

## **PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION**

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

\* Sec. 102(b)(D)(iii) of WIOA

### **1. INPUT OF STATE REHABILITATION COUNCIL**

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

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;

The State Rehabilitation Council (SRC) is established in Section 105 of the Rehabilitation Act of 1973, as amended (Act), and 34 CFR §361.16.17 of its implementing regulations. The SRC gives advice to and works in partnership with the Division of Rehabilitation Services (referred to as "the Division" throughout this report) including input on the state plan.

I. The SRC strongly recommends that the Program develops and implements marketing strategies to increase statewide awareness of VR services for businesses with hiring opportunities for individuals with disabilities.

**RESPONSE:** As the Division strategically implements WIOA, business will become more of a customer of the Vocational Rehabilitation Program. This will include studying the best marketing practices for new and existing services. The 17 Community Rehabilitation Training Centers and the Training Center at Smyrna will be involved in those strategies.

II. SRC encourages the Division to continue to provide opportunities for education to students, family members, and Local Education Agencies (LEA's) regarding vocational rehabilitation and other services.

**RESPONSE:** The Division will continue implementation of PETS services through a phased approach beginning phase I with the Jackson/Madison School system. The Division is planning for full statewide implementation following the release of the final Federal Regulations in spring of 2016.

III. SRC encourages the administration to continue reviewing available resources related to Order of Selection and the ability to serve more individuals with disabilities.

**RESPONSE:** The Division continues its review of all available resources in respect to the order of selection and the new language in the law.

IV. SRC commends the achievement of exceeding the Program's production closure goals.

RESPONSE: The Division remains committed to providing quality services that lead to competitive integrated employment. As one of the core partners in WIOA, the Division is dedicated to assisting Tennessee in having a 21st Century Workforce.

V. SRC recommends that, due to the current vacancy rate of staff in direct client services, the Division move toward fully staffing these positions to ensure continued increases in successful consumer employment outcomes.

RESPONSE: As the Division moves forward with implementation of WIOA, the personnel needs of the Vocational Rehabilitation Program will be continuously evaluated.

VI. SRC commends the Program for the development of the Business Unit and strongly recommends fully staffing this unit and expanding national and statewide business partnerships.

RESPONSE: The Division is continuing the development of the Business Services Unit. WIOA establishes business as a customer of the Vocational Rehabilitation Program, therefore the Business Services Unit will take a larger role in service delivery. The Division continues to participate in the Talent Acquisition Portal (TAP), a searchable database for clients and employers. In addition, Tennessee VR participates in the National Employment Team (NET) sponsored by the Council of Administrators of Vocational Rehabilitation (CSAVR). The NET gives access to national business partnerships. The SENET, is specific to the southeast and increases statewide business partnerships.

VII. Due to council structure and bylaw requirements, the SRC recommends that all SRC membership nominations be reviewed and processed within six (6) months.

RESPONSE: The Division will continue its efforts to work with the SRC to meet both internal and external deadlines. The Division would like to express its appreciation to the council for providing feedback and hopes it too will be mindful of providing information to the Division in a timely manner.

VIII. The VR & SRC FY2015 Annual Report was reviewed and edited by the DHS Communications staff prior to it being forwarded to the Offices of the DHS Commissioner, the Governor and the RSA Commissioner. The SRC recommends that the VR Services Portion of the Tennessee Combined State Plan be formally reviewed and edited as well to ensure a professional quality document is presented for inclusion in the combined state plan.

RESPONSE: The Department of Human Services strives to present all documents that are professional in quality.

Input provided by the Council for the 2018 modification of the combined state plan included continued support for the Council's original recommendations and provided the following new input:

As the Division has thus far not achieved the goal established in the 2016 Combined State Plan to increase successful employment outcomes by 2% or more during each of the four years of the plan, the SRC requests that the Division conduct a review of the program to identify potential causes for the decline in successful employment outcomes. The SRC further requests to receive a report from the Division regarding the findings to enable the SRC and the Division to work together to identify methods for meeting or exceeding this goal during the remainder of this Combined State Plan period.

**RESPONSE:** The Division remains committed to providing quality services that lead to competitive integrated employment. As one of the core partners in WIOA, the Division is dedicated to assisting Tennessee in having a 21st Century Workforce. As a result, the Division has been increasing its focus on looking at where and how human and other resources have traditionally been allocated to determine the best way to make adjustments to increase its community outreach with its partners along with reviewing its overall organizational structure to reach more individuals, including those potentially eligible Pre-ETS participants. It is anticipated that the long term effect will be a program that is agile and more readily responsive to its customers and advocates in support of the needs of both the individuals that it serves and the business that ultimately hire those customers in highly competitive positions in an integrated setting.

SRC commends the Division for providing recent joint trainings with stakeholders (TennCare Managed Care Organizations, Community Rehabilitation Providers and VR Staff) to discuss Employment Community First CHOICES program (ECF) and clarify roles and responsibilities.

**RESPONSE:** Collaborating with other state departments and programs, like the state Medicaid agency, that provide similar services to shared customers is an integral component of the state's strategy to fulfilling its commitment to providing quality services that lead to competitive integrated employment. Further, the Division continues to explore both traditional and non-traditional partnership opportunities that not only allow for a broader base of collaboration, but just as importantly, the blending and braiding of funding resources to improve the efficiency and effectiveness of service delivery by all partners.

SRC commends the Division for the recent implementation of a statewide Pre-Employment Transition Services (Pre-ETS) team comprised of Pre-ETS Specialists and Field Supervisors. As there continues to be somewhat limited participation and ongoing confusion regarding the provision of these services, both for vendors of the services as well as the schools, the SRC encourages the Division to assist this team in providing joint trainings for these services as done with the ECF CHOICES program.

**RESPONSE:** The Division will continue its efforts in the implementation of the of a statewide Pre-Employment Transition Services (Pre-ETS) team comprised of Pre-ETS Specialists and Field Supervisors. This implementation will include both internal staff training and external training for local education agencies, vendors and other stakeholders. The Division has already completed a joint training for VR and DOE staff on the MOU. The designated staff from VR and DOE developed a joint training to present to staff from both agencies and outside stakeholders. In addition to training and adding new staff, the Division is reaching out to our contract partners to seek input on

lessons learned with the hope that we along with our partners and the Local Education Authorities (LEAs) can build upon what is working and develop strategies for what is not meeting our expectations through peer guided information sharing.

SRC commends the Division for making changes in the Letters of Agreement (LOA) to improve the ease of use for community providers in applying for the LOA and for streamlining the services reporting process.

RESPONSE: The Division remains committed to providing quality services that lead to competitive integrated employment. Part of that commitment involves a much deeper review of all procurement methods, including LOAs, to make improvement in efficiency. The Division anticipates that the end result will be more streamlined processes, and increased accountability that leads to improved services in support of the mission and ultimately those we serve.

The SRC highly recommends that the VR program continue to push toward a method and/or means in receiving customer feedback. Once returned, turn it into actionable steps/initiatives in order to improve client satisfaction.

RESPONSE: Receiving feedback from customers is a critical component of the state's continuous improvement efforts and committed to providing quality services that lead to competitive integrated employment. The Division will continue to engage the resources of the Quality Improvement and Strategic Solutions unit within the Department of Human Services (DHS) to improve channels and methods for receiving feedback from our customers, advocates, businesses, partners and the communities that we serve as well as explore ways to better analyze that feedback that make it more actionable in order to improve the Division's agility in the way it provides services.

the Designated State unit's response to the Council's input and recommendations; and

The State unit's response is included with the SRC's input in the response to question 1 in this section.

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

The State unit's explanations for rejecting any of the SRC's input is included the response to question 1 in this section.

## **2. 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:

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;

The Division requests a waiver of state wideness in order to maintain thirty Third Party Agreements with thirty-five (LEAs). These Third Party Agreements are designed to

provide enhanced and concentrated services to Transition School to Work students/clients covered by the agreements. The Division has a contract with each entity that is consistent with Federal regulations (34 CFR § 361.26) and includes the following provisions:

1. The vocational rehabilitation services to be provided are identified in Section A. Scope of Services in each contract (Each contract has been submitted separately to RSA to provide the written assurances requested for this attachment);
2. The LEA assures that non-Federal funds are made available to the Division by committing to their maintenance of effort in Section E.13 of the contract;
3. The LEA assures that the Division's approval is required before services are provided with the Division's counselor determining eligibility for each client served;
4. The LEA assures, through the Division's vocational rehabilitation counselors, that all other state plan requirements, including the Order of Selection policy, are applied to persons receiving services through the agreement; and
5. The LEA assures that reasonable accommodations will be provided. A list of the LEA contracts is provided below: • Anderson County Schools • Bledsoe County Schools • Blount County Schools • Carter County Schools • Johnson County Schools • Clarksville/Montgomery County Schools • Cocke County Schools • Dysersburg City Schools • Elizabethton City Schools • Greene County/ Greenville City Schools • Hamblen County Schools • Henderson County Schools • Humboldt City, Trenton Special School District, Milan Special District • Jackson/Madison County Schools • Kingsport City Schools • Knox County Schools • Lauderdale County Schools • Loudon County Schools • McMinn County Schools • McNairy County Schools • Metro Nashville Public Schools • Polk County Schools • Putnam County Schools • Sequatchie County Schools • Shelby County Schools • TN School for the Blind • TN School for the Deaf • Tullahoma City Schools • Unicoi County Schools • Warren County Schools • Washington County Schools

In fiscal year 2014 the division changed the services offered under the TSW agreements. These new agreements provide more innovative services to the LEAs and the students.

While the Division provides transition services to all LEAs throughout the state, these Third Party Agreements enable the provision of an expanded and more intense transition service to students/clients resulting from the inclusion of Transition Case Managers, job coaches, transition coaches, and work place readiness specialists that would not otherwise be available to work with the vocational rehabilitation clients. These agreements enable the Division to have a greater presence within the schools and act as a stronger resource to the LEAs in the provision of transition services. The Division will continue to make efforts to increase the number of Third Party Agreements.

Over the last two years, the Division has expanded contractual arrangements that have increased coverage across the state. These expansions include new LEA contracts in the following areas:

- Germantown Municipal Schools • Chester County Schools • Hardeman County Schools • Haywood County Schools • Grundy County Schools • Williamson County Schools

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

All of the appropriate information is included in the response to question 1 of this section.

### **ALL STATE PLAN REQUIREMENTS WILL APPLY**

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

All of the appropriate information is included in the response to question 1 of this section.

### **3. 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:

#### **A. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS:**

The Division has interagency cooperation, collaboration, and coordination with other state and local entities that are not components of the Statewide Workforce Investment System. The Division works in cooperation with the following federal, state, and local agencies and programs to provide services for individuals with significant disabilities: 1. The Department of Children's Services for youth-The Program is currently meeting with DCS state office staff to determine how to blend DCS Independent Living Services with VR program services. DCS state office staff has toured the TRC at Smyrna to learn more about the services provided at the TRC. The DCS Independent Living Coordinators statewide have an annual meeting. The VR Program has offered to host the 2016 spring meeting of the DCS Independent Living Coordinators. During that meeting, all Independent Living Coordinators will tour the facility in order to assist in a plan for coordination of services. 2. The Department of Health in providing services to individuals with Traumatic Brain Injury (TBI); 3. Post-secondary school systems and their governing bodies; 4. The Department of Education and Local Education Agencies for individuals who are transitioning from school to work. 5. The Department of Corrections for individuals released from state correctional facilities; 6. The Tennessee Board of Probation and Parole for individuals released from state correctional facilities and monitored by the Board. 7. Local city police, county sheriffs and judge's programs for individuals being released from jails or on probation or trial diversion; 8. The Department of Human Services Family Assistance and Child Support Division for individuals participating in services under the Temporary Assistance for Needy Families (TANF) program; 9. The Department of Mental Health and Substance Abuse Services for individuals with mental illness and substance related disorders; 10. The Department of Intellectual and Developmental Disabilities for individuals with intellectual and developmental disabilities; 11. University of Tennessee, Center for Literacy, Education and Employment for marketing to businesses the services provided by the Division, to recruit businesses to hire the Division's clients and to provide staff training and development and consultation services for community supported employment service

providers; 12. Tennessee AgrAbility program for professions in agriculture production. This is a cooperative effort of the University of Tennessee Agricultural Extension Service, Tennessee State University Cooperative Extension Program, and Easter Seals in Tennessee, Special Technology Access Center, East Tennessee Technology Access Center and other collaborative entities of the Division; 13. Tennessee Works for employment partnerships and collaborative efforts to increase access to meaningful work and internet-based information. 14. Community Rehabilitation Agencies of Tennessee which administers the Tennessee State Use Program, directs government procurement toward organizations serving individuals with disabilities. 15. Council on Developmental Disabilities that promotes public policies to increase and support the inclusion of individuals with developmental disabilities in their communities and works with public and private groups across the State to find necessary supports for individuals with disabilities and their families, so that they may have equal access to public education, employment, housing, health care, and all other aspects of community life. 16. Tennessee Council for the Deaf and Hard of Hearing and Centers for the Deaf and Hard of Hearing and Deaf-Blind that operate in six communities and provide interpreter services consultation. 17. Tennessee Technology Access Programs that operate in five communities and provide assistive technology services and evaluations. These programs provided the contracted services with the Program within the Division that administers activities described in section 4 of the Assistive Technology Act. 18. Tennessee Centers for Independent Living that operate in six local communities are operated primarily by persons with disabilities and provide a variety of independent living services. 19. Community Rehabilitation Providers throughout the state that provide rehabilitation services under a Letter of Agreement. 20. In addition to the MOUs listed above, the Division has entered into an MOU with the State Medicaid agency, TennCare. State Medicaid — the Division of TennCare for the Employment and Community First CHOICES program that provides long-term services and supports, including employment services, to individuals with intellectual and developmental disabilities.

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

Information regarding this question is included with the response to question 1 in this section.

Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture;

Information regarding this question is included with the response to question 1 in this section.

Noneducational agencies serving out-of-school youth; and

Information regarding this question is included with the response to question 1 in this section.

State use contracting programs.

Information regarding this question is included with the response to question 1 in this section.

## **B. COORDINATION WITH EDUCATION OFFICIALS**

Describe:

### **1. DSU's PLANS**

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.

The Division maintains an ongoing interagency agreement with the Tennessee Department of Education, Tennessee Department of Children's Services, Tennessee Department of Finance and Administration, Bureau of TennCare, Department of Intellectual and Developmental Disabilities, Tennessee Department of Health, Tennessee Department of Mental Health and Substance Abuse Services and Tennessee Department of Corrections. The agreement, along with the Division's policy manual and Standard Procedures Directives, outlines the plans, policies and procedures for coordination with education officials to facilitate the participation of the Division staff in transition planning and the referral of students with disabilities to the Division for a determination of eligibility for VR services.

The DSU entered into an exclusive Interagency Agreement with the Department of Education in October, 2017. The Agreement lays out the Purpose of the Agreement, VR responsibilities, DOE responsibilities, and mutual responsibilities. We were aided by WINTAC, an RSA technical assistance contractor. Training has begun across the state at the Special Education Study Councils and is currently being provided at the Partners in Education Conference, February 6-8, 2018.

When a student who is eligible based on the Individuals with Disabilities Education Improvement Act (IDEIA) standards reaches the age of fourteen (14), the Individualized Education Program (IEP) team, as defined by 34 CFR § 300.344, formulates a statement of transition service needs as a component of the IEP. The Division's staff is invited and to the extent possible participates in these IEP meetings.

The Division has been under an Order of Selection since 2001. Under the current Order, the Division is able to provide direct services to those eligible individuals in Priority Category 1 and Priority Category 2. The Division was able to open Priority Category 2 effective September 30, 2012. There was a release of clients from the waiting list in Priority Category 3 on October 1, 2013. From January 2015-March 2015 all PCs were closed for the provision of new services. This was a brief closing and Priority Categories 1 and 2 were re-opened in March 2015. The opening and release of clients from the waiting list allows for the provision of direct services to significantly more students with disabilities. The Division provides information and referral services to help all applicants find services through other agencies and entities. The inclusion of Pre-Employment Transition Services (Pre-ETS) will allow for the provision of the five stated Pre-ETS

services for those students with a disability who are eligible or potentially eligible for VR services.

The IEP team, which should include the Division's staff when invited and when available, parent and student, determines that the student should be referred for VR services. The Division's staff should inform the student and parents, preferable at the IEP meeting, the purpose of the vocational rehabilitation program. VR Staff make every effort to attend IEP meetings, however due to staff resources this is not always possible. However information regarding VR Services is made available during IEP meetings.

The Transition School to Work Unit within the VR program is working with the Department of Education on how to incorporate VR services information into the IEP meeting. The Director of the Unit has been trained on Easy IEPs. In the provision of the Pre-Employment Transition Services, students with disabilities and their families will start receiving information on VR services as early as age fourteen. Information will be made available to Middle school staff in order to assist with the beginning the transition.

Beginning in October 2015, these IEP meetings will include information on Pre-Employment Transition Services (Pre-ETS) services that are available at age 14. Pre-ETS services are available to students with disabilities ages 14-22. Pre-ETS services can be provided without an application for VR services. For those individuals that are interested in applying for services, the information should include the application procedures, the eligibility requirements including the Order of Selection, and the potential scope of services that may be available. As soon as possible after referral, the Division takes an application from the student and determines eligibility as well as whether the student is in an open priority category. If the student is in an open priority category, the Division's staff assists in the formulation of the student's IEP and the student's vocational rehabilitation Individualized Plan for Employment as soon as it is determined that the student can benefit from services provided by the Division in preparation for exiting the school system and transitioning into training and/or employment. Services provided by the Division may include attending job fairs, community vocational adjustment training and pre-employment, vocational skills training, college prep, and job readiness training.

The DSU has chosen to provide Pre-Employment Transition Services through Transition School to Work Contracts, Pre-ETS contracts, LOAs and direct staff contact.

VR is providing application materials to the school for the students to become recipients.

The DSU has hired 9 Pre-Employment Transition Specialists and 3 Pre-employment Transition Supervisors to coordinate services provided in their areas, identify Local Education Agencies (LEAs) who have a need for Pre-Employment Transition Services, and recruit Community Rehabilitation Providers (CRPs). They will match interested schools and willing CRPs and/or provide services where there are students with disabilities who need the service.

The Pre-Employment Transition Specialists will work with the schools to identify students who are of working age who want to become VR clients and make referrals to the VR Counselor assigned to the school.

There are 28 Pre-Employment Transition Community Rehabilitation Providers providing services.

The LEA's involved in the interagency agreement with the Division should cooperate in developing and coordinating services for students and youth with disabilities within each respective agency's legal authority. The ultimate goal of each agency participating in the agreement is to provide, or cause to be provided, a continuum of appropriate services leading to transition from school into employment. The agreement provides for:

1. Consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including vocational rehabilitation services;
2. Consultation and technical assistance on providing reasonable accommodations;
3. Transition planning by personnel of the Division of Rehabilitation Services and the educational agency for students with disabilities that facilitates the development and completion of their individualized education programs under section 614(d) of the Individuals with Disabilities Education Improvement Act (IDEIA) of 2004 (P.L. 108-446);
4. The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining state lead agencies and qualified personnel responsible for transition services; and
5. Procedures for outreach and identification of students with disabilities who need transition services.

A VR counselor is assigned to work with each local education agency (LEA) for the purposes of referrals, eligibility determination and the provision of services to eligible students. In twenty-one LEAs, the VR counselor is dedicated to the LEA under a contract with the LEA. VR counselors provide technical assistance to school personnel and LEAs to help them identify appropriate referrals for vocational rehabilitation services. The VR counselor also provides information and referral to students not eligible for VR services.

In 2014 VR transitioned from VR counselors to TSW grants to work in the school systems. There are currently 38 TSW grants serving 42 LEAs.

It is the Division's policy that the development and approval of the IPE for each student determined eligible for VR services occurs as soon as it is determined that the student can benefit from services provided by the Division. An IPE must be developed before the student leaves the school setting.

The interagency agreement identifies the financial responsibility of the Department of Education (DOE) to ensure that individuals who are IDEIA eligible receive a free appropriate public education (FAPE) in the least restrictive environment. A free appropriate public education means regular and special education and related services which:

1. Are provided at public expense, under public supervision and direction, and without charge to the parent;

2. Meet the standards established by state law, including the requirements of IDEIA Part B and the Rules, Regulations and Minimum Standards for the Governance of Tennessee Public Schools, issued by DOE;
3. Include preschool, elementary school, and secondary school (including appropriate vocational, career or work experience education); and
4. Are provided in conformity with an IEP.

The interagency agreement relates the financial responsibility of the Division to ensure that individuals who are IDEIA eligible and meet the Division's eligibility requirements will receive VR Services. VR Services means any services necessary to determine eligibility and those services described in an IPE necessary to assist an individual with a disability in preparing for, securing, retaining, or regaining an employment outcome that is consistent with the strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of the individual.

The LEA is responsible for the educational costs related to the provision of special education and related services for the individual attending school. The agreement states that if another public agency is obligated under federal or state law or assigned responsibility under state policy to provide or pay for any services that are considered special education or related services and are necessary for ensuring FAPE to students who are IDEIA eligible, the public agency shall fulfill that obligation or responsibility, directly, through contract or by another arrangement. However, failure of that public agency to pay for that service does not relieve the LEA of its obligation to provide that service to an individual with a disability in a timely manner.

The Division is responsible for all costs necessary for eligibility determination and provision of services under an IPE. The Division must take into account comparable services and benefits [34 CFR § 361.53 (c) (1)], available under any other program that does not interrupt or delay the progress of the individual toward achieving the employment outcome identified in the IPE.

The Division's staff maintains a working relationship with special education supervisors, vocational education supervisors, directors, secondary school guidance counselors, and LEA administrators for the purpose of providing outreach for students with disabilities and technical assistance to school personnel to assist LEAs in preparing students with disabilities for career opportunities. The Division participates in in-service training programs for LEAs, as well as in statewide special education conferences for the purpose of providing information regarding VR services. The Division also participates in and organizes local community job fairs, job clubs, attends civic club/organization meetings to inform students and parents of the purpose of the VR program, the application procedures, the eligibility requirements, and the potential scope of services that may be available.

Other activities to identify students with physical, mental or emotional disabilities who do not meet the criteria for special education services (commonly referred to as Section 504 services) include completion of student health survey forms coordinated with guidance counselors or general education teachers.

It is the Division's intent to develop relationships with LEA middle or junior high schools to provide consultation for students with disabilities who are about to enter high school.

The Division has two dedicated full-time state office positions that coordinate transition services statewide. One position is focused on the provision of the Pre-Employment Transition Services (Pre-ETS) to students with disabilities. The other position serves as liaison with the State Department of Education and other partners in the interagency agreement to provide technical assistance and training related to vocational rehabilitation services. Both positions work with VR counselors and supervisory staff to improve access and services for students with disabilities. In addition, both positions identify, arrange for, or provide training to the Division's counselors, educators, students with disabilities, and families in a variety of areas related to transition services. On a yearly basis, staff in the Transition Unit provides presentation at the Partners in Education that is sponsored by the Department of Education.

The Division currently contracts with forty-four LEAs as part of its transition initiative. The contracts provide for a menu of needed and additional services chosen by the LEA to assist in the transitioning of students from school to work. All services provided under these contracts/agreements have a VR employment focus. All services provided under these contracts/agreements are in keeping with all state plan requirements to include our state's Order of Selection requirements. Services provided under these contracts/agreements are only available to applicants for, or recipients of, services of the Division. The Division will strive to increase the number of contracts with LEAs as allowed by the Division's and LEAs' funding availability.

Although the Division utilizes contracts with LEAs as part of its transition initiative, all decisions affecting eligibility for VR services, the nature and scope of available services, and the provision of these services remain the sole responsibility of the VR counselor employed by the Division. VR staff is responsible for determinations to close cases and for all allocations of expenditures for services.

The Division in partnership with 6 LEAs and the Council on Developmental Disabilities, operates 6 High School Transition Project Search Sites. Those Sites are located as follows: • Memphis/Shelby County-LeBonheur Children's Hospital • Nashville/Davidson County- Embassy Suites Downtown • Murfreesboro/Rutherford County-Embassy Suites • Blount County -Maryville College • Jackson/Madison County- Jackson Madison Hospital • Clarksville/Montgomery County-County Government offices

Project SEARCH is in the second year of a 3 year state rollout. There are currently 9 programs with 72 interns. 54 of the previous year's interns are employed for a 66% successful employment rate. One site had an employment rate of 100%.

Project SEARCH has added an additional high school transition site at: • Sheraton Downtown in partnership with Shelby County Schools

A two-day Project SEARCH® orientation was held in Knoxville, TN in November, 2017. There were 4 potential programs who participated in the orientation and 3 have chosen to move forward and form a Steering Committee.

**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;

Information regarding this question is included with the response to question 1 in this section.

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

Information regarding this question is included with the response to question 1 in this section.

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

Information regarding this question is included with the response to question 1 in this section.

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

Information regarding this question is included with the response to question 1 in this section.

**4. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS**

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

Based on information gathered by continuing statewide studies, the annual facility survey of public and private community rehabilitation programs and the on-going monitoring and annual evaluation of effectiveness, the Division continues to maximize the use of community rehabilitation programs to provide rehabilitation services in the most integrated setting possible consistent with the informed choices of the individual.

The Division is utilizing community rehabilitation programs (CRPs) throughout the state as follows:

**I. The Division's Facility Program:**

A. The Tennessee Rehabilitation Center (Center) at Smyrna is a state operated comprehensive residential rehabilitation facility that serves individuals with significant disabilities. The facility is accredited by the Commission on Accreditation of Rehabilitation Facilities (CARF) in programs of comprehensive vocational evaluation

services, employee development services, and employment skills training services. The Center offers the following program and support services:

i. Program Services

- Comprehensive vocational evaluation and mobile evaluation services
- Employment Readiness Program (ERP) a pre-employment and life skills training program to encourage positive work behaviors and independence.
- Occupational skills training in automotive maintenance/detailing, manufacturing, garden center services, retail, business education, food service, warehouse training, power equipment operations, and pharmacy technician.
- Physical Rehabilitation Services to include: Work Conditioning and Work Hardening, Occupational and Physical Rehabilitation, Spinal Cord Injury Program, Personal Care Attendant training, Vision Rehabilitation, Independent Living Skills, Equipment Operation Screens and Adaptive Equipment Assessments.
- Traumatic brain injury services to include: Case Management, Occupational, Physical, and Speech/Language Pathology to include cognitive therapy; Vision Rehabilitation, Therapeutic Golf Rehabilitation, Vocational Evaluation and Assessments; Behavioral instruction, Job Skills/Readiness training and Community Re-entry training.
- Vision impairment services to include: pre-vocational assessment, training for independent living to include adaptive kitchen skills and home management skills; braille, Orientation & Mobility training, Adaptive communication skills, assistive technology assessments and training; computer training; and prerequisite evaluation and training for entry into Tennessee Business Enterprises.

ii. Support Services

- Campus Life Services (Residential Living) • Student Health Services to include Medical Dormitory • Case management services • Psychiatric and physician services • Recreation therapy and leisure-time skills • Remedial education • Job seeking skills training • Psychological services • Independent living skills training • Autism Support Services • Deaf Service • Behavioral Education

The Center operates at a program capacity of 190 individuals with an annual enrollment ranging from 700 - 1000 Tennesseans with significant disabilities each year.

The Center is a member of the National Consortium of State Operated Comprehensive Rehabilitation Centers. An Advisory Council is utilized to provide valuable feedback used in guiding decision making in Center operations and program development. In addition, the Center conducts exit customer satisfaction surveys on all individuals completing services, and conducts client family surveys, as well as a referring counselor needs assessment and satisfaction survey on an annual basis. Feedback obtained from these survey instruments is also used in guiding decisions about current and future support services and program services operations, as well as accessibility and physical plant operations.

B. A network of 17 Tennessee Rehabilitation Centers (TRCs) is located across the state providing day services to eligible individuals with significant disabilities, seeking competitive integrated employment. All community TRC facilities are accredited by the Commission of Accreditation of Rehabilitation Facilities (CARF) in programs of comprehensive vocational evaluation and employee development services. The TRCs are supported by a combination of appropriated local and Federal funds.

i. Program Services

- Comprehensive vocational evaluation services provide an individualized, timely and systematic process for identifying viable vocational options and developing employment goals and objectives.

An accredited comprehensive vocational evaluation service is used to examine a wide range of employment alternatives using the following techniques:

1. Assessment of functional/occupational performance in real or simulated environments
2. Psychometric testing
3. Preference and interest inventories
4. Personality testing
5. Extensive personal interviews
6. Other appropriate evaluation tests depending on the individual
7. Analysis of prior work experience and transferable skills

ii. Employee Development Services

1. Services are based upon individual needs and can include comprehensive employment services or any individual component.
2. Employee development services and/or job readiness instruction
3. Work skills development through a facility workshop: including the use of contract work, job readiness assessment and training.
4. Community Employment Services include: (job development and placement)
5. Job readiness assessment and instruction includes: interview skills instruction, completing a job application, developing a resume, grooming and hygiene for the work place, self-determination training, developing and using job-finding networks and resources.
6. Job development and placement into competitive employment through the identification of employment opportunities in the local job market
7. Development of realistic employment goals
8. Establishment of service plans to achieve employment outcomes
9. Identification of resources to achieve and maintain employment.

TRC facilities conduct exit customer satisfaction surveys on individuals completing services from each program of service provided, completes a yearly survey with clients receiving services, referring counselors, contract providers, funding sources, employers, and other identified stakeholders. Feedback obtained from the surveys is used to improve program services.

II. Service Contracts:

A. The Division plans to continue service contracts with the following community rehabilitation providers to ensure quality services statewide provided funding is available:

- Clovernook
- Department of Education
- National Federation for the Blind
- Southeast TN Human Resource Agency
- Technology Centers: East Tennessee Technology Access in Knoxville; Signal Centers; Technology Access Center of Middle Tennessee in Nashville; West Tennessee Special Technology Access Resource (STAR) Center in Jackson; and Mid-South ACT in Memphis
- Tennessee Disability Coalition Benefits to Work
- University of Tennessee, Center for Literacy Education and Employment

Cincinnati Children's Hospital Medical Center • Statewide Independent Living Council • STAR Center • Department of Education • Department of Labor and Workforce Development • Department of Mental Health and Substance Abuse • Department of Intellectual and Developmental Disabilities

B. The Division has two service contracts with community rehabilitation programs (Clovernook and Volunteer Blind Industries, Inc.) serving visually impaired clients in the areas of evaluation, adjustment, activities of daily living, orientation and mobility, training, job development and employment.

The Division has four service contracts with Center for Independent Living (CIL)-IL expanded outreach (Empower TN, Jackson, Memphis, and Training Advocacy Referral and Peer Support (TARP). These services are provided in accordance with the 2017-2019 State Plan for Independent Living. To conduct needs access to identify independent living needs of people with disability in Tennessee.

The Division has five service contracts for deaf services and advocacy services (Frontier Health, Interpreting Services for the Deaf, doing business as DeafConnect of the Mid-South, Jackson Center for Independent Living, Knoxville Center for the Deaf, and Partnership for Families, Children and Adults.) They provided outreach, referral and advocacy, interpreting services to the deaf, deaf/blind, and the hard of hearing individuals.

### III. Letters of Agreement

A. Beginning in FFY2013, the Division began a rewrite of the Letters of Understanding (LOU), to change them to Letters of Agreement (LOA). The LOA has the same purpose as the LOU in that it is an agreement between the Division and the Community Rehabilitation Programs and in cooperation with the Department of Finance and Administration. The LOA describes the functions and responsibilities of the Division and the CRP as well as the scope of services and payment methodology agreed upon by both the Division and CRP in a joint effort of improving and expanding employment opportunities for individuals with disabilities.

Some of the differences in the LOAs from the LOUs are: • Concentrated focus on outcomes rather than services • Different payment schedule based on Priority Category assignment of the client • Bonus for exceptional wages • Streamlined application and approval process

CRP's must apply and be approved for a LOA each year. The application period is in the Fall (October, November). LOAs are effective during the calendar year each year, January thru December.

For State Fiscal Year 2017-2018, the Division has 142 total LOAs with CRPs throughout the state.

• 84 LOAs for Vocational Assessment • 32 LOAs for Vocational Adjustment Services • 83 LOAs for Trial Work Experiences • 115 LOAs for Job Placement Services • 92 LOAs for supported employment services • 12 LOAs for Pre-Employment Transition Services

The Divisions Facility Programs, Service Contracts and Letters of Agreements are used to provide needed services such as but not limited to: • Vocational evaluation • Personal and vocational adjustment training • Transportation and daily meals • Vocational training • Job readiness training • Job development and job placement • Supported employment • Rehabilitation technology • Orientation and mobility • Activities of daily living • Trial work experiences • Follow-up • Pre-Employment Transition Services

The VR Program is finalizing the implementation of Customized Employment Services and extended services to youth with most significant disabilities who require supported employment.

## **ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES**

(Formerly known as Attachment 4.8(b)(4)). 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.

The Division has interagency arrangements and coordination with the following entities for the provision of supported employment services and extended services:

1. The Department of Intellectual and Developmental Disabilities for individuals with intellectual and developmental disabilities;
2. The Department of Mental Health and Substance Abuse Services for individuals with mental illness and substance related disorders;
3. The Tennessee Employment Consortium, an independent association of community rehabilitation providers and state agencies developed jointly by the Division, the Department of Intellectual and Developmental Disabilities, and the Tennessee Council on Developmental Disabilities to provide a forum for all stakeholders to review and discuss state policies and share best practices;
4. University of Tennessee, Center for Literacy Education and Employment to provide staff training and development and consultation services for community supported employment service providers; and
5. Tennessee Department of Labor and Workforce Development, to provide customized employment services through their system of Career Centers on behalf of VR clients and business and industry. The Department of Mental Health and Substance Abuse Services for individuals with mental illness and substance related disorders. Utilizing an evidence based Individual Placement and Support (IPS) model of supported employment; Tennessee Division of Health Care Finance and Administration, Division of TennCare for provision of employment services for individuals enrolled in Employment and Community First CHOICES. The Department of Education for the provision of Pre-Employment Transition Services.

The Division has encouraged the establishment and development of Community Rehabilitation Providers (CRPs) to improve and expand services through Letters of Agreement. The Letter of Agreement (LOA) is an agreement between the Division and the CRP. The LOA describes the functions and responsibilities of the Division and the CRP as well as the scope of services and payment methodology agreed upon by both the

Division and CRP in a joint effort of improving and expanding supported employment and extended services for individuals with disabilities. The Division currently has 92 LOAs for supported employment services. The Division continues its' efforts to increase S.E. providers and anticipates the numbers of providers will increase. VR is actively pursuing a number of other providers for underserved areas across the state.

## **5. COORDINATION WITH EMPLOYERS**

(Formerly known as Attachment 4.8(b)(5)). 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

In Tennessee, the Vocational Rehabilitation Program employs Business Employment Consultants (BECs) in order to facilitate the relationships between businesses and the VR Program.

- Role of the State Business Employment Consultant and Business Employment Consultants (BECs): Facilitate employment opportunities for persons with disabilities by providing services and resources to assist Tennessee businesses in recruiting, hiring, returning to work, and retaining employees with disabilities.
- Number and location of the BECs: Currently, there are a total of 11 BEC's positons statewide and the positions are located in the following regions: region 1, region 2, region 3, region 4, region 5, region 6, region 7, and region 8. There is also a Statewide Business Employment Consultant located in state office, which assists with statewide participation in the Talent Acquisition Portal (TAP) that is managed by the Consortium of State Agencies of Vocational Rehabilitation (CSAVR).

According to the Tennessee Department of Labor and Workforce Development, the rapid rise of technology, rebounding manufacturing and construction, and large presence of the healthcare sector are expected to offer numerous jobs for those looking for work. Tennessee's current unemployment rate is at 3.2% and nationwide it is 4.2%.

WIOA expands the VR Program's customer base as Business becomes a recognized partner of the program. As this concept continues to grow, the VR Program is developing more Initiatives with Businesses in order to provide more opportunities for competitive integrated employment and career exploration opportunities.

- Business Initiatives: The Division conducts several business initiatives across the state such as Walgreens' REDI programs, Project Search East TN Children's Hospital and UT Medical Center, Kroger/Peyton's distribution centers, AutoZone distribution centers, Vanderbilt University Cummins, Auto Zone, Cracker Barrel, Food City, Allegro, Phoenix Boats, and Veteran's Administration- Johnson City.

- Role of the state agency with 503 Compliance: Tennessee VR BECs work with contacts established through the US Department of Labor's Office of Federal Contract Compliance Programs as a resource to assist federal contractors in addressing the Final Rule of Section 503 of the Rehabilitation Act of 1973. The BECs participate in regional/local meetings to provide information about services and job candidates

available through Tennessee's VR services. The BECs assist in recruiting efforts by linking businesses with qualified applicants.

- Additional business initiatives for the agency are: The TN Rehabilitation Center at Smyrna has developed customized training partnerships with Schwan Cosmetics, Walgreens, and CVS Caremark to develop curriculums specific to their hiring requirements which build capacities for diversity within companies.

VR has been working with NASA at Marshall Space Flight Center as a resource to assist in their efforts of 503 compliance. TN VR and Alabama VR has been coordinating efforts to assist in their hiring efforts.

TRC continues to develop new partnerships and keep the relationships of its current partners. This makes the training experience for the students available in many different areas. Auto Detail/Lube has had a long relationship with Od's Car Wash and Detail in Murfreesboro, TN and has developed a recent commitment for internships with Nashville's Auto Art Body Shop. Food Service recently signed a partner agreement with Jim N'Nicks Bar-B-Q that will allow students to intern. Another longtime partner is the local ProCharge Company in LaVergne. TRC is also excited about employers such as Publix, Walmart, and Onin staffing who have recognized the great skill sets of our clients and hired recent graduates for their companies.

The Tennessee Rehabilitation Center at Smyrna has also established agreements with local employers to provide career exploration, externships, and internship training opportunities on site. New agreements are being signed on a regular basis.

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

Pre-Employment Transition Services (Pre-ETS) is a set of 5 services available to students with a disability ages 14-22 who are eligible or potentially eligible for VR services. These services should be provided in a collaborative manner with the recipient's educational provider.

Fifteen percent (15%) of the Basic VR grant must be set aside for the provision of Pre-ETS services. TN VR provides the 5 Pre-ETS services through contracts with qualified Community Rehabilitation Partners (CRPs), Local Education Agencies (LEAs) and/or VR staff.

The 5 Pre-Employment Transition Services are: 1. Job Exploration Counseling can be provided in classroom or a work setting of in-demand occupations. Counseling can include completing interest inventories to determine a student's interests, job shadowing, exploration of Career Pathways, and researching local labor market information that apply to the student's interests. 2. Work-Based Learning Experiences, which may include in-school or after-school opportunities, or experiences outside of the traditional school settings (including internships). It is provided in an integrated environment in the community to the maximum extent possible; 3. Counseling on Post-Secondary Opportunities, which may include exploration and preparation for enrollment in comprehensive transition or postsecondary education programs at institutions of higher education; 4. Workplace Readiness Training for the development of social skills and

independent living skills necessary for successful employment. This may include skill acquisition as well as opportunities to apply newly acquired knowledge. 5. Instruction in self-Advocacy, which may include Self-Determination, Life Skills Training and peer mentoring from individuals with disabilities working in competitive integrated employment. Recipients learn about their rights, responsibilities, and how to request accommodations for post-secondary education placement as well as employment.

## **6. 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;

Tennessee is an Employment First State, and there is an established Employment First Task Force. The Employment First Task force facilitated the completion of a Memorandum of Understanding for services to youth with disabilities between the following State agencies: • Vocational Rehabilitation • Department of Education • Department of Intellectual and Developmental Disabilities • Department of Labor and Workforce Development • Department of Mental Health and Substance Abuse Services • Council on Developmental Disabilities (Oversees the Implementation of the MOU)

In Tennessee the agency that administers the State Medicaid plan is the Bureau of TennCare. The VR Program is developing a Memorandum of Understanding with the Bureau of TennCare. The VR Program has developed a Memorandum of Understanding with the Department of Developmental and Intellectual Disabilities.

In conjunction with the Department of Mental Health and Substance Abuse Services, the VR program is providing supported employment to individuals with severe and persistent mental illness under the Individual Placement and Supports Model. In Federal Fiscal Year 2015 there were 351 total SE cases in Status 26 (VR program only). At least 15.38% or 54, were from IPS. The VR Program plans to expand the IPS program into other areas of the state in Federal Fiscal Year 2016.

### 2. the State agency responsible for providing services for individuals with developmental disabilities; and

Information regarding this question is included in the response to question 1 in this section.

### 3. the State agency responsible for providing mental health services.

Information regarding this question is included in the response to question 1 in this section.

## **7. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEMS ON PERSONNEL AND PERSONNEL DEVELOPMENT**

(Formerly known as Attachment 4.10)). 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:

## **DATA SYSTEMS ON PERSONNEL AND PERSONNEL DEVELOPMENT**

### **A. QUALIFIED PERSONNEL NEEDS**

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

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

The Division received 7,692 applications for new services in FY2014 and provided services to 21,545 eligible individuals. In FY2015, the division received 6,782 applications and provided services to 19,500 eligible individuals.

The Division currently has 610 allocated positions. Of these 610 positions, 174 are currently vacant (28.5%). Out of the 610 positions 334 positions provide direct client services. 101 of the direct client services positions are currently vacant. All VRC position are filled at the Master's degree level. The CSPD requirement in Tennessee is eligibility to sit for the Certified Rehabilitation Counselor (C.R.C.) exam. All current counselors will meet the CSPD requirement by January 1, 2018. When new staff are hired at the Master's degree level, if they do not meet the CSPD at the time of hire, they have 36 months to meet the requirements

As a result of changes regarding personnel in WIOA, TN will we assessing current staffing patterns and staffing needs.

The Tennessee Division of Rehabilitation Services utilizes a department wide on—line computer system known as Edison for collecting and tracking all personnel actions relative to positions being vacated (resignations, terminations, retirement) as well as tracking personnel data relative to filling vacant positions (new hires, position transfers and/or promotions). Job Title-Total positions-Current vacancies-Projected vacancies over the next 5 years: Administrative 17 3 0 Clerical 77 23 0 Rehabilitation Assistants 66 14 0 Supervisors 86 18 0 Support 20 5 0 Instructor 44 5 0 VR Direct Client Services Staff 243 100 0 Medical 28 4 0 BEP Specialist/Consultant 15 0 0

ii. The number of personnel currently needed by the State agency to provide VR services, broken own by personnel category; and Information regarding this question is included with the response to question A in this section.

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.

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

Information regarding this question is included with the response to question A in this section.

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. Information regarding this question is included with the response to question A in this section.

## **B. PERSONNEL DEVELOPMENT**

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

i. a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;  
In Tennessee, there is one university that has Council on Rehabilitation Education (CORE) certified program offering a master's degree in rehabilitation counseling. It is The University of Memphis, located in the western part of the state.

The University of Tennessee at Knoxville (UTK) has a current enrollment of 17 students in its distance education program, 5 of whom are employees of the Division. Of the 17 students currently enrolled, 5 have disabilities and 3 students represent a minority. For the federal fiscal year (10/13 — 9/14), 3 students graduated from the program. All 3 graduates met the academic criteria to sit for the Certified Rehabilitation Counselor (CRC) exam.

The University of Memphis currently has 18 graduate students in their on—campus program. None (0%) of these students are employed by the Division.

Institutions-Students enrolled-Employees sponsored by agency and/or RSA-Graduates sponsored by agency and/or RSA-Graduates from the previous year:

University of Memphis 18 0 0 57 University of TN — Knoxville 17 5 5 15

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

Information regarding this question is included in the response to question (i) in this section.

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.

Information regarding this question is included in the response to question (i) in this section.

## **8. 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.

Information regarding this question is included in the response to question (i) in this section.

#### **A. 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 34 CFR 361.18(c) 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**

Members of the Division's leadership team have quarterly contact with the program administrators at the University of Tennessee and the University of Memphis for the purpose of planning and sharing information relative to personnel development activities. The Rehabilitation Services Training Unit staff also meets or corresponds with University of Memphis staff for the purpose of gathering information regarding the number of students enrolled in their respective rehabilitation counselor education programs, as well as the number who graduated from their programs during the past year.

To advance recruitment activities, the Division has dedicated a program specialist position. This program specialist is actively seeking out other masters level programs across the nation; primarily those with RSA funded slots, to increase the number of incumbent staff in masters programs. Other duties of the program specialist include developing/distributing recruiting brochures at job fairs, speaking to graduate level programs to promote state employment in the rehabilitation field and encouraging incumbent staff to take advantage of graduate level training opportunities in rehabilitation counseling distance learning programs. The Division recognizes that recruitment activities are also the responsibility of counseling, supervisory and management level staff across the state with these personnel involved in recruitment activities in their regional and local communities.

The Tennessee Excellence, Accountability and Management (TEAM) Act of 2012 is designed to establish methods for attracting, selecting, retaining and promoting the best applicants and employees based on performance and equal opportunity, free from coercive political influence, and to provide technically competent employees to render impartial service to the public at all times.

The TEAM Act will give agencies greater flexibility in personnel management and increase customer focused effectiveness and efficiency in a best practice environment,

and by doing so, will allow the Division to strengthen its efforts to hire and retain top quality counselors.

The division has had over twelve (12) interns serve in a variety of capacities at regional offices and community rehabilitation centers during the past two (2) years. Five (5) of them have been rehabilitation counseling graduate students completing their practicum and 600-hour internships, of those three (3) have been hired as master VR counselors. One intern chose to work for Veterans Administration and the other went to work for a non-profit agency.

Current incentives for incumbent staff to participate in a Master's degree program include financial assistance with tuition, books, fees, and minimal educational leave. Funding for a pay incentive based upon successful completion of a Master's Degree program was approved in January 2005 for graduates and has been requested and approved for each successive graduate.

The Division continues to explore retention strategies for qualified staff. Exemplary counselors are given priority for attendance at various out-service training events in recognition of their hard work, dedication and commitment to assisting individuals with disabilities in achieving their employment goals.

In WIOA the definition of qualified personnel has undergone some changes. The Vocational Rehabilitation Program will be assessing its current staffing patterns to ensure qualified personnel are available.

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

Information regarding this question is included with the response to question A in this section.

## **B. STAFF DEVELOPMENT**

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

### **SYSTEM OF STAFF DEVELOPMENT**

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

The Office of Professional Development (OLPD), is a section of the Office of General Counsel (OGC) - Human Resources and Professional Development (HRPD) division of the Department of Human Services (DHS). OLPD provides staff development and training for DHS employees, and in so doing, conducts training needs assessments and

provides training opportunities (mandatory and elective) to enhance staff competencies and skill sets. OLPD has dedicated staff to provide support for Rehabilitation Services and works in conjunction with the Rehabilitation Services division in the development of training necessary to ensure effective, outcome driven results. The development of core competencies for effective service delivery is an integral focus of Rehabilitation Services training. Additionally, HRPD provides performance management support to all DHS employees in alignment with the goals and priorities established by the Governor and the Commissioner of DHS. HRPD has processes in place to create individual performance plans and on-going evaluations of employees' performance in each division, including rehabilitation services.

Additional data is collected relative to training needs through the following methods: 1. Input from staff in all job classifications compiled into a statewide training needs report; 2. State rehabilitation management and administrative staff input; 3. State Human Resources Department training division mandates; 4. Rehabilitation Services Administration guidelines; 5. Recommendations of the State Rehabilitation Council and the Statewide Independent Living Council;

Program case reviews conducted by the Department's Performance Management Unit (QUISS) division of DHS are also utilized to identify strengths and deficiencies among staff and related training needs.

Staff was encouraged to give feedback on what they thought were their training needs. Outcomes of this internal review yielded the following training related recommendations:

OLPD sends out a training effectiveness survey that asks respondents of training needs.

1. Additional human resources to meet statewide need for new and incumbent staff training;
2. More timely delivery of training for new counselors; The OLPD standard is to provide (or at least begin) new employee training within 90 days of hire.
3. Expand the new counselor curriculum to be more comprehensive /incorporate more hands-on activities to reinforce knowledge and skill sets; The comprehensive NCI 6 week training curriculum was presented to learners in 2013 and has continued ensuring current policy by completing revisions prior to each new session.
4. Provide refresher training for incumbent staff relative to the Division's policy and other disability related topics; and Counselor policy Refresher training was developed and was scheduled for quarterly or semi-annual facilitation. To this point, only one statewide refresher training consisting of three sessions was approved and was held in September of 2014.
5. Additional/follow up training regarding the new online case management system.

As a result of these staff recommendations, the Rehabilitation Services Training Unit, under Division of Human Resources and Professional Development is implementing the following strategies: 1. There are four VR training positions and one program coordinator. Of the four VR/ OLPD trainers, in addition to maintaining current policy and TRIMS knowledge to facilitate segments of NCI and Counselor Refresher training, each trainer is assigned a specific area of focus based on specialized training and/or experience. Currently, one trainer is assigned to work specifically with sensory loss units; one is assigned to work with community TRC; one with Smyrna TRC; and one with TSW program in light of all the WIOA policy implications. 2. All new counselors will be

expected to participate in the new counselor training within the first 3 months of employment. 3. The previous two one-week training sessions for new counselors has been significantly expanded (2012/2013) to a new curriculum. The curriculum is an intensive, hands-on training, utilizing a variety of training modalities to include navigation of the new online case management system, case studies/scenarios, and individual and group discussions. Additionally, PowerPoint presentations, facilitator guides, participant guides, handouts, assessment questions and related materials are being revised to include recent policy revisions and updates as changes occur. 4. OLPD staff has provided regional and district policy trainings per contacts with regional and district supervisors to determine and address training needs. 5. OLPD has had in place for several years a training website entitled the Training Resource Website (TRW) whereby all training materials will be posted to enable trainers and supervisors to access training modules for disability related training topics. 6. Following implementation of the online case management system, follow up regional training sessions were conducted to further illustrate how to navigate the system and provide answers to staff questions. A new state office position was also added in recent years to serve as a resource to field staff in providing guidance in navigating/utilizing the new online case management system. TRIMS is being updated to include forms and processes that are consistent with the recent policy revisions.

VR Program contracted for online course system offered by the VR Development Group (VRDG). All courses are designed for the field of VR. VRDG is the only organization offering accessible, interactive multimedia courses in the VR field. VRDG information is continuously updated and includes changes from WIOA and the 2017 CRC Code of Ethics. Course topics include: Effectively Managing VR Caseloads, Autism Spectrum Disorders and Employment, Introduction to VR, Comprehensive Assessment, and Job Development and Employment Acquisition (to name a few). These trainings are available 24/7. Supervisors choose the sessions for their staff. At the end of each session there is a quiz to check for learning and comprehension.

As part of the new Performance and Quality Improvement process, focus groups were formed to identify new employee specific training needs relative to each job position/classification. These focus groups laid the foundation for the development of a progressive training curriculum to include standards for measuring performance at three, six and nine month increments during the probationary process. Utilizing this process to identify specific training needs and a subsequent training curriculum relative to each job position/classification has proven to be a more effective means of identifying and addressing training needs than staff surveys conducted in the past.

Below are the top 5 training priorities based on staff and management feedback: 1. Leadership/supervisory training provided through the New Supervisor Academy (NSA); All new supervisors must attend a three week New Supervisor Academy session, delivered by the Department's OLPD division, to enhance and develop their leadership skills. 2. Caseload management (moving a case through the VR process, critical casework activities such as eligibility determination, plan development, budgeting, etc.). This training is provided as part of the New Counselor Institute (NCI) and as needed to incumbent VR counselor staff. 3. Communication skills/customer service (interviewing skills, effective communication, how to deal with difficult people, cultural diversity)

VR/OLPD staff has information included in the NCI, counselor refresher and community TRC staff training modules regarding appropriate and professional communication, interviewing, and cultural awareness. TN Department of Human Resources, DoHR has courses available which are currently being delivered to management staff by OLPD staff members, who have become DoHR certified trainers, on topics of Customer Service, Respectful Workplace, and Civil Rights. 4. Employment / placement training (including disability disclosure) NCI covers some on disability disclosure. The module recently developed on job development and placement for sensory loss staff could be modified for delivery to all counseling staff as well as Business Employment Consultants. 5. General on-boarding for new employees (vision/values, people first language, respectful workplace, customer service, ethics, and departmental and division organization). On boarding training has been revised and is being reviewed by DOHR. NCI addresses vision and values and people first language as well as Departmental and divisional organization. As is noted above Customer Service and Respectful Workplace are provided by certified facilitators as part of the onboarding training.

Based on the recommendations VR has provided VRDG training on effective case management to improve counselors understanding and implementation of VR case management.

The Tennessee Rehabilitation Center at Smyrna also holds staff in-service two times per year and includes training and workshops designed to improve the effectiveness and efficiency of vocational training programs offered.

The Division continues to provide on-going training and technical assistance regarding the Americans with Disabilities Act to staff and the general public, including business and industry. As part of the on-boarding process, counselors also receive training relative to the Rehabilitation Act of 1973 and subsequent amendments.

The Division continues to contract with technology centers across the state for training and technical assistance in rehabilitation technology services. Rehabilitation technology contracts are in place with the East Tennessee Technology Access Center (Knoxville), Technology Access Center of Middle Tennessee (Nashville), West Tennessee STAR Center (Jackson), Signal Center (Chattanooga), and Mid-South Access Center for Technology (Memphis).

The Divisions employees continue to receive specialized training in assessment and vocational evaluation activities. Through a partnership with the University of Memphis, vocational evaluators receive extensive instruction in the appropriate selection of assessment tools, interviewing skills, evaluation techniques and report writing. The contract with the University of Memphis has expired. Current training on Vocational assessment and evaluation is being provided by Tami Long, the OLPD/RS training director who has nine years of experience as an evaluator, and maintains both the CRC and the Vocational Evaluation Specialist certification (CVE) through The Commission on Rehabilitation Counselor Certification. Statewide Vocational Evaluator training was provided in September 2015 for all community TRC evaluators and managers. Training covered interviewing skills, scheduling, evaluation techniques, choosing assessments, and report writing.

Evaluators complete a competency examination with subsequent training provided based on the individualized needs of each employee. New counselors receive, via a new counselor training program, training relative to assessments, vocational evaluation and interpreting medical and psychological reports to assist them in acquiring skills to identify the specific strengths and weaknesses of individuals with disabilities. Training in the areas of vocational counseling, job placement and other topics relevant to client service delivery continue to be focal areas for the Division. The training noted above was delivered to incumbent staff as the pilot for the new VE training. This training will become the new employee training and will be provided within 90 days of hire as approved by program. All evaluators will be expected to submit reports for review and will receive training based on individual needs.

Division employees are encouraged to participate in web-based training events as offered through the Department and other Agencies, as appropriate. The Vocational Rehabilitation Program was approved for a one-time no cost extension to the training grant funds offered from RSA. These funds will allow the program to continue to provide training to staff.

While dedicated funding is no longer available, the Division has begun exploring other cost affected means of providing staff development through the purchase of modular web-based training that allows the Division to purchase high quality training as needed through contractual partnerships.

The Office of Learning and Professional Development (OLPD) is currently examining the existing structure of collecting personnel and training data. A new database for collection of personnel, professional, and training data is currently being developed.

The new system will provide a more effective way to track and report the staff data for TDRS. Edison's Enterprise Learning Management has been in place for several years. It is the system that allows for documenting available courses, learner enrollment, and learner participation in various classes. Each learner has a "My Learning" page that documents all sessions of training (classroom or online) attended and completed.

The Division has posted information memoranda on its intranet website to provide staff with an easily accessible means of acquiring information on current research, resources and related activities in the vocational rehabilitation field. Leadership staff also disseminates new information (such as the latest Institute on Rehabilitation Issues publications) through electronic conveyance. Employees, particularly those with specialized job responsibilities, are encouraged to attend conferences, seminars and training workshops relative to their specialty areas. Local, regional and statewide meetings provide an additional avenue for keeping employees informed of new developments in the vocational rehabilitation field.

## **ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE**

Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals:

Information regarding this question is included with the response to question A in this section.

### **C. 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..

The Division has policies and procedures to ensure that it includes among its personnel, or has readily available, the services of (1) Individuals able to communicate in the native languages of applicants and eligible individuals who have limited English proficiency through Avaza Language Services; and (2) Individuals able to communicate with applicants or eligible individuals in appropriate modes of communication.

During staff orientation, new counselor training, annual Title VI training and other training activities, Division staff members are informed of specific procedures to be followed to communicate with limited English speaking individuals. Telephonic translation services are available through Avaza Language Services. All regions have received orientation packages to be used to train all of their staff in the use of this service.

The Division continues to recognize its responsibility for employing or obtaining the services of sign language interpreters, which fall within the definition of appropriate modes of communication in (34 CFR § 361.5(b) (5)), to the extent necessary to meet the communication needs of individuals who are Deaf, Blind or Deaf-Blind. The Divisions policy addresses the (1) significance of such services, (2) the selection of service providers, (3) the scheduling and payment for services, and (4) an evaluation process for such services.

### **D. COORDINATION OF PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT**

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

The Individuals Disabilities Education Act provides renewed emphasis on the planning for service delivery and collaboration of the various divisions and programs designated to serve students and youth with disabilities.

The Division has an interagency agreement with the Division of Special Education, state Department of Education in providing administrative support for a coordinated, collaborative effort of service delivery. The Blind and Visually Impaired Services/Deaf and Hard of Hearing unit continues an agreement with the Tennessee School for the Blind and the Tennessee School for the Deaf. Networking of the two divisions relative to transition services has provided a means for coordinating and sharing information regarding personnel development under IDEIA. There is ongoing communication between the two divisions and each division has responsibility for providing input into personnel development activities.

An interagency agreement was developed to fulfill the requirements of IDEIA. The most recent version of this agreement was signed July 1, 2012. The purpose of this agreement is to identify and define the financial responsibility of each state agency for providing

services under IDEIA and to facilitate the provision and coordination of services for all children with disabilities. The following state agencies are participating in this agreement: Tennessee Department of Education; Tennessee Department of Children's Services; Tennessee Department of Finance and Administration; Bureau of TennCare; Department of Developmental Services; Tennessee Department of Health; Tennessee Department of Human Services; Tennessee Department of Intellectual and Developmental Disabilities; and Tennessee Department of Correction.

In 2013, Governor Bill Haslam signed an Employment First Executive Order. This Executive Order established the Employment First Taskforce. In 2014, the Employment First Taskforce sign and executed a Youth Memorandum of Understanding (MOU). The agencies involved in the MOU are: • Department of Education • Vocational Rehabilitation • Department of Labor and Workforce Development • Department of Intellectual and Developmental Disabilities • Department of Mental Health and Substance Abuse Services • Council on Developmental Disabilities (this agency oversees the implementation of the MOU).

The purpose of this MOU, is to state how these agencies will work together to provide transition school to work services to students and youth with disabilities.

The Division continues to recognize the value of the involvement of its State Rehabilitation Council in personnel development activities. It is the policy of the Division to give the Council ongoing review and input on the development of issues associated with the Comprehensive System of Personnel Development.

The Council continues to be involved with CSPD issues associated with the recruitment and retention of staff, such as; counselor salaries and pay incentives for the successful attainment of counselors with a Master's degree in Rehabilitation and also training for existing staff to obtain a Master's Degree in Rehabilitation.

## **9. STATEWIDE ASSESSMENT**

(Formerly known as Attachment 4.11(a)).

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

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

The Tennessee Division of Rehabilitation Services (Division), in collaboration with the State Rehabilitation Council (SRC), completed a comprehensive assessment of the vocational rehabilitation needs of Tennesseans with disabilities in the summer of 2013 and is conducting needs assessments on a three-year cycle. The VR program is conducting a new Comprehensive Needs Assessment to be completed in the summer of 2016. As required in 34 CFR § 29, the information obtained from a number of sources was assessed and analyzed to determine the needs as stated above.

Methodology Five surveys were developed, one for each category of participant. The surveys have some questions in common. The five surveys were administered in mid-

August 2013. Survey participants included vocational rehabilitation clients and/or their caregivers, staff, workforce investment system personnel, community resource partners, and vocational rehabilitation stakeholders. All five surveys were administered through an anonymous web-based (Survey Monkey) process. In addition, five interviewers attempted to administer the client/caregiver survey to a beginning list of 1,000 (750 active and 250 closed) clients. In all, there were 907 completed surveys evaluated and analyzed for this Vocational Rehabilitation Needs Assessment. There were 6,291 e-mail requests sent and 616 calls made. These 6,907 contacts yielded a response rate of 13%. Earlier during this Needs Assessment, Focus Groups of VR Staff and VR Clients were conducted in six Regions (1, 2, 5, 7, 8, and 9). These Focus Groups aided in the low response rate of the Client/Caregiver survey.

**Survey Overview** Five surveys were developed, one for each category of participant. The surveys have some questions in common. The five surveys were administered in mid-August 2013. Survey participants included vocational rehabilitation clients and/or their caregivers, staff, workforce investment system personnel, community resource partners, and vocational rehabilitation stakeholders. All five surveys were administered through an anonymous web-based (Survey Monkey) process. In addition, five interviewers attempted to administer the client/caregiver survey to a beginning list of 1,000 (750 active and 250 closed) clients.

The client/caregiver sample was obtained from active cases and case closures from October 2011 to March 2013. The list of 19,689 clients included active cases (Status 10 and 18), successful outcome closures (Status 26), and closures without a successful outcome (Status 28). Of the 15,965 active cases on the list, 5,521 provided an e-mail address for contact information. In addition, of the 3,724 closed cases on the list, 1,158 provided an e-mail address for contact information. Therefore, the client/caregiver survey link was sent to 6,679 participants. Of the 5,521 active case participants with an e-mail, 598 e-mails bounced back undeliverable. Therefore, 4,923 active Vocational Rehabilitation clients received the survey link. Of the 1,158 closed case participants with an e-mail, 617 e-mails bounced back undeliverable. Therefore, 541 closed case Vocational Rehabilitation clients received the survey link. Of the 541 total participants, 495 began the survey process and 469 completed the client/caregiver survey. The survey completion rate was 94.7%.

So that customers without access to the Internet could also have an opportunity to provide their opinions, five interviewers contacted 1,000 (750 active and 250 closed) clients by phone. The 1,000 clients were chosen randomly in SPSS from the customers without e-mail addresses. Of the 1,000 customers contacted by phone, there were 384 wrong numbers or disconnected numbers. Of the remaining 616, 151 were contacted and agreed to complete the client/caregiver survey. These 151 participants fully completed 146 surveys for a completion rate of 96.7%. Approximately 25% of the 1,000 clients called completed the client/caregiver survey. Combined, the web-based survey link and the telephone survey of clients' response rate totaled approximately 10%.

The Staff survey link was sent by e-mail to 537 staff members and 45 supervisors for a total of 582 staff members. Of these 582 staff members, 123 started a staff survey and

106 or 86.2% completed the survey questions. Therefore, 21% of Vocational Rehabilitation Staff responded to the staff survey.

The Workforce Investment Act System (WIAs) personnel were sent their survey link in 92 e-mails. However, 128 WIA surveys were completed. Therefore, the survey link e-mail sent out by the Research and Planning Unit was shared with at least 36 other individuals. The completion rate for these 128 surveys was 91.4% for the 117 surveys completed. The response rate for the WIAs survey equaled 79%.

Community Resources Partners (CRPs) were sent 118 e-mail requesting respondents complete the CRP survey. There were 46 surveys started by the CRPs and 43 surveys finished. This is a completion rate of 93.5%. This places the return rate much lower at approximately 39%.

Vocational Rehabilitation Stakeholders were sent 35 e-mails for the Stakeholder survey link. Twenty-nine started the survey and 26 completed all questions on the survey. This is a survey completion rate of 89.7%. However, this particular surveys return rate was 83% much higher than were the others.

In all, there were 907 completed evaluated and analyzed for this Vocational Rehabilitation Needs Assessment. There were 6,291 e-mail requests sent and 616 calls made. These 6,907 contacts yielded a response rate of 13%. Earlier during this Needs Assessment, Focus Groups of VR Staff and VR Clients were conducted in six Regions (1, 2, 5, 7, 8, and 9). These Focus Groups aided in the low response rate of this particular survey. The five surveys shared several like items, but also differed on distinct issues for each group.

From these five survey instruments, this Needs Assessment will attempt to identify the needs of individuals with the most significant disabilities in Tennessee, to discover the unmet needs of minority groups (including the not served and the underserved) in Tennessee, and to recognize which population(s) of individuals with disabilities are those not served and/or the underserved in Tennessee.

#### Survey Results & Analysis

Vocational Rehabilitation Stakeholders Overall, respondents (38%) are sometimes satisfied with the services VR clients receive from TN Rehabilitation Services. Twenty-four percent are satisfied and 21% are dissatisfied. Two respondents listed not applicable, two were very dissatisfied, and one person stated that they were very satisfied with the services VR clients receive. One stakeholder praised VR's improvements made in "Working on developing relationships with future clients before they leave high school; actively participating in meaningful IEP transition meetings."

According to survey results, 48% of stakeholders straddled the fence in their belief that VR Counselors fully understand how and why a client's disability affects their chances of employment. Twenty-four percent agree and 17% percent disagree that VR Counselors understand the impact a disability has on employment. Eleven of the Stakeholders felt that employment opportunities were an unmet need of individuals with disabilities. One respondent shared that "There seems to be a lack of creativity to find positions that are compatible with their disabilities."

Slightly over one third of stakeholder respondents agree that VR Client chances of getting a job increased because of training and services received through Vocational Rehabilitation. One third feel training and services sometimes assist in increased job probability for clients. In addition, 30% disagreed with the statement. Qualitatively, 18 Stakeholder respondents felt that potential employers are looking for the following four types of skills from individuals with disabilities: 1) Entry level (55%), 2) Timeliness/Good Work Ethic (16%), 3) Behavior/Soft Skills (16%), and 4) Basic Computer Skills (11%). From comments on this survey, most employers seek “Reliability, job pride, honesty and friendliness.”

Of the 29 Stakeholder respondents, an overwhelming 72% do not feel that VR Counselors help secure employment for VR Clients. Fifty-five percent of respondents feel the majority of clients find jobs themselves. Only 10, 34.5% feel clients do not secure their own employment. Three people did not respond to the survey question.

Forty-one percent of responding Stakeholders feel VR Counselors sometimes invite VR Clients to be part of developing their vocational goals. Thirty-eight percent agree that VR Counselors involve Clients in the development of their goals and 17% disagree, while one person chose to skip the question. The 17% that disagree may feel that clients are being judged by their behavioral choices. One respondent stated an unmet need as “The effects of their disabilities are often confused with behavioral choices, making them often appear to be resistant to services.”

Of those who responded, 55% feel that VR Counselors do inform their clients of the available jobs of interest that also match their skills. Twenty-one percent agree that counselors do make clients aware of possible jobs, while 17% disagree. Two people skipped this question.

One Stakeholder suggested the “need for job carving for some individuals on spectrum.”

More stakeholders disagreed (31%) than agreed (24%) that VR Counselors are strong advocates for VR clients’ mental, physical, and vocational needs. However, the majority, 41%, is unsure if Counselors are strong advocates or not. One responder did not answer. The lack of communication was a constant theme in this survey. One respondent made the following comment concerning communication: “Placing information on the VR web site and keeping it updated, be a highly visible collaborative partner with disability related organizations and efforts geared toward employment, and positive outreaches and advertising to the community.”

Community Resource Partners (CRP) on average TN Vocational Rehabilitation Community Resource Partners, service more than 100 individuals with disabilities. CRP qualitative comments state that the more clients are provided one- on-one interaction time with various jobs and receive personal individualized attention or job site assessments they are better able to provide or suggest a more suitable work environment and with greater success. In addition to interpreter services, Community Resource Partners also listed computers as a big need in their agency to accommodate people with disabilities. According to respondents, the most successful element of CRP soft skills training is Individualized attention and Job Readiness. CRP sees the underserved and the not served population to be those with severe disabilities, autism, deaf and hard of hearing, along

with cognitive functions. Unmet needs of the not served population include counseling and guidance as well as communication, outreach. To serve these clients CRP suggest developing better partnerships and changing eligibility to be more inclusive and flexible.

CRP believes that potential employers are most interested in employees who have appropriate behavior, work ethic, and timeliness in respective job settings. Survey response state the most beneficial agency partnerships for CRP have been other non-profits agency. The majority of CRP survey respondents are interested in documentation training. Many CPR responders report constant policy and procedure changes in VR are confusing.

CRPs provided information about successful pieces to their assessment process and successful soft skills. For both the job readiness category garnered the most responses. For assessment one provider stated “Providing a concise report that includes realistic vocational options based on interests, aptitudes, transferrable skills, and labor market information” as the successful piece of their assessment process. Another provider stated “Job Shadowing Job Sampling Working Interviews” were a successful soft skill teaching tool for clients.

CRPs reported the unserved and underserved to be individuals with developmental disabilities (Autism Spectrum Disorder and Asperger’s), Veterans in category 3 or category 4, and individuals with felony charges and/or chronic or recent drug addictions. These unmet needs were reported by CRPs to be met by education and training 24% of the time. For instance, “employment specialist needs to help stabilize client’s job”. “They have the skills to GET job but have no skills to KEEP the job.” The barriers reported by minorities with disabilities were VR knowledge/awareness (20%) and language barriers (14%).

CRPs requested better training in job development and job placement. They praised the opening of Priority 2 category as a significant positive. In order to improve communication, they requested weekly or bi-weekly meetings with VR Counselors and Supported Employment staff to review caseloads.

Workforce Investment Systems (WIS) on average Workforce Investment Systems service more than 100 individuals with disabilities. Services that WIS felt was most helpful include job readiness, Support services, and education.

Computer hardware topped the list in most needed accommodations for people with disabilities. The majority of qualitative comments requested updated staff computers as well as updated computers for clients. WIS is also asking for laptops they can carry between sites and visits. The most helpful element of their assessment is the staff’s knowledgebase of the client, disability, and job market. Interviewing skills, communication, and job readiness were the number one soft skills WIS felt helped clients obtain and maintain employment. The suggestions for underserved or unserved clients included opening the priority categories, blind and visually impaired along with clients who have autism. Suggested ways to reach this group include expand outreach, improve resources, and communication. Stated barriers to reaching this group include cultural competence, educating VR staff and employers on various barriers. Respondents also

suggested building the awareness of VR services among the common population, including schools, business, and VR partners.

Five respondents stated that they do not have any clients with disabilities. Another 5 stated they provide services to 1-9 persons with disabilities. Nine respondents service 10-39 clients while 40-59 clients are seen by at least 12 of the Workforce Investment Systems who responded to the survey. Three (8.6%) respondents provide client services to approximately 60-79 clients. Eleven of the 128 WIS see at least 80-99 persons with disabilities while the majority, 56.3%, of survey respondents provides supportive services to over 100 persons with disabilities.

In addition to non-VR clients, the majority, 54.7%, of surveyed Workforce Investment Systems provide services for more than 100 Vocational Rehabilitation clients. Five respondents stated that they do not have any VR clients. Seven stated they provide services to 1-9 Vocational Rehabilitation Clients. Ten respondents service 10-39 clients while 40-59 clients are seen by at least nine of the Workforce Investment Systems who responded to the survey. Fifteen (11.7%) respondents provide client services to approximately 60-79 clients, while only 10 of the 128 WIS see at least 80-99 VR Clients.

Of the services available through WIS, Job Development (50%), Job Search (44%), On-the-Job Training (35%), and Assessments (32%) are the most successful components in obtaining and maintaining employment for individuals with disabilities.

Vocational Rehabilitation Staff VR Staff would like more training in New Counselor Training, Job Development, Case Management, and Disabilities. Many feel they are adequately aware of the job market but would like a more thorough understanding of connecting their clients with the right employment match based on need and client skills. From focus groups conducted in February Staff feel they would do a much better job if they are able to build relationships with businesses in their surrounding areas. Unserved clients are those who are elderly, economically unqualified, those with learning disorders, and high school students ranked as the most mentioned unserved group. Most underserved group include middle aged working age people, and those with less severe and more severe disabilities (autism and learning disabilities were listed) Support Services such as technology access, job training, were listed as unmet needs. Barriers to reaching out to the unserved and underserved include cultural competence in understanding various cultures and disabilities on the part of employers and some staff.

Job Readiness and basic computer skills topped the list in expected training and skills most potential employers are looking for from VR clients. VR Staff feel that the DHS Vocational Rehabilitation is most successful in providing assistance to clients, conducting assessments and making changes to serve them more effectively.

Forty-nine percent of VR Staff agrees that the current accommodations their clients receive meet their employment needs. Four people did not respond.

Forty-six percent of VR Staff agrees that the job training their clients received or are still receiving adequately prepares them for employment. Five people did not respond.

Fifty-four percent of VR Staff agrees that they are well informed and understand how and why clients' disabilities impact their chances of getting or keeping a job. Four people did not respond.

Sixty-one percent of VR Staff stated yes, they often help clients obtain jobs. Eighteen people did not respond.

Seventy percent of VR Staff respondents stated, no, the majority of their clients do not find jobs themselves. Ten people did not respond.

Eighty-one percent of VR Staff respondents agree that they do invite clients to participate in developing vocational goals and they are involved in selecting the services of the preferred providers. Staff feels clients are unaware of the available providers, there are not enough providers, and some clients do not like to be told their ideas or plans for a career will not be supported by VR. Clients feel VR should support whatever career choice and path they decide.

Twenty-five percent of respondents agreed that on average, clients use VR services approximately 3 times to obtain employment. Fourteen staff did not respond.

Thirty-nine percent of respondents sometimes agree that the VR assessment process correctly identifies clients' strengths and their physical, mental and emotional needs. Fourteen people did not respond.

Thirty-six percent of responding VR staff stated that placement agencies are most effective method or practice that often leads to the best employment outcomes for their clients. Non-profit agencies were the second most helpful followed by family and friends.

Two-thirds of responding VR Staff feels they are adequately informed of the developing labor market and how to better advise their clients in developing skill sets that will be in demand.

At the time of the survey, 71% of VR Staff stated that their clients were not employed. Only 10 of the 122 responded that their clients were currently employed.

Of the 34 responding VR Staff, 9 agreed that clients are employed 1-3 months on average, followed by 7 who stated 1-2 years and another 7 stated 6-12 months. The time span varied practically even from 3 months - more than 2 years. There wasn't a great variation.

Of the 92 who responded, 48 stated that few clients have jobs when they leave the VR program. Forty-two (42%) stated that most clients have jobs and only 2 stated none of their clients have jobs when they leave the program.

Most clients, 60-79%, currently receive checks from the government such as SSI or SSDI, according to 30% of the VR Staff respondents. Another 28% stated that 80-90% of their clients receive SSI or SSDI.

Half of the staff who responded has Master's degrees. Another fourth have a bachelor's degree. Twenty-six people skipped this question. Most respondents are between the age of 45-64 years of age.

VR Client/Caregivers Fifty-nine percent of the respondents are satisfied with the services they received or are still receiving from VR. However there were suggestions regarding education and training. VR Clients repeatedly want education expenses paid for college and perhaps graduate level courses. VR Clients continue to be thoroughly uninformed of the policy, procedures, and stipulations for funding school or training programs. One responded stated, "Explaining how the money is dispersed would be helpful in the beginning of the person's acceptance into the program and how it works with the available financial aid the client receives." Other suggestions for improvement include basic computer skills training, additional options for job training and improved and increased employment prospects. Clients voiced concern about too many jobs being geared towards janitorial, cooking, and cleaning.

Over 50% agree that the job training they received or are still receiving prepares them for employment.

Sixty-three percent of surveyed Clients agree that their counselor understands how and why their disability impacts their chances of getting or keeping a job.

Fifty-three percent of respondents agree that their chances of getting a job increased because of VR training and services. Only 185 (29%) disagreed with this statement. The remaining 94 selected "sometimes". Twenty-four respondents elected to skip this question.

Of the 639 who responded, only 12% stated that their counselor helped them secure a job. Forty-four percent selected N/A and the remaining 43% did not feel counselors helped them secure employment.

Twenty-three percent of responding clients stated that they found their own job, while 27% stated they did not find their job on their own and 50% selected N/A meaning they currently did not have or job or they have never had a job while working with VR.

Fifty-five percent of VR clients who responded agreed that their counselor invites them to be a part of developing their vocational goals and involved in selecting services and training. Seventeen percent of those who responded selected 'sometimes' and another 28% state that they disagree or strongly disagree that the counselor invites them to participate in the development of goal setting and training.

The majority of respondents, 43%, stated that their counselor informs them of available jobs of interest and skill match. Thirty-eight percent disagreed with this statement. Eighteen percent were felt counselors sometimes informed them and sometimes did not inform them of suitable jobs.

Only 1/8 of the responding VR Clients had a job when they left the VR program. Thirty-two percent stated they did not have a job when leaving the program.

Over half (55%) of the VR Client's responding to the survey stated they have not used VR services to secure employment. More than 20% used VR services at least once to secure employment. The remaining respondents, 112, secured employment via VR services 2-5 times.

Only 18% of those who received placement were satisfied with their current job situation. Eight percent are unsatisfied and 40 of the 631 responding were on the fence of satisfied and not satisfied. They selected 'sometimes'.

Fifty-seven percent of respondents agree that their counselor is a strong advocate for their mental, emotional, and vocational needs. Twenty-eight percent disagree, 14% sometimes feel the counselors are strong advocates. The remaining 4% of the 646 skipped this question.

In 2016, the Department of Human Services, Vocational Rehabilitation conducted their triennial statewide needs assessment. The Research and Data Analysis unit monitored and collected surveys from the following groups: VR Staff, VR Community Resource Partners, VR Clients/Caretakers, VR Stakeholders, and Workforce Innovation and Opportunity Partners.

Participants had 2 weeks (July 25-August 8, 2016) to complete their respective survey.

In addition to the VR Management team, the State Rehabilitation Council (SRC) consulted and validated the creation and distribution of the surveys.

Vocational Rehabilitation staff, clients, caregivers, community partners and stakeholders were asked for guidance from their perspective. The results of the 2016 Needs Assessment identified that the Vocational Rehabilitation Program in Tennessee should focus efforts, over the next three years, in the areas of program knowledge for employees, community partners and the general public.

Specifically, the assessment identified the following primary needs for the program:

- Outreach materials to increase awareness and knowledge about the VR program and services to communities and local businesses. VR's outreach activities are woven throughout the state plan. See sections a, d, e, j, l, o, p, and q.
- Training to VR employees and Community Resource Partners covering policy changes and Letters of Agreement (LOA). The state plan includes numerous training initiatives and strategies for both VR staff and CRPs in sections a, c, d, f, i, j, l, n, o, p, and q.
- Training to VR employees covering medical impairments and how they impact limitations with work. As noted above, the state plan includes numerous training initiatives and strategies in sections a, c, d, f, i, j, l, n, o, p, and q.
- Transportation for clients. Meeting the transportation needs of clients continues to be an identified need in Tennessee. Transportation was a need identified in 2010, 2013, and 2016. Transportation is a major support service provided by VR either directly to an individual or through area transportation providers. The needs assessments identified needs in rural areas that do not have the transportation opportunities available in urban areas. To the extent possible, VR works with each individual to address transportation needs through rural transportation agencies or family members until an individual can afford his or her own transportation following employment. DHS continues to work with rural transportation providers and Human Resource Agencies to address rural transportation needs for individuals participating in work programs.
- Improved communication with Community Resource Partners (CRP). The state plan includes information on communication with CRPs through contracts, letters of agreement, training, and monitoring as outlined in sections a, c, d, e, f, l, m, o, p, and q.
- Increase in Pre-Employment Transition Services. The state plan includes

several updates to the pre-employment transition service activities occurring throughout the state in sections a, d, e, f, g, l, and m. • Increase in Local Education Association (LEA). The state plan includes several updates to its work with local education agencies in sections a, d, g, l, o, and p. Most notably, the number of LEAs served by the Transition School to Work program has increased.

B. who are minorities;

Information regarding this question is included with the response to question A in this section.

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

Information regarding this question is included with the response to question A in this section.

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

Information regarding this question is included with the response to question A in this section.

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

Information regarding this question is included with the response to question A in this section.

**10. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE  
COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE;  
AND**

Information regarding this question is included with the response to question 1 in this section.

**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 .**

Information regarding this question is included with the response to question 1 in this section.

**11. ANNUAL ESTIMATES**

Describe:

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

As of Sept 30, 2017, 8,010 individuals in the state are eligible for services under an IPE. Of this number and in compliance with our Order of Selection, 7,255 are receiving services provided with Title I, Part B funds and 755 are receiving services provided with Title VI, Part B funds and with Title I, Part B funds.

For Fiscal Year 2018, it is projected that there will be 5,499 new applicants and that 12,754 individuals in the state will be eligible for services under an IPE. Of this number, 12,013 will receive services under an IPE provided with Title I, Part B funds and 741 will receive services under an IPE provided with Title VI, Part B funds and with Title I, Part B funds. It is estimated that the number of individuals to be served under Title I, Part B and Title VI, Part B under an IPE during Fiscal Year 2018 under each priority category within our Order of Selection will be:

- Priority Category 1 - 8,928 (Includes Title VI, Part B) • Priority Category 2 - 3,826

Total 12,754

Note: Estimates for eligible individuals and those who will be provided services under our Order of Selection in Fiscal Year 2018 is based on current trends and adjustments to utilization of Title VI, Part B funds.

It is estimated that the cost of Title I, Part B and Title VI, Part B services for the projected 12,754 individuals who will be eligible for services under an IPE will be approximately \$25,150,000 and that the service cost for each priority category within the Order of Selection for the individuals served will be:

- Priority Category 1 - \$17,605,128 (Includes Title VI, Part B)
- Priority Category 2 - \$7,544,872

Total \$25,250,000

Note: Estimated cost for services is based on the total available funding approved by the State's Department of Finance and Administration for our Delegated Purchase Authority.

Category Title 1 or Title VI- Estimated Funds Est to Be Served Under IPE Average and Total Cost of Services

1 and 2 N/A \$25,150,000 12,754 \$1,972/per case

Category Title 1 or Title VI- Estimated Funds Est to Be Served Under IPE Average and Total Cost of Services

1 Title VI included 0 8,928 \$17,605,128

2 N/A 0 3,826 \$ 7,544,872

Totals N/A 0 12,754 \$25,150,000

2018 Update: As of April 30, 2018, 8,347 individuals in the state are eligible for services under an IPE. Of this number and in compliance with our Order of Selection, 7,987 are receiving services provided with Title I, Part B funds and 360 are receiving services provided with Title VI, Part B funds and with Title I, Part B funds.

For Fiscal Year 2019, it is projected that there will be 5,797 new applicants and that 13,000 individuals in the state will be eligible for services under an IPE. Of this number, 12,259 will receive services under an IPE provided with Title I, Part B funds and 741 will receive services under an IPE provided with Title VI, Part B funds and with Title I, Part B funds. It is estimated that the number of individuals to be served under Title I, Part B

and Title VI, Part B under an IPE during Fiscal Year 2019 under each priority category within our Order of Selection will be:

- Priority Category 1 — 9,100 (Includes Title VI, Part B)
- Priority Category 2 — 3,900

Total 13,000

Note: Estimates for eligible individuals and those who will be provided services under our Order of Selection in Fiscal Year 2019 is based on current trends and adjustments to utilization of Title VI, Part B funds.

It is estimated that the cost of Title I, Part B and Title VI, Part B services for the projected 13,000 individuals who will be eligible for services under an IPE will be approximately \$25,623,000 and that the service cost for each priority category within the Order of Selection for the individuals served will be:

- Priority Category 1 - \$17,936,100 (Includes Title VI, Part B)
- Priority Category 2 - \$7,686,900

Total \$25,623,000

Note: Estimated cost for services is based on the total available funding approved by the State's Department of Finance and Administration for our Delegated Purchase Authority.

Category Title 1 or Title VI- Estimated Funds Est to Be Served Under IPE Average and Total Cost of Services

1 and 2 N/A \$25,623,000 13,000 \$1,971/per case

Category Title 1 or Title VI- Estimated Funds Est to Be Served Under IPE Average and Total Cost of Services

1 Title VI included 0 9,100 \$17,936,100

2 N/A 0 3,900 \$ 7,686,900

Totals N/A 0 13,000 \$25,623,000

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

A. The VR Program;

Information regarding this question is included with the response to question 1 in this section.

B. The Supported Employment Program; and

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

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

Priority Category 3 as of Sept 30, 2017 - 82

Priority Category 4 as of Sept 30, 2017 - 138

Priority Category 3 as of April 30, 2018 - 117

Priority Category 4 as of April 30, 2018 - 122

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.

Information regarding this question is included with the response to question 1 in this section.

## **12. STATE GOALS AND PRIORITIES**

The designated State unit must:

### 1. Identify if the goals and priorities were jointly developed

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.

The goals and priorities for 2017 are:

Goal 1. Continue Increasing Successful Employment Outcomes

Objective 1.1:

A. Increase Successful Employment Outcomes by 2% or more annually over the next 4 years. The opportunity exists to reinvigorate historical referral sources. This effort will include development of marketing initiatives for use in local areas for community outreach as well as joint efforts for partners listed below but not limited to:

- All agencies as required in the Combined State Plan
- Tennessee's Department of Labor and Workforce Development
- Department of Economic and Community Development
- Department of Intellectual and Developmental Disabilities
- Department of Children's Services and Department of Mental Health and Substance Abuse Services
- Chambers of Commerce
- Tennessee Works Partnership
- TennCare

The Division will develop strategies for increasing referrals of Pre-Employment Transition Services (PRE-ETS) through local education agencies. Special focus will include the identification of any underserved population at the regional level.

B. Action Steps to establish a stronger focus on employment related activities include:

- i. Fully staff the Agency: Increase visibility and engagement of the Agency's Business Services Unit for regional and statewide activities;
- ii. Building a comprehensive network of employment resources across the state;
- iii. Implementing services to employers promoting the value of the Division and the hiring of people with disabilities;
- iv. Maintain the current Community Rehabilitation Provider monitoring process to ensure effectiveness and efficiency;
  - Develop/disseminate surveys to determine adequate training needs of service providers (new and seasoned staff)
  - Maintain the monitoring and expansion of contracts related to Business Initiatives (ex. CLEE)
- v. Continue to work collaboratively with and provide greater technical assistance to the Workforce Investment System. The program will continue to have counselors co-located in each of the State's Local Workforce Investment Areas' comprehensive career centers and to provide itinerant counselors to serve all satellite career centers.

Objective 1.2: The Program will continue to monitor expenditures and available resources to determine sufficiency of releasing and/or opening Categories 3 and 4.

Goal 2. Improve Efficiency and Effectiveness in Client Services Delivery System

- Throughout the SFY, Vocational Rehabilitation will achieve a monthly timeliness rating of 92% for the determination of eligibility with the inclusion of extension agreements per policy. Determination of eligibility within 60 days.
- Throughout the SFY, Vocational Rehabilitation will develop the Individualized Plan for Employment within 90 days unless there is an agreed upon extension between the client and counselor. A timeliness rating of 90%.
- Meet with core partners to develop goals around the new federal standards and indicators regarding wages

Objective 2.2:

- Research prevailing wages for various industries

Objective 2.3:

- Research, develop, and implement strategies to increase the awareness and accessibility of client satisfaction surveys
- Achieving an 80% or higher satisfaction rating for the vocational rehabilitation program as reported by the consumer satisfaction survey program for successful outcome closures
- Continue to increase staff knowledge in rehabilitation practices through on-going training.

Objective 2.4: Ensure access to VR documents, materials and training for clients, citizens, and staff:

1. The Program will ensure that all documents and materials are available in alternate formats.
2. The Program will ensure that timely requests are made when qualified interpreters are needed or requested
3. The Program will create VR marketing materials to accommodate individuals with sensory disabilities
4. The Program will research, develop, and implement a marketing plan to educate the community about VR services.
5. Meet with Disability Pathfinder to identify needs and engage diverse populations

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

Information regarding this question is included in the response to question 1 in this section.

3. Ensure that the goals and priorities are based on an analysis of the following areas:

Information regarding this question is included in the response to question 1 in this section.

A. The most recent comprehensive statewide assessment, including any updates;

Information regarding this question is included in the response to question 1 in this section.

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

Information regarding this question is included in the response to question 1 in this section.

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.

Information regarding this question is included in the response to question 1 in this section.

### **13. ORDER OF SELECTION**

Describe:

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

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

Description of Priority categories

PRIORITY CATEGORY I -- Eligible individuals who have the most significant disabilities

PRIORITY CATEGORY II -- Eligible individuals who have significant disabilities

PRIORITY CATEGORY III -- Eligible individuals who do not have significant disabilities and whose vocational rehabilitation is expected to require multiple vocational rehabilitation services

PRIORITY CATEGORY IV -- Eligible individuals who do not have a significant disability that cannot be classified into a higher priority category

#### Definitions

"Most Significant Disability" means the individual meets the criteria for having a significant disability but has a physical or mental impairment that seriously limits two or more functional capacities in terms of an employment outcome.

"Significant Disability" means the individual meets the three following criteria:

1. The individual has a severe physical, sensory or mental impairment which seriously limits at least one functional capacity (such as visual/mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome; and
2. The individual has one or more physical or mental disabilities resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, deaf/blind, head injury, heart disease, hemiplegic, hemophilia, respiratory or pulmonary dysfunction, mental retardation, mental illness, multiple sclerosis, muscular dystrophy, musculoskeletal disorders, neurological disorders (including stroke and epilepsy), paraplegia, quadriplegia and other spinal cord conditions, sickle cell anemia, specific learning disability, and end-stage renal disease; or another disability or combination of disabilities determined on the basis of an assessment for determining eligibility, and vocational rehabilitation needs to cause comparable substantial functional limitation; and
3. The individual's vocational rehabilitation program can be expected to require multiple vocational rehabilitation services over an extended period of time.

"Non-Significant Disability" means the individual does not meet the criteria for significant disability or the criteria for most significant disability.

"Multiple Vocational Rehabilitation Services" mean two or more major vocational rehabilitation services, i.e. physical or mental restoration, training, counseling, guidance and placement. Excluded are support services such as transportation, maintenance, and the routine counseling and guidance that should take place in every case.

"Extended Period of Time" means 6 months from the date services begin until the employment objective is achieved.

B. The justification for the order.

The Division's Order of Selection is developed in accordance with 34 CFR § 361.36 of the final regulations. The Order of Selection has four priority categories as defined below in this section.

On August 1, 2001, the Division implemented an Order of Selection due to funding limitations that would not allow the Division to provide services under an IPE to all eligible individuals. Only Priority Category 1 cases (eligible individuals who have the most significant disabilities) were served until 2009.

From 2009 until October 2012 there were numerous releases of Priority Category 2 and 3 cases. Beginning October 1, 2012, the Division opened Priority Category 2 for services. The Division is now serving all Priority Category 1 and 2 cases. Those Priority Category 3 cases that were on the waiting list were released for services on October 1, 2013.

The Division's funds and resources remain inadequate to serve individuals in all four priority categories. The Division expects to have approximately \$21,000,000 from the federal grant and state appropriations to spend for assessments for an estimated 5,797 new cases and planned services for approximately 13,000 existing and new cases. Approximately half of this amount must be allocated for pre-employment transition services.

The Division also elects not to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment. The Division expects to serve 13,000 existing and new Priority Category 1 and 2 in 2019. Of this number, the Division expects to provide services for 9,100 Priority Category 1 cases and 3,900 Priority Category 2 cases.

The Division will monitor staffing needs to determine if there is sufficient manpower to schedule releases of Priority Category 3 and 4 cases for services or open all Priority Category 3 cases for services. Therefore, continuation of the Order of Selection mandated by the Rehabilitation Act of 1973, as amended, to determine which eligible individuals will be served under an IPE is still warranted due to staffing deficiencies.

The Division monitors services and expenditures on a continuous basis, allowing the Division to manage available funds and staff to assure sustainability of services for cases placed in an open priority category and receiving services under an Individualized Plan for Employment (IPE). Additionally, adequate funds will continue to be conserved and staffing deficiencies monitored to provide assessment services for all applicants expected to apply throughout the year to determine eligibility and to provide services for those eligible individuals in an open priority category within the Order of Selection.

#### C. The service and outcome goals.

The Order of Selection priority categories outcome and service goals and time frames are as follows:

##### 1. PRIORITY CATEGORY I -- Eligible individuals who have the most significant disabilities

A. Outcome and Service Goal: Expect to determine eligibility for 3,823 new individuals in this priority category; serve 9,100; and close 1,092 successfully employed.

B. Goal will be achieved by September 30, 2019.

2. PRIORITY CATEGORY II -- Eligible individuals who have significant disabilities

A. Outcome and Service Goal: Expect to determine eligibility for 1,741 new individuals in this priority category; serve 3,900; and close 488 successfully employed.

B. Goal will be achieved by September 30, 2019.

3. PRIORITY CATEGORY III -- Eligible individuals who do not have significant disabilities and whose vocational rehabilitation is expected to require multiple vocational rehabilitation services

A. Outcome and Service Goal: Expect to determine eligibility for 38 new individuals in this priority category and have 120 on the waiting list.

B. Goal will be achieved by September 30, 2019.

4. PRIORITY CATEGORY IV -- Eligible individuals who do not have a significant disability that cannot be classified into a higher priority category

A. Outcome and Service Goal: Expect to determine eligibility for 9 new individuals in this priority category and have 125 on the waiting list.

B. Goal will be achieved by September 30, 2019.

D. The time within which these goals may be achieved for individuals in each priority category within the order.

Cases	Estimated Number of individuals to be served	Estimated number of individuals who will exit with employment after receiving services	Time within which goals are to be achieved	Cost of services
New	5,797	0	N/A	\$1,494,250
PC 1	9,100	1,092	Sept. 30, 2019	\$17,936,100
PC 2	3,900	488	Sept. 30, 2019	\$7,686,900
PC 3	38 eligibility and PC determination only	0	Sept. 30, 2019	\$9,500 Assessments
PC 4	9 eligibility and PC determination only	0	Sept. 30, 2019	\$2,250 Assessments

E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and

The Division is currently serving Priority Category 1 and 2 cases. If the Division cannot continue to serve all Priority Category 1 and 2 cases, then Priority Category 1 cases will continue to be served and services for Priority Category 2 cases will be provided based on the date of application for services. If the Division cannot continue to serve all Priority Category 1 cases, then services will be provided based on the date of application for services.

The Division plans to open Priority Category 3 within the 2015 plan year. If after Priority 3 is opened and the Division cannot continue to serve all Priority 3 cases then services will be provided based on the date of application for services.

The Division continues to monitor resources in order determine if resources would allow the Division to open Priority Category 3 in a sustainable manner. If Priority 3 is opened and the Division cannot continue to serve all Priority 3 cases then services will be provided based on the date of application for services.

Individuals who are determined to be in a closed priority category are referred to other appropriate agencies for services.

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

## 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.

The Division continues to provide supported employment services to eligible clients with the most significant disabilities who have been determined to require on-going support (extended) services in order to maintain employment.

It is the continued goal of the Division to provide quality supported employment services which are delivered in an effective, efficient and timely manner. Supported employment services are provided through Letters of Agreement with community rehabilitation providers, and in cooperation with the Department of Intellectual and Developmental Disabilities, and the Department of Mental Health and Substance Abuse Services. The community rehabilitation providers must assure that on-going support (extended) services will be provided prior to the implementation of supported employment services or will be developed as natural supports during training. The Division has an excellent supported employment program along with training and support activities to ensure the continued provision of quality supported employment services. These programs are ongoing and are not subject to a specific timeline. Prime examples of these ongoing activities are:

1. Through contract with the University of Tennessee, Center for Literacy, Education and Employment (CLEE), the Division funds three supported employment consultants who are charged with the responsibility of working with our many supported employment

community rehabilitation providers in providing training and technical assistance to the staff who provide services to our clients. These same consultants also work with the Division staff on an as needed basis to provide technical assistance.

2. The Division has Program Specialists in the three grand regions of the state who assist in the monitoring of and consultation to the community rehabilitation providers to ensure appropriate services are being provided to our clients.

3. The Division plans to continue the funding of the UT CLEE SE consultants activities as well as continue the provision of in-house monitoring of the services provided to the Division's clients by the SE community rehabilitation providers.

The Division will continue to seek community rehabilitation providers to provide supported employment services to under-served disability groups with the most significant disabilities who, because of their disability, have not been able to enter traditional competitive employment or whose employment is intermittent or interrupted due to a most significant disability.

The Division expects to continue increasing employment opportunities for those individuals eligible for supported employment with co-occurring disorders of mental illness, and alcohol and drug abuse by expanding more effective partnerships with mental health entities that work with this population and by implementing improved services.

The

Division has a Central Office field liaison who works with mental health entities and the Division's staff statewide in developing such partnerships where needed and who provides training and technical assistance to the mental health community rehabilitation providers and our staff.

The Division has a Central Office field liaison who works with service providers statewide that provides supported employment and extended services for individuals with intellectual and developmental disabilities to assist with technical assistance and staff training.

The Division expects to serve in excess of 740 clients through the supported employment program during the Fiscal Year 2018. The Division has consistently closed around 22% of the supported employment clients in successful employment. This would mean around 163 successful outcomes for FY2018.

The Division expects to serve in excess of 741 clients through the supported employment program during the Fiscal Year 2019. The Division has consistently closed around 22% of the supported employment clients in successful employment. This would mean around 163 successful outcomes for FY2019.

The Division has established service codes and defined the extended services that will be provided for up to 4 years for youth with disabilities. The Community Rehabilitation Providers have been notified of these services that can be provided for youth.

In 2013, Governor Bill Haslam signed an Employment First Executive Order. This Executive Order established the Employment First Taskforce. In 2014, the Employment

First Taskforce sign and executed a Youth Memorandum of Understanding (MOU). The agencies involved in the MOU are:

- Department of Education
- Vocational Rehabilitation
- Department of Labor and Workforce Development
- Department of Intellectual and Developmental Disabilities
- Department of Mental Health and Substance Abuse Services
- Council on Developmental Disabilities (this agency oversees the implementation of the MOU).

This MOU will assist the Division in leveraging other public funds to increase resources for extended services and extended employment.

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

Information regarding this question is included with the response to question 1 in this section.

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.

Information regarding this question is included with the response to question 1 in this section.

#### **14. 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.

Funds will be utilized in Fiscal Year 2017 for addressing the following priorities that continue to be identified in our needs assessment as they relate to individuals with the most significant disabilities, including those who need supported employment services; individuals with disabilities who are minorities; individuals with disabilities who have been un-served or underserved by the vocational rehabilitation program; and individuals with disabilities served through other components of the statewide workforce investment system and personnel assisting those individuals through the components of the system:

Education and Training; Employment Opportunities; Information; Support Services; and Counseling and Guidance.

In addition, as the Division continues to serve Priority Category 1 and 2 cases, more individuals with significant disabilities are able to access vocational rehabilitation services. The Division continues to monitor the budget and the staff capacity in order to determine the ability to serve Priority 3 and 4 cases. It is anticipated this activity will lead to improvement in the number of individuals with disabilities reaching successful rehabilitation outcome statuses by:

1. Continuing the practice of ensuring the availability of appropriate training activities and resources to meet the individualized needs of clients by seeking out and developing partnerships with other private and public entities to provide specialized education and training activities, to include those that can be provided through self-employment, on-the-job- training by employers, and customized employment.
2. Continuing the development and expansion of statewide employer relationships that focus on inclusion of employees with disabilities in the workforce and the value of hiring people with disabilities. The Division will continue its expansion of our activities with Employment Groups across the state and in the local areas with new programs, such as Walgreens REDI and Project Search.
3. Continuing to support expansion of supported employment services by actively seeking out, training, and monitoring community rehabilitation providers; especially in the more rural areas, that are willing to provide supported employment services to vocational rehabilitation clients with the most significant disabilities; and by fostering partnerships with DIDD and chapters of The ARC in Tennessee to implement employment network projects with community rehabilitation providers. The Division is striving to have shared vendors with DIDD in order to access services for shared clients. The Division is expanding participation in the Individual Placement Model of Supported Employment (IPS) statewide.
4. Continue to increase employment opportunities for clients through development, training, and monitoring of community rehabilitation providers providing job coach pools and employment services.
5. Development of the Business Services Unit will increase targeted marketing and education services to employers; and the provision of additional technical support and expertise to Division staff, clients, and employers in the areas of ongoing and emerging disability issues, and supported employment issues.
6. Continuing to support expansion of Transition School-to-Work services by continuing to work with Local Education Agencies (LEA's) in the maintenance of existing partnerships and the creation of additional partnerships to provide vocational rehabilitation services targeted specifically to that LEA's school system. Continuing to work with and educate school personnel on the mission and scope of the Division in order to maximize services from both entities to better serve our mutual clientele to include appropriate qualified interpreters/accommodations for students that are in LEA/School to Work programs. The newly hired Transition School to Work Director will manage this process.

7. Continuing improvement in the service delivery of the Division's 17 community rehabilitation centers and the comprehensive rehabilitation center at Smyrna geared directly toward providing services leading to successful employment of individuals with the most significant disabilities. Pursue the development of additional service delivery entities in metropolitan and rural markets for services including vocational evaluation, personal and work adjustment, job development, job placement, and job coaching. The 17 Community rehabilitation centers are focusing on expansion of the job readiness programs and collaboration with local area businesses. The Smyrna TRC is expanding vocational training programs through partnerships with CVS Caremark and Nissan and continues to research national employment trends to identify needs for new training programs.
8. Continuing support of vocational rehabilitation counselor development by providing opportunities for vocational rehabilitation counselors to obtain Masters Degrees in Rehabilitation Counseling. The Division will pursue all available RSA slots for master's level training available to the Division through outreach and research. The Division will continue utilization of recruiter staff for recruiting vocational rehabilitation counselors who have a Master's Degree in Rehabilitation Counseling. Finally, the Division will continue financial support of counselors seeking master's degrees.
9. Developing and implementing a comprehensive staff development program based on core competencies for all VR Staff. Utilize partnerships through the university programs. There is an Education Development Plan being developed for all staff in order to reinforce and encourage the Division's goals and priorities.
10. Continuing to implement a marketing/outreach plan that targets and reaches unserved or underserved populations to include all minorities, such as Spanish-speaking clients and clients with traumatic brain injury, autism, deaf-blindness, and mental illness. The marketing efforts will target individuals with the most significant disabilities who are seeking employment.
11. Continuing to support the Workforce Investment System by continuing to co-locate vocational rehabilitation counselors in each of the major Workforce Investment Act Service delivery area career centers and ensuring that all career center satellites also have vocational rehabilitation counselors assigned to visit their centers on a regular basis to work with individuals with disabilities that visit each center.
12. Providing cross training to the career center staff in regard to meeting the needs of individuals with disabilities. Continue to provide consultation on career center accessibility and accommodation needs in regard to the accessibility needs in the building(s), and accommodations in terms of appropriate technology needed to serve individuals with the disabilities. Continue to partner with the American Job Centers (AJCs) in employment initiatives such as the summer youth employment project and the DEI grant.
13. Continuing to support the Ticket to Work and Self-Sufficiency Program and use of other Social Security work incentives that benefit clients by continuing contract with the Benefits to Work Company. This company provides Social Security benefits counseling to clients before and after the Individualized Plan for Employment process. Currently the

Division contracts with Benefits to Work to provide outreach to communities on how working affects Social Security Benefits, work incentives, and benefits planning. The agency will also continue to promote the most effective use of Ticket to Work Employment Network programs for the Division and our partners.

14. Continuing training for vocational rehabilitation staff on how effective rehabilitation technology options lead to successful employment outcomes. Staff at the Technology centers meeting quarterly with staff to provide training on services.

15. Continuing support of the State Rehabilitation Council. Council members will be reimbursed for reasonable and necessary expenses for attending Council meetings and performing Council duties (including child care, - personal assistance services and qualified interpreters).

16. Continuing support of the Statewide Independent Living Council. Council members will be reimbursed for reasonable and necessary expenses for attending Council meetings and performing Council duties (including child care, personal assistance services and qualified interpreters).

17. Continuing to submit to the Commissioner an annual report of how funds are utilized relative to innovation and expansion activities.

18. Continuing to provide a coordinated, comprehensive and statewide assistive technology delivery system through a network of contracted assistive technology centers. Each of these five centers, strategically located in Memphis, Jackson, Nashville, Chattanooga and Knoxville ensure access to clients from all 95 counties in Tennessee regardless of location. The centers diverse staff includes: Rehabilitation Engineers; Speech and Language Pathologists; Assistive Technologists; Orientation and Mobility Specialists, Therapists and other Professionals who provide clients with evaluation, training, device fabrication and follow up services. By providing clients with access to this highly trained and skilled resource, and by purchasing the required devices, clients have the tools that they need throughout their rehabilitation program to assist them in realizing their IPE goals.

19. Continue implementation of the electronic case management system (TRIMS) utilizing input from agency staff and vendors to enhance the Division's technological infrastructure and client service capabilities.

20. Continue partnerships with the three federal grants that target employment of persons with disabilities. Those grants are Tennessee Works, Employment First, and DEI. Tennessee is one of three states in the country that are receiving all three grants.

21. Revise the self-employment process to streamline the experience for clients seeking the self-employment option. Research other state VR self-employment policies for efficient, consumer oriented strategies; and include successful business owners in the process to produce a successful program that will help individuals with disabilities become successful entrepreneurs.

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.

Information regarding this question is included with the response to question 1 in this section.

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.

Information regarding this question is included with the response to question 1 in this section.

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).

Information regarding this question is included with the response to question 1 in this section.

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

Information regarding this question is included with the response to question 1 in this section.

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

Information regarding this question is included with the response to question 1 in this section.

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

Information regarding this question is included with the response to question 1 in this section.

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

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

Information regarding this question is included with the response to question 1 in this section.

B. support innovation and expansion activities; and

Information regarding this question is included with the response to question 1 in this section.

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.

Information regarding this question is included with the response to question 1 in this section.

## **15. 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.

The goals and priorities of the Division of Rehabilitation Services for Fiscal Year 2012, as developed and agreed to by the Division of Rehabilitation Services staff and the State Rehabilitation Council, are focused around the Division's strategic plan.

The goals and priorities for 2015 are:

Goal 1. Continue Increasing Successful Employment Outcomes

OBJECTIVE 1.1:

A. Increase Successful Employment Outcomes by 10% or more over Federal Fiscal Year 2014. The opportunity exists to reinvigorate historical referral sources. This effort will include development of marketing initiatives for use in local areas for community outreach as well as joint efforts with the:

- a. Workforce Investment System
- b. Tennessee's Department of Labor and Workforce Development
- c. Department of Economic and Community Development
- d. Department of Intellectual and Developmental Disabilities
- e. Department of Children's Services and Department of Mental Health and Substance Abuse Services

The Division will develop strategies for increasing referrals of transition school to work clients through local education agencies. Special focus will include the identification of any underserved population at the regional level.

ACHIEVEMENT: In Federal Fiscal Year the Program had 2358 successful employment outcomes. This is a 9% increase over FY2014's successful employment outcomes of 2159. The VR Program continued focused collaborative efforts with numerous state

agencies, in addition to collaboration with Universities across the state. In FFY 2015 Transition School to Work contracts were increased.

2018 UPDATE: The Vocational Rehabilitation program continues to strive to increase successful employment outcomes. Despite continuing efforts to market and outreach through the identified partners, FFY 2016 and FFY 2017 saw a decrease in the number of successful closures. As reported in other sections of the report, the Division has continued its work with state partners, including new memorandums of understanding and interagency agreements with TennCare and the Department of Education. Additionally, VR has increased both pre-employment transition services and transition school to work opportunities through grant contracts with local education agencies.

B. Action Steps to establish a stronger focus on employment related activities include:

- a. Staffing the Agency's Business Services Unit for regional and statewide activities;
- b. Building a comprehensive network of employment resources across the state;
- c. Implementing services to employers promoting the value of the Division and the hiring of people with disabilities;
- d. Continuing the current Community Rehabilitation Provider monitoring process to ensure effectiveness and efficiency;
- e. Continue to work collaboratively with and provide greater technical assistance to the Workforce Investment System. The Division will continue to have counselors co-located in each of the State's Local Workforce Investment Areas' comprehensive career centers and to provide itinerant counselors to serve all satellite career centers.

ACHIEVEMENT: In FFY2015, the VR Program met with the Business Services Coordinator from the VR Program in Alabama to discuss strategies on expansion of the Business Services Unit in Tennessee. The Statewide Business Services Consultant worked with over 130 businesses statewide in FFY2015. The program offered new services to businesses, such as assistance with Section 503 compliance. The Department of Human Services continues to provide monitoring of the CRPs throughout the state.

2018 UPDATE: In 2017, Vocational Rehabilitation centralized the leadership and reporting structure of the Business Service Unit to align with the Workforce Innovation and Opportunity Act. The unit models the dual customer approach, recognizing that VR must serve clients and engage businesses. There is an increased and intentional focus that extends beyond finding job vacancies and sharing them with clients to learning and understanding employer needs and ensuring VR training and clients can meet those needs. The unit's goal is for business to see VR as a source for diversifying their workforce and providing qualified candidates for their vacant positions. Examples of this work can be found in Section G.

In an effort to continue to work collaboratively with and provide greater technical assistance to the Workforce Investment System, the VR program conducted site reviews of the American Job Centers (AJCs) across the state to assist with building and program accessibility. Additionally, Vocational Rehabilitation Counselors are assigned to AJCs 2

to 3 days a week and other counselors rotate and use the space provided by the AJCs regularly.

#### OBJECTIVE 1.2:

The Division will continue to monitor expenditures and available funding to determine if there is sufficient funding to release Category 3 and 4.

2018 UPDATE: The Division continues to monitor expenditures and available funding to determine if there is sufficient funding to release Category 3 and 4.

#### Goal 2. Improve Efficiency and Effectiveness in Client Services Delivery System

##### OBJECTIVE 2.1:

Meet or exceed the Federal rehabilitation success rate of 55.8% for FY 2014 (Success rate is determined by the number of Status 26 rehabilitated case closures divided by the number of Status 26 plus the number of Status 28 non-rehabilitated Case closures). The division is focusing on the Employment Needs Assessment Process in order to write better Individualized Employment Plans. This effort will increase the number of successful closures and decrease the number of unsuccessful closures.

2018 UPDATE: The Division continues to monitor timeliness of eligibility determinations and development of the Individualized Plan for Employment (IPE). Monthly rates have met or exceeded the established performance metrics of 92% and 90% respectively. Additionally, the Division continues to monitor the success rate of case closures. To date, the Division has not achieved its goal of meeting or exceeding the federal rate of 55.8%. The success rate for FFY 2017 was 50.8%.

OBJECTIVE 2.2: Meet or exceed the Federal ratio of the average hourly wage of individuals who achieved competitive employment to the average hourly wage of all employed individuals in the State of 0.520. Fifty-two percent of closures should be working at wages of \$10-\$11 per hour.

ACHIEVEMENT: The VR Program did not meet this goal. The ratio has consistently been 0.49, meaning Forty-nine percent of the successful closures were work at wages of \$10-\$11 per hour.

2018 UPDATE: The Average reported hourly wage of clients closed successfully in FFY 2017 was \$10.01. The Division continues to strive for meeting or exceeding the federal ratio for wages. To date, the Division has not achieved this goal.

##### OBJECTIVE 2.3:

Ensure adherence to quality services leading to employment and quality case management practices by:

1. Achieving an 80% or higher satisfaction rating for the vocational rehabilitation program as reported by the consumer satisfaction survey program for successful outcome closures.
2. Continuing with improvements to the Division's electronic case management system (Tennessee Rehabilitation Information and Management System, TRIMS) to enhance efficiency and accuracy.

3. Training- Continue to increase staff knowledge through continuous training.

ACHIEVEMENT: The Program continues to make improvements the TRIMS system that will increase efficiency and effectiveness for the staff.

2018 UPDATE: The Division ensures quality services leading to employment and quality case management through improvements to the electronic case management system and on-going training to staff. The state issued a request for information (RFI) as the initial first step in securing a new electronic case management system. Additionally, the state invested in on-line training and professional development for VR counselors. Staff have completed several modules of training to increase their knowledge of rehabilitation practices.

OBJECTIVE 2.4:

Ensure access to VR documents, materials and training for clients and staff:

1. The Division will ensure that all documents and materials are available in alternate formats, as needed and requested.

ACHIEVEMENT - the Division always ensures that materials are available in alternate formats. This information is always made available.

2. The Division will ensure that timely requests are made when qualified interpreters are needed or requested.

ACHIEVEMENT: The Division makes requests for interpreters as soon as possible.

3. Video ASL for the Deaf

ACHIEVEMENT: The Division continues to research how to best achieve this goal.

2018 UPDATE: The Division ensures that all documents and materials are available in alternate formats as needed and requested, makes timely requests for interpreters as needed or requested, creates marketing materials to accommodate individuals with sensory disabilities, and is working with state and community partners to educate the community about VR services. Through our partnership with TTAP, the VR program works to ensure that all state and vendor materials are accessible. Additionally, the VR program has established a separate delegated authority for providing accommodations to those applicants who have not yet been determined eligible to make providing interpreters much more efficient.

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

Information regarding this question is included with the response to question A in this section.

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.

Information regarding this question is included with the response to question 1 in this section.

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

Information regarding this question is included with the response to question 1 in this section.

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

Information regarding this question is included with the response to question 1 in this section.

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

Information regarding this question is included with the response to question 1 in this section.

## **16. 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.

The Division continues to provide supported employment services to eligible clients with the most significant disabilities who have been determined to require supported employment services, in accordance with 34 CFR § 361 and 363, in order to obtain and maintain competitive integrated employment.

In FFY 2017, the goal was to serve 1,300 supported employment cases and to close 286 successful rehabilitation outcomes. The agency served approximately 1,527 and closed 369 cases in Status 26. These can be attributed to the improved and stronger alliance with the community rehabilitation providers and with other state agencies.

When the Supported Employment attachment to the Letter of Agreement was introduced on January 2015, one of the staffing qualification requirements for Employment Specialists is to have completed training through the Association of Certified Rehabilitation Education (ACRE) or by obtaining the Certified Employment Support Professional (CESP) certification. Tennessee providers have been proactive in securing the CESP certification and there have been 223 reported individuals that have obtained the certificate since CESP was introduced to the state.

It is the continued goal of the Division to provide quality supported employment services which are delivered in an effective, efficient and timely manner. Supported employment services are provided through Letters of Agreement with community rehabilitation providers and in cooperation with the Department of Intellectual and Developmental Disabilities (DIDD), Department of Mental Health and Substance Abuse Services

(DMHSAS), and the Division of TennCare. The VR staff and community rehabilitation providers must assure that extended services will be available prior to the provision of supported employment services or will be developed as natural supports.

During FFY 2017, interagency agreements were signed and implemented that articulated the following collaboration:

- The agreement between the Division and the DMHSAS solidified the use of evidence based supported employment model, Individual Placement & Support (IPS), in assisting individuals with behavioral health and co-occurring diagnoses in their pursuit of competitive integrated employment. The Division has 8 CRPs that have specific IPS LOA with the agency.
- The agreement between the Division and the Department of Intellectual and Development Disabilities created a pilot program for individuals who are in DIDD's Harold Jordan Center. It is a state owned facility for individuals with intensive behavioral issues and will utilize employment as part of the wrap around services.
- The agreement between the Division and the Division of TennCare created provision of employment services for persons enrolled in the Employment and Community First (ECF) CHOICES program. Federal guidance for Medicaid LTSS stipulates employment should be an ongoing part of the delivery of services. Regulations for home and community-based programs requiring provision of opportunities to work in competitive integrated setting. The target populations are individuals with intellectual and/or developmental disabilities. The agreement intends to ensure that services are coordinated, seamless, and efficient. The Division and TennCare coordinated training efforts to implement the agreement requirements.

There is a small pilot supported employment program for individuals with intellectual and development disabilities that have a behavioral health diagnosis. This pilot program is utilizing IPS in providing SE services. IPS is a promising employment service model for non-behavioral health individuals. The Division along with the DIDD, DMHSAS, and the CRP are testing the applicability of the IPS model in serving individuals with said diagnoses.

For FFY 2018, the Office of Disability Employment Policy (ODEP) has selected Tennessee as a Core and Vision Quest state to receive technical assistance under the Employment First State Leadership Mentoring Program (EFSLMP). As a Core state, TN will be assisted in Employer Engagement and Provider Transformation. TN's goal to increase the number of providers undergoing transformation and increasing the people engaged in competitive integrated employment. As a Vision Quest state, TN will receive guidance about funding and expansion of IPS services in partnership with VR, DMHSAS, and TennCare.

The Division coordinates with other state agencies and the community rehabilitation providers to transition clients receiving supported employment services to extended services. An individual is moved to extended services when the client has reached a point where he/she has achieved maximum performance on the job; has achieved minimum necessary supports on the job; the job is not in jeopardy of ending; and individual is maintaining work performance which is acceptable to employer and client. The Division

is working with the University of Tennessee, Center for Literacy, Education and Employment to develop training for CRPs on how to develop natural supports to address extended services where funding is not available from another Agency.

The Division will continue to contract for services from the University of Tennessee's Center for Literacy, Education and Employment (CLEE). These programs will provide continuing training to the Division's staff and contracted community rehabilitation providers to assure competency and compliance.

The number of supported employment providers has increased over the past year from 62 to 75 supported employment CRPs. The Division continues its efforts to increase S.E. providers and anticipates the numbers of providers will increase. VR is actively pursuing a number of other providers for underserved areas across the state. While the number of CRPs remains adequate to serve the Division's number of supported employment clients, there remains a shortage of CRPs able to provide supported employment services in more rural areas and under-served communities and under-served populations of the state. The Division will continue to enter into supported employment agreements with appropriate state agencies, as well as Letters of Agreement with private and/or non-profit agencies which have the capabilities of providing quality service delivery and extended services in multiple counties. The Division will assertively seek those agencies that will provide supported employment services to persons being transitioned from institutional settings to the community and to work in competitive, integrated employment settings.

The Division will continue to seek community rehabilitation providers to provide supported employment services to under-served disability groups with the most significant disabilities.

The Division expects to serve in excess of 1430 clients through the supported employment program during the Fiscal Year 2018. The Division has consistently closed around 22% of the supported employment clients in successful employment. This would mean around 315 successful outcomes for FY2018.

For the provision of extended services to youth with disabilities who received supported employment services, the division will continue to collaborate and find partnership opportunities with DIDD, DMHSA, Department of Education, and other entities to continue outreach to transition students that may need supported employment. As mandated, the Division has set aside applicable VR funds for extended services of youth with most significant disabilities who require supported employment but whose extended services are not funded by other entities or sources. To capture this, the Division has created a specific status code for these cases.

The Division will work with the Department of Education using the PRE-ETS program. These would offer work experiences that can assist transition students to a more positive and encouraging supported employment roadmap.

The Division will continue to work with the Center for Medicare and Medicaid Services (CMMS) in continuing to align policies and funding that would support employment services.

The Division has convened a work group of VR staff, CRPs, managed care organizations (Amerigroup, BlueCare, and United Health Care) and other entities to review policies, training, identify improvements and best practices for the ECF CHOICES program.

The Division will work with disability specific stakeholders and advocacy groups such as the Autism Society and chapters of The ARC in Tennessee in conducting collaborative meetings to help identify sources of support.

The Division will continue to work with the IPS community for expansion and sustainability of the IPS SE services.

The Division will continue to encourage CRPs to become Employment Networks as possible funding source for on-going services. The Division will continue to train CRPs and VR staff to increase usage of SSA PASS plan and other work incentive programs.

The Division will assure that funds are made available will only be used to provide Supported Employment services to individuals who are eligible to receive such services.

The Division's case management system, TRIMS, has the ability to identify cases and expend the funds allotted as required by the RSA.

## 2. The timing of transition to extended services.

Information regarding this question is included with the response to question 1 in this section.

## 17. CERTIFICATIONS

Name of designated State agency or designated State unit, as appropriate    Vocational Rehabilitation Program

Name of designated State agency    Tennessee Department of Human Services

Full Name of Authorized Representative:    Danielle Barnes

Title of Authorized Representative:    Commissioner

States must provide written and signed certifications that:

1. The designated State agency or designated State unit (as appropriate) listed above is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA \*, and its supplement under title VI of the Rehabilitation Act.\*\*    Yes

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

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan\* , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;\*\* Yes
4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; Yes
5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes
6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes
7. The Authorized Representative listed above has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement; Yes
8. The Authorized Representative listed above has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; Yes
9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement. Yes

## **Footnotes**

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### **Certification 1 Footnotes**

\* Public Law 113-128.

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

### **Certification 2 Footnotes**

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

\*\* No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

\*\*\* Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

### **Certification 3 Footnotes**

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

\*\* Applicable regulations, in part, include the citations in \*\*\* under Certification 2 footnotes

### **Additional Comments on the Certifications from the State**

#### **CERTIFICATION REGARDING LOBBYING – VOCATIONAL REHABILITATION**

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### **STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE**

The undersigned states, to the best of his or her knowledge and belief, that:  
If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization Tennessee Department of Human Services, the Vocational Rehabilitation Program

Full Name of Authorized Representative: Danielle Barnes

Title of Authorized Representative: **Commissioner**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>). If applicable, please print, sign, and email to [MAT\\_OCTAE@ed.gov](mailto:MAT_OCTAE@ed.gov)

#### **CERTIFICATION REGARDING LOBBYING – SUPPORTED EMPLOYMENT**

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the

required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

### **STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE**

The undersigned states, to the best of his or her knowledge and belief, that: If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization

Full Name of Authorized Representative:

Title of Authorized Representative:

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>).

### **18. ASSURANCES**

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

The State Plan must provide assurances that:

#### **1. Public Comment on Policies and Procedures:**

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

#### **2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement:**

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section

102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

### 3. Administration of the VR services portion of the Unified or Combined State Plan:

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.

b. the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.

The designated State agency or designated State unit, as applicable (B) has established a State Rehabilitation Council

c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.

d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).

e. the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.

The designated State agency allows for the local administration of VR funds No

f. the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.

The designated State agency allows for the shared funding and administration of joint programs: No

g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan. Yes

h. the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.

i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act .

j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.

k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.

l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities.

m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.

#### 4. Administration of the Provision of VR Services:

The designated State agency, or designated State unit, as appropriate, assures that it will:

a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act.

b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act .

c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act?

Agency will provide the full range of services described above      No

d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.

e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.

f. comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act.

g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.

h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act.

i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs

j. with respect to students with disabilities, the State, has developed and will implement:

- strategies to address the needs identified in the assessments; and
- strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and

i. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).

#### 5. Program Administration for the Supported Employment Title VI Supplement:

a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.

b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.

c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act.

#### 6. Financial Administration of the Supported Employment Program:

a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act.

b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.

#### 7. Provision of Supported Employment Services:

a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.

b. The designated State agency assures that:

- the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act
- an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act , which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.

Additional Comments on the Assurances from the State