

## VI. Program-Specific Requirements for Vocational Rehabilitation

### Program-Specific Requirements for State Vocational Rehabilitation Services Program

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

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

[check box] (A) is an independent State commission.

[ X ] (B) has established a State Rehabilitation Council.

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

<b>Council Representative</b>	<b>Current Term Number/ Vacant</b>	<b>Beginning Date of Term Mo./Yr.</b>
Statewide Independent Living Council (SILC)	1 <sup>st</sup> Term	09/2021
Parent Training and Information Center	2 <sup>nd</sup> Term	10/2023
Client Assistance Program	2 <sup>nd</sup> Term	10/2023
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	2 <sup>nd</sup> Term	10/2023
Community Rehabilitation Program Service Provider	1 <sup>st</sup> Term	07/2022
Business, Industry, and Labor	1 <sup>st</sup> Term	10/2023
Business, Industry, and Labor	2 <sup>nd</sup> Term	10/2023
Business, Industry, and Labor	2 <sup>nd</sup> Term	10/2023
Business, Industry, and Labor	2 <sup>nd</sup> Term	04/2021
Disability Advocacy Groups	1 <sup>st</sup> Term	10/2023
Current or Former Applicants for, or Recipients of, VR services	1 <sup>st</sup> Term	10/2023
Section 121 Project Directors in the State (as applicable)		
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	1 <sup>st</sup> Term	10/2023
State Workforce Development Board	1 <sup>st</sup> Term	10/2023
VR Agency Director (Ex Officio)	1 <sup>st</sup> Term	10/2023
Representative of Disability Group	1 <sup>st</sup> Term	02/2022
Representative of Disability Group	1 <sup>st</sup> Term	07/2022

Please note: While these members are fully participating on the council, some may be pending approval from the Governor's office.

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

Meetings are being conducted quarterly.

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

The SRC is engaged continuously throughout the year regarding the activities, initiatives, and goals of the Tennessee VR agency. The SRC provides feedback to the VR agency at each quarterly meeting and as needed throughout the year. For the State Plan, the SRC was engaged at the beginning of the process and worked together with the VR agency to formulate their responses. The SRC identifies areas they want to focus on based on the comprehensive statewide needs assessment and relevant topics that arise throughout the year. An extremely important aspect for the SRC is the belief in diversity, equity, inclusion, and accessibility (DEIA) for all individuals in all aspects of their lives. The SRC made DEIA one of its primary focuses for both VR customers and VR employees in the State of Tennessee. The SRC continuously heard from the Blind community about the quality and availability of services to help them achieve their career goals. Therefore, the SRC engaged the VR agency and requested a comprehensive review take place. Another important topic for the SRC is the accessibility of service providers to assist VR customers in achieving their career goals. In order to make sure VR customers have access to the best providers, the SRC requested the VR agency review the current fee structure. Another topic area the SRC finds critical is the online/virtual accessibility to the TN VR program. Similarly, the SRC recommends the TN VR agency create customer journey maps to help VR customers navigate their VR journeys from start to finish.

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

- The SRC recommended DEIA training for all VR employees. VR agency supported this recommendation and provided required HR training along with disability specific trainings related to DEIA.
- The SRC recommended a review of the Blind Services offered through VR. VR agency supported this recommendation and contracted with a third party to complete an analysis of blind services and assist with the creation of a comprehensive strategic plan to enhance blind services in TN VR.
- The SRC recommended a review of the CRP fee structure. VR agency supported this recommendation and is conducting an analysis to determine if TN VR needs to make adjustments

to the current CRP fee structure. Also, the TN VR agency has established a process to continuously review CRP fee structures to ensure equitable pay for service provisions occurs.

- The SRC recommended a review and update to the VR website. VR agency supported this recommendation and updated the VR website. The VR agency created a QR code for the SRC to utilize when sharing information with the public. The VR agency continuously reviews and updates, as appropriate, the VR and SRC websites.
- The SRC recommended the VR agency create common VR journey maps customers might take to help them understand and better participate throughout their VR journey to employment. VR agency supports this recommendation and will be working to create these with input from the SRC.

**(b) Comprehensive Statewide Needs Assessment (CSNA).** Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

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

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

In 2022, in collaboration with the State Rehabilitation Council, the Vocational Rehabilitation Program conducted several assessments and relied upon existing State and national data to capture a comprehensive picture of the state's needs. VR customers and their caregivers, CRPs, VR staff, stakeholders, WIOA partners, Pre-ETS providers, and parents of students with disabilities all provided valuable feedback on the strengths and opportunities for vocational rehabilitation in Tennessee.

The CSNA seeks to address the vocational rehabilitation needs of Tennesseans that represent individuals with the most significant disabilities, including their need for supported employment services.

As part of the VR Assessment that VR and the SRC conducted, respondents across several surveys were asked which VR services they believe most help individuals prepare for employment. Across the board, top choices included job readiness, job placement, and supported employment. Although, customers and caregivers ranked the option of "College Training" highly. More than 68% of respondents to the Customers and Caregivers survey believed that the services offered by VR met their needs. However, when respondents were asked if they believed the VR services they received assisted in eliminating barriers long term, only about 52% of respondents agreed that VR services helped remove barriers long term.

The majority of stakeholders who responded actively refer individuals for VR services, but do not believe that VR services address certain barriers. 63% of stakeholder respondents do not feel that VR staff are professionals who are informed, trained, and prepared to help VR customers match their abilities, strengths, needs, and interests with successful employment outcomes. Further, 74% do not think that VR Counselors are informed about the current and developing labor market or how to better assist customers in developing in-demand skills. While they were generally positive about VR service delivery, stakeholders submitted recommendations on ways that VR could improve, including increasing communication and coordination with community partners, businesses, and WIOA partners, increased community

presence, and an increased number of counselors in the field. However, customers and caregivers were increasingly more satisfied when asked questions about VR service delivery and timeliness and responsiveness of VR staff. 75% of respondents were happy with how soon they were able to meet with a counselor and apply for services. Additionally, 69% of respondents stated that services received met their needs and of those with a job, nearly 92% indicated their job aligned with their interests, skills, and abilities.

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

The VR needs assessment provided respondents with examples of “unserved” (defined as individuals eligible for VR services but have not yet received VR services) or “underserved” (defined as individuals that have not traditionally received equal access to benefits of VR services, such as racial or ethnic minorities) populations as defined by the Rehabilitation Services Administration (RSA) and asked them to identify whether they thought certain populations fit into either category. Additionally, respondents were asked to elaborate on what they believed to be the unmet needs of these groups and to identify ways that VR could reach out to these populations. When asked what they felt the unmet needs of those populations identified as “unserved” or “underserved” were, survey respondents indicated that knowledge of VR services, transportation, and healthcare were among the top needs identified. When asked for ideas on how to better reach these individuals, survey responses show the need for public outreach such as hosting an open house to explain VR services and community partnerships to assist in ensuring a VR presence at job fairs, health fairs, and community events to meet these populations where they may already be visiting.

The CSNA used data obtained in the 2020 ACS one-year experimental data tables at <https://www.census.gov/programs-surveys/acs/data/experimental-data/1-year.html> to determine accurate information about the racial makeup of citizens in the state of Tennessee.

Label	Tennessee Estimate	Margin of Error
Total:	6,886,833	*****
White alone	5,062,808	+/-16,905
Black or African American alone	1,055,220	+/-11,761
American Indian and Alaska Native alone	22,813	+/-2,191
Asian alone	127,575	+/-4,157
Native Hawaiian and Other Pacific Islander alone	2,396	+/-431
Some other race alone	148,209	+/-13,200
Two or more races	467,812	+/-21,294

For Tennessee, data suggests that regardless of race, individuals with a disability are less likely to be employed. The most recent overall employment rate for individuals with disabilities who were of working age is 35% (up from 33% when the CSNA was completed), while the employment rate of working-age people without disabilities in Tennessee is 74% (down from 77% when the CSNA was completed), illustrating a 39% employment gap (down from a 44% gap in employment rate when the CSNA was completed, a 5% improvement for Tennessee in 2023. <https://www.tennesseeworks.org/by-the-numbers>

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

According to the VR Needs Assessment, VR staff responded that the agency or community partnerships that have been the most beneficial in assisting VR customers to achieve successful employment outcomes were WIOA Partners to include American Job Centers and Adult Education. However, when asked what areas/topics they would like to receive additional training in to better prepare for their job, respondents indicated that WIOA training would be beneficial. While the WIOA partner response rate to the survey was severely lacking, these state partners indicated that their organization's staff was not well informed, or trained, and do not understand the importance of assistive technology and accommodations for individuals with disabilities, especially in terms of helping individuals to obtain employment in a competitive and integrated setting. Respondents agreed that the Tennessee workforce system works together to create unified policies that work toward successful WIOA implementation but disagreed that the Tennessee workforce system adequately shares relevant data, reporting measures, or works to jointly monitor progress toward outcome-based results.

- (D) Youth with disabilities, including students with disabilities and their need for pre-employment transition services. 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 IDEA.

Another component of the 2022 needs assessment focused on youth and/or students with disabilities and their needs for Pre-Employment Transition Services (Pre-ETS). Based on the statewide assessments conducted with parents of students with disabilities, it was strongly agreed that youth with disabilities need help preparing for the world of work. Across the five areas that Pre-ETS services address, parents agreed their children could greatly benefit from these services; however according to information reported, there was an evident gap in knowledge about the Pre-ETS program. Parents also felt that overall, their children would benefit from the following opportunities:

- learn about the local labor market;
- develop skills through employment in the community;
- talk with employers in the community about job options;
- participate in job shadowing;
- receive job training;
- explore two-year community college and vocation training program options;
- explore four-year college options;
- learn about disability support services available in college.

- (2) Identify the need to establish, develop, or improve community rehabilitation programs within the State.

When services are not provided by VR staff, VR engages with various for and not-for-profit partners, commonly referred to as Community Rehabilitation Providers or CRPs, to deliver individualized and specialized services to customers. These services can include supported

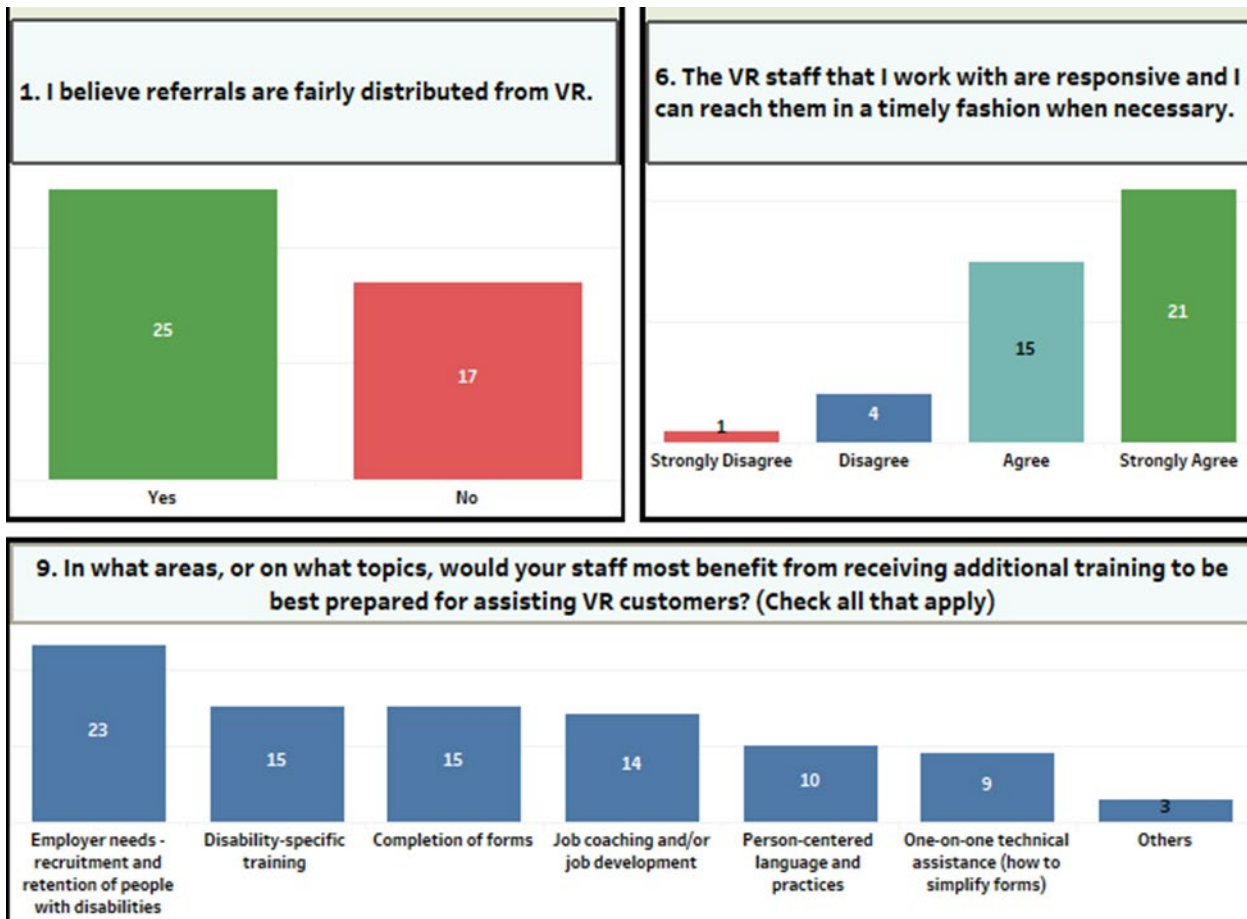
employment, job readiness and placement, and other services that provide training in preparation for competitive, integrated employment. Community Rehabilitation Provider partnerships are typically carried out through contractual relationships or by Delegated Authority and allow the VR program the flexibility to provide a comprehensive array of highly individualized services while clearly communicating service level expectations and provider accountability. In fiscal year 2021, VR worked with over 100 CRPs and other entities across the state to deliver specialized services to individuals participating in the VR program.

In addition, the state has partnered with Vanderbilt University and the Vanderbilt Kennedy Center to develop a portal on the Transition Tennessee website (<https://transitiontn.org/>) that focuses specifically on Pre-Employment Transition Services. This site expands the state's capacity to provide high-quality, evidence-based pre-employment transition services that lead to successful post-secondary and employment outcomes for students with disabilities. In addition to having resources for students and families, the Transition Tennessee Pre-ETS Blueprint serves as an online hub for professional development and resources for educators, providers, and other professionals. Each course in the portal features free video modules, downloadable resources, webcasts, and information about upcoming conferences and trainings.

According to the 2022 VR Needs Assessment, VR staff were surveyed about the performance of CRPs and results show there may be a need for more CRPs to provide the needed services for VR customers and that overall, quality services are provided in a timely manner. When VR staff were asked the following questions with answer options of *Strongly Agree*, *Agree*, *Disagree*, *Strongly Disagree* the majority answer for each topic can be conveyed as follows:

- There are enough CRPs to provide the necessary services for VR customers in my geographic location. *Disagree*
- The CRPs that I currently work with meet the needs of VR customers. *Agree*
- The CRPs that I currently work with provide quality services to VR customers. *Agree*
- CRPs are adequately trained and have the skills necessary to meet the needs of VR customers. *Agree*
- The CRPs that I currently work with understand TN VR policies and procedures. *Agree*
- The CRPs that I currently work with have received training from VR /TN Division of Rehabilitation Services staff. *Agree*
- The CRPs that I currently work with are responsive and I am able to reach them in a timely fashion when necessary. *Agree*
- CRPs are timely and accurate in any reporting required of them. *Agree*
- I continue to use the same CRPs because I am confident in the services that they provide. *Agree*
- I will discontinue using a CRP that I have a good relationship with if I believe there is another CRP who provides better quality services that will benefit the VR customer. *Agree*

When CRPs were surveyed about improving service delivery, they indicated a positive working relationship with VR, but noted areas for training that would be beneficial in assisting VR Customers.



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

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

VR meets with the SRC on a quarterly basis and engages in additional conversations throughout the year. During these meetings performance outcomes are shared, as well as successes and challenges. Additionally, the SRC consists of a subcommittee specifically dedicated to the CSNA. The subcommittee is responsible for partnering with VR to develop the survey questions, target participants, inform the community about the survey, and determine the distribution methodology. Beginning in January 2021, VR met with the SRC CSNA subcommittee to review previous goals, analyze CSNA results, and to identify goals and priorities on a quarterly basis. On September 15, 2022, the full SRC committee met to hear from VR and the SRC CSNA subcommittee and to discuss the goals

and priorities as recommended by VR and the SRC subcommittee. The committee approved the recommendations presented on September 15, 2022.

- (2) Identify measurable goals and priorities in carrying out the VR and Supported Employment programs and the basis for selecting the goals and priorities (e.g., CSNA, performance accountability measures, SRC recommendations, monitoring, other information). As required in section 101(a)(15)(D), (18), and (23), describe under each goal or priority, the strategies or methods used to achieve the goal or priority, including as applicable, description of strategies or methods that—
- (A) Support innovation and expansion activities;
  - (B) Overcome barriers to accessing VR and supported employment services;
  - (C) Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post secondary education, employment, and pre-employment transition services); and
  - (D) Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.
- [text box: List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority]

As a result of the 2022 Comprehensive Needs Assessment, the VR program, in collaboration with the SRC, identified specific priorities for focusing energy and resources, and associated actions for VR to take in the upcoming year.

### ***Key Priorities Identified***

1. **Talent Management** - Staff hiring, training and retention, including addressing adequate compensation to improve recruitment and retention of master's degree holding Vocational Rehabilitation Counselors and other critical VR staff.
  - a. Continue to improve and expand training opportunities for staff through the development and deployment of role specific training and ongoing professional learning and development plans.
  - b. Incorporate an employee suggestion mechanism that provides an opportunity for employees to share with decision-making leaders, comments and recommendations for an improved workplace.
  - c. Develop and create a position dedicated to coordinating training opportunities.
2. **Communication and Responsiveness** – Communication and responsiveness within VR and with customers, Community Resource Providers (CRPs), partners, and the public.
  - a. Enhance the *Aware* case management system to include a vendor portal, which will allow CRPs to easily submit payment requests, inquiries, and other correspondence to VR in a secure and efficient method and a Pre-ETS provider portal for documenting actual services. (a)
  - b. Implement a modernized, omnichannel customer support model that fields customer inquiries across 4 channels: phone, live chat, email, and web-based forms. Create a web-based VR referral form so the public can complete and submit a referral to the VR Program for themselves or for someone else. (a)(b)



3. **Customer Engagement** - Focus on engaging customers throughout the VR process to ensure customers are empowered to practice informed choice throughout their person-centered journey with VR and to increase successful employment outcomes for VR customers.
  - a. Review online assets including webpages, appearance on partner’s websites, social media platforms, and print materials and identify any that need to be updated, modified, removed, or created to assure adequate public and cultural awareness of VR Program, eligibility, and services offered as well as full accessibility. Develop a prioritization of changes identified with action plans, resources needed, and timelines. (a)(b)
  - b. Facilitate customer journey mapping exercises that result in a web-based journey mapping tool that outlines the process, timelines, and specific touchpoints throughout the journey to employment to increase customer awareness, understanding, and engagement. (a)(b)
  
4. **Community Partners and Resources** – Invest time in educating and informing the public, community partners, staff, and customers to ensure communities have a clearer understanding of the services available through Vocational Rehabilitation, and other community agencies.
  - a. Develop a public outreach strategy that assures reach and understanding of VR services.(a)(b)
  - b. In partnership with the Department of Mental Health and Substance Abuse Services (DMHSAS), continue to expand the delivery of Individual Placement and Support (IPS) supported employment services with an intentional focus on TN distressed counties. By 2026 reach 95% of all counties in TN, including all identified distressed counties. (a)(b)(d)
  - c. Procure a third-party consultant to help strengthen the relationship between VR and the blindness community and create a strategic plan for improving VR services for individuals with low and no vision.(b)
  - d. Create and make available VR specific presentations for staff use in Committee, Council, and Board presentations. Update presentations quarterly with relevant performance data.

In addition to priorities created VR established additional objectives based on various inputs such as the priorities and goals developed through the CSNA in collaboration with the SRC, an assessment of funding availability, review of program performance metrics, and technical assistance received from RSA. These objectives include review and exploration of the following:

- Policy revisions to Financial Need Assessments (FNA)
- Priority category definitions
- Closed priority categories
- Serving individuals in a closed priority category
- Elimination of Order of Selection

Finally, beginning July 1, 2023, the VR Program established a customer focused operational goal to increase the number of signed Individualized Plans for Employment (IPE)s by 7% by June 30, 2024.

Through these efforts, the Tennessee Vocational Rehabilitation program, together with our community partners and stakeholders, including the State Rehabilitation Council, are transforming the VR program to better meet the needs of the individuals we serve, the businesses we rely on, and the communities we live in.

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

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

- Progress has been demonstrated in the area of talent management with several priorities being accomplished. All staff participate in a newly developed onboarding training curriculum, Connecting Opportunities, Resources and Education (CORE). The first two modules of CORE are offered to all new division staff, regardless of their role, and the curriculum has been designed to align with the division's mission, vision, values, and embed person-centered philosophies into daily work and interactions with customers. Additional modules within CORE have been created that are specific to the roles and duties of positions with a focus on service delivery and customer engagement throughout a customer's VR journey. Additionally, talent management improvements include a new survey available for staff to provide feedback and suggestions for policy, training, professional development, and process improvement. The survey is available anytime and results are pulled monthly with action taken in addressing feedback received and outcomes are communicated to submitters. Finally, to demonstrate VR's commitment to improve talent management, a training coordinator position was created to research, coordinate, and communicate professional development and educational opportunities, and ensure a work environment that helps employees develop their skills, foster career advancement, and promotes programs and resources.
- To enhance communication and responsiveness, the Aware Vendor Portal was launched July 2023. This new portal was designed specifically for vendors and provides secure, remote access to VR's case management system via a web-based interface. VR business processes and operational processes have been built around the use of the Aware Vendor Portal, creating a positive impact on process efficiency as well as workflow. Additionally, Pre-ETS actual services will soon be captured in Aware with a targeted go live date of April 2024. Also, a cross-program contact center which fields customer inquiries across multiple supported channels was implemented August 2023. The model supports 4 communication channels: phone, live chat, email and web-based forms. Customers, providers, and partners can reach VR using any of these communication channels. There is now the ability to refer an individual to the VR Program using a web-based form located on the VR website. Referrals can be received by phone, in-person, email, or webforms.
- Progress has been made to improve customer engagement. Webpages have been updated to provide customers, providers, and community members information on the purpose of VR and the journey toward competitive integrated employment.
- Community Partners and Resources have been a priority this year. A third-party consultant completed an assessment and provided guidance in completing a strategic plan to improve services for individuals with low and now vision. Within the strategic plan key results have been identified and implementation of plan will start July 2024. Also, presentations are available to staff when sharing information on the VR program to Committees, Councils, and Boards.
- The other objectives identified have resulted in specific services being removed from the list of services requiring FNA, the income level for financial participation being changed from

2009 LIHEAP to 138% above the 2023 federal poverty level, and all individuals in closed priority status being moved to active status to begin receiving VR services. Finally, Order of Selection will be eliminated in early 2024.(a)(b)

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

PY 2022

- MSG Rate – Negotiated Target: 55% / Actual: 57.6%
  - With a rate of 57.6%, the TN VR Program met and exceeded both the negotiated target (55%) and national average (49%). Tennessee made the most progress in the nation, moving from 40<sup>th</sup> in the fourth quartile to 12<sup>th</sup> in the first quartile.
- Employment 2<sup>nd</sup> Quarter After Exit – Negotiated Target: 47% / Actual: 60.2%
  - With a rate of 60.2%, the TN VR Program met and exceeded both the negotiated target (47%) and national average (56%).
- Employment 4<sup>th</sup> Quarter After Exit – Negotiated Target: 46% / Actual: 54.5%
  - With a rate of 54.5%, the TN VR Program met and exceeded both the negotiated target (46%) and national average (53%).
- Median Earnings – Negotiated Target: \$3,950 / Actual: \$4,193
  - With a median earnings amount of \$4,193, the TN VR Program met and exceeded the negotiated target (\$3,950).
- Credential Rate – Negotiated Target: 30% / Actual: 22.5%
  - The TN VR Program did not meet the Credential Rate negotiated target of 30% for PY 2022. The main factor preventing TN DRS from achieving the target is the lack of access to credential information for customers after they exit the VR program. To improve on this metric, TN DRS is developing a Credential Guide for staff to assist with understanding how to capture and report in the case management system. Additionally, TN DRS released an RFI in November 2023 to explore the possibility of contracting with an organization to conduct customer surveys to collect credential information post-exit.

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

VR would like to incorporate the use of virtual reality into the customers' options for career exploration activities during Pre-ETS and as an eligible VR student/ customer. Additionally, the VR agency is interested in increasing the use of technology such as virtual reality into employment training opportunities for customers. In partnership with the Department of Mental Health and Substance Abuse Services (DMHSAS) and our network of shared community providers, VR is dedicated to ensuring all Tennesseans who need services through the Individual Placement and Support (IPS) Supported Employment model have access to these services. Therefore, our goal is to continue to expand the delivery of IPS supported

employment services with an intentional focus on TN distressed counties. Additionally, by 2026 we hope to reach 95% of all counties in TN, including all identified distressed counties.

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

(1) Acceptance of title VI funds:

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

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

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

The VR Program assures that funds made available for SE will only be used to provide SE services to individuals who are eligible to receive such services.

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

When an individualized plan for employment indicates an employment outcome in a supported employment setting for an individual with a most significant disability, the supported employment services to be provided by VR is identified and the expected extended services needed, including the source of extended services, is specified.

The IPE provides for periodic monitoring to ensure that the individual is making satisfactory progress toward meeting the weekly work requirement established by the time of transition to extended services. It also provides for the coordination of services when services are available from other Federal or State programs. To the extent that job skills training is provided, VR captures if training is onsite, and placement in an integrated setting for the maximum number of hours possible based on the unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of individuals with the most significant disabilities.

Supported employment services means ongoing support services, that may include customized employment placement services, and other appropriate services needed to support and maintain an individual with a most significant disability, including a youth with a most significant disability, in supported employment that are:

- Organized and made available, singly or in combination, in such a way as to assist an eligible individual to achieve competitive integrated employment;
- Based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment;
- Provided for a period of time not to exceed 24 months, unless under special circumstances the eligible individual and the rehabilitation counselor jointly agree to extend the time to achieve the employment outcome identified in the individualized plan for employment; and Following transition, as post-employment services that are unavailable from an extended services provider and that are necessary to maintain or regain the job placement or advance in employment.

The scope of supported employment services may include but is not limited to:

- A consultation meeting with the service provider prior to IPE development to determine the individual's service needs and specific employment objective.
- Career development by the service provider following completion of the IPE and placement services provided in Service Status.
- When warranted, Customized Employment placement services.
- Career stabilization (training) and maintenance (ongoing supports) provided in Service Status and Employed Status by skilled employment specialists and job coaches.
- Other services, beyond routine services, that are required because of the individual's intensive support needs.
- Individual Placement and Support (IPS) for individuals with mental illness.

Extended services funded by other sources or by VR under certain circumstances for youth no older than age twenty-four (24) to maintain employment stability.

When an individualized plan for employment indicates an employment outcome in a supported employment setting for an individual with a most significant disability, the supported employment services to be provided by VR is identified and the expected extended services needed, including the source of extended services, is specified. The IPE provides for periodic monitoring to ensure that the individual is making satisfactory progress toward meeting the weekly work requirement established by the time of transition to extended services. It also provides for the coordination of services when services are available from other Federal or State programs. To the extent that job skills training is provided, VR captures if training is onsite, and placement in an integrated setting for the maximum number of hours possible based on the unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of individuals with the most significant disabilities.

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

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

- The Department of Intellectual and Developmental Disabilities refers individuals with intellectual and developmental disabilities (DIDD) to the Vocational Rehabilitation program for Supported Employment Services.
- The Department of Mental Health and Substance Abuse Services (TDMHSAS) works with the Division to employ an evidence based Individual Placement and Support (IPS) model of supported employment for individuals with mental illness and substance related disorders.
- University of Tennessee, Center for Literacy Education and Employment provides staff training, professional development, and consultation services for community supported employment service providers.
- Tennessee’s Medicaid program, TennCare, partners with the Division for the provision of Supported Employment services for individuals enrolled in Employment and Community First CHOICES. ECF CHOICES serves individuals with intellectual and developmental disabilities who are receiving home and community-based services as a Medicaid Long Term Service and Support.
- The Tennessee Department of Education (DOE) for the provision of Pre-Employment Transition Services, transition services, and other VR services provided by VR to students with disabilities in order to support an efficient transition from secondary school to post-school employment and related activities leading to competitive integrated employment.
- The Division is a party to the Interagency agreement between DOE, DIDD, the Tennessee Department of Health, TDMHSAS, the Tennessee Department of Correction, and TennCare to fulfill the requirements of Part B and Part C of the Individuals with Disabilities Education Act (IDEA). The partner agencies strive to ensure that individuals and youth with disabilities are prepared for competitive integrated employment with access to necessary support services.

The VR Program has encouraged the establishment and development of Community Rehabilitation Providers (CRPs) to improve and expand services through grant and fee-for-service contracts in a joint effort of improving and expanding supported employment and extended services for individuals with disabilities. The Division currently has 89 active registered CRPs for supported employment services. The Division continues its’ efforts to increase Supported Employment service providers and anticipates the numbers of providers will increase. VR is actively pursuing several other providers for underserved areas across the state.

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

(1) Estimates for next Federal fiscal year—

(A) VR Program; and

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
PC 1	7,772	7,772	\$16,485,865	N/A

PC 2	3,214	3,214	\$6,818,722	N/A
PC 3	28	28	\$60,709	N/A
PC 4	44	44	\$94,704	N/A
<b>TOTAL</b>	<b>11,058</b>	<b>11,058</b>	<b>\$23,460,000</b>	

(B) Supported Employment Program.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
PC 1	3,611	3,611	\$6,532,000	N/A
PC 2	5	5	\$8,000	N/A
<b>TOTAL</b>	<b>3,617</b>	<b>3,617</b>	<b>\$6,540,000</b>	

**(g) Order of Selection.**

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

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

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

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

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

- (A) The justification for the order;  
[text box]
- (B) The order (priority categories) to be followed in selecting eligible individuals to be provided VR services ensuring that individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and  
[text box]
- (C) The VR agency's goals for serving individuals in each priority category, including how the agency will assist eligible individuals assigned to closed priority categories with information and referral, the method in which the VR agency will manage waiting lists, and the projected timelines for opening priority categories. NOTE: Priority categories are considered open when all individuals in the priority category may be served.  
[text box]

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

[check box] Yes

[check box] No

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

Not Applicable

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

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

- (A) The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;
- (B) The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and
- (C) Projections of the number of personnel, broken down by personnel category, who will be needed by the VR agency to provide VR services in 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.

Vocational Rehabilitation currently employs 491 staff. Of these 491 positions, 62 are currently vacant. Of the 491 staff members, 443 provide direct customer services. These positions are broken down by job category and position classification in the table below.

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Administration	21	1	28
Clerical	63	5	85
Rehabilitation Assistants	8	1	11



Supervisors	82	7	111
Support	22	5	34
Instructor	19	6	31
VR Direct Client Services	204	54	322
Medical	12	3	18
BEP Specialist/Consultant	12	5	21

These allocated positions reflect the estimated number of personnel needed by TN VR to provide services. The table below provides a breakdown by job category and indicates the current number of vacancies.

The Division anticipates needing to increase the number of VR Counselors and Support Coordinators across the state due to opening up all priority categories and reducing the number of services that require Financial Need Assessment.

- (D) Ratio of qualified VR counselors to clients: In PY 2022, a total of 11,703 VR customers were served. This number includes all customers who completed a VR application. These customers were served by a total of 91 counselor positions, 7 of which are currently vacant.

Projected number of individuals to be served in 5 years: The VR Program is projecting a 25% increase in customers served over the next five (5) years for a total of 14,629. The VR Program will reassess and update the projection in the modification based on the next 2 years of data.

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

- (A) A list of the institutions of higher education in the State that are preparing VR professionals, by type of program; the number of students enrolled at each of those institutions, broken down by type of program; and the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

In Tennessee, the University of Memphis, located in Memphis, TN is the only school that has the Council on Rehabilitation Education (CORE) certified program offering a master’s degree in Rehabilitation Counseling. The program was first accredited by CORE (Council on Rehabilitation Educations) in 1975. With the merger of CACREP and CORE, the program was accredited by CACREP from July 1, 2017- July 1, 2023. Additionally, The University of Memphis Clinical Rehabilitation Counseling Concentration is a nationally recognized training program that offers a 60-semester hour, dually accredited CORE and CACREP curriculum. Situated in an urban research university, we offer flexibility to both full-time and part-time students. The primary goal of the Clinical Rehabilitation Counseling Program is to prepare graduates to become Licensed Professional Counselors in the State of Tennessee (LPC-MHSP). Students are eligible to take the

national Certified Rehabilitation Counselor (CRC) exam during the last semester of their course work. Rehabilitation Services Administration (RSA) scholarships provide tuition and stipends to selected students.

The master’s degree in Rehabilitation Counseling program at the University of Tennessee located in Knoxville, TN ended in 2018.

Eight graduate students are enrolled in the master's level Clinical Rehabilitation Counseling (CLRC) and Vocational Rehabilitation Counseling (RC) Concentrations. Seven are enrolled in the CLRC concentration, and one is in the RC concentration. Three graduate students are scholars on the RSA Long Term Rehabilitation Counseling Training Grant.

Of the eight RC/CLRC students, three identify as Black, two identify as Multiracial, and one identify as having a disability. In other words, 87.5% of our graduate students in the two rehabilitation counseling concentrations are from underrepresented groups.

There are 11 VR staff enrolled in graduate rehabilitation counseling courses at University of Memphis.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
The University of Memphis	Clinical Rehabilitation Counseling	7	5

- (B) The VR agency’s plan for recruitment, preparation, and retention of qualified personnel, which addresses the current and projected needs for qualified personnel; and the coordination and facilitation of efforts between the VR agency and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

Within The Department of Human Services, the Division of Rehabilitation works closely with People Operations Learning & Organization Development units. This unit ensure that TDHS can attract, recruit, select, develop, engage, and retain staff. There are specific services provided by HR that includes a new employee orientation, employee relations, employee performance management and other employee-related services. The Learning and Organizational Development team within People Operations plays a vital role in culture of continuous learning, and focusing on enhancing employees 'knowledge, skills, and capabilities. The primary goal is to ensure the employees have the necessary competencies to perform their job effectively, adapt to changing demands, and contribute to the overall success of the organizations. Opportunities for training include leadership development, professional growth, and development. There is a comprehensive online onboarding guide to aid new hires during their first year of employment.

Higher Institutions are notified of open position and assist with the recruitment of counselors which includes individuals with disabilities and individuals who are minorities. Also, external

partners, councils and hiring platforms are utilized to recruit for all positions. A few examples of this would be NCSAB, Community Rehabilitation Providers, Universities (handshake), LinkedIn and indeed. To aid in recruitment there are supplemental postings that are more specific to positions and provide information to the mission and vision of the agency.

An entry level position has been created that assist Master level counselors with workloads. This position has created a pipeline to the counselor level position for those that are interested. Job descriptions were reviewed for professional staff as to the needed level of degree and experience were taken into consideration. Duties were updated to reflect the current job role of professional positions.

To aid in the preparation and retention all personal participate in introductory modules (first two modules) DRS CORE (Connecting Opportunities, Resources and Education). CORE offers a series of modules for staff, each increasing knowledge and awareness of the VR program, while always connecting back to the Division's core beliefs. These first two modules offer a broad foundation of VR for all personal, incorporating our transformation into the onboarding, and aligning with and reinforcing the person-centered philosophy. Orientation and Person-Centered thinking are a session where all personal meet program directors and provide an overview of the variety of support options available to our customers. The focus is to demonstrate person-centered thinking in all that we do. The customer journey is a session that focuses on service standards and showing respect for our customer at each touch point on their journey to competitive integrated employment. The remaining Modules are specifically for VR Counselors, diving into the innerworkings of a VR case and offering training and assistance on how to assist customers in achievement of employment goals. Additional modules have been created that are specific to Pre-Employment Transition Specialist (Pre-ETS) which consist of four self-directed, online modules covering the background of Transition services, the job role of a pre-ETS specialist and the pre-ETS toolbox. Modules to be implemented soon are for Supervisors and Business Services Unit.

In the preparation and retention efforts TN VR looks for ways to enhance the employee's ability to fulfill the Department's mission in Strengthen Tennessee by Strengthening Tennesseans. Personal are encouraged to participate and attend trainings, conferences, and events. Opportunities are provided that enhance the DHS employee's job skills; and prepare staff to evolve in a successful upward progression in their profession.

Within TN DHS is Diversity, Equity, Inclusion and Accessibility Program. The mission of this program is to advance a culture of belonging to unleash potential and become "One Tennessee". With a vision to be the best place to work by creating an environment in which employees thrive. The four key pillars are: Communication, Data Analysis-Planning and Monitoring, Education, and Engagement - internal and External. There are champions selected within each agency to serve on the enterprise Diversity Workgroup. Champions play a central role in disseminating information and developing agency diversity initiatives that align with the enterprise. There is a "This is Me" Campaign. This campaign focus on employees sharing different aspects of their identities and encouraging voluntary self-identification. Also, a State Bill within TN is State as a Model Employer (SAME) and the purpose is to ensure that departments design and proactively

implement best, promising, and emerging policy, practices and procedures related to the recruitment, hiring, advancement, and retention of qualified individuals with disabilities.

Ongoing communication is used to promote diversity and facilitate healthy discussion using diversity message. The purpose of diversity messaging is to increase awareness and create a sense of belonging for all employee in the state workforce. A diversity newsletter is available to connect, engage, and understand one another to enhance employees belonging and wellness. Continuously education opportunities are available that offers learning and development opportunities on Diversity.

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

- i. Particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and
- ii. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.

TN VR has implemented specific onboarding and professional development training for all staff. There are modules within CORE that provide direction and guidance to positions as to responsibilities and duties. For VR Counselors, modules are diving into the innerworkings of a VR case and offering training and assistance on how to assist customers in achievement of employment goals. Additional modules have been created that are specific to Pre-Employment Transition Specialist (Pre-ETS) which consist of four self-directed, online modules covering the background of Transition services, the job role of a pre-ETS specialist and the pre-ETS toolbox. Modules to be implemented soon are for Supervisors and Business Services Unit. Personnel are encouraged to participate and attend trainings, conferences, and events.

TN staff utilize YesLMS, LinkedIn, and HR trainings for onboarding purposes as well as for professional development. Trainings are also available to all staff thru regional/unit meetings, one on one with policy and UTCLEE. TN program has a training coordinator position to ensure all staff have access to training and to provide an intentional focus to training opportunities. Policy coordinators are available to each region to provide policy trainings as request or based on trends that have been identified. Trainings are conducted by webinars and/or recorded online.

For onboarding practices TN has reviewed current practices and will be expanding curriculum for all field positions. The onboarding process will allow sufficient time in training and getting to know the program prior to working independently. With the goal being to increase confidence of new staff in current position as well retain

There is a strong partnership with the University of Memphis. This has proven to be very beneficial to those counselors who are hired without a degree in Rehabilitation Counseling. There are specifically three virtual courses providing the foundations of Rehabilitation Counseling.

- (3) Description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency professional and paraprofessional personnel are adequately trained and prepared, including—
- (A) Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and
  - (B) The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

With the addition of a training coordinator position TN VR has been able to focus on training needs of all staff. This has ensured there is a skill set of assisting individuals with disabilities toward competitive integrated employment. Trainings include are in customer service, medical aspects, ethics, and competitive integrated employment to name a few. The Business Services unit is available to provide trainings on laborer market information and disability etiquette. This past year TN VR has worked to ensure that there is the opportunity for CRC hours to accompany trainings for those who hold this certification.

TN holds an annual ResouceABILITY Fair that allows all staff to learn more about assistive technology with meeting with vendors and getting a hands-on view of new technology. This fair also provides trainings that incorporate how to deliver services that enhances a customer's opportunities for employment. The event is hosted in partnership with the stat's AT Act Program, the Tennessee Technology Access Program (TTAP). Each year VR staff participate with The Department of Labor with convening sessions held across the state to share labor market information and best practices in serving customers. Staff within the VR program are co located at the American job centers and attend quarterly training on services available at each center as well as updates to the laborer market to their geographic area. The American job centers have a business services unit, and the VR business employment consultant participates with this unit in identifying employment opportunities.

The VR counselor positions requires Graduation from an accredited four-year college or university with a master's degree in Rehabilitation Counseling OR Graduation from an accredited four-year college or university with a master's or completion of a doctoral program in a related field of study with course content that emphasizes rehabilitation, counseling, disability, therapy, health, employment, wellness, or human development. Within 90 days of hire must enroll, at their own expense, in an approved educational plan that will result in the completion of the following courses: Professional Orientation & Ethics in Rehabilitation Counseling, Medical & Psychosocial Aspects of Disabilities, Theories & Techniques of Counseling within thirty-six months from the date of hire. The

position of VR Support Coordinator was created for collaboration with VR Counselors. VR Support Coordinators engage with multiple colleagues across disciplines to ensure a successful customer experience. Education and Experience for this position is Graduation from an accredited college or university with a bachelor's degree and one year of full-time professional-level experience in a social science, social service, or related field. The intent is for this position to also create a pipeline for those that are interested in pursuing a degree in Rehabilitation Counseling and wanting to become a VR Counselor.

- (4) Method(s) the VR agency uses to ensure that personnel are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

The Tennessee Department of Human Services (TDHS) will take reasonable steps to ensure that persons with Limited English Proficiency have meaningful access and an equal opportunity to inquire, apply for and participate in Agency-offered services, including VR services, activities, programs and other benefits. All interpreters, translators, and other aids needed to comply with this policy shall be provided without cost to the person seeking services.

The Division of Rehabilitation Services 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, Linguistica International, or TransPerfect; 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 ensure effective communication with limited English-speaking individuals. Telephonic translation services are available through Avaza Language Services, Linguistica International, or TransPerfect. The Tennessee Language Center is also available for written translation and in person interpretation. All regions have received training for all staff in the use of these services.

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, Hard of Hearing or Deaf-Blind. The Division's 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.

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

In 2015, the TDOE partnered with Vanderbilt University to create an online and in-person professional development system called Transition Tennessee ([www.transitiontn.org](http://www.transitiontn.org)). Transition

Tennessee was originally intended to be a one-stop shop for educators to have immediate access to all things related to transition planning in the school system through an online portal. It began with an initial set of online professional development courses and expanded into establishing regional communities of practice, local technical assistance sites, monthly webcasts, and much more. The courses offered under the educator blueprint are:

- Guiding Principles
- Age-Appropriate Transition Assessments
- Developing a High-Quality Transition Plan
- Pathways to Employment
- Pathways to Community Life
- Pathways to Self-Determination
- Pathways to Postsecondary Education
- Supports and Partnerships

This new online resource was presented across the state to teachers, but also to vocational rehabilitation staff. To continue and expand the State's collective impact, VR also entered into a partnership with Transition Tennessee to create a Pre-ETS Blueprint portal that would also be housed on [www.transitionTN.org](http://www.transitionTN.org). As of Jan. 2022, there are eight courses available within the Pre-ETS Blueprint and two more being developed.

- Power of Early Work Experiences
- An Overview of WIOA and Pre-ETS
- Connecting with Employers and Families
- Instruction in Self-Advocacy
- Work-Based Learning
- Job Exploration Counseling
- Developing Strong Partnerships
- Strategies for Effective Instruction
- Workplace Readiness Training (2022)
- Counseling on Postsecondary Education Opportunities (2022)

An ever-evolving student portal has also been created where students can receive free training on tips for going to work or continuing their education. This student can also be leveraged by providers to be used as an instructional tool, complete with resources, handout, notes, and guided lessons.

This partnership between the TDOE, VR, and Vanderbilt to create and expand Transition Tennessee has also resulted in hosting a pre-conference in addition to the TDOE's Partners in Education Conference. The pre-conference is called Passport to the Future and has reached capacity of 450 during the first two years and over 500 in January of 2020. Passport to the Future brings together both education and VR staff for the sole purpose of improving the knowledge, skills, and abilities for the partners who help build a seamless pathway to postsecondary. A virtual option was also provided in 2021, but there is not an option for a Passport to the Future conference in 2022 as part of the TDOEs' Partners in Education Conference, as the conference is no longer occurring. More

information about Passport to the Future or other training opportunities can be found here: <https://transitiontn.org/conferences>.

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

**(j) Coordination with Education Officials.** In accordance with the requirements in section 101(a)(11)(D) of the Rehabilitation Act—

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

The VR Program has chosen to provide Pre-ETS through Transition School to Work agreements with Local Education Agencies (LEAs) for interagency transfer, Pre-ETS contracts through Community Rehab Providers (CRPs), Pre-ETS Summer Camps, and direct staff contact. In addition, VR staff collaborate to provide information VR sessions to students while in high school who may benefit from further VR services and seek to acquire additional VR referrals through this process.

The VR Program employs 23 Pre-Employment Transition Specialists and four Pre-Employment Transition Supervisors to coordinate services provided in their areas, identify Local Education Agencies (LEAs) who have a need for Pre-ETS, and recruit CRPs. They 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 work with the schools to identify students who are of working age who want to become VR customers and make referrals to the VR Counselor assigned to the school.

As of PY23, there are 23 Pre-Employment Transition Community Rehabilitation Providers and 56 LEAs contracted to provide services.

### **Transition Tennessee**

An important feature that helped to operationalize the interagency agreement between the VR Program and the Department of Education is the continued development of TransitionTN.org. This online professional development and resource hub is funded by both the Tennessee Department of Education and Tennessee Vocational Rehabilitation. The site provides portals into an educator blueprint and a provider blueprint where users can participate in asynchronous professional development and get acquainted with a host of resources. For example, there is a Transition Framework, age-appropriate transition assessment database, searchable curriculum database, and so much more. While much of the content was targeted towards a specific target audience, the content in both the educator and provider portals provide cross training opportunities.

Tennessee VR continues to work with the Vanderbilt Kennedy Center and Transition TN to update and develop new content and resources for Pre-ETS providers. In addition, we are now offering



content directly to students to receive Pre-ETS in a self-paced manner or through the use of an instructor led online session. We have now identified and begun training the first model demonstration site that will highlight best practices and to be used as a training resource for other school districts and provider agencies. Lastly, more in-person training for Pre-ETS providers and educators has been identified and planned for upcoming years of the Transition Tennessee contract.

### **Policy**

The VR Program has policies and procedures governing Pre-employment Transition Services (Pre-ETS). These policies and procedures are designed to support field staff in providing quality services and resources to students with disabilities in Tennessee and encourage collaboration between school personnel, contractors, and VR staff. The Pre-ETS policy also explains the process if the student desires to apply for VR services. The goal of the policies and procedures is to offer experiences that can assist transition students to a more positive and encouraging competitive employment outcome.

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

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

The VR Program initially signed an exclusive agreement with the Tennessee Department of Education (TDOE) in October 2017 to provide pre-employment transition services (Pre-ETS). This agreement was updated on April 1, 2023. The agreement outlines its purpose, the responsibilities of Vocational Rehabilitation (VR), the responsibilities of the Department of Education (DOE), and shared responsibilities.

In the summers of 2022 and 2023, transition academies were created to provide comprehensive training to school-based transition coordinators, teachers, and Pre-ETS providers. Moreover, there are scheduled training opportunities for the 2023-24 school year, covering transition planning for students with disabilities, including Pre-ETS and VR services. These training sessions will be shared with various transition stakeholders, such as VR staff, Community Rehabilitation Providers (CRPs), and Local Education Agency (LEA) staff. Each year, these training sessions will continue, but will be updated to include relevant content requested by stakeholders. Additionally, as part of the jointly funded project Transition Tennessee, the first Pre-ETS model demonstration site in a Middle Tennessee LEA has been identified.

Tennessee VR employs 23 Pre-Employment Transition Specialists to offer guidance and technical assistance to educational agencies. Each county and local school district has an assigned Pre-ETS Specialist responsible for providing continuous support, coaching, and technical assistance. These specialists also complete ongoing VR referrals to facilitate a seamless transition for potentially eligible students receiving Pre-ETS to VR referral, application, and, if eligible, VR customer status.

Tennessee VR collaborates with the Tennessee DOE in multiple state-level task forces aimed at promoting shared responsibilities and visions for transition planning and services. These groups include, but are not limited to, the TDOE Transition Leadership Team, Employment Roundtable, TennesseeWorks Partnership, and the Governor's Employment First Task Force. Participating in these roles enables Tennessee VR to maintain a strong working relationship at the state level with the state education agency. This results in joint planning for state-level initiatives, consistent messaging to local school districts, and a deeper understanding of the interplay between the two entities.

- (B) Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under section 614(d) of the Individuals with Disabilities Education Act;

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 VR Program staff is invited and to the extent possible participates in these IEP meetings.

To ensure each LEA is aware of the involvement VR staff can have on a student and customer's journey, the DSU has ensured each LEA has appropriate coverage from a multitude of VR staff. VR staff are charged with ensuring all schools are visited, in-person or virtual each year, conducting outreach and engagement activities, including, but not limited to job fairs, transition fairs, resource fairs, community events, parent/teacher conferences, and back to school nights.

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

A no cost interagency agreement between the Tennessee Department of Education (TDOE) and the Division describes the roles and responsibilities of each to ensure that individuals who are IDEIA eligible and meet the VR Program's eligibility requirements and will receive VR Services through a comprehensive and coordinated effort. The agreement negotiated between both agencies is very specific in defining the specific responsibilities for each.

For the VR Program, VR is responsible for various aspects of making its services available to students with disabilities, including the five (5) required Pre-ETS services through VR staff, contracted CRPs and LEAs. While not a comprehensive list, some of the specific responsibilities of the VR Program include: providing Pre-ETS on an individual or group basis; providing materials and information regarding the VR process and services; accepting referral of students with disabilities who choose to pursue VR services beyond Pre-ETS; consulting with LEAs on transition planning to prepare a student to move from school to work or postsecondary education; providing information to parents and/or guardians, students/clients; and informing teachers, students, parents and legal guardians of the Rehabilitation Act requirements and implementing regulations.

The Tennessee Department of Education has accepted responsibility for helping the VR Program encourage participation of Tennessee's over 130 independent LEAs in the provision of Pre-ETS

services and helping assure that parents, students and teachers are aware of and have access to Pre-ETS through multiple delivery methodologies including, but not limited to: encouraging LEAs to distribute the Pre-ETS materials to students, family members, guardians, or their representatives; emphasize transition best practices with all LEAs; expand existing technical assistance, training and transition reference materials to include information regarding WIOA to LEAs and other stakeholders, including encouraging the Tennessee Parent Training and Information Center to share information with parents, families, guardians and students relating to the provision of Pre-ETS; develop active communication and outreach efforts to make parents and students aware of coordinated Pre-ETS activities; and provide VR and stakeholders regarding TDOEs adopted written policies and guidelines regarding compliance with WIOA including the coordinated provision of Pre-ETS.

Similar to the agreement between the Division and TDOE, the VR Program constructs its contracts with CRPs and agreements with LEAs as referenced in section d.1 above with very specific terms for each respectively that includes CRP or LEA terms that outline expected deliverables, timelines, reporting, outcomes and reimbursement procedures. Those scope and general terms are similar regardless of which procurement method is used and include: provision of the Pre-ETS activities for students with disabilities ages 14-22 in accordance with the Public Law 113-128, Workforce Innovation and Opportunity Act of 2014 (WIOA), Section 422, and Code of Federal Regulations, Title 34, Part 361, as amended; assure that only staff meet minimum qualifications detailed in the agreement provide services; accommodate the needs of students with disabilities in compliance with state and federal law, including without limitation the Americans with Disabilities Act; obtain written permission from the student's parent or guardian for demographic information and disability certification; and provide monthly fiscal and program reports of its Pre-ETS activities that document details of services provided.

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 a free appropriate public education (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 VR Program is responsible for all costs necessary for eligibility determination and provision of services under an IPE. The VR Program must consider 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 Pre-ETS interagency agreement identifies the financial responsibility of the Department of Education (DOE) to ensure that individuals who are IDEIA eligible receive a FAPE in the least restrictive environment. A free appropriate public education means regular and special education and related services which:

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

- 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;
- Include preschool, elementary school, and secondary school (including appropriate vocational, career or work experience education); and
- Are provided in conformity with an IEP.

- (D) Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals;
- (E) Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and

In complying with the documentation requirements in 34 CFR 397 for youth with disabilities and with section 511 of the Rehabilitation Act, the VR Program has contracted with the University of Tennessee, Center for Literacy, Education, and Employment (UTCLEE) to coordinate with local education agencies to provide career counseling and information and referral services for youth with disabilities who are seeking subminimum wage employment and including referral information providing self-advocacy, self-determination and peer mentoring training. UTCLEE maintains and submits to VR documentation of services including verification for each youth who was contacted and received the requisite services or who was contacted and refused such services. For youth employed at subminimum wage UTCLEE complies with the requirements to provide the requisite services once every six (6) months for the first year of the eligible youth's employment and annually thereafter for the duration of such employment.

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

To ensure clear understanding and compliance with the subminimum wage provisions of the Workforce Innovation and Opportunity Act (WIOA), the following term has been included in the interagency agreement and all Pre-ETS provider contracts, involving the Division, TDOE, and LEAs: "The Department of Education (DOE) and any Local Education Agency (LEA) in Tennessee are prohibited from engaging with an organization that holds a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of having students with disabilities work at subminimum wages. Both parties are obligated to follow the documentation requirements outlined in Section 511 of the Workforce Innovation and Opportunity Act (WIOA) when students with disabilities seek subminimum wage employment."

**(k) Coordination with Employers.** In accordance with the requirements in section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

The Vocational Rehabilitation Business Service Unit (BSU), in collaboration with the VR Community Service Unit, and Pre-ETS staff, works with employers to promote competitive integrated work opportunities and career exploration for customers through job search and placement services, combined service provision with WIOA core partners and stakeholders, and facilitation of work-based learning opportunities and employer-based training and employment programming.

VR customers can work with Community Service Unit staff or a Business Employment Consultant (BEC) from the BSU to explore career opportunities aligning with their occupational goals and desired geographical location of residence. Together, the VR team member and VR customer can search for local employment opportunities of interest, apply for opportunities, conduct interview preparation, and execute final placement. The success of BECs is measured by their successful service delivery to enhance competitive integrated employment outcomes for customers, focusing on outcomes with competitive wages, employer benefit offerings, and alignment of the outcome with the customer stated occupational goal.

The BSU also provides services directly to the business community, focusing on the needs of Tennessee employers, large and small. As employers across the state seek to recruit and retain individuals with disabilities, the BSU is a resource for consultation and assistance regarding services such as: Work Opportunity Tax Credit, Person-Centered Trainings, Workplace Accessibility, Workplace Accommodations, and more. In 2023, 12 BECs across the state were certified Windmills trainers and approximately 50 Windmills trainings have been provided annually. If a Tennessee employer is facing a challenge regarding the recruitment and retention of individuals with disabilities to their workforce, the BSU will assist in developing customer-centered solutions for that business.

Vocational Rehabilitation's Business Service Unit works with partners from state agencies such as the Department of Intellectual and Developmental Disabilities, Department of Labor and Workforce Development, Department of Economic and Community Development, and Department of Corrections to align efforts in serving business customers and agency customers. Through participation in the Department of Labor and Workforce Development's local Business Service Teams, the VR Business Service Unit's BECs provide education and outreach services to employers offering competitive integrated work environments, enabling VR customers to have an expanded horizon of opportunity with Tennessee employers. Last, the VR BSU, in collaboration with the Community Service Unit and the Pre-ETS team, is leveraged for developing work-based learning sites across the state to promote career exploration for individuals with disabilities receiving services through the Division. Employer-based training and employment programs across the state enable customers to engage in meaningful work in a variety of industries through an integrated setting where compensation and benefit eligibility for full-time employees is competitive with the local labor market and equally available for VR customers.

The Tennessee Rehabilitation Center (TRC) – Smyrna continues to develop new partnerships and maintains the relationships with its current partners. This ensures that a work-based training experience is available for students in all Areas of Study. The Center has agreements with employers to provide internship opportunities and new agreements are being signed on a regular basis. TRC Smyrna continues to offer customized training in partnership with Schwan Cosmetics and CVS Health and maintains a Business Employment Consultant on campus to assist students in job placement upon graduation. To ensure a greater focus is placed on building employer relationships, TRC Smyrna maintains a designated position to develop new internship opportunities to meet the needs of the increasing student enrollment. This position also conducts follow up to ensure that students are applying skills learned and employers are evaluating the students and the overall internship process. In addition, employers interested in offering internships and/or employment to TRC students are always invited to tour the campus, meet the instructors, and observe classroom instruction prior to signing a partnership agreement.

The VR Community Service Unit has team members strategically located throughout the state to provide opportunities for engagement with business to identify competitive integrated employment and career exploration opportunities unique to the local communities where the CSU centers are located. CSU services include training, career assessment, and career readiness to prepare individuals for employment. CSU staff engage with local business to educate on the benefits of hiring people with disabilities, the services available by the center, and to secure training opportunities for VR customers. Since the CSU moved from facility-based training to community-based training, there have been additional opportunities to engage with business which include internships, externships, tours to teach customers about local employers and the skills needed for their jobs, job shadowing and mentoring. Additionally, the CSU has local Advisory Boards which consists of members of the local community (business leaders, representatives from the local education agency, civic leaders, non-profit members etc.) The area managers can leverage these relationships to spread the word about VR, and the training and support services available in the CSU that lead to competitive integrated employment for VR customers.

As noted above, the Division is working with employers to provide transition services, including pre-employment transition services for students and youth with disabilities. In addition to the work done through coordination with community rehabilitation providers, the division works with employers through its partnership with the Business Services Unit and Community Service Unit, which helps Pre-ETS staff and students coordinate with employers by utilizing business relationships that the BSU and CSU have developed in order to achieve specific goals reliant on partnerships with the business community. BSU and CSU staff serve as a liaison for the Pre-ETS teams as they seek to identify opportunities with the business community such as: Career-Exploration Initiatives, Work-Based Learning Opportunities, Community-Based Training Opportunities, business representation on local and state advisory boards, and more. BSU and SCU teams serve as a resource for the VR team to access the opportunities that exist within the business community for serving youth and adults with disabilities at varying stages of their customer journey to long-term competitive integrated employment.

As previously mentioned, the Division works with employers through Transition School to Work grants, and the Project SEARCH® sites. In partnership with ten local education agencies and the Council on Developmental Disabilities, the Division operates 13 High School Transition Project SEARCH® Sites through local employers. Those employers include:

- Erlanger and BlueCross BlueShield – Hamilton County Schools
- Embassy Suites – Rutherford County Schools
- Embassy Suites – Metro Nashville Public Schools
- Le Bonheur Children’s Hospital – Shelby County Schools
- Hilton Airport Hotel – Blount County Schools
- Methodist North Hospital – Shelby County Schools
- Parkwest Medical Center – Knox County Schools
- Nike Distribution Center – Shelby County Schools
- Tennova – Clarksville-Montgomery County Schools
- The Peabody – Shelby County Schools
- Welch College – Sumner County Schools
- West TN Healthcare – Jackson-Madison County Schools
- Wilderness in the Smokies – Sevier County Schools

For the student-intern cohort years of 2021-22, 2022-23, and 2023-24, there have been 279 students enrolled in one of the 14 transition-model Project SEARCH programs. For the 2021-22 intern cohort, 84 students enrolled in Project SEARCH and 70 completed the program. Of those 70 graduates, 65 interns had job records, which was a 93% employment rate and 87% met the Project SEARCH employment criteria for competitive, integrated employment. For the 2022-23 intern cohort, 101 students enrolled, and 73 interns have been reported as completing the program. As of November of 2023, 58 graduates currently have a job record. Project SEARCH sites have until February of the following year to enter their outcome data, so this number will continue to rise. The 2023-24 intern cohort is currently actively in the Project SEARCH program with 94 students entering the program. For the most recent complete intern cohort data from 2021-22, out of the 48 states and 10 countries who provide Project SEARCH programs, Tennessee ranks in the top 5. Over the past decade, Project SEARCH has proven to be one of the VR programs more successfully job training programs with 647 completed the program and 85% securing employment.

Since September 2015 through May 2021, a total of 382 students have enrolled in the Project SEARCH® Program. The Project SEARCH® Program has a success rate of 92%, with 353 out of 382 students completing the program in Tennessee to date. Tennessee currently has 9 Community Rehabilitation Providers participating as Project SEARCH® Providers. The program operates from 17 different business sites across Tennessee and during the 2021-12 school year has 65 interns participating in the program. Project SEARCH® has proven to be one of TN VR’s more successful job training programs, with a >75% employment rate.

**(I) Interagency Cooperation with Other Agencies.** In accordance with the requirements in section 101(a)(11)(C) and (K), describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are **not** carrying out activities through the statewide workforce development system to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

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 disabilities:

- The Department of Intellectual and Developmental Disabilities (DIDD) refers individuals with intellectual and developmental disabilities to the Vocational Rehabilitation program.
- The Department of Mental Health and Substance Abuse Services (TDMHSAS) works with the Division to employ an evidence based Individual Placement and Support (IPS) model of supported employment for individuals with mental illness and substance abuse disorders.
- The Tennessee Employment Consortium, which is 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, was established to provide a forum for all stakeholders to review and discuss state policies and share best practices.
- University of Tennessee, Center for Literacy Education and Employment provides staff training and development and consultation services for community supported employment service providers.
- Tennessee Division of TennCare (TennCare) partners with the Division for the provision of services for individuals enrolled in Employment and Community First CHOICES. ECF CHOICES serves individuals with intellectual and developmental disabilities who are receiving home and community-based programs under Medicaid Long Term Services and Supports.
- The Tennessee Department of Education (DOE) for the provision of Pre-Employment Transition Services, transition services, and other VR services provided by VR to students with disabilities to support an efficient transition from secondary school to post-school employment and related activities leading to competitive integrated employment.

The Division is a party to the Interagency agreement between DOE, DIDD, the Tennessee Department of Health, TDMHSAS, the Tennessee Department of Correction, and TennCare to fulfill the requirements of Part B and Part C of the Individuals with Disabilities Education Act (IDEA). The partner agencies strive to ensure that individuals and youth with disabilities are prepared for competitive integrated employment with access to necessary support services.

Tennessee Works for employment partnerships and collaborative efforts to increase access to meaningful work and internet-based information for students with disabilities.

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.

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 and the division's State Grant for Assistive Technology program, the Tennessee Technology Access Program (TTAP) and their network of technology centers.



Tennessee Technology Access Program (TTAP) that increase access to, and acquisition of, assistive technology devices and services. Through its four core programs: Funding Assistance, Device Demonstration, Device Loan and Device Reutilization.

Tennessee Council for the Deaf, Deaf-Blind and Hard of Hearing (TCDDDBHH) that provide interpreter services and consultation.

Statewide Independent Living Council to advance advocacy and independence for Tennesseans with disabilities by collaborating with all interested parties.

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.

Community Rehabilitation Providers throughout the state that provide rehabilitation services.

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

Tennessee Technology Access Program (TTAP) that increase access to, and acquisition of, assistive technology devices and services. Through its four core programs: Funding Assistance, Device Demonstration, Device Loan and Device Reutilization.

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

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 and the division's State Grant for Assistive Technology program, the Tennessee Technology Access Program (TTAP) and their network of technology centers.

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

Tennessee Works for employment partnerships and collaborative efforts to increase access to meaningful work and internet-based information for students with disabilities.

(4) State use contracting programs;

The Division is a party to the Interagency agreement between DOE, DIDD, the Tennessee Department of Health, TDMHSAS, the Tennessee Department of Correction, and TennCare to fulfill the requirements of Part B and Part C of the Individuals with Disabilities Education Act (IDEA). The partner agencies strive to ensure that individuals and youth with disabilities are prepared for competitive integrated employment with access to necessary support services.

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

Response provided in Section I above.

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

The Department of Intellectual and Developmental Disabilities (DIDD) refers individuals with intellectual and developmental disabilities to the Vocational Rehabilitation program.

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

The Department of Mental Health and Substance Abuse Services (TDMHSAS) works with the Division to employ an evidence based Individual Placement and Support (IPS) model of supported employment for individuals with mental illness and substance abuse disorders.

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

The Tennessee Employment Consortium, which is 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, was established to provide a forum for all stakeholders to review and discuss state policies and share best practices. University of Tennessee, Center for Literacy Education and Employment provides staff training and development and consultation services for community supported employment service providers.

(9) Other private nonprofit organizations.

Statewide Independent Living Council to advance advocacy and independence for Tennesseans with disabilities by collaborating with all interested parties. 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.

GEPA 427 Form - Vocational Rehabilitation

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

*The following policies ensure equitable access to, and equitable participation in the Vocational Rehabilitation Program:*

DHS Policy 1.04 Effective: November 15, 2019

- The Tennessee Department of Human Services (TDHS) will take reasonable steps to ensure that persons with Limited English Proficiency have meaningful access and an equal opportunity to inquire, apply for and participate in its services, activities, programs, and other benefits. All interpreters, translators, and other aids needed to comply with this policy shall be provided

without cost to the person seeking services. The purpose of this policy is to ensure meaningful communication with persons that experience Limited English Proficiency and their authorized representatives. This policy also provides for communication of information contained in vital documents, including but not limited to, applications for benefits, client release forms, and civil rights complaint forms. AVAZA Interpreter services are used for LEP needs available online for all employees is the language identifier tool and Step-by-Step Guide to Accessing AVAZA Interpreter Services.

DHS Policy 1.05 Effective: February 1, 2019

- The Tennessee Department of Human Services (TDHS) will adhere to all applicable federal and state laws, regulations, and guidelines with respect to making reasonable modifications in policies, practices, or procedures, as necessary, to afford individuals with disabilities an equal opportunity to participate in Department programs and services. The Tennessee Department of Human Services (TDHS) recognizes that in order to have equally effective opportunities and access to benefits, individuals with disabilities may need reasonable modifications to policies and procedures. The purpose of this policy is to provide procedures and guidelines to ensure that TDHS allows for equal and effective opportunities and access to Department programs, services, and activities to all members of the public with disabilities.

Contracts

- **Nondiscrimination.** The Grantee hereby agrees, warrants, and assures that no person shall be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination in the performance of this Grant Contract or in the employment practices of the Grantee on the grounds of handicap or disability, age, race, color, religion, sex, national origin, or any other classification protected by federal, Tennessee state constitutional, or statutory law. The Grantee shall, upon request, show proof of nondiscrimination and shall post in conspicuous places,

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

*Barriers which may impede equitable access and participation of students, educators, and other beneficiaries include:*

Economic disadvantage, gender, race, ethnicity, color, national origin, veteran status, disability, age, language, education, rural status, homeless status, housing insecurity, pregnancy, weight, sexual orientation.

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

*Steps to address barriers to equitable access and participation include:*

Understand what barriers exist and their prevalence. Determine and implement possible mitigators for highest occurring barriers. Increase cultural competence and response of employees and providers.

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

Increase cultural competence and response of employees and providers through training and resource sharing. Begin within the next year.

Conduct surveys, meet with advocacy groups representing underserved populations, and hold focus group meetings to understand what barriers exist and their prevalence. Begin within the next 1-2 years.

Determine and implement possible mitigators for highest occurring barriers. Begin within first year following data and information gathering.

GEPA 427 Form - Supported Employment

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

*The following policies ensure equitable access to, and equitable participation in Supported Employment:*

DHS Policy 1.04 Effective: November 15, 2019

- The Tennessee Department of Human Services (TDHS) will take reasonable steps to ensure that persons with Limited English Proficiency have meaningful access and an equal opportunity to inquire, apply for and participate in its services, activities, programs, and other benefits. All interpreters, translators, and other aids needed to comply with this policy shall be provided without cost to the person seeking services. The purpose of this policy is to ensure meaningful communication with persons that experience Limited English Proficiency and their authorized representatives. This policy also provides for communication of information contained in vital documents, including but not limited to, applications for benefits, client release forms, and civil rights complaint forms. AVAZA Interpreter services are used for LEP needs available online for all employees is the language identifier tool and Step-by-Step Guide to Accessing AVAZA Interpreter Services.

DHS Policy 1.05 Effective: February 1, 2019

- The Tennessee Department of Human Services (TDHS) will adhere to all applicable federal and state laws, regulations, and guidelines with respect to making reasonable modifications in policies, practices, or procedures, as necessary, to afford individuals with disabilities an equal opportunity to participate in Department programs and services. The Tennessee Department of Human Services (TDHS) recognizes that in order to have equally effective opportunities and access to benefits, individuals with disabilities may need reasonable modifications to policies and procedures. The purpose of this policy is to provide procedures and guidelines to ensure that TDHS allows for equal and effective opportunities and access to Department programs, services, and activities to all members of the public with disabilities.

Contracts

- Nondiscrimination. The Grantee hereby agrees, warrants, and assures that no person shall be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination in the performance of this Grant Contract or in the employment practices of the Grantee on the grounds of handicap or disability, age, race, color, religion, sex, national origin, or any other classification protected by federal, Tennessee state constitutional, or statutory law. The Grantee shall, upon request, show proof of nondiscrimination and shall post in conspicuous places, available to all employees and applicants, notices of nondiscrimination.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

*Barriers which may impede equitable access and participation of students, educators, and other beneficiaries include:*

Economic disadvantage, gender, race, ethnicity, color, national origin, veteran status, disability, age, language, education, rural status, homeless status, housing insecurity, pregnancy, weight, sexual orientation.

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

*Steps to address barriers to equitable access and participation include:*

Understand what barriers exist and their prevalence. Determine and implement possible mitigators for highest occurring barriers. Increase cultural competence and response of employees and providers.

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

Increase cultural competence and response of employees and providers through training and resource sharing. Begin within the next year.

Conduct surveys, meet with advocacy groups representing underserved populations, and hold focus group meetings to understand what barriers exist and their prevalence. Begin within the next 1-2 years.

Determine and implement possible mitigators for highest occurring barriers. Begin within first year following data and information gathering.

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