Program-Specific Requirements for Vocational Rehabilitation

VOCATIONAL REHABILITATION

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

(a) Input of State Rehabilitation Council. All agencies, except for those that are independent consumer-controlled commissions, must describe the following:
   (1) input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council’s report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council’s functions;

BENEFITS COUNSELING

VR should continue to support benefits counseling as this is a key concern for families. It was recommended that benefits counseling resources and knowledge be shared across WIOA core partners. This could be achieved through collaboration with the Disability Employment Initiative (DEI) Grants, through education and training of WIOA partners, and be exploring the availability of benefits counseling in the local Work One centers.

VR Response: VR plans to continue to support benefits counseling through the funding of the Benefits Information Network (BIN), and agrees that counseling on the impact of working on benefits and available federal and state work incentives is critical in helping consumers to make informed choices about working and in working toward self-sufficiency. VR will include discussion on the importance of benefits counseling in conversations with WIOA partners.

COLLABORATION WITH DWD AND WIOA PARTNERS

Greater collaboration with WIOA partners including Department of Workforce Development (DWD) is also needed to coordinate services for mutual consumers; ensure each partner has appropriate information about referral processes and a basic understanding of eligibility requirements and available services. VR was encouraged by the commission to continue with the pilot project to develop a subject matter expert in local VR and Work One locations. Increased education with DWD and other WIOA partners is needed to improve awareness and knowledge of how to best serve individuals with disabilities and ensure services are individualized as appropriate.

1 Sec. 102(b)(2)(D)(iii) of WIOA
VR Response: The pilot project that developed subject matter experts in local VR and One Stop offices will continue. VR will continue to take the opportunity to educate WIOA partners about VR services in ongoing communication with these partners.

BRS provided an update on collaboration efforts with DWD at a commission meeting on February 16, 2018, including efforts for reporting on federally required business engagement efforts, collaborative training strategies, and referral processes in local VR offices and Work One centers.

TRANSITION
Further education to secondary schools regarding services available through WIOA partners is also necessary, including services available to youth through DWD. It is important to ensure that in addition to special education professionals, school guidance counselors and transition coordinators also receive the necessary information. Cross-training will be useful to also ensure that WIOA partners understand the services and supports provided through local education agencies. Discussion with schools is also needed to identify students who may not be receiving special education, but would benefit from VR services or services through DWD or other WIOA partners.

The Commission also suggested that further exploration is necessary on the provision of work experience services to students, including those working toward a High School diploma. Financial literacy and self-disclosure are also important issues for individuals with disabilities and VR is encouraged to ensure resources are in place to meet these needs. Additional suggestions regarding services to youth with disabilities included looking at best practices from a School-to-work pilot project utilizing career coaches in schools and providing work experiences prior to a student’s exit from school.

VR Response: VR continues to facilitate a Statewide Transition Workgroup and will address these recommendations with the group. VR has implemented modifications to the VR employment service model and Discovery services. One of the changes is increased access to work experiences by all VR consumers, including youth. Discussions are already underway between the VR Director and the DWD Youth program directors. Both parties are very interested in better collaboration on programs such as Jobs for America’s Graduates (JAG).

VR provided an update regarding provision of pre-employment transition services at a commission meeting on February 16, 2018 through discussion of VR goals in the updated state plan.

VR STAFF QUALIFICATIONS AND RETENTION
The commission focused much of their input on the opportunities for hiring and retaining qualified VR staff in light of changes to the Comprehensive System of Personnel Development (CSPD). Both VR Leadership and the Commission recognize that there is a severe lack of candidates in Indiana with a Master’s degree in Rehabilitation and/or a Certified Rehabilitation Counselor (CRC) licensure. The commission voiced support for modifying the hiring criteria for VR Counselors in Indiana to align with the revised CSPD requirements outlined in WIOA,
including the ability to hire qualified candidate who do not have an appropriate Master’s degree, but have a Bachelor’s degree in an appropriate area and the necessary skills and experience in working with individuals with disabilities. The commission, like VR Leadership, believes this strategy will assist with broadening the pool of qualified candidates and potentially improve job retention. The commission continues to express their concern that the starting salary of a VR Counselor in Indiana is a barrier to obtaining and retaining qualified staff. The commission also suggested a pay differential for VR Counselors who do have a Master’s degree and/or are a CRC.

The Commission relayed the importance of promoting careers in VR through outreach to area colleges and universities.

VR Response: VR appreciates the support of the outlined changes in CSPD’s personnel standard as reflected in more detail in Section (i).

VR provided updated data regarding staff retention, turnover and average caseload size at a commission meeting on February 16, 2018 in discussion regarding updates to the state plan. BRS will explore strategies to increase outreach with Indiana colleges and universities to educate students about careers in VR including sharing job openings. BRS will also explore other strategies for enhancing recruitment efforts.

**VR SYSTEM MODERNIZATION**

The commission was provided with an update on BRS’ efforts to modernize its case management system and shared some background information on the AWARE VR case management system. Target timelines for implementation, data migration efforts, cost saving expectations for maintenance and support of the new system, and accessibility of the system were reviewed in response to the Commission’s questions. The Commission is supportive of the system modernization efforts and shared that increased efficiency and improved customer service will likely result. Plans for implementing a vendor claims payment system was also discussed with the commission as well as timelines for implementation.

VR Response: VR thanks the commission for their support of system modernization efforts and will continue to provide updates to the commission on progress toward implementation.

**ORDER OF SELECTION**

The BRS Director met with the commission on March 10, 2017 to obtain feedback regarding the determination by the Director that Indiana must seek approval, through a state plan amendment, to implement an Order of Selection. The Director outlined the challenges faced by BRS regarding insufficient staffing and fiscal resources. The commission assisted in identifying locations for public hearings and will encourage constituents to provide comments. Further input from the commission was sought prior to submitting the state plan amendment. The BRS Director addressed additional concerns and reviewed the annual estimates and justification for the order of selection with the commission at an additional meeting on April 13, 2017. Specific concerns and questions voiced by the commission included the following:
- The commission desired to have a better understanding of what resources would be shared with individuals who would be deferred for services, and relayed that they would like to see a plan for building sufficient capacity in order to serve all eligible individuals and open all priority categories.
- The commission inquired about the number of individuals served in each priority category, and the estimated length of time individuals would need to wait to receive services.
- A few commission members expressed that they did not have sufficient involvement in the determination to seek approval to implement an order of selection.
- Several commission members voiced their understanding of the deficit of resources, and offered their assistance in working toward building capacity.

The commission would like to collaborate with BRS to begin working toward a plan to build sufficient capacity to serve all eligible consumers, and understands that this will require several different strategies to improve recruitment and retention of staff, as well as addressing the projected fiscal deficit.

VR Response: BRS appreciates the feedback and assistance of the commission. BRS and the Commission have discussed staffing challenges for the last couple of years, and BRS has provided multiple reports on the progress of implementing various strategies to build staff capacity. Despite those efforts, BRS continues to lack sufficient resources to serve all eligible individuals. There is much work ahead of us as we work together to ensure that a unified message is relayed to consumers, families, providers, and other stakeholders. Over the next several months, the commission’s feedback will continue to be sought to identify other resources that may be shared with consumers who may not be served by VR. BRS will also continue to update the commission on identified strategies and progress toward building capacity.

An update regarding order of selection was provided at a commission meeting on February 16, 2018, including updated projections of the number of individuals who will be served in each priority category and the number of eligible individuals who will be deferred for services, as well as other updates to the annual estimates and order of selection sections of the state plan. BRS appreciates the collaboration from the Commission on efforts to identify and implement strategies to increase capacity and improve the quality of services and outcomes to eligible individuals. BRS thanks the commission for taking time to understand the current challenges of the VR program and looks forward to a continued partnership with the commission to work toward improving employment outcomes for individuals with disabilities.

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

Please see above.

(2) the designated State unit’s explanations for rejecting any of the Council’s input or recommendations.
Request for Waiver of Statewideness. When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

(2) a local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;

This section is non-applicable in Indiana.

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

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

(b) Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System. Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

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

Vocational Rehabilitation (VR) seeks interagency cooperation with a number of agencies and entities that are not partners required through the statewide workforce development system. Within VR, the area of Community and Business Engagement was added about three years ago to address a need to ensure a consistent message a VR and the services it can provide. Education and outreach has occurred with a variety of stakeholder and organizations including schools, businesses, other state agencies, and national partners. The Community and Business Engagement unit also built a VR presence on social media, including Twitter and Facebook to provide further education and outreach through a variety of approaches.

Written cooperative agreements with appropriate entities are identified below.

The below provides information related to Federal, State, and local agencies and programs:

Centers for Independent Living (CIL) and Independent Living Programs: The Independent Living Program is located with the Bureau of Rehabilitation Services. BRS (and in particular the VR program) makes a concerted effort to maintain an open working relationship with the CILs that are located in Indiana and the Statewide Independent Living Council. Counselors and other staff make referrals to CILs for wrap-around services. The CIL staff refers individuals to VR and other programs within VR. VR makes it a priority to support the network of CILs in Indiana by providing additional funding with the use of SSA/VR program income to support center operations in the provision of services to assist individuals with disabilities with increased independence and a better quality of life.
Bureau of Developmental Disabilities Services (BDDS): BDDS is a bureau under the Division of Disability and Rehabilitative Services (the Designated State Agency) and provides services for individuals with developmental disabilities that enable them to live as independently as possible in their communities and houses the relevant Medicaid waivers. BDDS and VR offices are collocated in the State of Indiana, which enables partnership and continued collaboration. VR works very closely with BDDS (and case managers) in order provide appropriate employment services to individuals with developmental disabilities. VR provides supported employment for up to 24 months, which benefits this population. In addition, VR works closely with BDDS staff and case managers to ensure a seamless transition from supported employment to extended services. At time of job placement, VR Counselors submit transfer documentation to ensure extended services are in place prior to VR case closure as appropriate. BDDS and VR continue to develop and improve existing processes in assisting individuals with disabilities who are considering subminimum wage employment or who are already employed, at a subminimum wage, to maximize opportunities to achieve competitive integrated employment through services provided by VR. Additionally, a representative from BDDS is an appointed member of the VR Commission. VR continues to look for new and innovative ways to partner with BDDS initiatives across the state in order to improve employment outcomes for those with the most significant disabilities.

Division of Mental Health and Addiction (DMHA): DMHA is a division within Family Social Services Agency, which enables VR to partner with DMHA on employment initiatives. VR staff work closely at a local level with the DMHA funded Community Mental Health Centers (CMHC). Through a contract, the Indiana Institute of Disability and Community provides training and consultation to all employment services providers, including mental health centers and VR staff regarding employment for people with disabilities, including a focus on mental health. There are approximately 25 CMHCs across the State that are community rehabilitation providers. DMHA continues to promote employment for persons with mental illness by including employment and career planning as measures in consumer services reviews. VR Leadership meets quarterly with the Mental Health Employment Council to discuss new initiatives and identify how initiatives, such as the recent Employment Service Model Revisions, impact CMHC’s and consumers with mental illness. CMHC employment staff also serve on the Employment Service workgroup. Additionally, a representative from DMHA is an appointed member of the VR Commission.

Social Security Administration (SSA): VR collaborates with SSA on Ticket-To-Work. VR continues to support the Indiana’s Benefits Information Network (BIN) to ensure that beneficiaries receive appropriate benefits planning and education on utilizing work incentives to work toward self-sufficiency.

Veterans Administration (VA): Employment can play a major role in the recovery of wounded and injured service members. To support these brave men and women in their return to civilian life, VR works with various local, state and federal entities concerning statewide veterans’ services. As an example, BRS was represented on the planning committee for the Operation Hire a Hoosier Veterans (OHHV) Job Fair. OHHV is a community collaborative effort between multiple government agencies and community organizations with a goal to support Veterans employment
goals. The career fair is now in its 11th year and is lauded as the largest annual Veterans Job Fair in the state.

**Client Assistance Program (CAP):** VR and the Indiana Disability Rights (IDR), Client Assistance Program (CAP) meet regularly on specific consumer cases to address consumer needs. CAP continues to be represented on the VR Commission and participated in the 2017 RSA Monitoring visit. CAP Representatives have also presented to VR Supervisors to educate about the wide array of services offered through IDR.

**Department of Corrections (DOC):** The DOC is represented on the VR Transition Advisory Council. Business & Community Engagement efforts have resulted in development of relationships with some administrative leaders at correctional facilities around the State. For the last three years, the Business & Community Outreach team has attended the Indianapolis area Conference on Re-entry and has presented in partnership with DWD to educate conference attendees about the VR program and the DWD re-entry program.

VR finalized their Traumatic Brain Injury (TBI) Demonstration Grant after the grant’s activities were proven to be self-sustaining with its Resource Facilitation goals. VR supported DOC in applying for the grant and they were successfully awarded. The grant provides screening and services to inmates preparing to be released for TBI-related issues and providing them early Resource Facilitation services in order for them to be better prepared for work opportunities once they are released from prison. VR still maintains an active membership with DOC staff on the Indiana TBI Leadership Board. VR staff provided DOC with technical grant oversight assistance during the grant’s transition from VR to DOC.

**Division of Family Resources (DFR):** DFR is a division within Indiana’s Family Social Services Administration. VR has specifically worked with Temporary Assistance for Needy Families (TANF) program and contractor to provide information about VR in order to assist with adult applicants and the employment and training program. Additionally, the DFR continues to expand partnerships at the local DFR offices, by inviting mobile VR Counselors to use their space to serve appropriate consumers. A DFR executive staff member also attended a Roundtable Summit in June, 2018, co-hosted by BRS and DWD to educate about the (then) upcoming implementation of order of selection in the VR program, and potential impact that could have on the number of individuals seeking employment services through other state and local agencies. The summit provided opportunity to educate about order of selection, address questions and concerns, and identify follow-up action items needed such as training, sharing of resources, and development of cross-agency referral processes.

**Small Business Administration (SBA):** As consumers explore small business ventures, VR utilizes the resources available through local SBA facilities. SBA has specialized staff that frequently work with VR consumers on developing business plans. Consumers also participate in classes through SBA. There is a renewed and strengthened relationship with SCORE, the nation’s largest network of free, expert business mentors. Discussions have begun on increasing and strengthening the resources available for VR counselors when it comes to providing support to consumers who would like to begin a small business or become self-employed.
Project SEARCH: Indiana has implemented this national training and employment model for youth and young adults with significant disabilities that is resulting in quality employment outcomes. Key collaborative partners for Project SEARCH include students and their families, VR, local educational agencies, identified businesses and the selected community rehabilitation provider.

Indiana Association of People Supporting Employment First (IN-APSE): BRS and IN-APSE share a common mission in that competitive, integrated employment should be the first and preferred option for all individuals with disabilities. BRS participates in IN-APSE events including the annual IN-APSE conference, and BRS staff regularly participate in planning as well as presenting at the conference. The IN-APSE statement on Employment First is based on several underlying principles including a presumption that all work age adults and youth with disabilities can work in jobs fully integrated with the general workforce, earning minimum wage or higher; and that employees with disabilities, as with all other individuals, require assistance and support to ensure job success and should have access to adequate, long term supports necessary to succeed in the workplace. These underlying principles are very much in line with BRS priorities, especially in light of WIOA and enhanced requirements to ensure that individuals receiving counseling, information and referral regarding alternatives to subminimum wage employment.

Other: VR maintains a collaborative working relationship with several advocacy and consumer support groups and organizations with a presence in Indiana. These include: the National Employment Team (The NET) which includes a national network of the 80 public Vocational Rehabilitation (VR) programs supports a united or “one company” approach to working with business customers. The NET vision is to create a coordinated approach to serving business customers through a national VR team that specialized in employer development, business consulting and corporate relations; the Indiana Resource Center for Families with Special Needs (INSOURCE); the Indiana Association of Rehabilitation Facilities in Indiana (INARF); the Indiana Council of Community Mental Health Centers, Employment Committee; and the Arc of Indiana. Input from many of these groups is obtained through various workgroups such as the transition advisory council and the VR employment advisory group.

In order to address underserved and unserved populations, VR has initiated interagency cooperation with the following programs: Indiana Civil Rights Commission, Commission on the Social Status of Black Males, and the Burmese American Association.

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

Assistive Technology Act Project: VR has an outstanding association with Easter Seals Crossroads Assistive Technology Center to ensure that the INDATA Project (Indiana Assistive Technology Act) federal goals are in compliance. The INDATA Project is one of 56 similar, federally-funded projects designed to increase access to and awareness of assistive technology. INDATA’s core services include: information and referral, funding assistance, public awareness and education, device demonstration, device loan, reutilized computers, and equipment reutilization. The INDATA Project is an international benchmark of success. The INDATA Project helped morph
the Easter Seals Crossroads AT Center into more than just what the federal act requires. Now the AT Center has its own recording studio and broadcasts 24/7 podcasts around the world. They are known for their expertise and ability to train their staff in order to prepare each member for their national RESNA certification as an AT Provider. In addition, the INDATA Project staff provides VR Counselors and Division staff ongoing assistive technology training and every month they offer ‘AT First Fridays’ webinars that are live-streamed to VR and Division staff. Furthermore, consumers and VR staff can access the equipment loan library to test various types of equipment or borrow equipment to be used when repairs are necessary to previously purchased items. INDATA Project also partners with Centers for Independent Living, Area Agencies on Aging and Community Rehabilitation Provider (CRP) programs insuring the greatest networking reach for persons with disabilities to understand what services are available and how they can best be utilized to assist our consumers in employment and independent living.

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

Department of Agriculture: Consumers utilize the Breaking New Ground program located at Purdue University. This program assists farmers with disabilities as well as providing outreach to rural communities. In addition to a strengthened relationship with AgrAbility, another connection with the Arthritis in Agriculture program was further developed.

(4) Noneducational agencies serving out-of-school youth; and

BRS continues to be a collaborative partner with DWD for services to all individuals with disabilities, including out-of-school youth. Training was provided to VR staff on services available to this population through the local Work One centers. Children’s Bureau and the Villages are service providers through the Department of Child Services. They provide services to foster youth and children. The Indiana Youth Institute promotes the healthy development of Indiana children and youth by serving the people, institutions and communities that impact their well-being. BRS maintains a relationship with these entities.

(5) State use contracting programs.

State Use Program: While there are no cooperative agreements with the State Use program, the Division of Disability and Rehabilitative Services has assigned a designee to represent DDRS/VR on the Indiana State Use Board. The Committee for the Purchase of Products and Services of Persons with Severe Disabilities (IC 16-32-2-7), also known as the State Use is fully functional and has a full complement of members. The Committee continues to meet quarterly to review services, products, and employment data while monitoring new initiatives by providers. DDRS has one committee member and provides staff for the recording minutes and acts as the executive secretary to the committee. Indiana Association of Rehabilitation Facilities (INARF) manages the program and acts in a liaison capacity to facilitate contracts with provider agencies and the Indiana department of Administration. INARF has recently completed a “rebranding” of the State Use Committee to enhance marketability and expand product into municipal and local
government. The program will be known as ABILITY INDIANA solutions. DDRS/BRS continues to be involved and partner when appropriate.

(c) **Coordination with Education Officials.** Describe:

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

Indiana VR and key partners continue to build a collaborative infrastructure for purpose of streamlined transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services. Ongoing Indiana initiatives and WIOA requirements are aligned for VR to coordinate with Education officials and other key partners (e.g., Department of Workforce Development) to identify the best methods for providing successful transition services to students.

Serving transition-aged students continues to be a priority for VR, even more so with the advent of WIOA and pre-employment transition services (pre-ETS). Through the efforts of VR’s dedicated transition staff, the Director of Youth Services and the Coordinator of Youth Services, VR continues to expand pre-ETS to counties and schools statewide, with education to key stakeholders being a major part of this expansion. This includes VR staff and contractors providing pre-ETS across the state, as well as outreach and education to students, parents, educators, and others. This education and outreach serves not only to educate about pre-ETS requirements and availability, but also to quell misconceptions about services. This training has included face-to-face meetings with pre-ETS contractors for the purpose of sharing resources, expectations, accomplishments, etc., as well as webinars to VR staff, parents, and educators, presentations to local school systems and transition cadres, and providing ongoing updates to the statewide VR Transition Advisory Council. The focus of much of this outreach has been to aid in understanding of how pre-ETS is being made available to students with disabilities across the state, VR’s plans for continued expansion, and to respond to any misunderstandings or concerns individuals may have. VR developed training briefs for VR staff to help them understand the impact of Order of Selection on pre-ETS. Additional written materials are in development for educators and parents, which will be distributed to school systems courtesy of the Department of Education (DOE).

VR, in collaboration with DOE, established a Statewide Transition Advisory Council to identify and address the barriers that continue to impact students, and develop and implement strategies and services to make the transition successful for students and youth with disabilities. The Transition Advisory Council established a work plan based upon the Transition to Careers Subcommittee Chapter recommendations (one of the four created by the full Transition Advisory Committee on Increasing Competitive Integrated Employment for Individuals with Disabilities (ACICIEID)). The Statewide Transition Advisory Council includes representation from a wide range of key partners and stakeholders, including the following: VR, DOE, local educational agencies’ school personnel and
administrators, Indiana Council of Administrators of Special Education (ICASE), the Bureau of Developmental Disability Services (BDDS), the Department of Workforce Development (DWD), Department of Corrections, Center for Deaf & Hard of Hearing Education (CDHHE), Community Mental Health Centers, First Steps, Indiana Association of People Supporting Employment First (INAPSE), Indiana Association of Rehabilitation Facilities (INARF), Indiana Institute of Disability and Community (I IIDC), parent representation, the Arc of Indiana, INSOURCE, and other family advocacy groups.

As of December, 2017, progress from the work plan touched on all 5 of the goals identified by the group: early work experience, postsecondary education, family expectations, system integration, seamless transition, and professional supports and incentives. These accomplishments included over 61,000 early work experiences being provided to students with disabilities statewide, over 3,000 sessions related to education on postsecondary options provided to students with disabilities, outreach to families and educators related to transition expectations through webinars and in-person trainings sponsored by IN*Source, About Special Kids, and local transition cadres, training to pre-ETS providers on supplementing rather than supplanting training available through local education agencies to ensure seamless transition and system integration, as well as discussion of appropriate qualifications for transition providers.

VR works closely with IIDC at IU on several transition-related priorities. IIDC promotes partnerships between Indiana schools and various state agencies and other support organizations. IIDC’s focus is on career development, secondary education, and transition to adult life. As part of the need to establish an infrastructure and ensure sustainability of transition services, including pre-ETS, VR works with the existing Transition Cadres in Indiana. Established in 2011 and dedicated to improving secondary transition outcomes for students, a network of Transition Cadres throughout Indiana (funded by DOE) is working collaborative, both regionally and statewide. The efforts are focused on implementing promising practices and creating innovative strategies, tools, and resources for teachers and other transition professionals. VR has provided training on VR and its services to the Cadres and is attending the regularly scheduled cadre meetings to continue the joint collaboration. For more information please see: http://www.iidc.indiana.edu/pages/cadre-leaders.

In coordination with IIDC, VR developed written informational materials for educators and students. Three VR fact sheets, entitled “Working with Indiana Vocational Rehabilitation” are in the process of being updated to include information on pre-ETS, order of selection, and other programmatic updates. The fact sheets provide resources for students, teachers, and families about VR at students’ Transition IEP meetings. Another important informational and educational tool that was created to improve outreach and education about VR is the “Working with Indiana Vocational Rehabilitation” Video. This video provides a quick 5 minute overview of VR in an entertaining manner in hopes to provide a unique mode of educating transition-aged students and families. (Video may be viewed at www.vrs.in.gov.)

VR has counselors assigned to each school for outreach and education to teachers, students, and parents. These VR counselors collaborate with the school staff to enable a seamless transition to life after high school. The goal for each student is for a VR application to be completed, and, for
eligible consumers who are being served, to have an Individualized Plan for Employment (IPE) in place, before exiting high school. LEA’s and VR confer at least one time per year to identify students who may require VR services. VR Counselors are invited to IEP meetings and make it a priority to attend when schedules permit. VR counselors and/or area supervisors are also involved in local transition councils if they exist in the community. Councils are made up of local stakeholders who are involved in the transition from school to work and adult life. Councils could include students/family, school personnel, service providers, etc. In addition, VR is responsible for providing written information to students and their families regarding adult services.

(2) Information on the formal interagency agreement with the State educational agency with respect to:
(A) consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;

VR and DOE maintain an interagency agreement, which was updated in recent years to capture expanded federal requirements under WIOA. The interagency agreement states that: the roles and responsibilities, including financial responsibilities and methods for determining which partner agency and qualified personnel is responsible for transition services are:

1. The student’s Transition IEP will define the services and responsible payer for each of the services. If VR is responsible for payment of a service, this responsibility will be described in the Individualized Plan for Employment (IPE).

2. Each agency will maximize coordination in the use of federal funds.

3. Decisions related to which entity will be financially responsible for providing transition or pre-ETS that can be considered both a special education and a VR service must be made at the local level as part of the collaboration between the VR agency, state educational agency, and the local educational agency. The Partner Agencies will collaborate to develop the required procedures and processes that VR area offices and local educational agencies will use when considering and assigning the financial responsibility of each agency for the provision of transition and pre-ETS to students with disabilities. The required procedures and processes will be based, at least in part, on the following criteria:
   a. Is the purpose of the service related to an employment outcome or education?
   b. Is the service one that the school customarily provides under IDEA, Part B?
   c. Is the student receiving special education services 14 years or older or entered grade 9?

4. The partner agencies will develop procedures and processes for outreach efforts and identification of eligible and potentially eligible students with disabilities. These efforts
will occur as early as possible during the transition process and will include: a description of pre-ETS available to students who are eligible or potentially eligible for VR services; the purpose of the VR program; eligibility requirements; application process; and the scope of services that may be provided to eligible individuals. Any formal training on the topic of transition from school to adult life will include appropriate stakeholders, e.g., VR area office staff, school personnel, and students/families.

The interagency agreement between VR and DOE is in the process of being reviewed and will be updated by June, 2018. The review of the interagency agreement between VR and DOE will include an assessment of current strategies and identification of new strategies to maximize transition opportunities for students. This will include the types of consultation and technical assistance VR will provide to educational agencies, methods that VR can use to provide consultation and technical assistance, including through alternative means, such as conference calls and webinars, how DOE and VR will work together in the development and facilitation of the IEP and IPE, cross-training opportunities between the VR and DOE, and coordination with non-educational agencies for out-of-school youth.

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

Please see response to 2A above

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

Please see response to 2A above

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

Please see response to 2A above

(d) Cooperative Agreements with Private Nonprofit Organizations. Describe the manner in which the designated State agency establishes cooperative agreements with private nonprofit VR service providers.

VR purchases an array of services from a variety of vendors and community rehabilitation providers. Community Rehabilitation Providers specifically provide discovery, employment services, vocational evaluation, job shadow, placement, and supported employment services. VR promotes consumer choice in the provision of services. There are a total of 90 agencies with Provider Agreements for providing employment services in Indiana. Purchased employment services follow a new Employment Service Model that is based on a consumer-centric,
individualized, and flexible outcome-based payment model, blended with an hourly fee-for-service structure for Discovery activities and Supported Employment services. (Information regarding the VR Employment Services Model may be found at [www.vrs.in.gov](http://www.vrs.in.gov).) The 90 providers include Community Rehabilitation Programs and Community Mental Health Centers.

(e) **Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.** Describe the designated State agency’s efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

Indiana receives approximately $475,000/year of Title VI B funds to provide supported employment (SE) services. VR has made a commitment to serve people with the most significant disabilities and also utilizes Title I dollars to serve this population. VR spent approximately $6.2 million on SE services, and provided services under an IPE to approximately 5300 consumers with most significant disabilities (MSD) in FFY17.

For consumers with developmental disabilities who qualify for services under the Bureau of Developmental Disabilities Services (BDDS), VR works collaboratively with BDDS to provide SE services and seamless transition to extended services. BDDS defines extended services as ongoing employment support services which enable an individual to maintain integrated competitive employment in a community setting. Individuals must be employed in a community-based, competitive job that pays at or above minimum wage in order to access this service.

The initial job placement, training, stabilization may be provided through Indiana Vocational Rehabilitation Services. Extended Services provide the additional work related supports needed by the individual to continue to be as independent as possible in competitive, integrated employment. Ongoing employment support services are identified in the participants’ Individualized Support Plan and must be related to the participants’ limitations in functional areas (i.e. self-care, understanding and use of language, learning, mobility, self-direction, capacity for independent living, economic self-sufficiency), as are necessary to maintain employment.

Extended Services are provided in competitive, integrated settings where persons without disabilities are also employed. Extended Services do not include sheltered work or other similar types of vocational services furnished in specialized facilities or volunteer endeavors.

**Reimbursable Activities**

- Ensuring that natural supports at the work site are secured through interaction with supervisors and staff. A tangible outcome of this activity would be a decrease in the number of hours of Extended Services an individual accessed over time.
• Training for the participant, and/or the participant’s employer, supervisor or coworkers, to increase the participant’s inclusion at the worksite.
• Regular observation or supervision of the participant to reinforce and stabilize the job placement.
• Job-specific or job-related safety training.
• Job-specific or job-related self-advocacy skills training.
• Reinforcement of work-related personal care and social skills.
• Training on use of public transportation and/or acquisition of appropriate transportation.
• Facilitating, but not funding, driver’s education training.
• Coaching and training on job-related tasks such as computer skills or other job-specific tasks.

BDDS may provide long-term employment support services through Medicaid Waiver. VR counselors initiate transfer to extended services at the time of job placement. This ensures that BDDS eligible consumers move directly into extended services after case closure without a gap in services.

In July 2015, VR implemented a new employment service model that increases access to VR-funded SE services to ensure that individuals with the most significant disabilities who require SE services receive the supports they need to achieve stabilization on the job prior to transferring to extended services as appropriate. This procedural change was designed to ensure more accountability from both VR and employment service providers in determining that individuals are stable in their jobs prior to VR closure and transfer to extended services. Additional evaluation and training is necessary to ensure that this shift in practice is achieving the desired outcome of consumers receiving increased access to SE services from VR to better ensure stabilization, prior to transitioning to extended services.

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

(1) VR services; and

Over the last four years, the Business and Community Engagement team has found a niche in providing service to employers with technical assistance and the provision of individualized resources to employers. Through continued collaboration the Business and Community Engagement Team has become well known for the resources they can provide to business and community organizations in the area of disability, such as providing disability awareness and etiquette trainings, and connecting national experts in the industry to local employers. One example is a collaborative meeting that was set up between Subaru and Toyota Manufacturing. This ultimately led to another meeting and tour of UPS WorldPort Training Center in Louisville, which opened up communication about possible employment opportunities for VR participants.
VR continues to work to support businesses with their respective diversity/disability hiring initiatives. Very often a first meeting with a business begins with a tour of the workplace, an overview of business services and an in-depth listening session on what that business believes that it needs. Most recently, a business asked the Business and Community Engagement team to help build a March Disability Awareness program to present to their Supervisors. Through a lengthy discussion, this business revealed that they potentially have opportunities that might become workplace learning opportunities for local youth.

It is the goal of the VR Business and Community Engagement team to focus on building long-lasting relationships with each business that will ultimately increase the number of individuals with disabilities who are hired. Getting to this point often requires thinking outside the box. One business stated an immediate need for individuals to fill their employment vacancies. Aware that it was not going to be possible for VR to fill the immediate need, the team connected other potential resources (local veterans’ services and workforce development representatives) with this business to assist with solving their hiring challenges.

The re-launch of the Indianapolis Chapter of the Business Leadership Network (BLN) has also been a great collaboration between employers, community rehabilitation providers and VR. Because the Business and Community Engagement team was present and actively assisted in the planning and events surrounding the re-launch, the relationships with businesses continued to grow. As one example of the continued engagement, the VR team has been included on the strategic planning committee that will bring the first annual Midwest Diversity and Disability Awareness Conference to Indianapolis in 2018.

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

Business and Community Engagement has also worked with VR’s Youth Services team to identify businesses around the state (Subaru in Lafayette and Primex Plastics in Richmond) that hosted students through ‘mentoring days.’ These events, which took place in the fall, 2017, included tours of the business, and sessions that provided information about the local labor market, self-advocacy skills, and other pre-employment transition services for approximately 50 students with disabilities.

The VR Business and Community Engagement team is also working to connect a major employer that is a not-for-profit healthcare system to non-governmental resources that will allow them to expand a hiring initiative that began with the development of a natural pipeline of graduates from the Erskine Green Training Institute. The Erskine Green Institute provides opportunities for postsecondary vocational training for people with disabilities that empower and lead to meaningful employment. The graduates of the Erskine Green Healthcare Support program build skills in the areas of Nutrition Services (Dish room and Tray Transport), Environmental Service (Housekeeping), Patient Transport and Supply Chain: Inventory Distribution.
(g) **Interagency Cooperation.** Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

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

The Division of Disability and Rehabilitative Services (DDRS) and Office of Medicaid Policy and Procedure (OMPP) maintain a written agreement to outline responsibilities in serving consumers. This MOU states that OMPP has financial responsibility for necessary medical services covered by Indiana’s Medicaid Program for consumers who are eligible for both VR and Medicaid. VR has provided education and outreach regarding Indiana’s Medicaid buy-in program (called M.E.D. Works) to increase access to competitive, integrated employment for individuals with disabilities receiving Medicaid. Through the VR-funded Benefits Information Network (BIN), VR consumers also receive information about M.E.D. Works and how this program can enable them to both work and maintain their needed Medicaid benefits. The BIN process also educates VR consumers to make overall informed choices about working, providing education not only about the impact on Medicaid, but also the impact on other federal and state benefits, and the use of federal and state work incentives to assist in achieving gainful employment.

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

The Bureau of Rehabilitation Services (BRS) and the Bureau of Developmental Disability Services (BDDS) are housed in the same division, the Division of Disability and Rehabilitative Services (DDRS). Additionally, Vocational Rehabilitation (VR) and BDDS field offices are co-located, allowing for increased collaboration in serving mutual consumers, educating referrals about each program’s services and ensuring a smooth transition to extended services as appropriate upon exit from VR. At time of job placement, VR Counselors submit transfer documentation to ensure extended services are in place prior to VR case closure as appropriate. (Please reference attachment (c) and (q) for more information.)

The BRS Director, BDDS Director, and DDRS Director regularly collaborate and discuss how program changes in one bureau may have impact on the other bureau. For instance, bureau leaders have recently collaborated on revisions to BDDS waiver definitions to bring definitions in line with the new VR employment service revisions, particularly around supported employment and extended services.

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

VR staff also works closely at a local level with the Division of Mental Health and Addiction’s (DMHA) funded Centers for Mental Health. VR has a training contract which provides training and consultation to all employment services providers, including mental health centers and VR staff regarding employment for people with disabilities. The majority of mental health centers across the state have employment service agreements with VR for the provision of placement services including supported employment. Additionally, stakeholder members from these
centers, along with stakeholders from Community Rehabilitation Providers, participated in the VR employment services workgroup which resulted in the roll-out of substantial modifications to the VR employment service model. These revisions were designed to better serve all consumers, including those with the most significant disabilities and the highest support needs. Several revisions were made to the new draft model based on feedback from these workgroup members to ensure the new model is effective in serving all individuals.

A representative from both BDDS and DMHA were appointed to the VR Commission in FFY18 and are active participants on the commission.

(h) Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development. Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

(1) Data System on Personnel and Personnel Development
   (A) Qualified Personnel Needs. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:
      (i) the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

Projections of types and numbers of employees needed are based on current caseload sizes, demographic information regarding the population of Hoosiers with disabilities, the projected number of individuals exiting high school with disabilities, trends regarding number of consumers served in recent years, and current initiatives. The budget and state allocation available also drive the determination for the number of staff that can be sustained within Vocational Rehabilitation (VR). Reports that outline ratios of VR Counselors to consumers on a statewide, region, local area, and counselor basis, are readily available and are regularly reviewed by management. As of February, 2018, the Counselor to consumer ratio is 1:126. VR has consistently hired 20-25 new counselors per year due to retirements, promotion of staff, and general turnover. Over the next five years VR will need to fill additional vacancies due to an increased number of employees reaching retirement age. The projected number of consumers to be served is among the data reviewed in consideration of staffing levels. The following are projections of the anticipated number of applicants and eligible individuals coming into the system annually for each of the next five years.

FFY17 ACTUAL (Applicants: 10,942; Eligible: 8,777)
FFY18 ESTIMATE (Applicants: 11,050; Eligible: 8,860)
FFY19 ESTIMATE (Applicants: 11,160; Eligible: 8,950)
FFY20 ESTIMATE (Applicants: 11,270; Eligible: 9,040)
FFY21 ESTIMATE (Applicants: 11,380; Eligible: 9,130)
It is anticipated that VR will see a similar trend in the number of applicants, or an increase in applicants and eligible consumers in the coming years, due to increased outreach and education at schools statewide through the provision of pre-employment transition services, and through outreach to individuals employed at sub-minimum wage through provision of career counseling and information and referral services. VR is planning outreach efforts aimed at increasing VR applicants and expects the application trend to gradually increase over the next several years. A counselor-consumer ratio of not more than 1:100 is best practice to maintain efficient caseload management and quality service. As the number of applicants and people who are eligible are anticipated to increase, the number of staff needed to meet consumer needs may increase as well. As of this submission, 35 VR Counselors, 11 VR Case Coordinators, 5 secretaries, 5 area supervisors, and 2 regional managers are eligible for retirement.

<table>
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<tr>
<th>Row</th>
<th>Job Title</th>
<th>Total positions</th>
<th>Current vacancies</th>
<th>Projected vacancies over the next 5 years</th>
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<td>Vocational Rehabilitation Counselors</td>
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<td>8</td>
<td>BRS Central Office Staff</td>
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<td>5</td>
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</table>

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

Please see response to A(i) above

(iii) projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Please see response to A(i) above
Personnel Development. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

(i) a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

Indiana has one CORE-accredited Rehabilitation master’s program to prepare individuals to sit for the CRC exam. Ball State University has a long-standing Masters of Rehabilitation Counseling Program that has graduated over 80 students from the program. The Ball State Rehabilitation program has been CORE accredited since 2004. There were 6 new graduates in 2015, and this decreased to only 4 graduates in 2017, with only 3 graduates expected in the coming year (2018). The program currently has 6 students enrolled.

Though Indiana has other university institutions that offer degrees in related fields that may meet or partially meet CSPD hiring qualifications (including some that offer Rehabilitation Counseling degrees that are not currently recognized by CRCC), these programs do not offer CORE accredited Rehabilitation Master’s programs. VR does encourage students to participate in internships in the VR agency and believe this to be a valuable VR Counselor recruiting practice. VR will continue to work with Ball State to increase the number of interns with hopes of increasing the recruitment pool for vacant VR Counselor positions. VR also works closely with Indiana University through the Indiana Institute on Disability and Community (IIDC) in the provision of the Leadership Academy and other training initiatives.

<table>
<thead>
<tr>
<th>Row</th>
<th>Institutions</th>
<th>Students enrolled</th>
<th>Employees sponsored by agency and/or RSA</th>
<th>Graduates sponsored by agency and/or RSA</th>
<th>Graduates from the previous year</th>
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</tbody>
</table>

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

Please see response to B(ii) above

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

Please see response to B(i) above

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

VR acknowledges a long-standing challenge with recruitment and retention of VR Counselors who have met CSPD requirements in the past. In 2014, VR successfully implemented a comprehensive restructuring of the field services staffing model to improve the quality of service provided to our consumers. The addition of a new VR Case Coordinator role helped to ensure that the VR Counselor role is focused primarily on rehabilitation counseling and guidance. This field services restructuring also aimed to enhance recruitment activities to obtain qualified VR field staff. VR will continue working to identify institutions of higher education and professional associations to partner with in the development and implementation of this plan of action.

VR periodically conducts needs assessments with staff to identify training priorities. Staff performance appraisals were substantially revised in 2015 to shift expectations to increase focus on customer service and quality outcomes. The ongoing review of performance goals will also identify additional areas of training need for staff. VR has a designated staff member who coordinates the provision of training for VR staff.

VR in partnership with IIDC continues to evaluate and modify a web-based training program, called the Leadership Academy, for continuous improvements and increased effectiveness. This program will be explained in more detail below.

Initiatives within VR that may improve staff retention include the addition of 7 itinerant VR Counselor positions to assist with covering caseloads in local VR offices experiencing vacancies in VR Counselor positions. Additionally, the ongoing efforts to increase communication and training across VR may assist with retention. This includes ongoing quarterly statewide supervisor meetings, monthly regional management meetings, and monthly field staff training webinars, new supervisor trainings, regional field visits, and other opportunities to bring staff together within the region or state. In September 2016, BRS held a 2-day statewide VR Symposium for all counseling staff, case coordinators, and Central Office staff to come together for the purpose of training and collaboration. Additionally, Field Region Managers are an integral part of monthly Leadership Team meetings and give essential input on policies, training needs, new initiatives and priorities, etc. The VR Commission honored staff by presenting awards to four outstanding VR staff.
VR continues to offer counselors and support staff opportunities to participate in special agency projects outside of their regular work routines, which sends the message that leadership values and desires the input of field staff. In the coming year, VR will work to establish a more targeted focus on reaching out to local universities as a recruitment source for identifying qualified individuals with master’s degrees in rehabilitation counseling or closely related areas.

VR has a long-standing history of hiring qualified candidates from minority backgrounds and individuals with disabilities for all BRS positions, including VR Counselors. The Family and Social Services Administration (FSSA), the agency in which DDRS/BRS sits, has an Affirmative Action plan that includes FSSA’s policy on Affirmative Action, recruitment strategies, identifies responsible parties for implementation and monitoring, and addresses FSSA’s progress toward meeting goals for new hires. Outreach strategies include recruitment activities at events such as Indiana Black Expo as well as events at local universities such as job fairs and advisory board meetings. Furthermore, VR job postings are shared locally with Centers for Independent Living, CRPs and Mental Health Centers for broad distribution. VR Counselors also share openings as appropriate with VR consumers and VR has hired several former consumers into VR positions.

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

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

Of the 164 current VR counselors, 17 have their CRC. VR also has 2 certified region managers, 2 certified area supervisors, and 2 individuals on the Central Office team who is a CRC. VR recognizes long-standing challenges of the availability of qualified new hires in Indiana due to having only one CORE Accredited Rehabilitation program that graduates only a small number of students each year. While CRCs and/or individuals with closely related master’s degrees are certainly the ideal candidates for our VR counselor roles, VR anticipates that by changing the hiring requirements to allow for a relevant bachelor’s degree and at least 1 year of pertinent experience in service or advocacy of individuals with disabilities will allow struggling area offices an opportunity to hire more expeditiously and effectively, while still maintaining qualified staff. This will be especially beneficial in offices located in rural communities and offices where positions have historically needed to be reposted a number of times in order to identify qualified candidates.

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

Due to the shortage of CRCs in the state and WIOA changes to requirements, VR amended its hiring qualifications in 2016 as follows:

Master’s degree from an accredited university in rehabilitation counseling, rehabilitation administration, counseling and guidance, social work, special education, sociology, audiology, education, speech pathology, or a closely related human service area or certification as a Certified Rehabilitation Counselor (CRC) is preferred; OR

In lieu of a Master’s Degree a Bachelor’s degree from an accredited university in rehabilitation counseling, rehabilitation administration, counseling and guidance, social work, special education, sociology, psychology, audiology, education, speech pathology, or a closely related human service area or certification as a Certified Rehabilitation Counselor (CRC); AND

Demonstrated paid or unpaid experience, for not less than (1) one year, consisting of:

- Direct work with individuals with disabilities in a setting such as an independent living center;
- Direct service or advocacy activities that provide such individual with experience and skills in working with individuals with disabilities; or
- Direct experience as an employer, as a small business owner or operator, or in self-employment, or other experience in human resources, recruitment, or experience in supervising employees, training, or other activities that provide experience in competitive integrated employment environments.

Other preferred experience includes:

- Vocational counseling skills, motivational interviewing skills, or related counseling skills
- Awareness of cultural diversity, medical and psychological aspects of disability, counseling theories, assessment tools, job development and placement, Rehabilitation Act, ADA, IDEA, Social Security, Medicaid, Medicare, other state/federal programs, DWD programs, rehabilitation technology, economic and labor market trends, community organizations, and financial aid.
- Excellent oral and written communication skills, creativity, problem-solving, evaluation of services, and time management skills.
- Ability to communicate with diverse populations, flexibility, handling multiple tasks, maintaining professional demeanor, and ability to empathize.
- Ability to interpret psychological/medical evaluation reports and medical terminology.
- Familiarity with Assistive Technology and how to access AT services.
- Knowledge of local community and statewide resources preferred.
- Knowledge of local and statewide job market preferred.
• Willingness to obtain necessary continuing training/education for CRC maintenance, or if not a CRC willingness to work toward becoming eligible to sit for CRC examination.

With these changes to the hiring qualifications, VR projects an increased number of qualified applicants for VR Counselor vacancies to serve its consumers, and hopefully increase retention.

(4) **Staff Development.** Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

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

VR continues to assess training methods and curriculum in order to make necessary improvements to the development and delivery of training for staff, specifically new VR Counselors. Counselor training needs are assessed through survey, dialogue, supervisor recommendations, staff feedback, and agency directives. In October 2015, a VR Training Work Group was assembled which is comprised of field staff and Central Office staff members with various levels of experiences and roles.

Training is provided through a variety of modalities, including statewide symposiums, regional trainings, webinars, and in-person workshops. VR continues to collaborate with the Indiana Department of Workforce Development (DWD) in coordination of joint trainings to better serve shared consumers as well. In 2015, VR and DWD determined a need for cross-training and identification of subject-matter experts in each of the DWD WorkOne offices and the VR area offices statewide. A pilot group of subject matter experts came together for initial training in July 2015 and this group has been meeting regularly to work collaboratively in joint efforts to better serve consumers.

As mentioned previously, VR also contracts with IIDC for the provision of select training including maintenance and enhancements to the web-based Leadership Academy. In 2017, Orientation modules were revised to provide a more interactive experience for staff taking the courses. Content was updated, and quizzes, discussion questions and features designed to enhance supervisor to staff dialogue were incorporated. In 2018, the Core Course modules are undergoing this same revision process. Some of the topic areas covered through the Leadership Academy are listed below:

• **VR New Counselor Orientation** (6-week course covering The Field of Disability Services, Consumer Statuses, Referral, Application, Eligibility & Severity Determination, Fiscal Accountability, Services & Vendors, Additional Services, Comprehensive Assessment, Individualized Plan for Employment, Case Closure, & Post-Employment Services);
- Intro to the Rehabilitation Act and principles of Rehabilitation;
- Addictions;
- Ex-Offenders
- Independent Living; and
- Personality Disorder.

In addition to formal classroom style or web-based training, a great deal of mentoring and coaching occurs at the local level, especially for new staff. Supervisors play a large role in coaching new staff and will continue to be a key part of new staff training. Training curriculum specifically geared toward supervisors has been developed as well and was implemented in 2015. Training workshops have begun taking place regularly for new supervisors and ongoing training for all supervisors. Additionally, online training is required for new supervisors in regards to the human resources aspects of managing employees.

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

VR also accesses training and resources offered by partners, including the statewide Assistive Technology IN-DATA program which offers ‘first Friday’ AT webinars specifically for VR staff. VR contracted with a training entity called Educational Data Systems Inc. (EDSI) in October 2015 to provide comprehensive training workshops for staff on counseling and guidance in addition to case management. In 2016, all staff participated in this training. The training was also offered to new hires in 2017. Additionally, BRS is in process of working with the Indiana Client Assistance Program (CAP) to ensure that updated information about CAP is incorporated into VR staff training curriculum.

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

VR maintains the ability to communicate with VR consumers in their preferred mode of communication in a variety of ways. VR staff access and coordinate foreign language translation, ASL communication, Communication Access Real Time (CART), etc. whenever needed. To ensure communication services are available despite a shortage of some providers (i.e. ASL interpreters, CART providers), VR has increased utilization of remote interpreting services. Publications and brochures are available in large print and Spanish versions. VR has VR Counselors that cover population-specific caseloads including individuals who are deaf or hard of hearing, individuals with low vision, and individuals with a traumatic brain injury. VR seeks candidates with some fluency in ASL for Counselor positions covering a caseload of consumers with hearing loss. Virtual ASL training was piloted in 2015 for interested staff as well.
Coordination of Personnel Development Under the Individuals with Disabilities Education Act. As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

VR has a Statewide Transition Coordinator on staff to train and notify VR field staff of all changes and initiatives related to working with transition-aged students. In addition, VR will be adding a Statewide Transition Director. IIDC continues to serve as a transition resource to VR and DOE. Training and technical assistance is offered statewide and the targeted audience is parents, students, school officials, VR professionals, and CRP staff. Initiatives are currently ongoing to develop and update transition guides that will be available to all appropriate stakeholders. The Transition Alliance workgroup will be expanded in the coming year to serve as an advisory group pertaining to statewide VR Transition initiatives. Partners who sit on this group include parent advocates, DOE, schools, DWD, VR, IIDC, etc. VR is investigating opportunities for cross-training with VR and appropriate school personnel. Targeted training and technical assistance is ongoing for the VR field staff; specifically, VR has held webinars and face-to-face trainings on transition-related topics, such as special education overview, Transition IEPs, 504 Plans, special education eligibility, transition services, etc. All of these strategies will support VRs’ priority to increase outreach efforts and access to VR services for transition aged youth.

(i) Statewide Assessment.

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

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

Data Collection
While Indiana’s formal comprehensive statewide needs assessment is conducted every three years, data is gathered on a continuous basis. It is a joint effort of the Vocational Rehabilitation Services (VRS) and the Commission on Rehabilitation Services (CRS). The Commission provides ongoing input, especially in the acquisition of satisfaction data. It also provides input into the development and content of the final report. Commission members have an opportunity to review and offer comments prior to the release of the triennial needs assessment. Indiana’s 2017 comprehensive statewide needs assessment reflects a synthesis of quantitative and qualitative data addressing the state’s overall vocational rehabilitation needs. The data collection techniques varied as well. They included review of demographic data for Indiana, feedback from the Commission on Rehabilitation Services, input from providers, VR staff, Workforce Development staff, WIOA partners, advocates, and consumers.

In addition, VR developed and distributed a detailed survey to the following groups: VR staff, the Commission on Rehabilitation Services, community rehabilitation programs, the Arc of Indiana, In*Source, Autism Society of Indiana, Down Syndrome Indiana, National Alliance on Mental Illness (NAMI), Indiana Association of Persons Supporting EmploymentFirst (INAPSE), Indiana Association of Rehabilitation Facilities (INARF), Bureau of Developmental Disability Services, Department of Workforce Development, WorkOne, employers, Indiana Council for
Administrators in Special Education (ICASE), Cadres of Transition Leaders, Business Leadership Networks, Indiana Commission on Civil Rights, Indiana Protection and Advocacy Services, and 50 additional entities. Over 460 individuals responded to this survey.

This needs assessment will be used to identify appropriate goals and strategies for FFY17-FFY19.

**Demographic/Economic Data**

**PREVALENCE RATE**
The percentage of men and women, aged 16-64, who reported a sensory, physical, mental, or self-care disability in 2013 was 9.9% in Indiana and 9.7% in the U.S. The 2013 data indicated that the percentage of non-institutionalized males or females in Indiana, ages 16-64, regardless of ethnicity, with all education levels who reported a disability is 10.2% compared to a national rate of 12%.

The current population in Indiana, based on 2011 U.S. Census Bureau estimates, is more than 6.5 million, with approximately 62% of the population that are working age (18 through 64). Of the working-age population, 8.9% adults have self-reported as having been diagnosed with a disability.

**EMPLOYMENT**

Indiana’s employment rate in 2013 for 487,266 individuals with disabilities, ages 18-64 living in the community was 33.8% (164,556). The employment rate for individuals without disabilities is 76%. This is an employment gap of 42.3%.

Indiana’s Department of Workforce Development reported that in June 2015, Indiana’s unemployment rate of the general population was reported at 4.9%, closely mirroring the national average of 5.4%.

**EMPLOYMENT DEMAND IN INDIANA**

Indiana’s Department of Workforce Development has a list of Hoosier Hot 50 Jobs. The list’s ranking is based on expected demand and wages in 2022 for the state of Indiana. It is anticipated that there will continue to be need for employees over the next decade for each of the following (from most to least): registered nurses, K-12 teachers, truck drivers (heavy and tractor-trailer), sales representatives (wholesale and manufacturing), general operations managers, licensed practical nurses, postsecondary educators, accountants/auditors, office managers, and electricians. Even though this list reflects needs through 2022, all ten of these positions are listed as currently in demand.

**POVERTY**

The percentage of non-institutionalized persons, aged 21 to 64 years, with a disability in the United States who were living below the poverty line in 2013 was 28.2%. In Indiana that same group living in poverty was 29.3 %. In 2013, the poverty rate of individuals without disabilities, ages 18 to 64 years, living in the community was 13.3%—a poverty gap of 15.6 percentage points.
In 2013, an estimated 31.9% of civilian, non-institutionalized men and women with a work limitation, aged 18-64, in the United States lived in families with incomes below the poverty line. This rate was 35.4% for individuals with work limitations residing in Indiana.

In Indiana, an estimated 15.4% of the general population lived in poverty according to Census data, and the median household income was $47,508 in 2013.

SUPPLEMENTAL SECURITY INCOME

The percentage of non-institutionalized persons, aged 21 to 64 years with a disability, who were receiving Supplemental Security Income (SSI) benefits in 2013 was 17.7% in Indiana and 18.9% for the U.S.

Nationally, in December 2012, of the 8,262,877 individuals who received federally administered payments from the SSI program, 1,156,188 were eligible, 67,725 were eligible based on blindness, and 7,038,964 were eligible based on disability. In Indiana, of the 124,998 individuals who received SSI, 873 were eligible based on blindness and 118,655 were eligible based on disability.

Indiana has a Benefits Information Network (BIN) of certified liaisons that assists individuals in assessing the impact of employment on benefits. During the year July 2014 – June 2015, 1,394 BIN plans were completed. The Indiana Institute on Disability and Community (IIDC) at Indiana University conducted eight trainings with 184 Certified BIN liaisons and 14 certified Community Work Incentive Counselors. Indiana VR purchases this assessment of benefits through the trained liaisons.

EDUCATIONAL ATTAINMENT

In the United States in 2013, non-institutionalized persons, aged 21 to 64 years, with a disability, whose educational attainment was less than a high school education was 20.9%. In Indiana, that group was 21.4% of the population.

Students in the U.S., ages 6 to 21, who were served under IDEA, Part B, were 8.4% of the population. In Indiana, that group is 10.2% of the population.

Indiana data indicated that of the students who exited IDEA, Part B, special education services in 2011-2012, 5,617 graduated with a diploma, 1,056 received a certificate, 820 dropped out and 99 aged out or died.

VETERANS WITH A SERVICE-CONNECTED DISABILITY

In Indiana, the percentage of non-institutionalized civilian veterans, aged 21 to 64 years, who reported a VA service-connected disability in 2013 is 18.9%, compared to a U.S rate of 21.4%.

In 2013, there were 412,317 Indiana civilian veterans, ages 18 years and over, living in the community, 129,291 of whom were individuals with disabilities—a prevalence rate of 31.4%. In that same year, the poverty rate of civilian veterans with disabilities in Indiana, ages 18 to 64 years, living in the community was 16.9%, while the poverty rate of individuals without disabilities, ages 18 to 64 years, living in the community was 6.7%—a poverty gap of 10.2%.
HEALTH INSURANCE COVERAGE
The percentage of non-institutionalized persons, aged 21 to 64 years, with a disability in Indiana who were uninsured in 2013 was 17%.

INDIVIDUALS WITH INTELLECTUAL AND DEVELOPMENTAL DISABILITIES
The Institute for Community Inclusion data for 2013 shows that Indiana reported 31% of individuals with intellectual and developmental disabilities were served in integrated employment services. Indiana VR showed a 59.96% employment rate for individuals with a cognitive disability in 2013.

The 2015 Day and Employment Services Outcome System reports on 12,972 individuals from 57 Indiana employment providers. Twenty six percent were served in integrated employment, 27% in sheltered/facility-based work, 27% in alternative to work (seeking employment, volunteer work) and 18% in non-employment day services.

Commission on Rehabilitation Services Input
VR staff received the following comments from the members of the Commission on Rehabilitation Services:

• An emphasis on the importance on benefits counseling services to families as impact of employment on benefits remains a key concern for families.
• A need for increased education and collaboration with WIOA partners on serving individuals with disabilities.
• A need for financial literacy for individuals with disabilities as a strategy for working toward self-sufficiency.
• A need to educate individuals with disabilities about self-disclosure.
• Educating school personnel including special education teachers, guidance counselors and transition coordinators about services offered through WIOA partners, including WorkOne services.
• Continued emphasis on service youth with disabilities through outreach, use of career coaches, work experience opportunities, and increasing expectations for employment.
• Increased collaboration with other partners such as Department of Correction regarding services to shared consumers.
• Improved marketing including sharing of success stories and improving website information.
• Revision to hiring criteria for VR Counselors to address staff shortage and staff retention issues, including implementation of revised CSPD criteria to allow for hiring of qualified candidates with a Bachelor’s degree.

Consumer Input
Indiana Vocational Rehabilitation Services surveyed 697 consumers who had their VR cases closed due to successful job placements, and 168 individuals whose cases were closed
unsuccessfully. This survey was for the first six months of 2015. The table below compares the outcomes of this survey to the past two years.

<table>
<thead>
<tr>
<th>Question</th>
<th>Successful (26)</th>
<th>Unsuccessful (28)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) I was satisfied with the services I received from VR</td>
<td>4.56</td>
<td>4.60</td>
</tr>
<tr>
<td>2) I like the way I was treated</td>
<td>4.61</td>
<td>4.66</td>
</tr>
<tr>
<td>3) I would recommend VR to others</td>
<td>4.62</td>
<td>4.66</td>
</tr>
<tr>
<td>4) I received the services I needed</td>
<td>4.54</td>
<td>4.59</td>
</tr>
<tr>
<td>5) I received my services in a timely fashion</td>
<td>4.35</td>
<td>4.42</td>
</tr>
<tr>
<td>6) I was able to meet my counselor at a convenient location</td>
<td>4.59</td>
<td>4.65</td>
</tr>
<tr>
<td>7) I am satisfied with my job</td>
<td>4.43</td>
<td>4.46</td>
</tr>
<tr>
<td>8) I am satisfied with my fringe benefits (medical, dental, etc.)</td>
<td>3.76</td>
<td>3.95</td>
</tr>
<tr>
<td>Total surveys returned</td>
<td>2209</td>
<td>1952</td>
</tr>
</tbody>
</table>

The results of the responses to the close-ended questions are separated by closure type. Scores were calculated using a five point scale, with five representing strongly agree and one representing strongly disagree. The rating for the 2015 successful closures on each of the categories was just slightly lower when compared to the prior year, for those individuals whose cases were closed successfully. However, the mean was 4.44 on a 5 point scale. The individuals who were successfully placed in employment gave their highest rating 4.63 to stating that they would recommend VR to others. The lowest rating was received from consumers who were not satisfied with the fringe benefits they received from their employer. The mean for individuals whose cases were closed unsuccessfully was 3.81, which was slightly higher than the previous year. The individuals who did not achieve an employment outcome gave the lowest ratings (3.58 and 3.67) to the questions of whether they received the services they needed and if the services were received in a timely manner.

2017 UPDATE:

In 2017, BRS provided opportunity to VR participants to respond to a Customer Satisfaction Survey upon case closure. BRS received completed surveys from 2,638 participants. Of those, 1,913 surveys were completed by participants who had their VR cases closed due to achieving competitive, integrated employment, and 725 surveys were completed by individuals whose cases were closed unsuccessfully. The table below compares the outcomes of this survey to the past three years.
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>9) I was satisfied with the services I received from VR</td>
<td>4.60</td>
<td>4.60</td>
<td>4.63</td>
<td>4.61</td>
<td>3.69</td>
<td>3.66</td>
<td>3.77</td>
<td>3.70</td>
</tr>
<tr>
<td>10) I like the way I was treated</td>
<td>4.66</td>
<td>4.64</td>
<td>4.68</td>
<td>4.67</td>
<td>4.00</td>
<td>3.92</td>
<td>4.06</td>
<td>3.97</td>
</tr>
<tr>
<td>11) I would recommend VR to others</td>
<td>4.66</td>
<td>4.66</td>
<td>4.69</td>
<td>4.67</td>
<td>3.86</td>
<td>3.82</td>
<td>3.95</td>
<td>3.86</td>
</tr>
<tr>
<td>12) I received the services I needed</td>
<td>4.59</td>
<td>4.57</td>
<td>4.62</td>
<td>4.62</td>
<td>3.52</td>
<td>3.52</td>
<td>3.68</td>
<td>3.58</td>
</tr>
<tr>
<td>13) I received my services in a timely fashion</td>
<td>4.42</td>
<td>4.38</td>
<td>4.36</td>
<td>4.30</td>
<td>3.70</td>
<td>3.60</td>
<td>3.69</td>
<td>3.57</td>
</tr>
<tr>
<td>14) I was able to meet my counselor at a convenient location</td>
<td>4.65</td>
<td>4.61</td>
<td>4.63</td>
<td>4.63</td>
<td>4.14</td>
<td>4.14</td>
<td>4.16</td>
<td>4.09</td>
</tr>
<tr>
<td>15) I am satisfied with my job</td>
<td>4.46</td>
<td>4.45</td>
<td>4.54</td>
<td>4.54</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>16) I am satisfied with my fringe benefits (medical, dental, etc.)</td>
<td>3.95</td>
<td>3.91</td>
<td>4.02</td>
<td>4.09</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Total surveys returned</td>
<td>1952</td>
<td>1899</td>
<td>1550</td>
<td>1913</td>
<td>604</td>
<td>611</td>
<td>574</td>
<td>725</td>
</tr>
</tbody>
</table>

As past statistics demonstrate, the averages for all the shared measures were higher for consumers who achieved successful case closure. Yet, even for the consumers whose cases were closed as unsuccessful, their scores remained positive with a slight decrease in overall satisfaction as compared to 2016. The steady response indicates an overall satisfaction rating from both successful and unsuccessful case closures. The means on the common measures for the successful cohort continued to be high in 2017, ranging from 4.09 to 4.67, compared to a range of 4.02 to 4.69 in 2016. Fringe benefits, which is typically the lowest rated category, was 4.09, the highest measurement recorded across all four years. Furthermore, more surveys were returned in 2017 than in the three prior years.

**Current Service Levels**

A large number of individuals with disabilities pursue entry into the workforce system through the assistance of Indiana’s Vocational Rehabilitation Services.

- In period FFY 2015, VR assisted 3,996 customers to become competitively employed working a combined 116,289 hours per week and earning a combined $1,505,653.00 per week.

- This totals to $77,121,371.43 annually for all successfully closed cases.

- This is an increase of $38,542,383.57 in annual salary reported at application to that reported at closure, for all successfully closed cases.

- For competitively employed customers, this is an average increase of $9,645.24 in annual salary reported at application to that reported at closure.
• VR was able to help 1,904 customers gain jobs so that their own earnings have become their primary source of support.

• In Fiscal Year 2015, VR achieved 4,103 successful closures and a rehabilitation rate of 58.59%.

• VR spent a total of $42,914,783 in federal year 2015 for case services. The majority of these funds went to job placement and training services.

• In FFY 2015, 12,044 individuals applied for VR services, with 7,155 consumers completing Individualized Plans for Employment with VR. VR served 28,287 consumers in the year 2015.

The current distribution of Indiana consumers by primary impairment group appears in the list below. Mental illness, physical disabilities, and developmental disabilities/autism are the three most frequent primary impairments faced by Indiana vocational rehabilitation consumers.

**Populations Served by Primary Impairment Group**

<table>
<thead>
<tr>
<th>Disability Group</th>
<th>Count of Cases</th>
</tr>
</thead>
<tbody>
<tr>
<td>DD - Developmental Disability</td>
<td>4,861</td>
</tr>
<tr>
<td>MI - Mental Illness</td>
<td>7,257</td>
</tr>
<tr>
<td>OT - Other Disabilities</td>
<td>3,267</td>
</tr>
<tr>
<td>PH - Physical Disability</td>
<td>5,760</td>
</tr>
<tr>
<td>SC - Sensory Category</td>
<td>4,516</td>
</tr>
<tr>
<td>TB - Traumatic Brain Injury</td>
<td>646</td>
</tr>
</tbody>
</table>

**Indiana Employment Outcomes and Federal Indicators**

Employment outcomes are a key issue for all parties in the vocational rehabilitation system. It is a key measure by which the service delivery system is evaluated.

• In FFY 2015, Indiana reported 4,103 successful rehabilitations, which was lower than the 4,377 rehabilitations in 2014. This is below the Federal Indicator.

• The rehabilitation rate was 58.59% for FFY 2015, with 97.39% being competitively employed.

• The percentage of people with significant disabilities who were competitively employed was 83.40%.
The ratio of average wage of individuals employed as compared to all employed Hoosiers was .59 in FFY 2015 (well above the Federal Indicator of .52).

Individuals placed by VR earned an average wage of $12.06 an hour compared to all Hoosiers at $20.11.

Indiana did not meet the Federal Indicator of income being the largest source of support as compared to when starting the program. This indicator has a required ratio of 53. Indiana’s ratio for this indicator was 47.65.

The ratio of the service rate for minorities to the service rate for whites for FFY 2015 was .90 which is above the Federal Indicator of .80 (ratio).

SURVEY RESULTS
Respondents: 460
School personnel 30%
Community Rehabilitation staff/Mental Health staff 18%
Vocational Rehabilitation staff 12%
Advocate/Case Manager 10%
Family member 8%
Consumer 4%
Rehabilitation Commission Member (4 responses) 1%
WorkOne staff (4 responses) 1%

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

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

What are barriers to employment for individuals with disabilities?
Respondents indicated that the lack of adequate transportation was the most significant barrier to employment. This was very closely followed by the lack of employers willing to hire individuals with disabilities, specifically those individuals who would require job coaching or modifications to jobs or accommodations.

What barriers exist in serving individuals through supported employment?
Responses provided by 258 individuals were similar to barriers to employment for all individuals with disabilities. The top two barriers were lack of adequate transportation and lack of jobs, specifically lack of employers willing to hire individuals needing significant support. The third barrier identified was the lack of staff, VR counselors, employment specialists, and job coaches. There was also a perceived barrier that supported employment is time limited to the extent that it does not provide sufficient support to individuals.
What minority groups are unserved or underserved?

African American 31%
Amish 16%
Burmese 12%
Hispanic 10%
Haitian 7%

Others identified were those residing in rural areas and individuals with language barriers.

What are the service gaps for minority groups?

Services and methods to address the language and cultural barriers was the primary gap identified by the 131 respondents to this question. This also noted that there is a need for continued outreach to inform minority groups of the availability of programs and services.

Who have been unserved or underserved by the VR program;

What disability groups do you see as being unserved or underserved?

Mental illness 40%
Cognitive disabilities 22%
Autism 20%
Traumatic brain injuries 12%
Other: 20 of the 372 respondents indicated that all groups were underserved.

Deaf and hard of hearing also was listed frequently under “Other.”

Who do you see as being unserved or underserved populations?

Individuals residing in rural areas 48%
Individuals with most significant disabilities 42%
Veterans 10%
Other: Ex-offenders and those who are homeless were identified. It should be noted that a few individuals responded, noting that students with milder disabilities are often seen as not being eligible for VR services and are thus underserved.

What is needed to improve the involvement of the underserved populations?

There were two overwhelming responses for this question. One was the need to improve transportation options in general, but especially in rural areas. It was followed closely by the need for additional outreach to increase knowledge of Vocational Rehabilitation Services. Respondents also stated that increased involvement with employers is needed to address availability of jobs.
(D) who have been served through other components of the statewide workforce development system;

Please rate the current relationships between Vocational Rehabilitation Services and WorkOne offices.

- Great: 9%
- Good: 62%
- Poor: 30%

Although the majority of respondents indicated a good relationship between the agencies, there remains room for improvement, with over a fourth reporting a poor relationship.

What suggestions do you have in developing a partnership with WorkOne to assist individuals with disabilities?

The need to develop better communication and awareness between WorkOne offices, VR, and Education, which might include cross-training of staff, was the most frequent response of the 178 who answered this question. The second most frequent recommendation was to assist WorkOne staff in disability awareness and for WorkOne offices to be more accessible, specifically in areas such as use of closed captioning, JAWS, and testing. It should be noted that several respondents indicated they were unaware of WorkOne or the services it provides.

What strategies would enhance the engagement of employers in assisting individuals with disabilities, including students, in obtaining integrated employment?

The 233 respondents to this question identified the need to educate employers on disabilities and tax incentives. Networking with employers to provide on-the-job training and intern sites and for employers to see people with disabilities as valued employees were also frequently noted strategies. It was suggested that VR assist employers in linking with other employers who have successfully hired consumers, through linkages with entities like the Business Leadership Network.

What services or resources would be beneficial to support employers in hiring individuals with disabilities?

The 222 individuals who responded to this question rated disability awareness and assistance with making necessary accommodations as being equally important services to provide to employers. Following close, was the need to inform employers of incentives such as tax credits and how employment of individuals with disabilities benefits employers. The overarching response was to make the process easier for employers.
who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

What do you believe are the needs of students with disabilities for pre-employment transition services?

Those responding rated the importance of strategies as listed below. While the top three responses were very close in ratings, all of the other categories were viewed as having value. The two trends in the “Other” category indicated the need for more family involvement and earlier involvement of students.

- Work-based learning experiences, which may include in-school or after school opportunities or experience outside the traditional school setting (including internships such as Project Search), that is provided in an integrated environment
- Workplace readiness training to develop social skills and independent living
- Developing and improving strategies for individuals with intellectual disabilities and individuals with significant disabilities to live independently; participate in post-secondary experiences, and obtain, advance in, and retain competitive integrated employment
- Instruction in self-advocacy and self-determination skills (e.g., problem-solving, choice-making, self-awareness)
- Job exploration counseling
- Counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs at institutions of higher education
- Peer mentoring (including peer mentoring from individuals with disabilities working in competitive integrated employment) for career awareness
- Provide instruction to vocational rehabilitation counselors, school transition personnel, and other persons supporting student with disabilities
- Develop model transition demonstration projects

In assisting students with disabilities make the transition from school to work, what would you identify as the primary barriers?

The top three responses were again, very close, and again, all of the responses received high ratings as barriers. Trends in the “Other” category reflected the barriers of transportation, lack of coordination of services, and lack of family involvement.

- Students not prepared for work
- Gap in services from school to work (student leaves school without connections to services)
- Lack of information on available services
• Concerns related to loss of Social Security benefits or health benefits
• Lack of timeliness of services, that is, time from referral to job placement
• Lack of high expectations from families
• Lack of high expectations from school and agency personnel

What strategies do you recommend to improve/expand VR services for students and youth with disabilities?

The 250 respondents to this question gave a variety of responses. The most frequently noted was to have VR involved with students at a much earlier age, which would include having more frequent presence of VR counselors in the school and dedicated transition counselors. It was noted that better coordination is needed with the schools and VR. Another strategy that was frequently mentioned was that of more involvement with families to address expectations and impact of work on benefits.

(B) who are minorities;

Please see section (A) above. Sections A-E are clearly marked.

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

Please see section (A) above. Sections A-E are clearly marked.

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

Please see section (A) above. Sections A-E are clearly marked.

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

Please see section (A) above. Sections A-E are clearly marked.

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

In 2015, Indiana made major changes to its Employment Services Model. While retaining many of the components of the Results Based Funding (RBF) system, the rate structure now also includes hourly fees for services such as Discovery and for additional work place supports that are needed by consumers. Extensive trainings were held statewide, over the course of several months, to explain the new model and to address questions and concerns on the changes. Those who attended the trainings were primarily from VR and community rehabilitation programs, but
individuals from the Bureau of Developmental Disability Services, DWD, advocates, and school personnel were also in attendance.

A workgroup was established to guide the development of the revised Employment Service model. The workgroup is composed of BRS Leadership Staff, VR field staff, Community Rehabilitation Program, Community Mental Health Centers, INARF, and the Indiana Institute on Disability and Community (IIDC) at Indiana University. The workgroup continues to meet monthly to evaluate the revisions, and to obtain feedback on emerging best practices as well as additional areas of improvement. Some additional modifications to the model have already been implemented in response to feedback from the workgroup and other stakeholders.

The new employment service model is substantially different from the prior model. Services are more individualized, the menu of Discovery services has expanded, consumer access to supported employment has increased, expectations for service provision have increased, documentation requirements have been substantially modified, and funding has been shifted. Feedback from the workgroup has revealed that providers must consider needed changes to business practices such as staffing structure, staff training, billing mechanisms, etc. These changes are needed to improve Community Rehabilitation programs (CRPs) to better align with the new VR employment service model, and to ensure quality service provisions to consumers. BRS explored the use of funding for the establishment, development, and specifically, improvement of CRPs in order to accomplish this necessary shift. BRS entered into contractual agreements with 47 CRPs in April, 2017 to enhance staffing capacity and increase foundational skills training through Establishment project funding for the purpose of increasing the quality of VR employment services, including supported employment services for individuals with the most significant disabilities, and competitive, integrated employment outcomes to VR applicants or eligible individuals.

Establishment project funding is permitted for a maximum period of four (4) years and employment services provided through the project are delivered only to VR applicants or individuals who have been determined eligible to receive VR services. Employment services include discovery services, job readiness training, outcome-based employment services, supported employment services, on-the-job supports short-term, and job search/job placement assistance. Specific allowable costs are limited to costs of staffing to increase capacity to carry out employment services to VR applicable or eligible individuals, and costs to improve and expand training for employment services staff. Training methods consist of new and/or enhanced classroom-based and hands-on training, ensuring staff appropriately apply supports and techniques with ongoing coaching and mentoring. Quarterly reporting of measureable objectives provides BRS with progress updates on improved timeliness of initiation of services; increased provisions of SE services or on-the-job supports short-term; and increased quality and quantity of competitive, integrated employment outcomes.

Introductory one-day training on Discovery was attended by 285 individuals. A more detailed, two-day training on the Discovery process was held statewide, with 268 individuals attending
from over 74 community rehabilitation programs. Indiana currently has VR employment service agreements with 89 community rehabilitation programs across the state.

What are your perceived needs to improve Community Employment Programs?

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are there service gaps? If so, what?</td>
<td>147     80%</td>
</tr>
<tr>
<td>Is there a need for expanded services? If so, in what area?</td>
<td>93      51%</td>
</tr>
<tr>
<td>Is there a need for additional staff development? If so in what area?</td>
<td>115     63%</td>
</tr>
<tr>
<td>Are there needed improvements in service delivery? If so what?</td>
<td>96      52%</td>
</tr>
</tbody>
</table>

Gaps were identified, specifically, coordination of services between agencies and staff turnover at all agencies. The need for expanded services, including transition services and services to rural areas was also mentioned. Staff development needs were identified in the areas of job coaching and development. Improvements were noted again in the area of communication between agencies.

Community Rehabilitation Program Training Needs

In the fall of 2015, VR staff and staff of community rehabilitation programs (CRP) were surveyed as to their training needs. Surveys were received from 622 individuals – 60% were from CRP personnel and 28% from VR staff.

The top five General Employment needs were identified as:
- Discovery process – in-depth training
- Understanding supported employment
- Job-readiness training
- Understanding the difference between supported and customized employment
- Understanding how to fund employment services

In Working with Employers, the following were identified as training needs:
- Customizing jobs – job carving and restructuring
- Developing business partnerships
- Job development strategies
- Marketing services
- Developing small businesses/self-employment

The top five other Unique Training Needs were identified as:
- Working with consumers who have mental health needs
- Working with consumers who are ex-offenders
- Working with consumers with intellectual and developmental disabilities
- Working with consumers with autism
- Working with consumers with traumatic brain injury
The survey included specific questions regarding transition services and training needs. Top responses included:

- Developing quality work experiences and/or internships
- Working with transition teams (e.g., schools, VR)
- Understanding the transition process with schools
- Working with transition-age youth (adolescents)
- Other: (getting family support, knowing what schools do, engaging students, how do schools decide who to refer to VR; roles/responsibilities, all of the above, transition councils)

Identified training needs for Job Site Training and Supports were:

- Developing employment support and retention plans
- Teaching social and self-management skills
- Developing and building natural supports
- Developing accommodations
- Onsite systematic instruction and support strategies

Off-site support training needs included:

- Developing employment support and retention plans
- Teaching social and self-management skills
- Strategies for anger management and anxiety reduction
- Benefits planning and management (social security and work incentives)
- Other (time management, marking VR to partner agencies, training for job coaches and VR vendors, peer communication on job, fiscal/billing, soft skills)

Survey participants identified that they wanted training to be a hybrid of face-to-face and webinars. From the information generated, Indiana Vocational Rehabilitation Services is working with the Indiana Institute on Disability and Community (IIDC) at Indiana University to provide the needed training.

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

Please identify strategies for coordination with employers on transition services for students and youth with disabilities.

<table>
<thead>
<tr>
<th>Work experiences at local businesses</th>
<th>54%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disability Awareness Training</td>
<td>26%</td>
</tr>
<tr>
<td>Employers as mentors</td>
<td>23%</td>
</tr>
</tbody>
</table>

Most respondents indicated that if the survey would have allowed, they would have chosen all three choices. In the “Other” category, several respondents indicated the
need for a VR staff dedicated to building employer relationships which would include information on disabilities and incentives to hiring.

**Overall Comments or Suggestions That Have Not Been Covered**

The 47 individuals who responded to this question provided a variety of responses, but no real trends were identified. Several indicated the need for continued evaluation of programs and policies and the need for changes to occur as a result.

**Provide that the State shall submit to the Commissioner a report containing information regarding updates to the assessments for any year in which the State updates the assessments:**

With the annual state plan submission, Indiana will submit a report containing information on any assessments that have been updated. Indiana will conduct the next comprehensive, statewide assessment from 2017-2020.

**Conclusions**

VR has received considerable input from the surveys that were submitted during this statewide needs assessment. The 2014 Workforce Innovation and Opportunity Act presents considerable changes and challenges. Indiana VR will use the thoughtful comments and suggestions obtained to assist in furthering the development of quality programs and services for individuals with disabilities throughout the state.

Indiana Vocational Rehabilitation (VR) has made significant strides and impact in the last three years. The leadership has continued to obtain stakeholder input in identifying needed modifications to VR employment services. System revisions were rolled out in July 2015 and are designed to ensure that all VR consumers, including those with the most significant disabilities, have better access to the services and supports needed to prepare for, obtain, retain, and advance in competitive, integrated employment. The new system is more consumer focused, or consumer centric, allows for more individualization of services and supports, and increases accountability of both VR and provider staff. These significant programmatic changes are moving a system from a one size fits all “conveyor belt” approach to one that is more focused on the individual and their needs. In order to ensure success of the new employment service model, additional training is necessary for both provider and BRS staff, as well as identification of additional support and infrastructure changes with provider organizations to ensure capacity to service consumers under the new model and meet increased expectations.

Highlighting some past recommendations that were provided in the previous needs assessment (FFY14-FFY16)) help to set the framework that leads up to present day VR activities. Included in this section, is a quick review of past survey recommendations and where the VR program is
today. The PAST and PRESENT section highlights recommendations found in the prior needs assessment and describes actions taken based upon those recommendations. The section entitled FUTURE provides the current 2015 Triennial Needs Assessment recommendations to guide future strategic planning.

PAST AND PRESENT:

**TOPIC: Marketing and Public Relations - The overall need of better marketing/public relations with consumers, the community, business/employers, and VR staff, as well as enhancing the relationship with partners (CILs, WorkOnes, LEAs, BLNs, BDDS, etc.).**

In 2013, a position was created that was fully dedicated to the role of Business & Community Engagement. It was determined the dedication of this position would be to the development of information regarding VR Services and creating avenues to communicate the information through educational opportunities, presentations, newsletters, webinars, and through social media. Providing the information to stakeholders about VR Services within the communities across the state was a priority. This, coupled with an increased emphasis on each individual VR Counselor’s Outreach resulted in an overall statewide increase of referrals to VR services. Social media accounts on Twitter and Facebook for BRS/VR were created to help reach more individuals with information on VR Services. A short video that provided an overview of services was completed and distributed on social media. An emphasis on State agency cross education, collaboration and training is also ongoing across the state (Work Ones, DWD, local Workforce Investment Boards, Employers, CRPs).

**TOPIC: Training – There is a definite need for better and more training opportunities for staff, stakeholders and CRP staff.**

Since 2013, there was a dedicated position created of a VR Training Coordinator. The purpose of the position is the coordination of trainings opportunities across the state to staff and CRPs. There was a considerable increase in the training opportunities that were provided by VR and its partners to support employment specialists and CRPs with their job duties. In addition to a new overall rate structure implementation training, specialized training on topics like discovery and employment services were provided across the state to provide multiple resource opportunities to strengthen the skills and knowledge base of the persons who work directly with VR consumers. Opportunities to have training in different formats (webinar, in person or conference call) was another achievement to be noted. A “Friday Field Chat” was implemented for all staff to call in once a month to discuss Director’s Initiatives, or other relevant topics. Training opportunities were increased to VR staff by developing training curriculum for support staff and management staff. Training opportunities will be further expanded for providers over the next four year through the development of new training contracts that will offer additional classroom based, webinar, and hands-on workshops.
**TOPIC: Transition Services** – A process for providing Transition Services needs to be revised and more uniformly applied statewide.

In 2013, a dedicated role of Transition Coordinator was created. Primary goals of the position included development and implementation of a statewide plan for educating the transition age youth and stakeholders about Transition Services, and provide technical assistance and training to VR staff. As a result, relationships between VR and local education agencies have improved in several local areas, and both VR and LEA’s are more education about the programs and services offered by each partner. Transition students are also entering VR at an earlier age. Some specific, key achievements of the Transition Coordinator were the development of a map of schools across the state which indicated the specific VR Counselors assigned to each school, and the development and distribution of FAQ sheets through collaboration with the Indiana Department of Education to teachers, counselors and parents across the state. Also, Transition Conferences and Resource Fairs have a more consistent presence of VR Counselors... Because of the strengthened collaboration between the State Department of Education, Transition Cadres and Transition Resource Workgroups, better communication and collaboration between stakeholder groups focusing on students and transition has become the norm.

**Topic: Outreach to Minorities** – More outreach to minorities should be done through the use of agencies/organizations with which minorities have regular contact.

Through the newly created Business & Community Engagement role, there was an increased effort to provide outreach to Indiana’s minority groups through agencies/organizations with which minorities have regular contact. For example, the Native American Indiana Affairs Commission, The Latino Institute, the Burmese American Association and the Haitian American Association, The Commission for the Social Status of Black Males and the Indiana Civil Rights Commission are recent partners of engagement activities. The ratio of VR services provided to minorities has increased steadily over the past few years (ratio of services to minorities to whites was .90 in FFY15, compared to .82 in FFY12).

**FUTURE**

The TNA survey sheds light on the perceived needs and service gaps across the state when serving persons with disabilities. This information is important to study and thoroughly consider when developing strategic plans for VR Services for FFY 2017 through FFY 2019. Recurring themes of lack of access to transportation, limited access to employment opportunities, and lack of employers willing to hire persons with disabilities continue and should continue to be a priority focus. The emphasis on Transition services in light of WIOA legislation will be a focus of future collaborative efforts with other state agencies (Department of Education and Workforce Development), stakeholders and employers.

*Transportation – the lack of access to transportation is a recurring theme and a significant barrier to all persons with disabilities.*
The current and most prevalent barrier that isn’t new to the world of disability is the lack of access to transportation. Creating better access to transportation is a priority that current leadership recognizes as a need to explore. The topic was recently discussed at a strategic planning meeting of the Governor’s Council for People with Disabilities. Leadership is committed to exploring ideas to increase access to transportation for persons with disabilities. Lack of access to transportation is a long-standing barrier and not one that is easily or quickly resolved. VR will continue to work with providers and employers to explore creative solutions to ensure consumers have employment opportunities despite transportation barriers.

Defining minorities and service gaps: Given the diverse groups that are present in Indiana, there will continue to be targeted efforts to minority groups and an effort to better understand the cultural differences that can also present barriers to service delivery.

Unserved and Underserved Populations: Unserved are those who are eligible for VR services, but not receiving services. Underserved is defined as not receiving equal or full benefits of VR. (Susan Stoddard, PhD RSA USDOE) This definition certainly includes minorities and ethnic groups who speak a language other than English. These definitions also can also apply to specific disability groups with Mental Illness, Cognitive Disabilities and Autism as indicated through feedback from surveys. Also noted were individuals living in rural areas and recommendations to strengthen rural community outreach will be evaluated.

Based on this survey, a majority of persons with disabilities who have been served through other components of the statewide workforce development system had a good or great experience. This is expected to continue as a result of targeted strengthening of collaborative efforts. Suggestions received for developing these partnerships are encouraging as VR has staff have already begun cross training about the services provided by each agency. Much more work is to be done, but the foundation is set. Suggestions to provide more specific trainings on accessible technology (JAWS) and the use of closed captioning were also noted.

Suggestions for engaging employers that would result in more opportunities for youth include more disability awareness trainings and other opportunities to employers to learn about disability and benefits of hiring persons with disabilities like tax credits. Strengthening the local Business Leadership Networks across the state will help to foster collaboration and education of employers about disability and disability hiring initiatives.

What are the main needs of students and you with disabilities? The WIOA legislation continues to be a main focus for Vocational Rehabilitation and other state agencies. A major focus area is the provision of Pre-Employment Transition Services (Pre-ETS) to students with disabilities, which includes: 1) job exploration counseling 2) work based learning opportunities 3) counseling on opportunities for enrollment in post-secondary education 4) workplace readiness training and 5) self-advocacy. The recent revisions to the VR Employment Service Model increase emphasis on Discovery activities through an enhanced menu of services and a modified funding structure that funds discovery services individually instead of through a milestone payment. These revisions are especially timely in light of the new requirement for VR to utilize 15% of Title I
funds for Pre-ETS. Discovery activities include services such as job shadowing, situational assessments, work experiences, informational interviews, vocational counseling and guidance, vocational testing and other services needed to evaluate consumer strengths, interests, abilities and ideal work conditions.

Continued provision of comprehensive training to stakeholders, especially those of Community Rehabilitation Providers is needed and has been clearly communicated. Training specific to developing quality work experiences, working with transition age youth and providing Pre-ETS to students with disabilities will continue. VR has entered into contractual agreements with training and technical assistance entities that will be providing a wide range of training to employment service providers. Training topics will include but are not limited to, development of natural supports, job readiness training techniques, and hands-on job coaching techniques. Further exploration is needed to determine how BRS can support providers in improving service provision under the new VR employment service model through not only training, but also modifications to infrastructure such as changes in business practices and staffing models to build capacity. The improvement of community rehabilitation programs is essential in ensuring that quality employment services are appropriately carried out, and that opportunities to increase the quantity and quality of employment outcomes are maximized utilizing the new VR employment service model.

Finally, the hiring, training, and retention of VR Staff is critical in ensuring quality service provision to VR consumers, leading to competitive, integrated employment outcomes. Indiana VR Leadership recognizes a need for improvement in training staff as well as a need to greatly improve retention of VR staff, particularly VR Counselors. VR Leadership worked with State Personnel to broaden the requirements for VR Counselor positions to mirror the Comprehensive System of Personnel Development (CSPD) revisions in WIOA. This will assist Indiana in hiring from a greater candidate pool, which is especially important in rural areas and areas that experience ongoing challenges in identifying appropriately qualified candidates with a Master’s degree in Rehabilitation or closely related area.

Additionally, VR will continue to invest in training opportunities for VR Staff. VR Counseling and Guidance training will be rolled out by March 2016 and delivered in each region to ensure small classroom sizes. VR will also continue to revise the web-based Leadership Academy content to ensure needed modifications resulting from WIOA, policy changes, and other initiatives. VR will continue to obtain feedback from VR staff on training needs and work diligently to meet each of those needs.
References


Indiana IRIS (2015). Data retrieved upon request from Indiana’s case management system.


Every three years, Vocational Rehabilitation agencies are required to submit a Comprehensive Statewide Needs Assessment as an attachment to the State Plan. Indiana’s plan is to be submitted in March 2016. As part of the assessment, we are requesting your feedback on the needs for services or gaps in services. Please click on the survey or copy and paste the URL into your browser to complete the survey. Thank you in advance for your assistance.

Please tell us about you. Check the description/affiliation that best describes your role.
- VR Commission Member
- VR Personnel
- School Personnel
- Advocacy Organization
- Case Manager
- Family Member
- Self-advocate/Consumer
- BDDS Personnel
- WorkOne Staff
- Mental Health Center staff
- Community Rehabilitation Provider representative (e.g. Employment Service Provider Personnel)
- Other ____________________

Students and Youth with Disabilities Needs: The below questions are targeted to seek input on students (ages 14-21 in school) and youth (ages 14-24 regardless of whether they are in school). The responses assist in identifying transition needs of both students and youth with
disabilities. Additionally, the input will help identify strategies for methods used to improve/expand VR services for students with disabilities.

What do you believe are the needs of students with disabilities pre-employment transition services?
<table>
<thead>
<tr>
<th></th>
<th>Highest Need</th>
<th>Medium Need</th>
<th>Low Need</th>
</tr>
</thead>
<tbody>
<tr>
<td>Job exploration counseling</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Work-based learning experiences, which may include in-school or after school opportunities, or experience outside the traditional school setting (including internships, such as Project Search), that is provided in an integrated environments</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs at institutions of higher education</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Workplace readiness training to develop social skills and independent living</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Instruction in self-advocacy and self-determination skills (e.g., problem-solving, choice-making, self-awareness)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Peer mentoring</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---------------</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>(including peer mentoring from individuals with disabilities working in competitive integrated employment) for career awareness</td>
<td>✓</td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>Develop model transition demonstration projects</td>
<td>✓</td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>Provide instruction to vocational rehabilitation counselors, school transition personnel, and other persons supporting student with disabilities</td>
<td>✓</td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>Developing and improving strategies for individuals with intellectual disabilities and individual with significant disabilities to live independently; participate in post-secondary experiences, and obtain, advance in, and retain competitive integrated employment.</td>
<td>✓</td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>✓</td>
<td>❌</td>
<td></td>
</tr>
</tbody>
</table>
In assisting students with disabilities make the transition from school to work, what would you identify as the primary barriers?

<table>
<thead>
<tr>
<th>Lack of information on available services</th>
<th>High barrier</th>
<th>Medium barrier</th>
<th>Low barrier</th>
</tr>
</thead>
<tbody>
<tr>
<td>Students not prepared for work</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Concerns related to loss of social security benefits or health benefits</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lack of timeliness of services, that is, time from referral to job placement</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gap in services from school to work (student leaves school without connections to services)</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lack of high expectations from families</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lack of high expectations from school and agency personnel</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

What strategies do you recommend to improve/expand VR services for students and youth with disabilities?
Please identify strategies for coordination with employers on transition services for students and youth with disabilities. Check all that apply and please add additional strategies.

- Employers as mentors
- Work experiences at local businesses
- Disability Awareness Training
- Other ____________________
- Other ____________________

Individuals with the Most Significant Disabilities (individuals who have functional limitations to employment in three or more areas) and Supported Employment (providing job coaching and additional supports to individuals as needed) needs:

What barriers exist in serving individuals through supported employment?

Employer Engagement (how to involve employers):

What strategies would enhance the engagement of employers in assisting individuals with disabilities, including students, in obtaining integrated employment (employment in the community with at least minimum wage)?

What services or resources would be beneficial to support employers in hiring individuals with disabilities (e.g., disability awareness training, ADA workplace accommodations, etc.)?

What do you see as barriers to employment for individuals with disabilities?

Partnerships with the statewide workforce development system (i.e. WorkOnes):

What suggestions do you have in developing a partnership with WorkOne to assist individuals with disabilities?

Please rate the current relationships between Vocational Rehabilitation Services and WorkOne offices.

- Great
- Good
- Poor
Who are minority groups that are unserved or underserved?
- African American
- Burmese
- Haitian
- Amish
- Other ____________________

What are the service gaps for minority groups?

What disability groups do you see as being unserved or underserved? Individuals with
- Traumatic Brain Injuries
- Autism
- Mental Illness
- Cognitive disabilities
- Other ____________________
- Other ____________________

Who do you see as being unserved or underserved populations?
- Individuals with most significant disabilities
- Individuals residing in rural areas
- Veterans
- Other ____________________
- Other ____________________

What is needed to improve the involvement of the underserved populations?

Community Rehabilitation Providers and Service Needs:

What are your perceived needs to improve Community Employment Programs?
- Are there service gaps? If so, what? ____________________
- Is there a need for expanded services? If so, in what area? ____________________
- Is there a need for additional staff development? If so in what area? ____________________
- Are there needed Improvements in service delivery? If so what? ____________________
- Other: ____________________

Overall Comments or Suggestions That Have Not Been Covered:
(j) **Annual Estimates.** Describe:

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

The current population in Indiana, based on 2010 U.S. Census Bureau estimates, is approximately 6.5 million with approximately 62%, of the population of working age (18 through 64), which is over 4 Million individuals.

12.1%, or 484,000 of individuals age 18-64 in Indiana reported a disability in 2016.


In summary, 36.8%, or approximately 178,000 individuals with disabilities in Indiana, age 18-64 are employed, and 63.2% or approximately 306,000 individuals who are working age who have a disability in Indiana are not working and potentially could be eligible for VR services.

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

   A. The VR Program;

A State VR agency is required to implement an order of selection when it anticipates that it will not have sufficient personnel and/or fiscal resources to fully serve all eligible individuals. Indiana BRS lacks sufficient resources to serve all eligible individuals in the VR program. The annual projected number of eligible individuals in the VR program is 15,000. VR anticipates that resources will be insufficient to serve all eligible individuals in FFY18 and FFY19, and anticipates having sufficient resources to serve a maximum of 13,400 individuals annually over the next two federal fiscal years. (A breakdown by funding source is outlined in the table below). These deficits are attributed to insufficient personnel and fiscal resources.

The tables below provide the FFY18 and FFY19 projected spend for the Indiana VR program, with a breakdown by source of funding.

**Annual Budget**

<table>
<thead>
<tr>
<th>Funding Source</th>
<th>Client services</th>
<th>Pre-employment transition services</th>
<th>*Administration</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Title I VR</strong></td>
<td>38,500,000</td>
<td>9,500,000</td>
<td>32,000,000</td>
</tr>
<tr>
<td><strong>Title VI Part B SE</strong></td>
<td>500,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Program Income</strong></td>
<td>1,000,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>40,000,000</td>
<td>9,500,000</td>
<td>32,000,000</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>81,500,000</td>
</tr>
</tbody>
</table>
*Administration includes personnel, leasing, equipment, training, travel, IT, contractual expenses including establishment projects, and related. Any increase in staffing will increase administration expenses.*

VR estimates annual client services costs for Title I at $38.5 million for FFY 18 and FFY19.

VR estimates that of the 13,400 eligible individuals served annually over the next two years, Title VI, Part B ($500,000, pending reauthorization) will provide funding for approximately 150 eligible individuals annually. Note that additional individuals receive supported employment services with Title I funds.

The estimated annual service costs for serving 13,400 individuals in the Titles I and VI, Part B programs are approximately $39 million over the next two years, FFY18 and FFY19. Additionally, VR anticipates the availability of approximately $1 million in program income for client services costs each year, bringing the total client services projected spend to $40 million. Program income funds are sufficient to serve approximately 300 consumers each year.

For FFY 2018 and FFY19, VR estimates that total projected VR costs (services and administrative costs including federal grant funds and adjusted agency actual non-federal match) funded under Title I will be $80 million. Forty-eight percent (48%) will be case service costs funded under Title I ($38.5 million); 40% percent will be administrative costs ($33 million); and the remainder, 12% of the total Title I funding (federal and state), which equals 15% of federal funds ($9.5 million), is earmarked for pre-employment transition services.

For FFY18 and FFY19, total annual funding available for serving individuals in Title I ($38.5 million), VI-B ($500,000), program income ($1 million), administrative costs including personnel ($32 million), and the pre-employment transition services set aside ($9.5 million) is $81.5 million. The projected total funding needed to serve all eligible individuals is approximately $86.5 million.

BRS projects both a staffing and fiscal deficit for FFY18 and FFY19. Costs associated with the need to enhance staffing capacity, modernize the VR case management system to collect, track and report required information to comply with the Rehabilitation Act, as amended by WIOA, and ensure compliance with the requirement to earmark 15% of funds for pre-employment transition services, contribute to this deficit. BRS projects that total annual costs for FFY 2018 and FFY19 will total $86.5 million. Therefore, total funding available ($81.5 million) minus total projected costs ($86.5 million) creates a deficit of $5 million for FFY 2018 and a $5 million deficit for FFY 2019. To build staffing capacity and comply with federal requirements, and most importantly, serve all eligible VR consumers, in accordance with all standards for timeliness, an additional $5 million is annual fiscal resources would be needed. Therefore, the projected annual fiscal deficit for FFY18 and FFY19 is $5 million, in addition to a projected deficit of personnel resources.

(B) The Supported Employment Program; and
Please see response to section (2) (A) above.

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

In FFY18, the following numbers of individuals are projected to be served in each priority category:

- Priority category 1: 8,510 Individuals with a Most Significant Disability (MSD) are projected to be served.
- Priority category 2: 4,557 individuals with a Significant Disability (SD) are projected to be served.
- Priority category 3: 335 individuals with a Non-Significant Disability (NSD) are projected to be served.

In FFY19, the following numbers of individuals are projected to be served in each priority category:

- Priority category 1: 9,782 Individuals with a Most Significant Disability (MSD) are projected to be served. This number represents a projected 6% increase in consumers served in category 1 to account for anticipated growth in referrals.
- Priority category 2: 3,484 individuals with a Significant Disability (SD) are projected to be served.
- Priority category 3: 134 individuals with a Non-Significant Disability (NSD) are projected to be served.

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

Indiana implemented an order of selection on August 1, 2017, and anticipates a continued need to operate under the order of selection for FFY 2018 and FFY 2019. Indiana anticipates that approximately 1,600 eligible individuals will be unable to be served annually in both FFY 2018 and FFY 2019.

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

The projected average cost per individual and total projected costs for client services in FFY2018:

<table>
<thead>
<tr>
<th>Order of Selection Category</th>
<th>Projected Number to be Served</th>
<th>% of Total</th>
<th>Projected Number of Rehabilitations</th>
<th>Average Cost per individual</th>
<th>Projected Costs</th>
</tr>
</thead>
</table>


### Order of Selection Category

<table>
<thead>
<tr>
<th>Order of Selection Category</th>
<th>Projected Number to be Served</th>
<th>Projected Number of Rehabilitations</th>
<th>Average Cost per individual</th>
<th>Projected Costs</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) Most Significant Disability (MSD)</td>
<td>9782</td>
<td>4891</td>
<td>$3,000</td>
<td>$29.3M</td>
</tr>
<tr>
<td>2) Significant Disability (SD)</td>
<td>*3484</td>
<td>1742</td>
<td>$3,000</td>
<td>$10.5M</td>
</tr>
<tr>
<td>3) Non-Significant Disability (NSD)</td>
<td>*134</td>
<td>101</td>
<td>$1800</td>
<td>$240K</td>
</tr>
<tr>
<td>Total</td>
<td>13400</td>
<td>6734 (average time to achieve successful rehabilitation is 18 months from IPE)</td>
<td>$40M</td>
<td></td>
</tr>
</tbody>
</table>

*Individuals in all priority categories who had an Individualized Plan for Employment (IPE) in place prior to the implementation of the order of selection will continue to be served once the order is implemented.

### State Goals and Priorities

(k) **State Goals and Priorities.** The designated State unit must:

1. Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.
Goals and priorities were reviewed with the State Rehabilitation Council and modifications were made based on feedback from the SRC.

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

GOAL 1: Purposefully collaborate with the WIOA core programs and other appropriate agencies to provide a client-centered approach to service delivery to assist individuals with disabilities achieve their employment outcomes.

Priority 1.1: Develop a common understanding among WIOA core programs and other appropriate agencies (e.g., Bureau of Developmental Disabilities Services and Department of Education) of Vocational Rehabilitation and the services it may provide to eligible consumers, in varying capacities, in order to provide integrated service delivery and improve employment outcomes for consumers. VR Leadership will continue discussions with appropriate agencies throughout FFY 2016 and develop and/or revise written agreements in FFY 2016.

Priority 1.2: Continue systems modernization efforts, including development of a web-based VR case management system to improve the efficiency and enhance the mobile working environment of VR field staff and enrich the data utilized by VR to make informed program decisions. The system will also ensure appropriate system integration and data-sharing to align resources, collect common consumer information, increase efficiencies, track effectiveness of the program, and ultimately to improve the consumer’s experience in VR in meeting his/her employment goal. Develop a project plan and process flow in FFY 2016 and begin design of a new case management system in FFY2017. Efforts toward system modernization will also include identifying strategies to streamline billing procedures and improve efficiency of staff time, such as exploration of an electronic vendor claims payment system. Strategies will be identified by FFY17 and implemented in FFY18.

Priority 1.3: Develop and enhance processes and procedures to ensure proper and consistent referrals to and from VR and WIOA core programs (and other appropriate programs) in order to maximize the service options and service delivery for individuals with disabilities. Develop and conduct cross-training for VR and DWD staff in FFY 2017.

Priority 1.4: Ensure VR staff is trained, highly knowledgeable, and are providing information on services across WIOA core programs, and other appropriate programs that may assist individuals with disabilities achieve their employment outcome. New staff will participate in both web-based and classroom-based training throughout, at minimum, the first year of employment.

Priority 1.5: Work in partnership with WIOA core programs to strategically enhance employer engagement and work-based learning opportunities for individuals with disabilities. This includes expanding VR employer engagement to develop appropriate disability-related information and resources (e.g., disability awareness training, business-to-business resources for
beginning disability hiring initiatives, etc.) for employers. A plan for joint data collection will be developed by the end of FFY17.

GOAL 2: Increase the number of people with disabilities in competitive, integrated employment.

Priority 2.1: Develop a coordinated process with the Bureau of Developmental Disabilities Services and State and local educational agencies in assisting individuals with disabilities, especially youth with disabilities who are considering subminimum wage employment or who are already employed, at a subminimum wage, to maximize opportunities to achieve competitive integrated employment. Provide initial career counseling and information and referral (CCIR) services, and appropriate documentation, to youth seeking sub-minimum wage employment as well as ensure that all individuals employed at sub-minimum wage receive CCIR services by July, 2017, an annually thereafter.

Priority 2.2: Identify best practices, create strategies, and partner with other agencies to better serve students and youth with disabilities to ensure a pathway and appropriate services to meet their employment outcomes. This includes ensuring that pre-employment transition services are available to students with disabilities statewide and meeting the 15% earmarking requirement.

Priority 2.3: In collaboration with the Transition Advisory Council, Department of Education, and other stakeholders, ensure that required pre-employment transition services (pre-ETS) activities are widely available in all 92 Indiana counties by the end of FFY 2018.

Priority 2.4: Continue development of blind entrepreneurs through the Business Enterprise Program and increase trainees of the program. At least 50% of trainees will secure employment as licensed vendors within 6 months of completing training.

GOAL 3: Develop program initiatives and training that adequately support VR staff and community rehabilitation providers in the provision of quality services.

Priority 3.1: Conduct a systematic review of the new Employment Service Model (effective July 1, 2015) to identify best practices and determine necessary system revisions to ensure the quality of services and employment outcomes. Review trends in service provision and employment outcomes on a quarterly basis throughout FFY 2016, and continue to meet at least quarterly with the Employment Advisory workgroup to review strengths and identify areas of improvement.

Priority 3.2: Continue development of VR staff through professional development and training, including both face-to-face training, one-on-one mentoring, and the ongoing enhancement of web-based training modules (VR Leadership Academy) to increase knowledge about VR service delivery and to build skills of VR staff. VR will introduce new training by March 2016 that will aim to increase focus on counseling and guidance. BRS will continue to evaluate employment outcomes to determine whether enhanced training has impact on the quantity and quality of employment outcomes in FFY17 and FFY18, compared to prior years.
Priority 3.3: Develop training and technical assistance opportunities to community rehabilitation programs (CRP) and staff (e.g., program managers and employment specialists) to ensure best practices and improve the quality of employment services, including supported employment services to individuals with the most significant disabilities. BRS will continue to evaluate employment outcomes to determine whether enhanced training and technical assistance has impact on the quantity and quality of employment outcomes in FFY17 and FFY18, compared to prior years. Additionally, BRS will collaborate with VR Commission members who represent the business community to better understand needs of businesses, and identify necessary training to build and enhance skills of CRP staff in engaging with the business community while assisting VR participants with job development, placement and coaching activities.

(3) Ensure that the goals and priorities are based on an analysis of the following areas:
   (A) the most recent comprehensive statewide assessment, including any updates;

Goals outlined in section (2) align with the comprehensive statewide assessment.

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

Goals outlined in section (2) align with performance accountability measures of section 116 of WIOA.

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

Goals outlined in section (2) align with several recommendations and findings resulting from monitoring activities under section 107.

(I) **Order of Selection.**

After thorough review and evaluation, BRS determined that Indiana Vocational Rehabilitation (VR) need to implement an order of selection for serving consumers. VR lacks sufficient resources to serve all eligible consumers, as further outlined below. This determination follows identification and implementation of numerous strategies to improve capacity over the past few years. Despite those efforts, VR continues to experience significant challenges in building and retaining adequate personnel resources to serve all eligible individuals, and meet expectations for timeliness and quality of service provision.
As such, Indiana VR anticipates that available and projected resources will not be adequate to ensure the provision of the full range of vocational rehabilitation services, as appropriate, to all eligible individuals in federal fiscal years 2017, 2018 and 2019.

VR anticipates that it will be necessary to close two of its three priority categories under the order of selection described below. The order of selection was implemented August 1, 2017 after receiving approval from the Rehabilitation Services Administration. As of August 1, 2017, individuals determined eligible and assigned to the MSD priority category are served. BRS will annually evaluate available personnel and fiscal resources, to determine whether resources will be adequate to provide services to all applicants and the full range of services to eligible individuals in an equitable and expeditious manner.

Describe:
(1) The order to be followed in selecting eligible individuals to be provided VR services.

Priority Categories:

Effective August 1, 2017, individuals are served in the following order of priority under the Order of Selection:

- Priority Category 1: Individuals determined to have a most significant disability (MSD);
- Priority Category 2: Individuals determined to have a significant disability (SD); and,
- Priority Category 3: All other eligible individuals (Individuals determined to have a non-significant disability (NSD)).

MSD: An individual who has a severe physical or mental impairment that seriously limits three or more functional capacities (communication, interpersonal skills, mobility, self-care, self-direction, work skills, or work tolerance) in terms of an employment outcome, requires multiple vocational rehabilitation services over an extended period of time, and has one or more physical or mental disabilities determined to cause comparable substantial functional limitation.

SD: An individual who has a severe physical or mental impairment that seriously limits one or more functional capacities (communication, interpersonal skills, mobility, self-care, self-direction, work skills, or work tolerance) in terms of an employment outcome and whose vocational rehabilitation can be expected to require multiple vocational rehabilitation services over an extended period of time.

NSD: All other VR eligible individuals.

Basis for Order of Selection – Prohibited Factors:

The Order of Selection shall not be based on any other factors, including:

(1) Any duration of residency requirement, provided the individual is present in the State;
VR’s available and projected resources is not adequate to ensure the provision of the full range of vocational rehabilitation services, as appropriate, to all eligible individuals in federal fiscal years 2017, 2018, and 2019. VR experienced a deficit of staffing resources in FFY17, and a deficit of both staffing and fiscal resources is projected for FFY18. Insufficient resources are also anticipated for FFY19, however this will be re-evaluated prior to the end of FFY18. Challenges in regards to insufficient staffing resources include high VR Counselor caseloads, a poor VR Counselor retention rate, and other factors further detailed below. Furthermore, VR anticipates a projected annual fiscal deficit of approximately $5 million for both FFY18 and FFY19. The fiscal deficit results from the need to shift resources to meet WIOA requirements, including earmarking 15% of federal funds for pre-employment transition services, and the need to modernize information systems to ensure proper collection of new federal data requirements.

Total annual funding available in FFY18 and FFY19 for serving individuals in Title I ($38.5 million) and VI-B ($500,000), program income ($1 million), administrative costs including personnel ($32 million), and the required pre-employment transition services set aside ($9.5 million) is $81.5 million. Additional staffing would be necessary to provide the full range of services to all eligible individuals in an equitable and expeditious manner. A fiscal deficit is projected due to a need to shift funding to meet federal requirements under WIOA, including earmarking 15% of Title I federal funds on pre-employment transition services and contributing to the operation costs of the Department of Workforce Development (DWD) Work One centers through infrastructure funding agreements, as well as the need to modify data collection systems to meet enhanced federal reporting requirements. The anticipated projected annual deficit for FFY18 and FFY19 is $5 million. Therefore, an annual budget of approximately $86.5 million would be needed in FFY18 and FFY19 to serve all eligible individuals, which is at minimum 15,000.

The current ratio of VR Counselors to eligible consumers receiving services under an Individualized Plan for Employment (IPE) is 1:126. BRS believes that a counselor-consumer ratio of no more than 1:100 is optimal to maintain efficient caseload management and high quality services. At this time, additional VR Counselors are needed to work toward this optimal ratio, however there are challenges with expanding the number of VR Counselor positions, including lack of availability of qualified candidates, and challenges with fiscal resources. This is further discussed below.

Staff retention of VR Counselors has been a major concern for VR over the past few years. In recent years, the turnover rate for all VR field positions has been 41%, with turnover of 56% for VR Counselor positions. This turnover has been a major contributing factor to BRS’ diminished
capacity to serve all individuals seeking VR services, and the inability to serve consumers already in the system in a timely manner. BRS has experienced improvements in the retention rate over the past 9 months, and as of March, 2018 the turnover rate of VR Counselors has decreased to 31%.

Additional data outlining retention challenges is as follows:
- Out of 175 current VR Counselors positions:
  - 56 are filled with staff who have been employed with BRS more than 5 years, representing only 32% of staff.
  - 57 are filled with staff who have been employed with VR more than 2 years, but less than 5 years, which is 33% of staff.
  - 62 are either vacant or are filled with staff who have less than two years on the job, many of whom are still in the learning curve and in probationary status. This represents 35% of staff.

VR has investigated likely causes of the increased turnover. The two most common reasons reported when a staff member resigns are the overwhelming work load, and the salary for the type of work VR Counselors perform and required qualifications. There are several factors that likely contribute to the overwhelming and dissatisfied experiences that VR Counselors report, including high caseload sizes and the breadth and depth of the case work. Additionally, during periods of time where vacant clerical and support staff positions go unfilled, VR Counselors must absorb those additional tasks, further reducing their ability to provide high quality counseling and guidance to consumers.

Recruitment of qualified individuals to be a VR Counselor is also a significant challenge. Indiana continues to have only one university offering a graduate program in Rehabilitation Counseling, which graduates 5-10 students annually. Several VR field offices are currently experiencing a low response rate to posted vacancies, and are having to repost positions multiple times in order to attract qualified candidates. Additionally, the unemployment rate in Indiana is extremely low at 3.6% as of January, 2018, and it has become more challenging for BRS, like many employers, to attract qualified candidates. If resources became available to increase the number of staff, the availability of qualified candidates for those positions, and ability to attract those candidates to state government, is a significant concern. Contracted staff have been used to provide support in offices, however there are limitations on the tasks that contracted staff can perform to adhere to non-delegable functions outlined in the federal regulations. Several other strategies have been implemented to address staffing capacity challenges, which will be further discussed below.

Obtaining additional VR Counselor and other field staff positions is needed to help address this challenge; however, it is important to understand that this provides only a partial solution. BRS must also address issues related to low retention rates of VR Counselors and significant recruitment challenges. Furthermore, BRS must take into account the lengthy learning curve for new hires. Due to the broad scope of knowledge and skills required for the VR Counselor role, and dependent on the specific background and experience of the staff member, it takes newly hired VR Counselors anywhere from 6-18 months to learn all aspects of the job. New VR
Counselor training in a mobile environment adds further challenge as staff are expected to work very independently and have reduced access to co-workers, compared to the office-based approach that existed prior to 2009. Newly hired staff typically work under very close supervision and do not independently manage their caseloads or take a full schedule of new applications for 6-12 months after their hire date.

Challenges with staffing capacity in BRS have increased over the past two to three years. During this time, BRS has been diligent in implementing numerous strategies to work toward increasing capacity and improving service provision. Several of those strategies are outlined below:

- BRS hired additional support staff to assist with billing, follow up on medical records, data entry into the VR Case Management system, and other administrative and case management related tasks that were often falling on the VR Counselors in prior years.
- Modifying VR Counselor qualifications in light of the modified CSPD criteria under WIOA. BRS has historically struggled with obtaining and retaining staff with a Master’s degree in Rehabilitation or related area. By expanding VR Counselor qualifications to include individuals with a Bachelor’s degree in Rehabilitation or a related area, plus one year of relevant experience, BRS was able to reach an increased talent pool in 2017, and hired several qualified candidates. Unfortunately, candidates have decreased again over the past few months. BRS has also evaluated whether this modification in hiring criteria has any impact on staff retention, and has seen an improvement in retention over the past year.
- VR shifted 7 VR Counselor staff to a ‘Working Lead’ role to help mentor newly hired VR Counselors in field offices that experience a high percent of new staff. These Working Leads have been very effective; however BRS has recognized that several additional Working Lead positions are necessary to truly meet the needs.
- After piloting a strategy that shifted VR Counselor roles into designated intake specialists and general counselors, BRS rolled this strategy out in all VR offices in July, 2017. Intake counselors are responsible for all new consumer applications and eligibility and severity determinations. This strategy has assisted with consistency in severity determinations and has also enhanced skills for these designated staff. BRS will continue to evaluate this approach to determine the effectiveness of having designated intake counselors.
- BRS created a Program Initiatives Director who consults with staff regarding Small Business Enterprise, Home Modifications, Farm Modifications, and Vehicle Modifications. This individual serves as a subject matter expert for the VR Counselors when they have cases that involve these very difficult specialty services. These cases are often very time consuming for VR Counselors, and BRS has been able to offset some of that time with the addition of this new staff position.
- BRS continuously reviews field office coverage areas on an ongoing basis, and shifts counties and staff as appropriate to level caseload sizes across offices to the extent possible.
- BRS has continued to implement several, small improvements to the VR Case Management system to gain efficiencies where possible, and is working toward implementation of the AWARE system in early 2019.
BRS is working to implement an electronic claims payment system to streamline billing processes and anticipates this system to ‘go-live’ in 2018.

While much improvement has been realized through efforts to improve staff capacity, including decreased retention and improved retention seen over the past several months, overall challenges with staff capacity remain.

With the addition of new federal requirements under WIOA, BRS is forecasting an annual budget deficit starting with federal fiscal year 2018. While the VR Federal grant provides sufficient resources to Indiana, BRS is unable to draw all federal funds due to insufficient non-federal match dollars. BRS does not have sufficient funds to serve all eligible individuals, increase staffing and comply with all requirements under WIOA, including earmarking 15% of federal funds for pre-employment transition services, provision of career counseling and information and referral services to over 4,000 individuals employed at sub-minimum wage, and participating in infrastructure funding agreements to support the operation of One Stop locations throughout the state. BRS has identified and implemented several cost savings initiatives over the past few years, however even with the initiatives outlined below, a budget gap of approximately $5 million is anticipated, starting in FFY18. Examples of cost savings efforts include the following:

- BRS has been supporting an antiquated case management system that has been in need of replacement for the past several years. Though there is an initial added cost to implement a new system, there is a significant cost savings of at least $500,000 per year that VR will begin to recognize in 2019, as the long term support of the new system is significantly less costly than the current system. BRS also expects to gain efficiency with staff time which will allow VR Counselors to better serve consumers, and allow BRS to recognize additional cost savings. Furthermore, more of the required federal reporting will be automated in the new system, freeing up additional resources.

- Although training is incredibly important, BRS has prioritized trainings and reduced training costs beginning in FFY17. The majority of training is conducted internally and focuses on services to individuals with the most significant disabilities, which is the primary population that will be served under the Order of Selection. Over the past several years, BRS has increased use of webinars and ‘train-the-trainer’ style events to reduce costs of training.

- BRS has reduced or eliminated several contractual agreements, resulting in anticipated savings of approximately $500,000 annually beginning in FFY18.

- BRS continues to review service rates to determine if there are additional savings to realize, however BRS has re-negotiated service rates for many different types of services over the past several years, and therefore further opportunities for savings are likely minimal. As a result of cost containment efforts, BRS continues to recognize a reduced spend on client services. These previous efforts included the purchase of hearing aids and devices at manufacturer rates, paying for medical services and devices at Indiana Medicaid rates, purchasing interpreter services through a single coordinating unit to
reduce spend on travel, and implementation of a calculator to ensure consistency in maximizing other resources for post-secondary costs prior to utilizing VR dollars.

- BRS is investigating the potential impact of implementing financial participation policies for consumers, in line with federal requirements.
- BRS is exploring the use of Third Party Cooperative Arrangements with state and local public agencies and Inter-agency cash transfer agreements with other state agencies, for the provision of pre-employment transition services.

BRS did not project any reduction in client services spend as a result of implementing the order of selection during, at minimum, one full year into the order of selection process. BRS has reviewed client services expenditures each month to identify any modifications in spend pattern. As of February, 2018, seven months after implementation of order of selection, BRS has not realized any reduction in client services spending. In fact, spend on some service categories has increased, including a 7% increase in spend on employment services compared to expenditures during the same timeframe in the prior year.

With the ongoing staffing capacity challenges, as well as projected budget shortfall beginning in FFY18, BRS must continue to operate under an order of selection.

(3) The service and outcome goals.

VR has continued to serve all consumers who were receiving services under an approved IPE prior to implementation of the order of selection on August 1, 2017. Based on review of data on the number of individuals served in each category during the first six months under the order of selection, the number of individuals projected to be served in each priority category in FFY18, as well as the number of individuals projected to achieve their vocational outcomes are as follows:

- Priority category 1: 8,560 Individuals with a Most Significant Disability (MSD) are projected to be served.
  - 4,280 individuals with a MSD will achieve their employment goals

- Priority category 2: 4,583 individuals with a Significant Disability (SD) are projected to be served. This number represents individuals who had an IPE in place prior to implementation of the Order of Selection.
  - 2,292 individuals with a SD will achieve their employment goals

- Priority category 3: 337 individuals with a Non-Significant Disability (NSD) are projected to be served. This number represents individuals who had an IPE in place prior to implementation of the Order of Selection.
  - 253 individuals with a NSD will achieve their employment goals

The table in section D further illustrates this data. Both FFY18 and FFY19 projections are included under Section D.
The time within which these goals may be achieved for individuals in each priority category within the order.

- 4,280 individuals with a MSD will achieve their employment goals, with the average time between IPE development (status 12) and successful closure (status 26) = 593 days
- 2,292 individuals with a SD will achieve their employment goals, with the average time between IPE development (status 12) and successful closure (status 26) = 649 days
- 253 individuals with a NSD will achieve their employment goals, with the average time between IPE development (status 12) and successful closure (status 26) = 227 days

Projections for FY 2018:

<table>
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<tr>
<th>Order of Selection Category</th>
<th>Projected Number to be Served</th>
<th>Projected Percentage of total rehabilitations</th>
<th>Projected Number of Rehabilitations</th>
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</thead>
<tbody>
<tr>
<td>1) Most Significant Disability (MSD)</td>
<td>8510</td>
<td>50%</td>
<td>4255</td>
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<tr>
<td>2) Significant Disability (SD)</td>
<td>4557</td>
<td>50%</td>
<td>2278</td>
</tr>
<tr>
<td>3) Non-Significant Disability (NSD)</td>
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<td>75%</td>
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<tr>
<td>Total</td>
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<td>*6784</td>
</tr>
</tbody>
</table>

* The number of rehabilitation figures above do not reflect the number of placements in one FFY, as the average time to achieve successful rehabilitation is 18 months from IPE.

Projections for FY 2019:

<table>
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<tr>
<th>Order of Selection Category</th>
<th>Projected Number to be Served</th>
<th>Projected Percentage of total rehabilitations</th>
<th>Projected Number of Rehabilitations</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) Most Significant Disability (MSD)</td>
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<td>50%</td>
<td>4891</td>
</tr>
<tr>
<td>2) Significant Disability (SD)</td>
<td>3484</td>
<td>50%</td>
<td>1742</td>
</tr>
<tr>
<td>3) Non-Significant Disability (NSD)</td>
<td>134</td>
<td>75%</td>
<td>101</td>
</tr>
<tr>
<td>Total</td>
<td>13400</td>
<td></td>
<td>*6734</td>
</tr>
</tbody>
</table>

* The number of rehabilitation figures above do not reflect the number of placements in one FFY, as the average time to achieve successful rehabilitation is 18 months from IPE.

(5) How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and
VR will continue to process referrals, complete application/intake, and determine eligibility and severity determination for all new referrals. Individuals who are determined to be an individual with a MSD (Priority category 1) will be prioritized for services. Individuals in the other severity determination categories will be placed on a deferred for services, and will be served according to application date as sufficient resources become available.

1. VR will continue to take all referrals and schedule individuals for intake appointments, per federal requirements.
2. VR Counselors will see the consumer for their intake appointment and will determine eligibility and severity for the consumer, per federal requirements.
3. Eligible individuals who are MSD will jointly develop the IPE with the VR Counselor, and necessary services will be implemented. Individuals who are SD and NSD will be deferred for services.
4. As sufficient resources become available to serve individuals who were deferred for services, BRS will assign individuals coming off of the deferred list to the appropriate VR Office and VR Counselor. Individuals in priority category 2, SD, will be the first individuals to come off of the deferred list, based on earliest application date, and in accordance with federal requirements.
5. Once the case is distributed to the appropriate office/VR Counselor, the VR Counselor will create a service plan with the individual and commence implementation of necessary services.

Implementing the order of selection is expected to increase focus on services to individuals with a MSD. As this population will become the largest population of individuals receiving VR services, BRS has and will continue to align training initiatives to focus on improving the quality of services to this population. Additionally, opportunity for further collaboration with other WIOA core partners may also be enhanced. BRS has been in communication with core WIOA partners at the Department of Workforce Development (DWD) regarding strategies to enhance access to Work One services by individuals with disabilities who may be unable to receive services from VR. DWD and BRS co-hosted a roundtable summit in June, 2017 in preparation for implementation of the order of selection, to bring together key representatives from state and federal organizations that may be in a position to expand services to individuals with disabilities. Statewide training was provided to Work One center staff following the roundtable summit to provide resources and information intended to help Work One staff to effectively serve individuals with disabilities, in anticipation of Hoosiers with disabilities accessing Work One centers at an increased rate following implementation of the order of selection. Furthermore, BRS continues to invest in pre-employment transition services which are available to students with disabilities, age 14-22, who are either eligible or potentially eligible for VR services. Through pre-employment transition services activities, students will also be educated about resources to assist them in pursuing their post-secondary training and employment goals.

(6) If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.
BRS does not have sufficient resources to serve eligible individuals who are SD or NSD who require specific services or equipment to maintain employment, with the exception of providing specific services or equipment for individuals in post-employment services. Post-employment services are limited to individuals who had previously achieved a successful employment outcome and require additional services to maintain, re-enter, or advance in employment and are of limited scope and duration. BRS will be sharing relevant resources with individuals unable to be served by VR who are in need of assistance to obtain or maintain employment, such as facilitating a referral to the local Work One. Other resources may include Ticket to Work Employment Networks, Centers for Independent Living, College and Universities, the IN Data Assistive Technology program, and other state and local resources.

(m) Goals and Plans for Distribution of title VI Funds.

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

Indiana has established three goals for its SE program.

**Goal 1**: Ensure that individuals receiving supported employment services have achieved stabilization, or their highest level of independence on the job, prior to VR case closure. VR Employment Service revisions implemented in July 2015 increased focus on stabilization and increased access to supported employment services for VR consumers. It is anticipated that greater long-term retention will result from these changes, for individuals receiving supported employment services.

**Measure**: Begin collecting wage and hour information for individuals receiving supported employment services and obtain baseline data by October 2016. Individuals who are MSD will achieve at least a 5% increase in average hourly wage from FFY16 to FFY18.

**Goal 2**: VR Supported Employment providers will increase knowledge and skills on the provision of supported employment services, including greater understanding and focus on development of natural supports, job readiness training techniques, customized employment, and strategies for achieving stabilization on the job.

**Measure**: BRS will invest in training for supported employment providers including classroom-based, web-based, and hands-on workshops that focus on job coaching and job readiness training techniques. BRS will examine strategies for improvement of community rehabilitation providers to ensure capacity to carry out increased expectations under the new model, such as provision of funding for Establishment projects. At least 500 individuals will attend training annually, beginning in FFY16.

**Goal 3**: VR will increase the provision of supported employment to individuals with a most significant disability, through increased education and training to VR and CRP staff.
Measure: VR will achieve a 30% increase in the provision of supported employment services from FFY16 to FFY18.

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

(A) the provision of extended services for a period not to exceed 4 years; and

With the VR employment service changes mentioned above, VR and BDDS worked collaboratively to update an extended service definition for Indiana’s Family Supports Waiver and Community Integration and Habilitation Waiver in order to clarify extended services activities and compliment the supported employment changes made in VR. Both changes became effective on July 1, 2015.

Extended services are ongoing support and other appropriate services that are needed to support and maintain a youth with a most significant disability in supported employment and that are provided by a State agency, a private nonprofit organization, employer, or any other appropriate resource. There are times when extended services are required for the youth to maintain employment but may not be available through traditional sources (e.g., the youth does not qualify for BDDS funding or a Medicaid Waiver, or natural supports are not available). In these instances, VR may provide funding to assist youth with the most significant disabilities in maintaining an employment outcome in supported employment.

VR may provide funding for extended services in accordance with the needs of each youth after all additional options for Extended Services have been exhausted and the youth has exhausted at least 24 months of SE services. Sources of extended services through BDDS, Medicaid, natural supports, or other options will be utilized before VR funds. Extended services may be purchased through written agreements with CRPs, and are paid at the same hourly rate as SE services as outlined in the VR Manual of Employment Services.

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

VR will purchase Supported Employment (SE) services for consumers with most significant disabilities (MSD), with Title I and Title VI-B funds (pending reauthorization). Consumers are able to access SE services through Community Rehabilitation Programs (CRPs), which include Community Mental Health Centers (CMHCs) across the state.

VR implemented major revisions to VR employment services in July 2015. Prior to these revisions, VR purchased employment services primarily through a Results Based Funding (RBF) approach. One significant revision that occurred is that SE services are no longer fully funded through employment milestones (or the previous RBF model). Because many individuals with MSD will require SE services that extend beyond the employment milestone payments, SE services are funded in addition to the current employment milestone payments. VR funding for
SE services is outlined in the Table below. (Please note that the complete employment service model, implemented July 2015, can be viewed at www.vrs.in.gov). For more specific information, please see section (q).

With the employment service changes, VR has collaborated with IIDD and Griffin and Hammis to provide additional training and technical assistance to Community Rehabilitation Providers and VR in the area of Discovery statewide. The training focused on Discovery, which is an individualized information gathering process that will guide employment services for the consumer. The training provided a framework to develop and implement a person-centered employment plan. While Discovery is important for many consumers, it is critical for consumers with the most significant disabilities and has an impact on their supported employment needs. VR continues to work collaboratively with the Bureau of Developmental Disabilities Services (BDDS), the Division of Mental Health and Addiction (DMHA), the Department of Education, IIDD, INARF, INAPSE, the Arc of Indiana, and other key stakeholders to improve competitive integrated employment opportunities for consumers with the most significant disabilities through supported employment. Interagency collaboration will aim to increase the quality of SE services, including customized employment, and ensure appropriate extended services are appropriately utilized when necessary for long-term supports.

VR provides work experiences or job-shadow opportunities to students and youth with disabilities who are eligible for VR services. Furthermore, Project SEARCH provides students and youth with quality internship experiences in preparation for competitive employment and VR plans to expand these opportunities in the future.

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

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

In July 2015, VR implemented major revisions to VR Employment Services to address the following needs of consumers based on stakeholder feedback:

- To develop a system that is responsive to all, including individuals with high support needs as well as consumers with minimal support needs;
- To refocus on **Discovery**, especially for individuals with minimal/no prior work experience;
- To ensure that individuals with MSD have access to adequate Supported employment services which includes ongoing support services;
• To ensure that individuals reach stabilization, or their highest level of independence, prior to VR case closure;
• To retain a system that focuses on outcomes, but also recognizes quality and individualization and allows for flexibility;
• To retain a system that is not difficult to administer; and
• To aim to improve the consumer experience.

Key revisions included:
• Increased focus and re-emphasis on Discovery and Supports needed to achieve true stabilization;
• Discovery activities are provided prior to milestone payments, funded per activity, and are no longer paid under a milestone. The menu of VR-funded Discovery activities is greatly enhanced.
• SE services (including ongoing support services) funding is available in addition to milestone payments.
• Increased flexibility to allow for more individualization based on consumer needs;
• Elimination of 2 separate tiered milestone payments
• Development of 3 new Milestones:
  o Milestone 1 = Job Development and Placement (1 week on the job)
  o Milestone 2 = Support and Short-term Retention (4 weeks on the job)
  o Milestone 3 = Retention (90 days AFTER stabilization)
• Reduced financial incentive to quickly reach ‘stabilization’ and closure by ensuring adequate supports are available, including up to 24 months of VR-funded SE services to ensure true stabilization.
• Changes to rates and expectations
• Increased VR Counselor engagement in the employment services process

This year, VR also continued its presence on social media, including Twitter and Facebook. Social media followers has nearly doubled from 2016 to 2017, and this platform helps communicate a consistent message about the program.

Furthermore, VR has continued to increase the provision of training to both VR staff and provider staff to improve the quality of services provided to VR consumers. VR has contracted with additional training entities to bring increased training to staff in FFY 2016 and FFY 2017, including counseling and guidance training for VR Counselors, and employment services training to provider staff. Training will be delivered through a variety of modalities including web-based, classroom based, and hands-on workshops. BRS also entered into establishment project contracts with community rehabilitation programs (CRPs) in April, 2017 to increase capacity to carry out increased expectations under the new model, including provision of supported employment services to individuals with the most significant disabilities, and to further increase training and skills of direct services staff.
(2) How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.

Assistive Technology During Rehabilitation Process - Pursuant to the Indiana VR rules, VR Counselors review each individual’s need for Assistive Technology (AT) devices and services at each stage of the rehabilitation process (i.e. eligibility determination, plan development and implementation, and placement). This is done through personal interviews with the consumer, observations, and professional AT assessments. Appropriate training is also provided as necessary, to ensure that consumers are able to independently utilize their adaptive equipment.

Assistive Technology Statewide - VR has awarded the Assistive Technology Grant to a statewide 501(c)(3) assistive technology program, Easter Seals Crossroads Rehabilitation Center. Contract deliverables include: coordination and collaboration with VR on AT services; increasing public awareness, training and technical assistance; providing device demonstrations, a device loan program, device reutilization program and state financing. This ‘INDATA’ program also offers targeted training to VR staff to increase staff knowledge on the availability and provision of AT services and devices.

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

Outreach procedures that are currently being used to identify and serve individuals with disabilities who are minorities as well as those who have been unserved or underserved began with state agency level outreach. In order to address underserved and unserved populations, VR has initiated interagency cooperation with the following programs: Indiana Civil Rights Commission, the Commission on the Social Status of Black Males, and Burmese American Association. For consumers with the most significant disabilities, VR continues to collaborate with BDDS, DOE, local educational agencies, INARF, and others to ensure opportunities are afforded to these individuals to achieve employment. BRS also continues to employ a diverse staff across the state.

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

One of the key VR employment service revisions is an increase in VR-funded Discovery activities. The menu of services and activities that is available through the Discovery process has been enhanced, and may include work experience, situational assessments, job shadows, informational interviews, vocational testing, and other related activities. BRS recognizes the importance of Discovery for job seekers with disabilities, and particularly for youth or other individuals with disabilities who have little or no work history, or a history of jobs that were not
quite the right ‘fit.’ Through an evaluation of the revised employment services model, implemented July, 2015, individuals receiving services through a CRP received, on average, 22.3 hours of discovery at the end of FFY 2017.

VR has also increased outreach and education to transition aged youth, including development of a brief video that has been widely disbursed including posted through social media. BRS has a dedicated youth services director, as well as a youth services coordinator, who have worked to expand and improve relationships with key transition stakeholders, largely through facilitation of the VR Transition Advisory Council, engaging in one-on-one conversations, and presenting and educating various stakeholder groups about VR and pre-employment transition services. The Transition Advisory Council has been instrumental in increasing outreach and education related to transition aged youth. Specifically, collaboration with representatives from IIDC, DOE, and DWD on the council has aided in outreach to school systems, training of educators on transition, VR, and pre-ETS, and services available to transition-aged youth through DWD and other sources.

In late 2017, student mentoring days were held at two separate business sites (an automotive manufacturing plant and a plastics manufacturer) in partnership with local schools, self-advocates of Indiana, and the local Work One.

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

BRS entered into contract agreements with non-profit CRPs in FFY17 for establishing, developing or improving CRP programs within the state, based on continued feedback on needed improvements to CRPs, to ensure capacity to serve VR consumers under the new employment service model, particularly those with the most significant disabilities. Funding under these contracts is used for building staff capacity and enhancing training to increase knowledge and skills of employment consultants. Several performance expectations for contracted CRPs are outlined in the contract agreements, including expectations to increase provision of SE services, improve timeliness of service delivery, and increase the quantity and quality of employment outcomes. VR continues to explore innovative strategies to address needed transition initiatives and services for individuals with the most significant disabilities as identified in the triennial needs assessment.

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

VR has been engaged in communication with DWD regarding strategies for obtaining necessary wage and employment data in line with new performance accountability measures. BRS’ MOU with DWD regarding data exchange, specifically wage data and other data necessary for federal reporting, has been updated. BRS has also secured access to DWD’s system for tracking business engagement efforts and both DWD and BRS will using that system to report on these efforts in preparation of submitting the Annual Report in October, 2018. Substantial modifications to the
VR case management system have been put in place to accurately capture new federal reporting requirements, and BRS has provided training to field staff regarding collection of expanded data elements. Furthermore, BRS is in process of modernizing its case management system to improve the tracking and reporting of federally required data.

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

VR continues to engage in collaborative discussion with DWD on several initiatives, and cross-training and education has been a major part of this effort. Training regarding disability etiquette, reasonable accommodations, and other topics was conducted with Work One staff in 2017. BRS staff sit on local workforce development boards in each region and offer subject matter expertise regarding training and employment services for job seekers with disabilities. Representatives from all 12 DWD Regions participated in a roundtable summit in June, 2017 co-hosted by BRS and DWD. BRS and DWD Leadership meet regularly to enhance collaboration and share information and updates. Federal monitoring visits occurred for both BRS and DWD in 2017, and there was cross-participation of both programs in these visits.

(8) How the agency’s strategies will be used to:
   (A) achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

All of the strategies listed above support VR’s goals and priorities. Initiatives such as the major changes to the VR employment service model, the increased availability of training to both VR and provider staff, increased outreach and collaboration among partners, etc. are all expected to improve services to VR consumers in terms of both the quality and quantity of employment outcomes. BRS believes that sharing success stories is one of the most effective strategies for both educating about the VR program, and for changing perceptions about employment of individuals with disabilities. BRS increased focus on sharing of success stories over the past two years, and continues to post updated success stories through newsletters, on the VR website, and in the annual report.

Based on the findings of the comprehensive statewide assessment of the rehabilitation needs of individuals with disabilities and the states goals and priorities, VR will continue to explore additional strategies to increase consumer education and technical assistance for VR and CRP staff, increase employment opportunities for those individuals who are most significantly disabled, and implement initiatives associated with increasing services and best practices for students and youth with disabilities.

The recent revisions to the VR Employment Services model were designed to improve the quality of employment outcomes, such as increasing wages, hours worked, and retention. It is expected that VR performance on these qualitative factors will begin to increase as a result. VR has also contracted with an entity to conduct an evaluation of the services and outcomes achieved to assess the impact of the new employment service model and inform further modifications.
Evaluation results are shared through regular summary reports and posted on the VR website. Evaluation reports are also reviewed with the VR Employment Advisory Workgroup.

(B) support innovation and expansion activities; and

The Innovation and Expansion authority is utilized to support the Indiana State Independent Living Council (INSILC), as well as new and innovative initiatives that open the door for new employment opportunities for individuals with disabilities and/or increase opportunities for those with the most significant disabilities. The VR Business and Community Engagement Team leads these innovate business outreach efforts for the BRS program.

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

As mentioned above, the VR employment service revisions implemented July 2015 increased access to discovery activities and supported employment services to individuals with the most significant disabilities who require supported employment services. The previous RBF model did not always allow for appropriate service provision or provide a funding structure necessary for those VR consumers with the most significant disabilities who have very high support needs.

BRS has partnered with the Arc of Indiana and Self-Advocates of Indiana to provide career counseling and information and referral services (CCIR) to individuals employed at subminimum wage. CCIR services are provided in a one-on-one or group setting. Group settings include a presentation which incorporated videos and success stories; and typically occurs at the sub-minimum wage employee’s worksite during the lunch hour. Guardians are welcome and encouraged to attend. During the presentation, attendees receive information about local resources regarding employment services and other-related information; discuss potential competitive, integrated employment opportunities and ways to learn more about a new career field (i.e. informational interviewing or job-shadowing); and discuss the importance of seeking assistance and guidance from a support network, such as family members or friends. Following the Q&A portion of the presentation, attendees receive a certificate of participation documenting completion of the CCIR activities, and the Arc submits a copy of each certificate to BRS for record-keeping purposes.

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

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

(A) Identify the strategies that contributed to the achievement of the goals.
GOAL 1: Purposefully collaborate with the WIOA core programs and other appropriate agencies to provide a client-centered approach to service delivery to assist individuals with disabilities achieve their employment outcomes.

Priority 1.1: Develop a common understanding among WIOA core programs and other appropriate agencies (e.g., Bureau of Developmental Disabilities Services and Department of Education) of Vocational Rehabilitation and the services it may provide to eligible consumers, in varying capacities, in order to provide integrated service delivery and improve employment outcomes for consumers. VR Leadership will continue discussions with appropriate agencies throughout FFY 2016 and develop and/or revise written agreements in FFY 2016.

Progress toward achieving Priority 1.1: An updated Memorandum of Understanding (MOU) was developed with DWD and regional Workforce Development Boards in 2016, and negotiations regarding infrastructure funding agreements were finalized in 2017. In June, 2017 BRS and DWD jointly conducted a Roundtable Summit to encourage open conversation about serving job seekers with disabilities and to better understand training needs of Work One offices. In follow-up to this summit, BRS and DWD collaborated on the development and provision of training on working with job seekers with disabilities for Work One center staff. The BRS Director also continues to be active member of the State Workforce Innovation Council (SWIC) and several BRS staff are represented on SWIC task forces.

Priority 1.2: Continue development of a web-based VR case management system to improve the efficiency and enhance the mobile working environment of VR field staff and enrich the data utilized by VR to make informed program decisions. The system will also ensure appropriate system integration and data-sharing to align resources, collect common consumer information, increase efficiencies, track effectiveness of the program, and ultimately to improve the consumer’s experience in VR in meeting his/her employment goal. Develop a project plan and process flow in FFY 2016.

Progress toward achieving Priority 1.2: A dedicated workgroup completed a Business Process Analysis in 2016, which was used to obtain an overview of requirements for the development of a new case management system. BRS contracted with Alliance Enterprises in April, 2017 and is on target to ‘go-live’ with a new case management system (AWARE) in 2019.

Priority 1.3: Develop processes and procedures to ensure proper and consistent referrals to and from VR and WIOA core programs (and other appropriate programs) in order to maximize the service options and service delivery for individuals with disabilities. Written procedures will be drafted in FFY 2016.

Progress toward achieving Priority 1.3: All VR staff completed training to gain a deeper understanding of DWD and Work One programs. Intake VR Counselors received additional training regarding eligibility requirements for the various Work One programs to help them work more effectively with VR participants on referral to specific Work One programs. If a VR applicant or eligible individual is interested in potentially accessing the
local Work One, VR facilitates a referral to the local Work One contact for the Area Office. The referral package consists of the participant’s basic contact information and a release to share information. VR is exploring the possibility of obtaining access to the Work One case management system to track the individual’s participation across programs, which will help VR to obtain required data for federal reporting purposes.

Priority 1.4: Ensure VR staff is trained, highly knowledgeable, and are providing information on services across WIOA core programs, and other appropriate programs that may assist individuals with disabilities achieve their employment outcome. New staff will participate in both web-based and classroom-based training throughout, at minimum, the first year of employment.

Progress toward achieving Priority 1.4: In late 2017 and early 2018, all VR staff received face-to-face training regarding DWD and Work One programs and services. VR Intake Counselors provide information about Work One during intake meetings with VR applicants and make referrals as applicable. Further training strategies will be explored in 2018.

Priority 1.5: Work in partnership with WIOA core programs to strategically enhance employer engagement and work-based learning opportunities for individuals with disabilities. This includes expanding VR employer engagement to develop appropriate disability-related information and resources (e.g., disability awareness training, Section 503 overview materials for Indiana-based federal contractors, business-to-business resources for beginning disability hiring initiatives, etc.) for employers. A strategy for required collection and report of business engagement efforts will be identified by late 2017.

Progress toward achieving Priority 1.5: At the state level, there is consistent participation of the VR team on three State Workforce Innovation Council workgroups: A Work based learning Task Force, the Work Ethic Certification Task Force and the Sector Strategies Task Force, along with mandated core programs. These efforts have helped to forge opportunities for closer collaboration at the state level.

Disability Awareness training has been presented to hiring managers with Indiana State Personnel as the State of Indiana is an employer/customer to VR. VR and DWD have partnered to ensure that Front line staff at Work One Centers across the state receive Disability Etiquette and Awareness training. VR representatives are participating on the Indy Business Leadership Network committee that is partnering with the Society of Human Resource Managers (SHRM) to bring the first ever Midwest Diversity & Disability Awareness Conference in 2018.

Additionally, DWD is currently utilizing Microsoft Dynamics 365 CRM for their statewide business service efforts. Dedicated staff throughout all 92 counties are responsible for building relationships with Indiana businesses to understand their workforce need and offer assistance to help fill this need. The customer relationship management (CRM) tool is used to track all of the interactions between our staff and the business’ across the state. The CRM allows for a concise
system allowing for better communication amongst staff and a greater understanding from a statewide perspective of the current and future needs of Indiana business. In addition to these activities, the CRM also tracks all DWD business services provided to those employers which allows DWD to meet their federal reporting requirement for business services. DWD is extending utilization of the system to VR to jointly track business engagement efforts. The Business and Community Engagement team has received training on the CRM and will begin using the database to capture business engagement efforts starting in 2018. In addition to helping VR meet federal reporting requirements, the system will help to better serve employers in a more comprehensive way across different agencies.

GOAL 2: Increase the number of people with disabilities in integrated, competitive employment.

Priority 2.1: Develop a coordinated process with the Bureau of Developmental Disabilities Services and State and local educational agencies in assisting individuals with disabilities, especially youth with disabilities who are considering subminimum wage employment or who are already employed, at a subminimum wage, to maximize opportunities to achieve competitive integrated employment through services provided by VR and the local educational agencies. Identify resources for conducting the necessary education and outreach to this population, including adequate personnel resources, in FFY 2016.

Progress toward achieving Priority 2.1: Career counseling and information and referral services (CCIR) are provided to youth who are considering subminimum wage employment or individuals of any age who are already employed at subminimum wage, either by a VR Counselor or through a partnership with the Arc of Indiana and Self-Advocates of Indiana. CCIR services are offered in a one-on-one or group setting; may include video or digital communication; and occur at the worksite during the lunch hour or at a mutually-agreed upon location. Guardians are welcome and encouraged to attend. During the discussion, local resources regarding employment services and other-related information are communicated to assist in maximizing opportunities for competitive, integrated employment. Following the discussion, the participant receives a certificate of participation to document completion of the CCIR activities and a copy is submitted to BRS for record-keeping purposes.

BRS, BDDS, and The Arc of Indiana continuously explore options to enhance the CCIR sessions, as it’s important the information and local resources provided on competitive, integrated employment are current and relevant to individuals with disabilities employed at subminimum wage. The goal is to build upon and not repeat information provided to the individuals receiving CCIR services twice within the first six months of employment, and those receiving CCIR services annually. Various avenues for how CCIR services are provided will also be explored, such as the development of an informational video and providing the services virtually.

Priority 2.2: Identify best practices, create strategies, and partner with other agencies to better serve students and youth with disabilities to ensure a pathway and appropriate services to meet
their employment outcomes. This includes expanding pre-employment transition services to students with disabilities and meeting the 15% spend requirement.

Progress toward achieving Priority 2.2: Through partnering with key stakeholders, VR was able to expand opportunities for students and youth with disabilities, including working with the State Workforce Innovation Council (SWIC) on the Work and Learn Taskforce, DWD on the Work Ethic Certificate taskforce for high school students, EmployIndy (the Marion County Workforce Development board) youth committee to ensure students and youth with disabilities were included in initiatives including Partner Engagement, and cross-training with Work One staff on providing services to individuals (including students and youth) with disabilities. VR is also partnering with DWD to expand the JAG (Jobs for America’s Graduates) program to more students with disabilities. Additionally, a webinar was presented to VR staff on the use of Labor Market Information for students and others with disabilities. BRS also drafted a pre-ETS forecasting document to outline strategies for expansion of pre-ETS statewide and working toward meeting the 15% earmarking requirement.

Priority 2.3: Develop a targeted education campaign to elevate the importance and expectation of employment for individuals with disabilities. This includes information and education related to benefits planning and economic independence to families, students, and beneficiaries of Social Security Income or Social Security Disability Insurance. VR will partner with INSOURCE, a parent group for youth with disabilities, the Client Assistance Program, and Protection and Advocacy for Beneficiaries of Social Security on developing the campaign and disseminating information. Strategies for increased education and awareness will be developed during FFY 2016.

Progress toward achieving Priority 2.3: Education and training was provided to a variety of stakeholders on the importance of employment for students and youth with disabilities, including IN*Source, ASK (About Special Kids), and local school systems through the transition cadres. In addition, materials were developed for DOE on VR services and employment for students with disabilities. Two VR mentoring days were completed in fall 2017, with VR partnering with local businesses as well as DWD and DOE to provide tours of the businesses and education on Work One services and self-advocacy.

Priority 2.4: Continue development of blind entrepreneurs through the Business Enterprise Program and increase trainees of the program. At least 50% of trainees will secure employment as licensed vendors within 6 months of completing training.

Progress toward achieving Priority 2.4: Three individuals completed training to become a licensed vendor in 2016, and two, or 67% of those individuals obtained employment within six months of training completion. An additional training class is planned for FFY18.

GOAL 3: Develop program initiatives and training that adequately support VR staff and community rehabilitation providers in the provision of quality services.
Priority 3.1: Conduct a systematic review of the new Employment Service Model (effective July 1, 2015) to identify best practices and determine necessary system revisions to ensure the quality of services and employment outcomes. Review trends in service provision and employment outcomes on a quarterly basis throughout FFY 2016, and continue to meet at least quarterly with the Employment Service Model workgroup to review strengths and identify areas of improvement.

Progress toward achieving Priority 3.1: An evaluation of services and outcomes under the revised employment service model, compared to services and outcomes under the previous Results Based Funding (RBF) employment service model has been ongoing since August, 2016. Baseline data was obtained in August, 2016, and an initial summary report was completed and posted on the VR website in November, 2016. Data has continued to be updated and shared in subsequent VR employment service evaluation reports, with the most recent report completed November, 2017. Within the first two years following implementation of the new model, VR participants who received employment services through a CRP, had increased access to discovery and supported employment services, and the quality of employment outcomes began to improve, with an average hourly wage of $9.26 in 2017 for those placed through a CRP, compared to an average hourly wage of $8.67 in 2015, which was a 7% increase over the two-year time period. This indicates good progress, however more improvement is needed. The overall average wage obtained by all VR participants achieving employment outcomes increased by 16% during this same time period, with average wages of $12.06 in FFY15 and $13.97 in FFY17.

Additionally, VR has achieved an increase in the number of individuals obtaining competitive, integrated employment during the first quarter of FFY18 (970), compared to the first quarter of FFY17 (846). Also, VR has seen a decrease in the number of individuals exiting the program without employment after development of an IPE in the first quarter of FFY18 (600), compared to the first quarter of FFY17 (694). This is a positive trend that BRS will be closely monitoring throughout FFY18.

Priority 3.2: Continue development of VR staff through professional development and training, including the creation of a web-based training curriculum (VR Leadership Academy) that can be shared across WIOA core programs to ensure consistency in information and increased knowledge about VR service delivery. VR will introduce new training by March 2016 that will aim to increase focus on counseling and guidance.

Progress toward achieving Priority 3.2: BRS contracted with Education Data Systems, Inc. to develop a curriculum centered on the building skills for the provision of high quality counseling and guidance to VR participants. All VR Counselors and Supervisors completed this training in 2016, and the training continued to be provided for new hires quarterly throughout 2016. The VR Leadership Academy was enhanced in 2017 to ensure alignment with modifications to the VR federal regulations resulting from WIOA, and to provide a more interactive learning process. Additional enhancements are planned for 2018.
Priority 3.3: Develop training and technical assistance opportunities to community rehabilitation programs (CRP) and staff (e.g., program managers and employment specialists) to ensure best practice and improve the quality of employment services and supported employment to consumers of varying disabilities, including those with the most significant disabilities. Increased training opportunities will be available to providers in FFY 2016 as compared to prior years.

Progress toward achieving Priority 3.3: Both the number of training opportunities and training topics increased in 2016. As an example, a ‘check and connect’ webinar training series was implemented in 2016 in partnership with Indiana University’s Center on Community Living and Careers, Indiana Institute on Disability and Community (CCLC/IIDC), which has featured topics on supported employment, discovery, customized employment, and a variety of other topics. Additionally, CCLC/IIDC under contract with BRS, provided one-on-one training and technical assistance to more than 20 CRPs in 2016 and 2017. Additionally, BRS entered into Establishment project contracts with 47 CRPs in 2017 for the purpose of enhancing training and building sufficient staffing capacity to provide high-quality, responsive services to VR applicants and eligible individuals. Through this funding, CRP’s have been able to increase the provision of training, including hands-on foundational skills training, to their direct services staff.

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

See responses to section A above.

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

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

Goal 1: Ensure that individuals receiving supported employment services have achieved stabilization, or their highest level of independence on the job, after a period of fading, prior to VR case closure. VR Employment Service revisions implemented in July 2015 increased focus on stabilization and increased access to supported employment services for VR consumers. It is anticipated that greater long-term retention will result from these changes, for individuals receiving supported employment services.

Measure: Begin collecting wage and hour information for individuals receiving supported employment services and obtain baseline data by October 2016.

Outcome: Achieved. Employment data including wage and weekly hours worked is collected and shared through the VR employment service evaluation reports. Baseline data was obtained in August, 2016, and an initial summary report was completed and posted on the VR website in
November, 2016. Data has continued to be updated and shared in subsequent VR employment service evaluation reports, with the most recent report completed November, 2017.

**Goal 2:** VR Supported Employment providers will increase knowledge and skills on the provision of supported employment services, including greater understanding and focus on development of natural supports, job readiness training techniques, customized employment, and appropriate fading of supports.

**Measure:** BRS will invest in training for supported employment providers including classroom-based, web-based, and hands-on workshops that focus on job coaching and job readiness training techniques. Training will be initiated on or before October 2016 with at least one-third of providers (29) participating in one or more training events by January 2017. BRS will also examine strategies for improvement of community rehabilitation providers to ensure capacity to carry out increased expectations under the new model.

Outcome: Achieved: BRS, in partnership with Indiana University, offered ample training opportunities to VR providers throughout 2016 and 2017, including a refresher on employment services, employment specialist training, supported employment, discovery, customized employment, and additional training topics. Hundreds of individuals participate in webinars throughout 2016 including a web-based training series called ‘check and connect’ that is focused on employment services. In March/April 2016, approximately 350 Community Rehabilitation Program (CRP) staff attended a half-day refresher training on the revised VR employment service model, including training regarding supported employment services. Well over half of CRPs participated in at least one training event in 2016.

**Goal 3:** VR will increase the quantity and quality of job outcomes for students and youth with the most significant disabilities through Project SEARCH.

**Measure:** At least 75 students will obtain work experience through Project SEARCH, and at least 50% of SEARCH participants will obtain competitive employment outcomes. Additionally, VR will establish an expansion plan for 2017.

Outcome: Partially achieved. 78 individuals participated in SEARCH in 2016 and 71 participated in 2017. As of December 2017, 681 individuals have participated in the Project since implementation in 2008, with an overall placement rate of 62%. The overall average wages are $8.54 per hour and individuals work on average 26 hours per week.

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

See responses to section A above.

(3) The VR program’s performance on the performance accountability indicators under section 116 of WIOA.
The amending of the Rehabilitation Act of 1973 (the Act), as amended by Title IV of the Workforce Innovation and Opportunity Act (WIOA) on July 22, 2014, required significant program and federal reporting changes beginning July 1, 2017. State VR agencies must now report on 363 individual data elements each quarter, for all active and closed VR cases. The enhanced reporting requirements require a significantly increased level of effort, as prior reporting was due annually for closed cases only, and required significantly fewer data elements. Additionally, BRS must now follow participants for four consecutive quarters post-exit from the VR program to report employment, earnings, and educational gains.

BRS has begun to report data through the revised and expanded RSA-911 report. Baseline data collected between July 1, 2017 and June 30, 2018 will assist the joint efforts of VR and RSA to set specific measures for each performance expectation. The existing Memorandum of Understanding (MOU) between BRS and DWD was updated to ensure that BRS can obtain employment and wage data through DWD. Additionally, other resources are being investigated to aid VR in meeting data collection and reporting requirements either through other State agencies and public or private sources, including post-exit data.

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

VR continued to support the Indiana Statewide Independent Living Council (INSILC) with I&E funds. INSILC members were given opportunity to attend national conferences, and were reimbursed for their travel and related expenses for attendance at board meetings. VR has also maintained a business and community engagement team who have a presence across Indiana to share resources and educate businesses about opportunities to employ individuals with disabilities. This team is led by a Director of business and community engagement, and their efforts have nearly doubled VR’s social media following in FFY2017. Additionally, continued collaboration with DWD occurred throughout 2017, including planning for new required federal data collection regarding business engagement efforts.

(p) Quality, Scope, and Extent of Supported Employment Services. Include the following:

(1) The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.

Indiana’s Supported Employment (SE) services are highly individualized and involve ongoing support services and other appropriate services needed to support and maintain an individual with the most significant disability (MSD), including youth with the most significant disabilities in SE for a period of time that generally does not exceed 24 months. Such services, such as job coaching, are for individuals who have SE and long-term supports identified on the Individualized Plan for Employment (IPE). Often, because of the nature and severity of the individuals’ disability, there is a need for extended services that are provided by a State agency, private nonprofit organization, natural supports, or any other appropriate resources that are funded outside of VR. VR funding is available for the provision of extended services to Youth with a
MSD, for a period not to exceed four years, if the youth has exhausted 24 months of SE services, and is not eligible for extended services through other agencies.

Eligible VR participants with the most significant disabilities obtain SE services through Community Rehabilitation Programs (CRPs) across the state. The service delivery requirements are to provide appropriate ongoing support services to individuals with MSD for whom competitive employment has not traditionally occurred, or for whom competitive employment has been interrupted or intermittent as a result of the significance of the disability, and who requires SE services. SE services are provided from the time of job placement through achievement of stabilization and retention (90 days after stabilization). The expected outcome of SE services is to ensure that stabilization on the job has appropriately occurred after a period of gradually decreasing needed supports and a correlated demonstration of increased independence. The intensive level of support needs should be well-documented by the CRPs in the Employment Support and Retention Plan, and the expectation of fading (i.e., decreasing the amount of support as a consumer becomes more proficient in completing job duties) is important to reach optimal independence. VR acknowledges that fading of supports may not always occur in a completely linear process, and levels of SE support may ebb and flow depending on the needs of the individual. However, a pattern of increased independence and reduced need for support (fading) should be evident prior to the identification that stabilization has occurred for an individual needing SE services. More specifics regarding Supported Employment may be found in the Indiana Vocational Rehabilitation Services – Manual of Employment Services at www.vrs.in.gov.

The scope of SE services may include, but not limited to, the following:

- Intensive job coaching (on-site, off-site, or a combination of both);
- Providing counseling or training to maintain the desired employment;
- Providing on-site job analysis, consultation, and recommendations for worksite and job modifications when appropriate;
- Developing appropriate natural supports; and
- Tracking fading and progress toward stabilization.

VR implemented major revisions to VR employment services in July 2015. Prior to these revisions, VR purchased employment services primarily through a Results Based Funding (RBF) approach. One significant revision that occurred is that SE services are no longer fully funded through employment milestones (or the previous RBF model). Because many individuals with MSD will require SE services that extend beyond the employment milestone payments, SE services are funded in addition to the current employment milestone payments. VR funding for SE services is outlined in the Table below. (Please note that the complete employment service model, implemented July 2015, can be viewed at www.vrs.in.gov).

<table>
<thead>
<tr>
<th>SE Funding Source</th>
<th>SE Services From Placement to Retention</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>Discovery</td>
<td>Discovery hourly services (i.e., job shadows, situational assessment, work experience, etc.) are provided to assess strengths, interests, talents, ideal work environments, etc. in order to identify an appropriate SE outcome.</td>
</tr>
<tr>
<td>---------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Milestone 1: Job Development and Placement</td>
<td>Job development placement services are provided to assist individuals to obtain employment in line with the SE IPE.</td>
</tr>
<tr>
<td>Milestone 2: Support and Short-Term Retention</td>
<td>Supports are provided day one on the job through completion of four calendar weeks on the job.</td>
</tr>
<tr>
<td>SE Hourly Funding</td>
<td>Supports typically start after the fourth week on the job and are provided through achievement of stabilization. Fading of support (decreasing the amount of support as a consumer becomes more proficient in completing job duties) should occur during this period.</td>
</tr>
<tr>
<td>Milestone 3: Retention</td>
<td>Supports are provided from stabilization through the ninety-day retention period.</td>
</tr>
</tbody>
</table>

Note: SE monthly level funding may begin sooner than four weeks, and/or could extend beyond stabilization if the consumer’s level of support extends beyond what is provided through the Milestone 2 and/or Milestone 3 payments.

(2) The timing of transition to extended services.

Extended services shall be identified as early as possible with the VR Counselor and CRP staff working together to secure necessary resources. It is critical that early conversations take place between VR, the consumer, and the CRP to begin planning for the transition to extended services early in the process. However, employment services may begin regardless of whether an identified funding source for extended services has been provided. It is important to recognize the impact that a good job match with appropriate and intensive ongoing supports may have on the amount and type of extended services an individual may need long term in order to maintain the consumer’s job. It is valuable to begin identifying extended service options (including natural supports) an individual may have available to him/her early in the process. When it has been determined that a consumer is stable on the job, the process to transition to extended services must begin, and this process must identify the consumer’s ongoing specific need(s), types of supports and services, the sources of extended services, and the projected number of hours. VR Counselors are required to assist in facilitating the seamless transition to extended services prior to VR case closure. The Transfer to Extended Services form is completed for VR consumers who require extended services. The form is completed following achievement
of stabilization. VR and CRP personnel work jointly to complete this document. VR forwards completed form to entities providing supports at least 60 days prior to achievement of Milestone 3 (Retention).

VR administration continues to focus on the need to ensure quality SE service; as such services are essential in securing quality employment outcomes for those consumers with MSD. VR will continue to work closely with the Bureau of Developmental Disability Services, the Division of Mental Health and Addiction, and CRPs to identify areas of concern, implement needed changes in practices, and provide training and/or technical assistance.