

OVR Public Meeting

Draft VR Services Portion of the WIOA Combined State Plan
November 7, 2019

1:00 – 2:00 p.m.
Review VR Services Portion of Plan

2:00 – 2:30 p.m.
Accept Public Comment/Input

5:00 – 6:00 p.m.
Review VR Services Portion of Plan

6:00 p.m. – 6:30 p.m.
Accept Public Comment/Input

OVR is pleased to announce a period of public comment, as well as public meetings, related to its proposed 2020-2024 Vocational Rehabilitation (VR) Services Portion of the commonwealth's 4-year Workforce Innovation and Opportunity Act (WIOA) Combined State Plan.

A copy of the draft VR Service Portion of the Plan is available on OVR's web site at www.dli.pa.gov/ovr (select "publications").

All written comments must be received no later than 5 p.m. on Sunday, November 17, 2019.

As required by WIOA, Pennsylvania currently has a Combined State Plan in effect from July 1, 2016, to June 30, 2020. The VR Services Portion of the State Plan is one of five core program areas represented in the WIOA Combined State Plan. Other core program areas include Adult, Dislocated Worker, Youth, Wagner-Peyser and Adult Basic Education.

OVR is required to submit a new 4-year plan to take effect July 2020-June 2024.

Under 34 CFR 361.20, OVR must obtain public input prior to the adoption of any substantive policies or procedures governing the provision of vocational rehabilitation services under the Combined State Plan.

- (a) Input of State Rehabilitation Council
- (b) Request for Waiver of Statewideness
- (c) Cooperative Agreements with agencies not carrying out activities under the statewide workforce development system
- (d) Coordination with Education Officials
- (e) Cooperative Agreements with Private Nonprofit Organizations
- (f) Arrangements & Cooperative Agreements for the Provision of Supported Employment Services
- (g) Coordination with Employers
- (h) Interagency Cooperation
- (i) Comprehensive System of Personnel Development (CSPD)

- (j) Statewide Assessment
- (k) Annual Estimates
- (l) State Goals and Priorities
- (m) Order of Selection
- (n) Goals and Plans for Distribution of Title VI Funds
- (o) State's Strategies
- (p) Evaluation and Reports of Progress: VR and Supported Employment Goals
- (q) Quality, Scope and Extent of Supported Employment Services

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

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

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

Recommendations:

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

OVR Response:

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

Recommendations:

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

OVR Response:

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

Recommendations:

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

OVR Response:

The goal of OVR is to open the OOS as soon as possible. The Rehabilitation Services Administration (RSA) has approved OVR to review and evaluate the ability to open the OOS on a quarterly basis. OVR will report to the PaRC quarterly plans to re-open the OOS and factors affecting progress toward achievement of this goal.

Recommendations:

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

OVR Response:

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

2. Hiram G. Andrews Center (HGAC)

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

Recommendations:

A. OVR should conduct a study at a minimum of every 3 years and report on the return on investment (compared to community-based VR services) for students attending HGAC. HGAC's yearly budget averages approximately \$23 million, which includes staff, operations, brick and mortar, and other costs. Overall, the cost per customer is reported as significantly higher at HGAC than that of non-HGAC customers. The report must include:

- 1) An analysis on return on investment;
- 2) An impact statement on customer choice;
- 3) A review of the extent to which its programs are provided in an integrated setting;
- 4) An assessment of the availability of HGAC programs in the community and
- 5) A determination of what other partners, like the Pennsylvania Department of Education (PDE), should be paying/contributing.

OVR Response:

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

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

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

Recommendations:

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

OVR Response:

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

Recommendations:

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

OVR Response:

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

4. Strengthen Collaboration and Partnerships with Stakeholders

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

Recommendations:

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

OVR Response:

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

Recommendations:

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

OVR Response:

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

Recommendations:

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

OVR Response:

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

Recommendations:

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

OVR Response:

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

5. Review of OVR Policies and Procedures

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

Recommendations:

A. OVR reports to the PaRC on a quarterly basis substantive policies and procedures under review which are subject to public meetings, non-substantive administrative changes and policies on matters of general administration of the VR program which require consultation. Additionally, include quarterly reports on workgroups.

OVR Response:

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

THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

OVR did not reject any of PaRC's input or recommendations.

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

- For additional information, please refer to the draft VR Service Portion of the Plan on OVR's web site at www.dli.pa.gov/ovr (select "publications").

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

Current agreements include the following:

1. The PA Department of Health (DOH), Department of Labor & Industry (DLI), Department of Education (PDE) and Department of Human Services (DHS) entered into a Memorandum of Understanding (MOU) in 1999, with a 2006 Addendum, and a Transition MOU addendum in 2010 to devote staff and other agency resources to promote successful post-school outcomes for youth/young adults with disabilities in transition.
2. A Data sharing Agreement between OVR and ODP has been finalized to exchange information on the services delivered to individuals enrolled in DHS ODP programs who also receive or received services through OVR.
3. OVR and ODP issued a joint bulletin that dictates when an individual receiving Supported Employment (SE) services can move to ODP-funded extended services and documentation requirements.
4. An MOU was initiated between OVR and the DHS Office of Mental Health and Substance Abuse Services (OMHSAS) in 2017.
5. An MOU has been developed between OVR and DHS, Bureau of Juvenile Justice Services (BJJS) in May 2017 to provide pre-employment transitions services to adjudicated students and youth placed in PA Academic Career Technical Training (PACTT) affiliate locations.

1) Federal, State and local agencies and programs;

Current agreements continued:

6. OVR has entered into Institute of Higher Education Agreements with the 14 State owned universities as well as agreements with all community colleges in PA.

7. OVR partners with PA Centers for Independent Living (CILs) by executing grants and contracts to provide services and outreach projects to individuals with disabilities in community settings.

8. OVR has entered into IGAs with Berks Career and Technology Center, the School District of Lancaster, Office of Developmental Programs, Bureau of Juvenile Justice Services, and Office of Mental Health and Substance Abuse Services for the provision of VR services and referrals.

- OVR estimates there are over 130,000 students with an IEP in Pennsylvania between the ages of 14-21 eligible for transition services and pre-employment transition services in 2019.
 - It is estimated that 27,000 students will receive pre-employment transition services in 2019.
- OVR's Systems and Evaluation Unit has updated OVR's CWDS to account for all the new federal reporting requirements.
- Effective Fall 2019, schools are to complete a School Profile for OVR, to identify their current transition resources and request pre-employment transition services from OVR each year. OVR will then use the School Profile to assess and determine student needs and ensure that OVR services are supplementary to services provided by schools under the Individuals with Disabilities Education Act (IDEA).

(d) Coordination with Education Officials (2)



- OVR has approximately 150 agreements with providers for the provision of pre-employment transition services.
- OVR staff participated in the 2019 PA Community on Transition Conference: Ignite the Future! Sparking Engagement in Career Readiness.
- During FFY 2019-2020, OVR continued to bring Mobile FABLAB experience to OVR customers, including students with disabilities.
- Project SEARCH – OVR currently has 17 student sites and 4 adult sites. Project SEARCH statistics kept by the Cincinnati Hospital indicate that as of the close of 2017-2018 school year, OVR had placed 143 interns, 93 of whom were employed for a total placement rate of 65%.

- OVR maintains negotiated Letters of Understanding (LOUs), as well as Administrative Memos (AM) and provider agreements, with more than 200 community service providers covering more than 1,000 different rehabilitation, independent living and related services.
- 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.
- These agreements are neither a contract nor a grant agreement but an agreement between 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.

(f) Arrangements and Cooperative Agreements for the Provision of SE Services



- OVR has coordinated with other State agencies such as Office of Developmental Programs, Office of Mental Health and Substance Abuse Services, Office of Long Term Living and other entities to provide supported employment services and extended employment services. In February 2019, a joint bulletin between OVR and ODP was issued outlining referral processes for supported employment cases in which a customer is eligible for OVR services and waivers through ODP.
- OVR has been diligently working with interested service providers to convert short-term Innovation & Expansion (I&E) projects into ongoing fee-for-service program options for customers based on customer need. The revision in the definition and requirements of supported employment brought about by WIOA have necessitated a more comprehensive and thorough review and assessment of long standing employment support programs such as OJT and other adaptive work training programs utilizing both wages and stipend.
- The Department of Labor & Industry and the Department of Human Services are in the process of developing a Memorandum of Understanding (MOU) for supported employment services. The MOU for SE services will guide a partnership to establish the collaborative framework for OVR and DHS to develop, expand and improve opportunities for competitive employment for individuals with disabilities, including individuals with the most significant disabilities.

(g) Coordination with Employers

- OVR routinely engages with employers and businesses to better understand their workforce needs so OVR can prepare individuals with disabilities with skills to best meet industry skill demands required by businesses and employers to be successful in competing in the global marketplace.
- The following are a few examples of OVR outreach and networking strategies to work with employers to increase competitive integrated employment and career exploration opportunities:
 1. National and in-state outreach to employers/businesses to recruit and hire people with disabilities.
 2. Employer outreach by BSOD Specialists through in-person meetings, regional and statewide Chamber of Commerce membership, participation in Society of HR Resource Managers and networking with local organizations.
 3. Continued outreach to employers by local OVR District Office Business Service Representatives, Placement Counselors and Vocational Rehabilitation Counselors.
 4. OVR's Business Service Specialists, HGAC staff and District Office staff offer no-cost consultation to employers on disability etiquette, accessibility and accommodation needs. These individuals have been trained in the mid-Atlantic TransCen ADA Leadership models from Cornell University, Misericordia University, Comprehensive Accessibility Kit and the Americans with Disability Act Architectural Guidelines standards.
 5. OVR Business Services Division will conduct bi-annual employer/business satisfaction surveys to measure effectiveness in business engagement.
 6. OVR promotes and supports National Disability Employment Awareness Month held annually in October.

(h) Interagency Cooperation



- OVR collaborates with the Department of Human Services on a number of initiatives, including the Pennsylvania Employment first State Leadership Mentoring Project (EFSLMP). This project initiated in 2014 with a goal to ensure that the employment needs of individuals with disabilities are met; that cost services are comprehensive, effective, innovative and not duplicative; and that every individual with a disability who wants to work to achieve self-support will be given the opportunity.
- OVR also participates in cross agency collaboration and coordination with DHS as part of the Pennsylvania Employment First Act (ACT 2018-36). This is a Governor inspired initiative to ensure individuals with disabilities have the opportunity to achieve economic independence through competitive integrated employment. Cross-agency collaboration between OVR and OLTL demonstrates continued partnership and commitment to ACT 2019-36, where competitive integrated employment, including self-employment, shall be the first consideration and preferred outcome when serving persons with disabilities who are of working age.
- These are just two important examples of interagency collaboration. The full report can be found on the OVR website at www.dli.pa.gov/ovr (select “publications”).

1. Data System on Personnel and Personnel Development

- As of May 1, 2019, OVR had 930 filled salaried positions and 115 vacancies. This figure includes 153 filled salaried positions at the Hiram G. Andrews Center (HGAC). Statewide, OVR had a total of 363 filled Vocational Rehabilitation (VR) Counselor positions, 17 Vision Rehabilitation Therapist positions, and 13 Orientation and Mobility Specialists positions.
- The current complement of Vocational Rehabilitation Counselors requires that OVR maintain an OOS and implement a waiting list for all new individuals determined eligible to adequately serve and meet the needs of eligible VR customers as of July 1, 2019.
- OVR projects that in the next five years, approximately 71 VRCs will become eligible to retire. An average of 20-25 new VRCs will need to be hired per year over the next 5-10 years. Succession planning is a necessary part of OVR's preparation to address projected hiring needs.

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

- OVR recruits from accredited university programs in Pennsylvania and nationwide.
- OVR has permission from the Office of Administration to have Pennsylvania residency requirements waived under the State Civil Service system for VRC classifications, including the VRC Intern position, which allows nationwide recruitment efforts.
- A paid VRC internship is available to interested master's degree students who are in their final semester of graduate school.
- The residency waiver and the paid internship both assist OVR's efforts to recruit and hire individuals with disabilities and those from diverse and minority backgrounds.

3. Personnel Standards

- In 2002, OVR raised the entry-level requirements for VR Counselor positions to reflect the requirements established by the Commission on Rehabilitation Counselor Certification (CRCC) for Certified Rehabilitation Counselors (CRC). 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.
- In December 2017, as a result of a decreasing candidate pool, the OVR **Vocational Rehabilitation Counselor Trainee and Vocational Rehabilitation Counselor Trainee, Deaf and Hard of Hearing** classifications were added.
- In December 2018, OVR requested review and approval through the Office of Administration and the Service Employees International Union to expand the minimum education and training requirements (METs) for the VRC Trainee position to include 5 additional master degrees: Counseling, Rehabilitation Services, Human Services, School Counseling, and Substance Abuse and Behavioral Health Disorder Counseling. Approval is pending.

4. Staff Development

OVR is committed to offering a plan for a comprehensive system of staff development and training. The goal is to ensure staff development for OVR personnel in areas essential to the effective management of OVR's program of VR services.

With the implementation of WIOA amendments to the Rehabilitation Act, targeted training areas include:

1. Functional limitations, employment implications and accommodations
2. Vocational assessment: tools, interpretation and application
3. Vocational counseling and guidance
4. Caseload management, case practices and service planning
5. Employer engagement and job development
6. Diversity, inclusion and multicultural competency
7. Leadership development

- A Comprehensive Statewide Needs Assessment (CSNA) is required to be completed every three years. Specific requirements of the CSNA can be found in the Rehabilitation Act of 1973, as amended, at Section 101 (a)(15) and at 34 CFR 361.29.
- The purpose of the CSNA is to inform OVR and the PaRC regarding issues and needs of the disability community in the Commonwealth. The information learned from the CSNA is used to develop the content of this state plan.
- OVR contracted with the Institute on Disabilities at Temple University to conduct and interpret the FFY 2015-2018 CSNA.
- OVR has once again contracted with Temple University Institute on Disabilities to conduct and interpret the CSNA for FFY 2019-2022

The comprehensive needs assessment must describe the rehabilitation needs of individuals with disabilities residing within the State, particularly the vocational rehabilitation service needs of:

1. Individuals with the most significant disabilities
2. Individuals with disabilities who are minorities and who have been unserved or underserved by the VR program
3. Youth with disabilities
4. Individuals with disabilities served through other components of the statewide workforce development system (example: those served through PA CareerLinks®)

Additional Targeted Activities Accomplished in CSNA 2015-2018

1. Development and revision of OVR Customer Satisfaction Surveys
2. Gathering of information and an analysis regarding the multifaceted programs of the Hiram G. Andrews Center
3. Identification of needed services delivered by Community Rehabilitation Programs (CRPs)
4. Identification of barriers and strategies to improve services to the broad spectrum of ethnic and cultural minorities with disabilities, particularly those who are Latino

Overview of CSNA project for the Federal Fiscal Years 2019-2021

1. A description of the rehabilitation needs of individuals with disabilities residing within the State, particularly the vocational rehabilitation service needs of individuals with the most significant disabilities, including their need for supported employment services.
2. A description of the needs of individuals with disabilities who are minorities.
3. A description of the needs of individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program.
4. A description of the vocational rehabilitation needs of individuals with disabilities served through other components of the statewide workforce investment system.
5. Assessments of the need to establish, develop or improve community rehabilitation programs within the commonwealth.

In addition, the CSNA must provide an assessment of the need of youth with disabilities and students with disabilities, including:

1. Their need for pre-employment transition services or other transition services and
2. An assessment of the needs of individuals with disabilities for transition services and pre-employment transition services, and the extent to which such services provided under this part are coordinated with transition services provided under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.) in order to meet the needs of individuals with disabilities.

The Number of Individuals in the State who are Eligible for Services

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

The number of eligible individuals who will receive services annually for FFY's 2020-2024:

1. VR Program 2020: 46,596, 2021-2024: 46,096
2. The Supported Employment Program:
 - A. Most Significantly Disabled: 7,015
 - B. To be served in FFY 2017 with Title VI funds: 421
 - C. Title VI funds to be allocated: \$860,335
3. Each priority category, if under an order of selection:
 - A. Most Significant Disability: 38,387
 - B. Significant Disability: 50
 - C. Non-Significant Disability: 0

The state goals and priorities were developed jointly between OVR and the PaRC

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

1. Expand the availability of apprenticeships, internships and on the job training (OJT) for individuals with disabilities.
2. Partner with the Bureau of Workforce Partnership and Operations (BWPO) to ensure programmatic and physical accessibility of the Pennsylvania CareerLink[®] centers for equal access for individuals with disabilities.
3. Increase Supported Employment (SE) and Customized Employment outcomes; evaluate and monitor OVR's SE policy implementation.

Goal #2: Improve Transition Services for Students with Disabilities

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

Goal #3: Increase community education and outreach.

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

During the prior four-year State Plan submission (2016-2020) and the two-year modification submission (2018-2020), Pennsylvania OVR reported it remained on an Order of Selection providing VR services only to eligible individuals with Most Significant Disabilities who met the criteria for priority category one. Since this time, OVR has determined available and projected resources have changed and will not be adequate to ensure the provision of the full range of VR services, as appropriate, to all eligible individuals effective July 1, 2019.

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

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

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

- New customers determined eligible and assigned to a closed priority category after July 1, 2019, will be placed on a waiting list until the resources are available to provide the full range of services. However, services will continue for all customers with approved IPEs with an effective date prior to July 1, 2019. OVR will continue to provide pre-employment transition services to potentially eligible students who began receiving them prior to eligibility determination and placement in a closed OOS priority category.
- Each customer placed on a waiting list will be notified in writing of the priority categories, their assignment to a particular priority category classification and be informed to alert OVR regarding possible reclassifications due to a change in the individual's circumstances or due to any misclassifications.
- Throughout the year, OVR senior management will evaluate the agency's available resources on a quarterly basis to serve all eligible individuals with disabilities. OVR will determine when to open each category based upon financial availability

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

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

- OVR provides SE services to eligible customers with the most significant disabilities who have been determined to require on-going support services to maintain employment. OVR has an on-going, over-arching goal of providing quality SE service which are delivered in an effective, efficient and timely manner. To that end, OVR initiated many changes/enhancements to the SE policy and procedures in 2018. The changes included: an expansion of types of SE services to better meet the diverse needs of customers; a move to an entirely online system for more streamlined referral, reporting, billing and tracking of SE cases; and incentives to providers for working with unserved/underserved populations including rural, transition-aged, veterans, Social Security Administration (SSA) recipients and others.
- OVR will seek opportunities to leverage other public and private funds to increase resources for extended services and expand SE opportunities for youth with the most significant disabilities. This will be done by exploring innovative partnerships and enhancing service coordination with agencies such as ODP, OMHSAS, OLTL and BJJS, as well as LEAs

Strategies in place to achieve goal and Priorities:

1. Increase Employment Opportunities for Individuals with Disabilities.

a. Expand the availability of apprenticeships, internships and on the job training (OJT) for individuals with disabilities.

- OVR's Business Services Division is well prepared to continue outreach to employers to increase opportunities for apprenticeships, internships and OJTs for individuals with disabilities. OVR will keep the process simple by using a SPOC approach modeled after the CSAVR use of a national Points of Contact network when a business with multi-county or state operations seek VR talent across several states and Pennsylvania Workforce regions.
- In addition, the HGAC in Johnstown, Pennsylvania is consulting with the Pennsylvania Apprenticeship & Training Office to develop a pre-apprenticeship training program. A short-term, pre-apprenticeship training program will be designed to provide the necessary preparatory safety, skills and certifications to individuals who are interested in entering registered apprenticeships.

1. Increase Employment Opportunities for Individuals with Disabilities (cont.)

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

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

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

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

2.Improve Transition Services for Students with Disabilities

a.Increase pre-employment transition services for students with disabilities.

- Revise the model for pre-employment transition services for students with disabilities.
- Increase opportunities for students to gain workplace skills and community integrated work experiences
- Enhance collaborative relationships with DHS, PDE and higher education institutions ensuring that each secondary school in PA has a point of contact; participating in the Statewide Leadership Team; collaborating in the development of the PA Community on Transition Conference each year; participating in cross-training and attending partner conferences.

3. Increase Community Education and Outreach

- a) **Work with the PaRC to identify and incorporate best practices and strategies to increase Customer Satisfaction survey response data.**
 - OVR will continue to work closely with PaRC on developing ideas and plans to increase customer satisfaction.
- b) **Continue to develop stronger awareness among OVR staff of the cultural and linguistic differences and needs of unserved/underserved individuals with disabilities from cultural and ethnic minorities.**
 - During 2018-2019, OVR conducted research on diversity and inclusion needs of unserved and underserved populations through a contract with the Pennsylvania State University Research Team. The outcome of this research, and associated benchmarks, will be used to guide OVR in the development of in-service training for staff as well as future programmatic adaptations to stretch OVR's reach to those identified as unserved or underserved in Pennsylvania.
- c) **Promote accessibility and technology based upon universal design principles.**
 - An important part of the rehabilitation process is evaluating the accessibility and technology needs of OVR customers. This takes place during the initial intake interview, continues throughout the life of the case and is most important at the time when the individualized plan for employment is developed.
 - The OVR Training Division is committed to ensuring that all training materials for OVR staff or external participants are available in accessible format before being released.

- OVR has met or exceeded its goals during the preceding 4-year period.
- During Program Year (PY) 2018-2019, OVR served nearly 70,000 individuals with disabilities, worked with over 6,000 employers and assisted more than 7,400 individuals with disabilities in obtaining or maintaining competitive integrated employment.
- Additionally, OVR and our partner providers continue to deliver an extensive array of pre-employment transition services to over 25,000 students with disabilities annually across Pennsylvania.
- In accordance with WIOA Section 506(b), the performance accountability system requirements of WIOA Section 116 took effect July 1, 2016. However, the U.S. Department of Education exercised its transition authority under WIOA Section 503 to ensure the orderly transition from the requirements under the Workforce Investment Act to the requirements under WIOA. As such, the performance accountability system requirements for the WIOA Title IV VR program went into effect July 1, 2017, at which time OVR began collecting and reporting data related to certain performance indicators under WIOA through the quarterly submission of the federal RSA-911 report.
- Only one of the six performance indicators is currently being reported and published by the RSA in the WIOA Statewide and Local Performance Reports (WIOA Annual Reports): Measurable Skill Gains. Data driving the remaining five performance indicators will be progressively available and reported as part of OVR's WIOA Annual Report over the next four years. As part of the PY 2018 WIOA Annual Reports, expected to be published by the RSA in Spring 2020, two additional performance indicators under WIOA Section 116 will be reported: Employment During the 2nd Quarter after Exit and Median Earnings During the 2nd Quarter after Exit.

OVR provides SE services to Pennsylvanians with disabilities through a network of CRPs. Services provided through these vendor partners are detailed in the draft VR Service Portion of the Plan available on OVR's web site at www.dli.pa.gov/ovr (select "publications").

Thank you



We appreciate your comments and input.

Thank you!