodel, roof repairs, air handlers and cooling tower replacement and the repair to a failing ADA ramp/egress.

The agency has completed the replacement of some end-of life systems, but not all outlined in the State Plan. This is due in large part to continued delays in supply chains for large systems related to infrastructure and technology. The agency was able to complete the repairs to the failing ADA egress, roof repairs and phone system upgrade. Substantial work has been completed on the air handler and cooling tower replacements, with programming and linking to the existing then new building automation system still slated to occur in spring 2024. Planning, mobilization, and installation/networking work continues with the building automation replacement, security cameras replacement and system upgrade, and public restroom remodel.

2. Increase opportunities for students through capital projects, including new classrooms, upgrades to existing classrooms and updated campus features.

Planning continues for new classrooms, with Childcare Development Associate being the next program slated to open. Technology has been upgraded in all classrooms where life cycles allowed, and we continue to implement industry standards in the classrooms as recommended by the PAC committees. Campus upgrades place opportunities for our students at the forefront, with improvements made in the Dining Hall, dormitories, shared recreational and study spaces, and classrooms.

3. Promote accessibility and technology through capital improvements based on universal design principles.

The agency continues to explore and move to procure systems, classroom and student life technology based on universal design. An internal navigation application for campus available on Android and Apple devices is currently moving through the Commonwealth procurement process. Every capital project design is assessed by architects fluent in universal design.

4. Expand the availability of services and education offered through HGAC.

The agency has been and continues expanding both on-campus and community programming for customers of the Commonwealth. The Center for Assistive and Rehabilitative Technology (CART) has expanded services and serves a greater number of customers off-campus in their community and residences. A deal was brokered between HGAC and the local public transportation agency to offer every customer receiving services a bus pass for the entirety of their campus stay with the agency. Future plans, currently in varying stages of program development, Commonwealth procurement, or MOU enactment, include virtual classroom driver's education services with in-community behind-the-wheel drivers training, transportation contract for students, virtual vocational assessments, virtual career services, and a driver evaluation program in conjunction with the PDE.

5. Phased renovation of the dormitories at HGAC.

HGAC has implemented and been approved to proceed with a project through PA's Department of General Services to renovate each dormitory on campus, which will be seven total with two being done at a time. It is anticipated each two-dormitory remodel will take approximately eight months. Administration has been presented with and reviewed several renderings for dormitory renovations and made alterations to plans to best serve the student body in function, form, and accessibility. Plans were solidified and final drawings have been developed. Renovations will begin in Bedford and Cambria Halls, with work taking place at the same time to maximize contractor time and to ensure materials are available and uniform. Due to other capital projects, start time for the renovations is unknown, however it is expected to begin late 2023/early 2024.

(2) Performance on the performance accountability indicators under section 116 of WIOA for the most recently completed program year, reflecting actual and negotiated levels of performance. Explain any discrepancies in the actual and negotiated levels; and

OVR's performance indicators for Program Year 2022 are as follows:

1. Employment Q2 After Exit – 61.8% (RSA's goal as established in the State Plan is 56%)
2. Employment Q4 After Exit – 56.8% (RSA's goal as established in the State Plan is 47%)
3. Credential Attainment (CA) – 19% (RSA's goal as established in the State Plan is 20%)
4. Measurable Skill Gains (MSG) – 36.5% (RSA's goal as established in the State Plan is 39%)

Of note is that PA OVR started Q1 off at 1.8%, climbed to 10.8% in Q2, 16.7% in Q3, and reached 36.5% in Q4, so although we fell just short of the goal for MSG, we were able to climb 34.7% in a 12-month period. The key now will be sustaining that momentum as the activities related to both CA and MSG tracking are an administrative burden on staff.

(3) The use of funds reserved for innovation and expansion activities (sections 101(a)(18) and 101(a)(23) of the Rehabilitation Act) (e.g., SRC, SILC).

No funds were used to purchase RSA-defined I&E activities during PY 2022 according to sections 101(a)(18) and 101(a)(23). However, OVR will evaluate the necessity of reserving I&E funds related to the provision of direct services to customers based on needs identified in the CSNA.

(e) Supported Employment Services, Distribution of Title VI Funds, and Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.

(1) Acceptance of title VI funds:

(A) VR agency requests to receive title VI funds.

(B) VR agency does NOT elect to receive title VI funds and understands that supported employment services must still be provided under title I.

(2) If the VR agency has elected to receive title VI funds, Section 606(b)(3) of the Rehabilitation Act requires VR agencies to include specific goals and priorities with respect to the distribution of title VI funds received under section 603 of the Rehabilitation Act for the provision of supported employment services. Describe the use of title VI funds and how they will be used in meeting the goals and priorities of the SE program.

Title VI funds will be used to provide SE services under the WIOA definition to eligible participants of the VR program. At least 50% of these funds will

be used to provide SE to youth with disabilities; however, it is OVR's intention to devote up to 100% for this purpose if there are sufficient numbers of appropriate youth participants. Adults with disabilities will be served with any remaining funds available after youth have been served using these funds. All services provided using title VI funds will operate under the same guidelines as SE services provided under title I.

(3) SE services may be provided with title 1 or title VI funds following placement of individuals with the most significant disabilities in employment. In accordance with section 101(a)(22) and section 606(b)(3) of the Rehabilitation Act, describe 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; and the timing of transition to extended services.

OVR provides SE services to Pennsylvanians with disabilities, including youth up to age 25, through a network of CRPs. Services provided through these vendor partners are described below.

Background

OVR completely overhauled its SE policy and procedures from 2016-18. Changes were brought about by recommendations of an SE workgroup and new regulations stemming from WIOA, and included a revision of the milestone payment approach that was in place to a fee structure corresponding to a customer's job stability, a move from Letters of Understanding (LOU) with CRPs to an SE Provider Agreement, the inclusion of Discovery/CE in the 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. As of October 2023, there are 173 approved SE providers (an 11% increase from August 2021), with 30 providers approved to render Discovery/CE services (17% increase).

Quality Standards

- OVR utilizes a broader case review process to ensure that counselors are providing services in accordance with policy and procedure. This covers the general oversight of providing SE services.
- OVR's electronic case management system has business rules in place to ensure that all reporting and documentation related to the provision of SE services are being conducted according to policy, thus helping to ensure quality standards.

- Current OVR SE policy requires that CRP staff have minimum credentials including Certified Employment Support Professional (CESP), Association of Community Rehabilitation Coordinators (ACRE), and CRC, in order to provide SE services to ensure quality service provision.
- 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, video conferences and conference calls.

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 include 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 PA, 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 Medicaid 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 that can be used for extended service funding are natural supports, SSA work incentives, and private foundations.

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 has a joint agreement that dictates when the case can move to ODP-funded extended services and documentation requirements.

(4) Sections 101(a)(22) and 606(b)(4) of the Rehabilitation Act require the VR agency to describe efforts to identify and arrange, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide SE services. The description must include extended services, as applicable, to individuals with the most significant disabilities, including the provision of extended services to youth with the most significant disabilities in accordance with 34 CFR 363.4(a) and 34 CFR 361.5(C)(19)(v).

As mentioned above, OVR has coordinated with other State offices such as ODP and OLTL. Preliminary meetings were held with OMHSAS to discuss a coordinated approach to bringing the Individual Placement and Support (IPS) and other entities to provide SE services and extended 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 offices to provide quality SE services and provide referrals and information regarding mutual customers. OVR will provide current information and training to state offices and other entities to ensure the provision of services and extended services.

OVR will continue to support the provision of quality SE services by adequately trained and properly credentialed staff either directly, through other state and local government agencies, or private service agencies, as appropriate.

(f) Annual Estimates.

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 CFR § 361.29(b), annual estimates must include the following projections:

(1) Estimates for next Federal fiscal year—

(A) VR Program; and

Table 3: Estimates for next Federal fiscal year - VR Program

Priority Category (if applicable)	No. of Individuals Eligible For Services (Statistical Estimation of open cases in PY from past performance {2018-2022} and PY22 category composition)	No. of Eligible Individuals Expected to Receive Services under VR Program	Total Career and Training Services Expenditures (from PY22 ETA-9369 per capita amounts)	No. of Eligible Individuals Not Receiving Services (if applicable)
Most Significant Disability	34,000	34,000	\$140,000,000	N/A
Significant Disability	1,000	1,000	\$5,000,000	N/A
Non-Significant Disability	125	125	\$600,000	N/A

(B) Supported Employment Program.

Table 4: Supported Employment Program

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	No. Receiving Services x Actual Per Customer Costs for SE From 7/1/22 to Present	No. of Eligible Individuals Not Receiving Services (if applicable)
Most Significant Disability	8,300	8,300	\$20,100,000	N/A

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	No. Receiving Services x Actual Per Customer Costs for SE From 7/1/22 to Present	No. of Eligible Individuals Not Receiving Services (if applicable)
Significant Disability	450	450	\$1,100,100	N/A
Non-Significant Disability	35	35	\$85,000	N/A

(g) Order of Selection.

The VR agency is not implementing an order of selection and all eligible individuals will be served.

The VR agency is implementing an order of selection with one or more categories closed.

* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

Pursuant to section 101(a)(5) of the Rehabilitation Act, this description must be amended when the VR agency determines, based on the annual estimates described in description (f), that VR services cannot be provided to all eligible individuals with disabilities in the State who apply for and are determined eligible for services.

(1) For VR agencies that have defined priority categories describe—

(A) 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. The OOS in PA gives priority first to individuals with Most Significant Disability; second to individuals with Significant Disability; and third to individuals with Non-Significant Disability.

On July 1, 2019, with approval from RSA, OVR closed priority categories Most Significant Disability, Significant Disability, and Non-Significant Disability. The OOS was subsequently opened on August 8, 2022, and as of February 22, 2023, all eligible customers on the wait list were able to be removed from the list. OVR will continue to evaluate the fiscal outlook

quarterly and resume the OOS and re-develop the wait list only if fiscally found necessary.

(B) The order (priority categories) to be followed in selecting eligible individuals to be provided VR services ensuring that individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and

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.

(C) The VR agency's goals for serving individuals in each priority category, including how the agency will assist eligible individuals assigned to closed priority categories with information and referral, the method in which the VR agency will manage waiting lists, and the projected timelines for opening priority categories. NOTE: Priority categories are considered open when all individuals in the priority category may be served.

OVR is not implementing an OOS and all eligible individuals will be served.

OVR's outcome and service goals are projected as follows for **FFY 2024:**

1. For the Most Significant Disability category, the number eligible is expected to be approximately 34,000, with all expected to be served.

2. For the Significant Disability category, the number eligible is expected to be approximately 1,000, with all expected to be served.
3. For the Non-Significant Disability category, the number eligible is expected to be approximately 125, with all expected to be served.

(2) Has the VR agency elected to serve eligible individuals outside the OOS who require specific services or equipment to maintain employment?

Yes

No

(h) Waiver of Statewideness.

The State Plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the RSA (Commissioner) may waive compliance with this requirement in accordance with section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 CFR 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 CFR 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."

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

An 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 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.

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)
3. Job Trainer (Paraprofessional)

These two programs provide two separate paths for Pre-ETS. Pathway One is identified as "Employability and Career Readiness," and Pathway Two is identified as "College and Career Readiness."

Pathway One – Employability and Career Readiness

A minimum of 120 OVR eligible and potentially eligible students with disabilities received employability skills, career readiness training and transition services.

1. Increased Employability and Career Instruction - Teachers are using the Life Centered Education Curriculum from CEC. Additional resources and curriculums were added.
2. Increased work simulations opportunities and projects in the classroom and building setting with a minimum of 10 new simulations and across students of multiple programs and level of need.
3. Continue to connect students to agency and transition services.

A minimum 45 OVR eligible students with disabilities will participate in at least one form of paid work experience. The following locations provide opportunities for paid work experiences.

1. School District of Lancaster - Student Employee Program was successful
2. Thaddeus Stevens
3. Marriott/Lancaster County Convention Center

A minimum of three employee partnerships to provide small group training and a minimum of three employee partnerships for individual high need student cases. An employee partnership is an agreement between the SDoL and/or agency providers such as OVR, along with a community employer to provide students various levels of employment experience/opportunities such as OJT.

20 students with disabilities received job readiness and employment skills support. Eight students obtained post-graduation competitive employment.

1. In the school setting with limited community opportunity;
2. 15 OVR eligible students with disabilities shall be placed in CIE consistent with their IEP.

Pathway Two - College/Career Readiness Transition

This pathway includes classroom-based instruction related to college/career readiness skills and participation in a part-time college campus experience. Daily instruction and coaching is provided on a college campus for two hours per day through the duration of one college semester with the use of a vocational special education teacher. A minimum of 10 eligible students with disabilities receive college/career readiness training and services annually.

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 PDE and DHS more effectively.

OVR, as the designated State unit, approved each proposed service before it was put into effect, as demonstrated by a fully executed IGA between the parties and following guidance in the OVR Fiscal Procedures Policy. Based upon 34 CFR §361.50 and OVR Fiscal Policy guidance, the OVR Executive Director or their designee also conducted a rate review of these inter-agency agreements to determine appropriate rates. These agreements are available for review, by year, upon request.

OVR approves each proposed service before it is provided by requiring 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.

(i) Comprehensive System of Personnel Development.

In accordance with the requirements in section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

(1) Analysis of current personnel and projected personnel needs including—

(A) The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;

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

(C) Projections of the number of personnel, broken down by personnel category, who will be needed by the VR agency to provide VR services in five 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.

Table 5: Current Personnel and Projected Personnel Needs

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
VRC (includes VR Counselors for Deaf & Hard of Hearing)	315	380	65
Vision Rehabilitation Therapist	20	21	2
Orientation & Mobility Specialists	10	15	5

(D) Ratio of qualified VR counselors to clients:

The ratio of qualified VRCs to clients with an active rehabilitation plan as of October 2023 was 1:111.88.

(E) Projected number of individuals to be served in five years:

OVR projects that in the next five years, approximately 50 VRCs will become eligible to retire. This will be an average of 10 VRCs retiring per year, in addition to an unknown number of VRCs who leave as part of general turnover. Additional numbers of new VRCs may be needed due to promotions into management positions. If the number of customers seeking VR services remains the same, or slightly increases or decreases, OVR projects that an average of 15-20 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.

(2) Data and information on personnel preparation and development, recruitment and retention, and staff development, including the following:

(A) A list of the institutions of higher education in the State that are preparing VR professionals, by type of program; the number of students enrolled at each of those institutions, broken down by type of program; and 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.

Table 6: Data and Information on Personnel Preparation and Development, Recruitment and Retention, and Staff Development

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
Pennsylvania State University	Clinical Mental Health and Clinical Rehabilitation	54	19
The University of Pittsburgh	Clinical Mental Health and Clinical Rehabilitation	60 (30 in Year 1, 30 in Year 2) but hoping to add Clinical RC back Fall 2024	20
Penn West University (Edinboro University of PA)	Clinical Rehabilitation Counseling	*School did not yet respond	*School did not yet respond
The University of Scranton	Clinical Rehabilitation *They also have other master's counseling programs	15 current Clinical RC students, plus 4 working on advanced studies credits towards licensure 62 Mental Health Counseling students 19 School Counseling students	8 Clinical Rehabilitation 20 Clinical Mental Health Counseling 7 School Counseling

(B) The VR agency's plan for recruitment, preparation and retention of qualified personnel, which addresses the current and projected needs for qualified personnel; and the coordination and facilitation of efforts between the VR agency 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

As a direct result of the COVID-19 pandemic, all PA Commonwealth agencies (including OVR) were placed under a hiring freeze in March 2020. Since this directive was initiated by former PA Governor Tom Wolf for a significant period of time, OVR was unable to hire VRC Interns and new VRCs starting in March 2020. Hiring has since resumed and has been inclusive of all job classifications, including internships. The Administrative Officer 3 for HR, Recruitment, and Diversity responsible for recruitment and retention of employees has been working diligently with Commonwealth Human Resources and the Office of Administration in developing and implementing a strategic plan for recruitment.

In July 2022, after ongoing collaboration and coordination with the Office of Administration – HR, an expansion of the Minimum Experience and Training Requirements (METs) for the VRC, VRC-Deaf & Hard of Hearing, and VR Supervisor positions was approved. This expansion now permits individuals with master's degrees in the following fields to apply for the VRC, VRC-Deaf and Hard of Hearing, and VR Supervisor positions: VR, mental health, special education, social work, human services, psychology, business administration, human resources, public administration, and closely related fields. This change has significantly increased the eligible talent pool for recruitment in these job classifications. Additionally, in September 2022, the Administrative Officer 3 worked closely with PDE to provide outreach to over 300 colleges and universities within PA to encourage applicants for all job classifications. This effort was also to again highlight the new expanded METs for the VRC, VRC-Deaf & Hard of Hearing, and VR Supervisor positions.

In addition to the available students graduating from in-state programs, OVR's Administrative Officer 3 for HR, Recruitment & Diversity continues to recruit students from CORE/CACREP-approved universities that offer a master's degree in Rehabilitation Counseling/Clinical Rehabilitation Counseling nationwide. PA residency requirements are waived under the State Civil Service commission for the VR Counselor Internship position and other VR Counselor classifications in OVR. This waiver provides OVR with an opportunity to recruit students nationwide and offer paid VR Counselor 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 will have a master's degree in the field of 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 from a broader

recruitment pool and can include more 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 PA. 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. This includes campus visits, onsite presentations, use of telecommunication technology, and one-on-one meetings with students for targeted recruitment. OVR has established relationships with the following HBCU's nationwide: Alabama State University, Coppin State University, University of the District of Columbia, Fort Valley State University, Langston University, University of Maryland Eastern Shore, North Carolina A&T State University, North Carolina Central University, South Carolina State University, Southern University and A&M College, and Winston-Salem State University. OVR will also continue to build relationships with program coordinators at graduate training programs in Puerto Rico who offer rehabilitation counseling disciplines including Bayamon Central University, Pontifical Catholic University of Puerto Rico, and the University of Puerto Rico;
- Maintaining membership on Rehabilitation Counseling Program Advisory Boards, including George Washington University, Penn West University (formerly Edinboro University), Rutgers University, The University of Scranton, and West Virginia University. OVR will also maintain a commitment to other related partnership meetings, including Assumption University, Auburn University, Florida International University, and The University of South Carolina.

- Maintaining active membership with professional organizations and visiting colleges/universities, and appropriate job fairs in conjunction with the Office of Equal Employment Opportunity, to recruit potential job applicants who are from diverse cultural backgrounds and applicants with disabilities.

VRC Updates

OVR is currently exploring additional options to expand the qualified talent pool for VRCs. This exploration involves consideration of varying levels of VRCs with the possibility of bachelor's level positions. This option was discussed at a previous State Board meeting and members were in favor of this option.

VRC – Deaf and Hard of Hearing

OVR's Administrative Officer 3 for HR, Recruitment & Diversity 3 also has partnered with colleges and universities nationwide specific to VRC – Deaf & Hard of Hearing positions. Entry-level requirements for the VRC – Deaf & Hard of Hearing includes the METs for the VRC as well as passing a sign language proficiency evaluation at the intermediate level. Recruitment spans to students and alumni who receive training at universities nationwide. Students and alumni from these programs reside both inside and outside of PA. Some of these collegiate partners include Emporia State University, Gallaudet University, Troy University, Western Oregon University, and Winston-Salem State University. OVR will continue ongoing outreach and partnership with these colleges and universities.

Orientation & Mobility Specialists and Vision Rehabilitation Therapists

OVR's Administrative Officer 3 for HR, Recruitment & Diversity recruits from accredited university programs in PA that train Orientation & Mobility (O&M) Specialists and/or Vision Rehabilitation Therapists (VRTs), including Salus University, the University of Pittsburgh's Vision Studies Program, and Kutztown University. Graduates of these approved university programs are eligible for certification in VRT or O&M from the Academy for the Certification of Vision Rehabilitation & Education Professionals (ACVREP). 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 PA. Additional collegiate partners that OVR's Administrative Officer 3 has worked with in this area include the following O&M Programs: California State University – Los Angeles, Florida State University, North Carolina Central University, San Francisco State University, Texas Tech University, Stephen F. Austin State University, University of Arkansas at Little Rock, Umass – Boston, O&M and VRT Programs: Northern Illinois University, West Michigan University, and VRT Programs: The University of Arizona.

OVR 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.

(C) Description of staff development policies, procedures, and activities that ensure all personnel employed by the VR agency receive appropriate and adequate training and continuing education for professionals and paraprofessionals:

i. 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

ii. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by WIOA.

OVR employs a Training Specialist who monitors trends in both training and rehabilitation, including participation in a Community of Practice under the Center for Innovative Training in VR (CIT-VR), sharing various training opportunities from other partnerships.

In addition, 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's internal subject matter experts receive guidance from various technical assistance centers including the National Technical Assistance Center on Transition: The Collaborative (NTACT:C) and the VR Technical Assistance Center for Quality Management (VRTAC-QM).

OVR supports various training opportunities and coordinates efforts with various professional associations such as the PA Workforce Development Association, PA Association of Rehabilitation Facilities, National Association of Multicultural Rehabilitation Concerns, PA Rehabilitation Association and the Association for Education & Rehabilitation of the Blind & Visually Impaired to train and retain qualified personnel. These external organizations frequently focus on evidence-based practices and current trends in their areas of subject matter expertise.

(3) Description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency professional and paraprofessional personnel are adequately trained and prepared, including—

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

(B) The establishment and maintenance of education and experience requirements, 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.

Section 101(a)(7) of the Rehabilitation Act as amended, 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 (CRCs). Specifically, all newly hired VRCs were 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 PA Civil Service Announcement for VRC positions became effective on October 4, 2002.

On July 1, 2017, all CORE programs merged under CACREP. The intent of this merger was 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 VR. While a benefit to the student, there is concern of 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.

As mentioned above, in July 2022, OVR expanded the METs for the entry level VRC as it relates to the CACREP standards.

As a result of the CORE/CACREP merger, PA Office of Administration approved the proposed MET expansion. Within this redesign, and following RSA standard (34 CFR §361.18©(2)(A)(1), OVR has observed documented increases in the VRC candidate pool which has allowed us to decrease our vacancies in addition to increasing our visibility amongst all CORE/CACREP programs nationwide. The approved job classifications for the expansion included: VRC, VRC-Deaf & Hard of Hearing, and VR Supervisors. The expanded degree areas included: VR, mental health, special education, social work, human services, psychology, business administration, human resources, public administration, and closely related fields. All efforts are mission critical to support our District Offices and give the ability to maintain work-life balance for our employees.

OVR continues to provide the following recruitment incentives for VRCs:

- A designated Administrative Officer who actively recruits qualified VRCs, including those with disabilities, individuals from diverse cultural backgrounds, and underrepresented groups, and from all CORE/CACREP programs nationwide. The Administrative Officer has developed a plan that will continue to be proactive in adequately supplying VRCs trained to provide services to specialty caseloads such as Counselors for the Deaf & Hard of Hearing and Counselors for the Blind & Visually Impaired.
- 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.
- 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 Labor Management Information (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 the 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 relationships 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 CIE 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-ETS.

(4) Method(s) the VR agency uses to ensure that personnel 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 & Hard of Hearing population. Entry-level requirements for these counselors require that candidates pass a sign language proficiency evaluation at the intermediate level. OVR District Offices in geographic areas where there are large numbers of individuals who speak Spanish, recruit and hire VRCs 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. In addition, OVR has a VR Specialist assigned to coordinate the Deaf, Hard of Hearing & Deaf-Blind Program in OVR. This Specialist assists with outreach to these populations to attract qualified OVR candidates for employment.

Additionally, OVR has incorporated 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.

(5) 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 (IDEA).

VRCs focused on Transition and Early Reach Coordinators (ERCs) within OVR work regularly with educators in local school districts who are working under IDEA. Training on OVR's School to Work 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.

COOPERATION, COLLABORATION, AND COORDINATION (Section 101(a)(11) of the Rehabilitation Act)

(j) Coordination with Education Officials.

In accordance with the requirements in section 101(a)(11)(D) of the Rehabilitation Act—

(1) Describe plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities, that are designed to facilitate the transition of the students with disabilities from the receipt of educational services in school to the receipt of VR services, including Pre-ETS.

The School to Work Transition Policy was updated on March 11, 2021. The policy details OVR staff responsibilities regarding Pre-ETS, transition

services, outreach, collaboration, and financial responsibility. Regarding coordination with education, OVR will collaborate with LEAs to improve the successful movement from school to work for students and youth with disabilities. OVR representatives will work with LEAs to develop strong, consistent relationships with LEAs so the OVR representative's knowledge and expertise can be of benefit to students and youth with disabilities, even before students/youth are formally referred to OVR.

Transition services, including Pre-ETS, offered by OVR will supplement, but not replace, IDEA transition services delivered through a secondary school or any other entity charged with the delivery of transition services in accordance with IDEA. The LEA is responsible for providing and paying for transition services that are also considered special education or related services and that are necessary for ensuring a free, appropriate public education to children with disabilities. Nothing under Title I of the Rehabilitation Act shall be construed as reducing an LEA's obligation to provide the above-described services under IDEA (see section 101(c) of the Rehabilitation Act and §361.22(c) of the VR regulations).

VR transition services facilitate the transition from school to post-secondary life, such as achievement of an employment outcome in CIE. Pre-ETS are part of the continuum of services that VR can provide to students with disabilities.

OVR will also designate a liaison to PDE and provide statewide coordination and technical assistance for transition from school to work. An OVR representative maintains contact as needed with personnel in area schools, alternative educational sites and community resources to ensure early identification of students and youth who may require VR services. These students and youth may or may not be receiving special education services.

(2) Describe the current status and scope of the formal interagency agreement between the VR agency and the State educational agency. Consistent with the requirements of the formal interagency agreement pursuant to 34 CFR 361.22(b), provide, at a minimum, the following information about the agreement:

(A) Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including Pre-ETS and other VR services;

OVR and the PDE-BSE have signed an MOU. The MOU was approved by all parties in October 2020. A training series that overviewed the MOU agreement was provided to OVR, BSE, LEAs, youth and families. The

trainings were offered on April 8, 2021 (Unpacking the MOU), April 21, 2021 (Engaging Stakeholders) and May 13, 2021 (Strategies for Aligning Efforts).

In addition, OVR has collaborated with PDE-BSE on launching a new PA Secondary Transition website with the intent to provide a “one-stop shop” for professionals and which provides general information about transition, practices, and resources. The website also includes an inter-agency shared events calendar and a place to share current announcements and information. The website is closely aligned with the Transition Discoveries website that contains resources for youth and families.

In the MOU with the PDE-BSE, OVR agrees to:

- Provide consultation for transition planning for students with disabilities to facilitate the development of their IEPs. OVR can provide information, technical assistance, case consultation and information/referral as needed for eligible or potentially eligible students.
- Inform and collaborate with LEAs on development and implementation of community events, such as job fairs, transition fairs, and career days, to introduce students with disabilities to possible career goals.
- Create a consistent communication plan to develop policies and procedures.
- Along with BSE, collaborate on the provision of ongoing joint staff training, such as development and implementation of IEPs, Pre-ETS, accommodations under Section 504, and limitations on youth entering employment paying subminimum wage.

Additionally, OVR participates in collaborative training each school year with other statewide transition stakeholders for education staff so that the most recent Pre-ETS information is made available to all LEAs.

BSE will direct LEAs to disseminate these requirements to parents, guardians, teachers, and students. OVR will maintain the documentation and provide a copy to the youth within the timelines identified as specified under 34 C.F.R. Part 397. Any of the services identified above that LEAs provide must be documented by the LEA and provided to the student and OVR.

(B) Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their IEPs under section 614(d) of IDEA;

OVR can assist the students and youth with a disability transition from school to CIE, or from school to post-secondary training/education that leads to CIE. The transition goal of the student with a disability should always remain the priority of the IEP process. It is OVR’s role to provide appropriate

and necessary information to the student and parent/advocate to ensure the IEP is developed with effective transition foremost in mind.

LEAs will send timely invitations to OVR counselors for participation in IEP meetings, when appropriate. When possible, OVR staff will attend IEP meetings in person or by alternative means, such as videoconferences and conference calls, when invited by the LEA. If they cannot participate in the IEP meeting, OVR staff can provide information, vocational planning and guidance, and transition-specific materials to the IEP team.

In addition to the MOU and WIOA, the PA 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 that students with disabilities have Pre-ETS included in IEPs when appropriate and that OVR reports on IEP meeting attendance.

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

The MOU outlines the roles and responsibilities of each agency:

OVR Responsibilities:

- Provide students with Pre-ETS and transition services under Title IV of the Rehabilitation Act of 1973, as amended by WIOA.
- Conduct outreach for students with disabilities who may benefit from VR services as early as appropriate during the transition planning process. OVR will work to foster the referral of students with disabilities to VR services at least two years prior to exiting high school.
- Coordinate a referral process for students with disabilities in need of Pre-ETS, and students or youth with disabilities interested in applying for VR services.
- Determine eligibility for individual VR services and develop an IPE in coordination with the student's or youth's IEP or 504 plan as early as possible if a student is interested and applies for VR services prior to graduation.
- Attend IEP meetings in person or by alternative means, such as videoconferences and conference calls, when invited by LEAs.
- Designate staff to be responsible for the oversight of the provision of technical assistance and consultation, and the development of program strategies and procedures applicable for students with disabilities.

- Provide technical assistance to BSE and LEAs through formal and informal training, joint problem-solving, and exchange of information on policies and procedures.
- Identify a SPOC for each LEA and other schools (including approved private schools and other specialty schools) who will coordinate transition activities, develop collaborative approaches for student outreach and referral for VR services, facilitate communication with OVR staff, and assist with transition planning that facilitates the completion of a student's IEP and the student's transition from school to post-school employment.
- Provide information to BSE on referrals and employment outcomes of students with disabilities by LEA on an annual basis, and additional information as requested and as applicable law allows.
- Share information regarding policies, procedures, guidelines, programs and services to improving the access to, and availability of, Pre-ETS and transition services.
- Provide brochures and materials about the OVR process and services to LEAs for distribution to the students, parents, legal guardians, teachers and others.
- Conduct outreach to businesses and promote employer participation in work-based learning experiences, such as worksite tours, employer mock interviews, job shadowing, and paid work experiences for students with disabilities.
- Advise OVR staff to attend IEP meetings when invited and with parental consent to provide employment information, technical assistance, case consultation, and information on VR programs and referrals needed.
- Perform outreach activities that help inform LEAs, students with disabilities, and their families about the VR program, including purpose of program, VR eligibility requirements, referral and application procedures, and the scope of services that may be provided to eligible individuals.
- Provide SE services to a student in their final six months of high school to secure permanent CIE if it is an identified service in their IPE.

BSE Responsibilities:

- Ensure the provision of a Free Appropriate Public Education (FAPE), including transition services.
- IDEA [34 CFR §300.43 (Authority: 20 U.S.C. 1401(34))]

- Transition services for children with disabilities may be special education, if provided as specially designed instruction, or a related service, if required to assist a child with a disability to benefit from special education.
- Ensure that LEAs' coordinated set of activities supports career and post-secondary education and training options.
- Ensure that LEAs collaborate with OVR in the provision of transition services and Pre-ETS.
- Ensure that LEAs collaborate with OVR in determining the student's needed Pre-ETS activities based upon the student's current assessment and secondary transition post-secondary goals.
- Ensure that LEAs provide opportunities for students to develop employment skills and participate in community experiences.
- Ensure that LEAs provide available student information to assist in VR eligibility determination and receipt of Pre-ETS.
- Ensure that LEAs assist OVR staff with access to students and their school environment and with identifying opportunities to work with students.
- Ensure that LEAs invite OVR staff to the student's IEP meeting.
- Ensure that LEAs collaborate with OVR to determine who will be responsible for providing services that are both special education services and VR services.
- Ensure LEAs are not contracting with an entity for the purpose of operating a program under which a youth with a disability is engaged in work compensated at a subminimum wage.
- For students with disabilities who are seeking subminimum wage employment after high school exit, ensure that LEAs provide OVR documentation of completion of appropriate transition services under IDEA.
- Ensure that LEAs implement special education requirements for transition planning services specified in IDEA as evidenced by the development and implementation of IEPs for students with identified needs.
- Designate BSE personnel to be responsible for the provision of technical assistance and consultation, and the development of statewide program strategies and procedures applicable to students with disabilities transitioning from school to post-school activities.
- Coordinate a network of professionals focused on assisting schools with implementing effective transition planning and services.

- Provide technical assistance and consultation to OVR through formal and informal training, joint problem-solving, and exchange of information on policies and procedures.
- In accordance with applicable law, share data related to students with disabilities regarding transition services, post-secondary goals, post high school outcomes, and exiting environment data.
- Provide representation on the PaRC and relevant committee participation.

Mutual Responsibilities:

- **Training and Technical Assistance:** OVR will provide consultation and technical assistance to LEAs that will assist in the planning and transition of all students with disabilities who are eligible or potentially eligible from school to post-school activities, including employment. OVR will develop and provide common training and professional development opportunities to improve transition and employment results for youth.
- **Planning and Coordination:** OVR and BSE will collaborate in the development of a work group (Pre-Employment Transition Activities Task Force) that targets the improvement of transition to employment outcomes in integrated, community settings for students with disabilities. This taskforce will also explore and identify Pre-ETS and transition-related services (work-based learning, internships, apprenticeships, dual enrollment programs, industry recognized credential programs, and college programs). Further, OVR and BSE agree to work collaboratively to coordinate with and engage employers on Pre-ETS for students with disabilities and transition services for youth with disabilities.
- OVR and BSE will continue to collaborate and lead in the PA Secondary Transition Community of Practice and related State Leadership Team.
- **Data Sharing:** OVR and BSE will share of data, within the bounds of applicable law, of potentially eligible and/or eligible students with disabilities regarding transition services and outcomes.
- OVR and BSE will post this MOU and provide training and technical assistance to VR and Education staff at the state and local level that is recorded and archived on their respective websites.
- OVR and BSE will provide relevant training and technical assistance to minimize redundant services and maximize resources in both systems.
- OVR and BSE will provide a copy of this MOU to the following key stakeholders:

- all LEA superintendents or chief school administrators
- all directors of special education
- all OVR District Administrators
- the DLI Office of Developmental Programs (ODP)
- Pennsylvania Rehabilitation Council (PaRC)
- State Board of Vocational Rehabilitation
- Right to Education State Task Force and Local Task Forces
- Client Assistance Program (CAP)
- other entities as identified.
- OVR and BSE will mutually develop and distribute notices, memorandums, and other information regarding transition to key stakeholders.
- Transition Services/Accommodations: OVR and BSE will identify and disseminate information about Pre-ETS and transition services, accommodations, employment services, effective practices/strategies that create positive employment outcomes to program staff, partners, families, individuals, employers, and public and private stakeholders.
- Assistive Technology (AT): BSE will work with OVR on identifying the AT needs of students eligible for OVR services.
- OVR and BSE will encourage students with disabilities to gain targeted skills necessary to compete in the workforce through specialized technical education programs, trade schools, pre-apprenticeships/apprenticeships, industry-based skills trainings, and internships.
- OVR and BSE will investigate additional funding sources for high school students with disabilities, such as statewide WIOA Title I programs for supplemental assistance through individual training accounts (ITAs).

For financial responsibilities, OVR and BSE will identify a method for defining the financial responsibility of OVR and LEAs for the provision of VR services and will identify procedures under which OVR may initiate proceedings to secure reimbursement for VR services from LEAs and vice versa. 34 C.F.R. §§ 300.154 & 361.53(d)(3)(i) and (iii).

Disagreements about which entity is financially responsible for payment for services may occur, and decisions about whether the service is related to an employment outcome or educational attainment, or whether the service is considered a special education or related service, as well as whether the service is one customarily provided under IDEA or the Rehabilitation Act, will be made at the State level by BSE and OVR.

LEAs should continue to provide some of the transition services typically provided under IDEA rather than cease providing the services with a referral to the VR program. If any of the five required Pre-ETS are needed by a student with a disability, and are not customary services provided by LEAs, OVR will collaborate and coordinate with the LEA regarding the provision of such services.

When similar or identical service needs are identified as education-related in the IEP established by the LEA and employment-related in the IPE established by OVR, it is understood that disputes will be resolved between OVR and LEAs at the local level. The process for dispute resolution is as follows:

- If the service is special education or a related service and included in the student's IEP, the LEA may provide the service either directly or through other sources, or request OVR provide the service. If OVR determines the service does not violate the comparable benefits policy (unless such a determination would interrupt or delay the progress of the individual) and is identified as a service on the individual's IPE, OVR may assume the costs for the service. If OVR determines that the purpose of the service is more for educational attainment than achievement of CIE, then the LEA would pay for the service, as they would for services under IDEA.
- OVR's funding for assessment for eligibility and vocational needs, counseling and referral services, job placement services, rehabilitation technology and auxiliary aids and services are exempt from comparable benefit and the FNT.
- When AT goods or services are needed for educational purposes, it will be the financial responsibility of the LEA. However, prior to exit from high school, OVR will determine needs and comparable benefits for AT for post-secondary education and employment purposes for the individual as needed for employment and identified on the individual's IPE.

Nothing in the MOU shall be construed to reduce the obligation under IDEA for the LEAs to provide/pay for transition services that are required to ensure FAPE.

(D) Procedures for outreach to and identification of students with disabilities who need transition services and Pre-ETS. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the VR program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals;

OVR and BSE will support outreach activities that will ensure referrals to OVR to provide eligible and potentially eligible students with disabilities a smooth school-to-work transition. OVR outreach activities focus on providing information about VR to school staff, students, families, community professionals, and others interested in Pre-ETS and transition services, including students and families of diverse backgrounds. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the following:

- VR program purpose
- Eligibility requirements
- Application procedures
- Scope of services that may be provided to eligible students
- Pre-ETS that may be provided to potentially eligible or eligible students.

OVR will provide information to BSE and LEAs regarding OVR services that will be disseminated to students and their families. BSE will ensure that LEAs highlight the information and outreach activities provided by OVR and make such information and activities available to all students with disabilities and families of students with disabilities.

OVR staff may conduct outreach in the following manner such as:

- Providing VR brochures and business cards to the school.
- Presenting at the first open house, family information nights, or orientation held at the school.
- Conducting regularly scheduled school visits.
- Participating in transition and job fairs at the school.
- Attending IEP meetings, when invited.
- Speaking about Pre-ETS and VR services at school staff meetings, teacher in-service trainings, student/family group meetings, or interagency meetings.

OVR will work with LEAs to ensure referrals of students with disabilities to the VR program at the beginning of the school year. Referral for Pre-ETS should begin at age 14 for all students with disabilities who may need them.

While outreach typically occurs in the LEA environment, OVR will work with PDE to identify students and youth with disabilities who may not be served in public schools under an IEP or 504 Plan. Outreach will be conducted to identify students and youth with disabilities who are underserved through other community partners, such as, but not limited to:

- Intermediate Units (IUs)
- Career and Technology Centers
- Approved Private Schools
- Charter and Cyber Schools
- Home School Organizations
- Student Assistance Programs
- Summer CIE programs
- Workforce Development Boards (WDBs)
- Parent-Teacher Associations, etc.
- Juvenile Justice System
- Foster Youth Organizations
- Homeless shelters/programs
- Medical facilities.

(E) Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and

As part of the MOU between OVR and the PDE-BSE, for students with disabilities who are seeking subminimum wage employment after high school exit, BSE will ensure that LEAs provide OVR documentation of completion of appropriate transition services under IDEA. The MOU includes the following section:

1. Limitations on Subminimum Wage and Documentation Requirements under Section 511

Documentation requirements under Section 511 of the Rehabilitation Act for students with disabilities seeking subminimum wage employment: Under Section 511 of Rehabilitation Act, 14(c) businesses referred to as “employers” are prohibited from employing any individual with disabilities who is 24 years of age or younger at subminimum wage, unless the individual has received documentation from OVR upon completion of all the following activities:

- a. Pre-ETS or transition services under the IDEA; and
- b. Apply for VR services and the individual was determined:
 - i. Ineligible for VR services.
 - ii. Eligible for VR services, had an approved IPE, and the individual was unable to achieve an employment outcome in

CIE after a reasonable period of time, and his/her case was closed.

- iii. Regardless of the eligibility determination made, the youth with a disability has received career counseling, and information and referral services to federal and state programs to help the individual explore, discover, experience, and attain CIE and the counseling and information was not for employment at subminimum wage.

BSE will direct LEAs to disseminate these requirements to parents, guardians, teachers, and students. OVR will maintain the documentation and provide a copy to the youth within the timelines identified as specified under 34 C.F.R. Part 397. Any of the services identified above that LEAs provide must be documented by the LEA and provided to the student and OVR.

OVR, in consultation with the BSE, will develop a new process or use an existing process to document the completion of the actions described in sections 397.20 and 397.30 by a youth with a disability, as well as a process for the transmittal of that documentation from LEAs to OVR, consistent with the confidentiality requirements of the Family Education Rights and Privacy Act (20 U.S.C. § 1232g(b) and 34 C.F.R. §§ 99.30 and 99.31) and IDEA (20 U.S.C. § 1417(c) and 34 C.F.R. § 300.610), pursuant to section 511(d) of the Rehabilitation Act and 34 C.F.R. § 397.10. This documentation must contain, at a minimum (34 C.F.R. § 397.10(a)(1)):

- Youth's name.
- Determination made, including a summary of the reason for the determination or a description of the activity or service completed.
- Name of the individual making the determination or the provider of the service or activity.
- Date determination was made or the required service or activity completed.
- Applicable signatures and dates by OVR or education personnel making determination or documenting completion of the required services or activity.
- Signature of the OVR personnel transmitting documentation to the youth with a disability.
- Date and method by which the document was transmitted to the youth.

If a youth with a disability or, as applicable, the youth's parent or guardian, refuses, through informed choice, to participate in the activities required by Section 511 or the implementing regulations at 34 C.F.R. Part 397, documentation must, at a minimum:

- Contain the information in section 397.10(a)(2).
- Be provided by the OVR to the youth within 10 calendar days of the youth's refusal to participate.

OVR and LEAs will retain copies of the documentation in a manner consistent with the requirements of 2 C.F.R. § 200.333.

(F) Assurance that, in accordance with 34 CFR 397.31, neither the SEA nor the LEA will enter into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.

As part of the MOU between OVR and the PDE-BSE, BSE will assure LEAs are not contracting with an entity for the purpose of operating a program under which a youth with a disability is engaged in work compensated at a subminimum wage.

The MOU states:

- BSE will not and will instruct LEAs to not enter an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a youth with a disability is engaged in work at a subminimum wage.
- OVR and BSE are committed to supporting the Employment First Act.

(k) Coordination with Employers.

In accordance with the requirements in section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify CIE and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including Pre-ETS for students with disabilities.

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, PA CareerLinks, economic development partners, CRPs, DHS Offices of ODP, OMHSAS, and OLTL, and other DLI 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 CIE in career pathways matched to each VR consumer customer's financial needs, unique aspirations, capacities and the talent succession plans of an employer.
3. VR 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 seeks VR talent across several states and PA workforce regions.

The following are OVR employer outreach and networking strategies to work with employers to increase CIE 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 OVR BSOD Specialists through in-person and/or virtual/telephonic 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 District Offices and HGAC. HGAC business services staff will identify and coordinate with the referring district VRCs and business services staff 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 District Office business service teams will actively coordinate employer recruitment, work-based learning experiences, internships, apprenticeships and pre-apprenticeships, OJT and other on-boarding supports for OVR customers. District Office business services staff, in consultation with VRCs, 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, ADAA Leadership models from Cornell University and a BSOD specialist trained on the use of the Misericordia University, Comprehensive Accessibility Kit, and the ADAA 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 14(c) Federal Ability One, or State operated set aside vendors, to ensure work settings are fully integrated before federal VR funds are used in placement supports or on-boarding;
6. OVR's BSOD Specialists will conduct 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.
8. OVR will work to establish regular employment hiring events to serve employers both at local/regional and statewide levels. These events may be conducted both in-person and through virtual means. In-person events are anticipated to incur costs for venue, supplies, marketing, and other materials to ensure the success and participation of employers, service providers, human service resources, and participants with disabilities. Virtual hiring events may require the purchase of a web access platform to accommodate an interactive and accessible virtual venue.
9. BSOD staff will assess and market available resources and services offered by OVR to employers through a proposed Business Portfolio tool. This tool will be offered to employers both in printed and electronic formats and will be designed to showcase the value of business partnerships with OVR and its constituents.

Partnering with Workforce Agencies to Align with Regional Employment Sectors

OVR BSOD staff and District Office business services teams will participate in regional planning processes in partnership with local WDBs.

OVR and Workforce partners will review and 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 Information (LMI) published monthly from the PA DLI's Center for Workforce Information and Analysis (CWIA) with their District Office VRCs 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 PA.

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 CIE. 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-ETS to prepare students for CIE. Project SEARCH is one example of this type of collaboration.

The OVR Early Reach Program is to assist youth with disabilities in becoming better prepared for the transition from high school to the world of work and independence. Early Reach is intended to promote successful employment outcomes for youth with disabilities, beginning at age 14, by increasing awareness of OVR services and the benefits of early career planning.

An Early Reach Coordinator (ERC) is an OVR employee with an extensive background in the social work profession. ERCs have specific training and skills in delivering services to a variety of populations. ERCs also have a great deal of experience in the service systems that students with disabilities encounter throughout their lives.

ERCs primary role is to develop and provide dynamic and engaging presentations and events that focus on the five required Pre-ETS categories. Coordinators also provide informational presentations and consultation to school personnel, community agencies, youth with disabilities and families to outline the services offered by OVR. Additionally, ERCs can assist youth with disabilities in planning and applying for OVR services and can provide consultation and links to resources that will help youth with disabilities pursue both independence and participation in the workforce.

(I) Interagency Cooperation with Other Agencies.

In accordance with the requirements in section 101(a)(11)(C) and (K), 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 to develop

opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

(1) State programs (designate lead agency[ies]) and implementing entity[ies]) carried out under section 4 of the Assistive Technology Act of 1998;

OVR utilizes the following agreements to address the AT needs of customers seeking employment services:

1. PA's Initiative on Assistive Technology ("PIAT") – The Assistive Technology Lending Library (ATLL) is a program facilitated through the Institute on Disabilities at Temple University, "TechOWL." PIAT is a regional center for southeast PA and is also the main organization for TechOWL. PIAT facilitates the activities of all of the other regional centers and reports to the state and federal agencies that fund our work. ATLL is PA's statewide program under Section 4 of the Assistive Technology Act. Activities that are provided by ATLL are: device demonstrations; device lending; device reuse; public awareness activities; and trainings to raise awareness and knowledge of AT topics. Any of these activities are available to Pennsylvanians with disabilities which includes OVR staff and clients, often at no charge.
2. OVR utilizes additional AT providers through whom services and/or devices can be purchased to address the specific needs of customers. OVR has executed LOUs or Administrative Memoranda (AM) agreements for expanded services to customers.

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

Currently, OVR does not have any agreements with the 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. In 2017, two new fees were added to the LOU to include reimbursement for travel and professional fees. Currently both agencies are working together to develop an IGA. The AgrAbility Project is a statewide project whose staff provides direct services for OVR customers who are farmers with a disability 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.

(3) Non-educational agencies serving out-of-school youth;

An MOU has been developed between OVR and the Bureau of Juvenile Justice Services (BJJS) to coordinate their work to support students and youth with disabilities receiving services through a PA Academic, Career and

Technical Training (PACTT) Affiliate. BJJIS provides state funds to OVR to serve students and youth. OVR will meet with PACTT Affiliates to determine need for services, will provide and/or set-up services to students and youth, and will assist interested PACTT Affiliates in becoming Pre-ETS providers.

(4) State use contracting programs;

OVR uses a number of statewide contracts through the PA Department of General Services (DGS), the agency responsible for the majority of Commonwealth contracting programs.

OVR and ODP have developed a Training Services Invitation to Qualify (ITQ) through DGS for Specialized Professional Skills Development Training. This ITQ pre-qualifies contractors to provide Supportive Employment Certification Trainings for OVR and/or ODP CRP agencies, who support individuals with the most significant disabilities, and who provide supportive employment services. When a training is needed, a Request for Quote (RFQ) is developed and sent to the t qualified contractors. An ITQ qualified contractor will be awarded a contract to provide necessary services based on the best value, meaning the best service. Contractors will provide training for CRP agencies for the following two certifications: The Association of Community Rehabilitation Coordinators' (ACRE) Certificate Training Program; or the Association of People Supporting Employment First (APSE) Certified Employment Support Professional (CESP) Certification.

DGS has executed multiple contracts with various service providers across PA to provide Sign Language Interpretation and Transliteration Services for all agencies in the commonwealth requiring the services of an interpreter or translator for business functions. OVR uses these contracts to secure interpreter services for daily business proceedings, meetings, workshops, public presentations, and conventions.

DGS has developed an ITQ for Information Technology (IT) hardware providers for Commonwealth agencies to purchase IT hardware. OVR then issues a Request for Proposal to qualified providers to purchase computers, monitors and peripherals for staff.

DGS developed a statewide Services ITQ to qualify contractors to address IT service requirements of Commonwealth 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.

(5) State agency responsible for administering the State Medicaid plan under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);

In PA, the State agency responsible for providing services for individuals with developmental disabilities is DHS/ODP. One of the ways OVR collaborates with DHS/ODP is 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 CIE.

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 CIE; increasing awareness of OVR services; and providing information about other agencies that can help them to achieve their goals for personal growth and independence.

(6) State agency responsible for providing services for individuals with developmental disabilities;

An MOU has been developed between OVR and PA ODP to fund, implement, and manage key services within the InVEST Project Model, a five-year model demonstration grant funded by the Disability Innovation Fund. The MOU will fund the following: 1) ODP Grant Liaison, a contracted position that will manage services funded through the grant via ODP contracts as well as assist with data collection, project monitoring and evaluation; 2) Training & Technical Assistance from the University of Missouri - Kansas City on Charting the LifeCourse™ Framework to integrate supported decision making throughout the InVEST Project; and 3) Services from PA Family Network for six positions dedicated to engaging adults with ID/DD/Autism who are earning subminimum wage and their families to consider the benefits of CIE. Representatives from ODP assisted with the development of the Subminimum Wage to Competitive Integrated Employment (SWTCIE) Grant proposal and have been OVR's primary partners in the development of the project. Both OVR and ODP representatives attend biweekly project team meetings. A relationship with the UMKC- CtLC™ Framework team has been established via ODP and initial OVR staff training is being developed for delivery in May/June 2023. Weekly meetings are conducted with the PA Family Network, funded through ODP's contract with the Columbus

Organization to discuss project development and to identify preliminary opportunities for education about the InVEST Project.

(7) State agency responsible for providing mental health services;

The existing MOU between OVR and OMHSAS ended on June 30, 2022. A new MOU is to be developed. The MOU will explore a transfer of funds from DHS to OVR, which would support opportunities for customers with serious mental health conditions to participate in various Certified Peer Specialist (CPS) training opportunities to achieve CIE. Certified Recovery Specialist (CRS) trainings and employment supports for customers with mental health diagnoses will also be explored.

(8) Other Federal, State, and local agencies and programs outside the workforce development system; and

OVR is participating in Brain Injury REACH, a research study conducted by the Icahn School of Medicine at Mount Sinai in collaboration with the Brain Injury Association of Pennsylvania (BIAPA) and funded by a federal grant from the National Institute of Justice. The study aims to evaluate NeuroResource Facilitation (NRF) intervention in adult male re-entrants with brain injury who are returning to Philadelphia, Bucks, Chester, Delaware, and Montgomery counties. The goal of NRF is to increase recidivism and improve community participation upon re-entry. VR has been identified as a key component of NRF. This project is being conducted in four State Correctional Institutions (SCIs) across PA (Chester, Frackville, Mahanoy, & Phoenix) over an initial five-year period (2021-2024) with plans for extension in place. The Reading and Norristown BVRS District Offices have collaborated with the NRFs in processing referrals and determining eligibility prior to case transfer to the District Office of residence.

(9) Other private nonprofit organizations.

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 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 PA.

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.

VOCATIONAL REHABILITATION CERTIFICATIONS AND ASSURANCES

CERTIFICATIONS

States must provide written and signed certifications that:	
1.	The Office of Vocational Rehabilitation within the Pennsylvania Department of Labor & Industry is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by title IV of WIOA, ¹ and its State Plan supplement under title VI of the Rehabilitation Act;
2.	In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency or the designated State unit when the designated State agency has a designated State unit) ² agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan ³ , the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations ⁴ , policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;

¹ Public Law 113-128.

² All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

³ No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

⁴ Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 CFR part 361.

3.	As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency or the designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the administration of the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan ⁵ , the Rehabilitation Act, and all applicable regulations ⁶ , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;
4.	The designated State unit, or if not applicable, the designated State agency has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement, and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c);
5.	The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.
6.	All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.
7.	The Executive Director of the Office of Vocational Rehabilitation has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;
8.	The Executive Director of the Office of Vocational Rehabilitation has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;
9.	The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

⁵ No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

⁶ Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 CFR part 363.

ASSURANCES

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

The State Plan must provide assurances that:

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

<p>(c) consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.</p> <p>(d) the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).</p> <p>(e) as applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.</p> <p>(f) as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.</p> <p>(g) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.</p> <p>(h) the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.</p> <p>(i) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.</p> <p>(j) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.</p> <p>(k) the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.</p> <p>(l) the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).</p> <p>(m) the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.</p>	
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	<p>accordance with section 606(b)(7)(H) and (I) of the Rehabilitation Act.</p> <p>(b) The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.</p>
7.	<p>Provision of Supported Employment Services:</p> <p>(a) The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.</p> <p>(b) The designated State agency assures that</p> <p>the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act , which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.</p>

Certification Signature

Signatory information	
Name of Signatory	Ryan Hyde
Title of Signatory	Executive Director
Date Signed	

Appendix 1: Performance Goals for the Core Programs

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

Include the state's expected levels of performance relating to the performance accountability indicators based on primary indicators of performance described in section 116(b)(2)(A) of WIOA.

Table 7: 2024-25 Vocational Rehabilitation Program Expected and Negotiated Levels

Performance Accountability Indicator	Program Year 2024 Expected Level	Program Year 2024 Negotiated Level	Program Year 2025 Expected Level	Program Year 2025 Negotiated Level
Employment (Second Quarter after Exit)	58%	TBD	59%	TBD
Employment (Fourth Quarter after Exit)	49%	TBD	50%	TBD
Median Earnings (Second Quarter after Exit)	\$5,000	TBD	\$5,100	TBD
Credential Attainment Rate	22%	TBD	23%	TBD
Measurable Skill Gains	41%	TBD	42%	TBD

Performance Accountability Indicator	Program Year 2024 Expected Level	Program Year 2024 Negotiated Level	Program Year 2025 Expected Level	Program Year 2025 Negotiated Level
Effectiveness in Serving Employers ⁷	Not Applicable	Not Applicable	Not Applicable	Not Applicable

Additional Indicators of Performance
1. Pennsylvania has chosen not to identify any additional indicators of performance.
2.
3.
4.

⁷ The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.