

TEXAS PYS 2020-2023

**VR ONLY**

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## VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

### PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (COMBINED OR GENERAL)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:

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[13] Sec. 102(b)(2)(D)(iii) of WIOA

## A. INPUT OF STATE REHABILITATION COUNCIL

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

### 1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

The Rehabilitation Council of Texas (RCT) meets quarterly with the leadership of the Texas Workforce Commission (TWC) - Vocational Rehabilitation Division (VRD) as a part of RCT's regular meetings. During these meetings, VRD provided quarterly updates and RCT provided input and made recommendations regarding VR services and program matters.

RCT uses a committee structure to review and provide comments to VRD. These committees are:

- the executive committee;
- the program planning and review committee, which is composed of all RCT members;
- the policy, procedures, and personnel development committee;
- the customer satisfaction and needs assessment committee; and
- the membership and education committee.

While the detail work is done in the committee structure, all comments and recommendations are from RCT as a whole.

### 2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

The following is a summary of the input and recommendations made regarding the combined state plan.

**Recommendation:** Regarding Section (C), Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System, RCT is unsure whether the reference to the Texas Health and Human Services (HHSC) Office of Deaf and Hard of Hearing Services (ODHHS) Specialized Telecommunications Assistance Program (STAP) is accurate information. STAP is to be used for personal telecommunication devices and other assistive technology (personal use and not for employment). RCT recommends reaching out to the STAP program to ensure that the information in the combined state plan is an accurate representation of the STAP program.

**Response:** VRD concurs with RCT's recommendations, and the reference to the STAP program will be removed from this section.

**Recommendation:** Regarding Section (G), Coordination with Employers, RCT recommends expanding who will have access to pre-employment training to include more than solely high school students and include students with disabilities.

**Response:** VRD concurs with RCT's recommendations and revised the language to include all students with disabilities.

**Recommendation:** Regarding Section (H), Interagency Cooperation, it is apparent that VRD is working in collaboration with HHSC regarding individuals who need long-term supports, including supported employment services. RCT recommends that VRD and HHSC work together to have the same providers for supported employment services. This will ensure a smooth transition from one program to the other.

**Response:** VRD currently collaborates with the HHSC Office of Disability Services Coordination to recruit supported employment providers already established with HHS and will continue to do so. VRD revised the language in this section to include, "VRD continues to collaborate with the HHSC Office of Disability Services Coordination to recruit supported employment providers already established with HHSC to ensure a seamless transition from one program to another when applicable."

**Recommendation:** Regarding Section (L), State Goals and Priorities, RCT recommends including the actions being taken to reduce the number of approval steps needed for service delivery. Additionally, RCT recommends adding a goal for VRD to strengthen relationships with employers. In order to improve successful outcomes, the agency would benefit from knowing the demands of the labor market. Also, working closer with employers will help VRD understand what employers are looking for when hiring employees.

**Response:** VRD concurs that reducing the number of approval steps is important and notes that there is current language discussing VRD's priority to streamline approval processes. Additional information regarding this is included in Section (O), State's Strategies. A sixth goal was developed in response to RCT's feedback to increase and enhance partnerships with employers.

**Recommendation:** Regarding Section (L), State Goals and Priorities, RCT recommends adding to Goal Area One that VRD will create a way to enter providers into the system timely so that services may be provided. RCT also recommends that VRD staff provide timely feedback to the providers with any contractual questions.

**Response:** VRD revised Goal Area One to include the statement, "VRD is working to improve provider onboarding through a process improvement effort to decrease the time from contract initiation to direct service delivery to customers. Additionally, VRD is committed to providing timely feedback to providers for both contractual- and programmatic- related questions."

**Recommendation:** Regarding Section (E), Cooperative Agreements with Private Nonprofit Organizations, RCT recommends revising the statement in which VRD refers to American Sign Language (ASL) as a communication skill when it is actually considered a foreign language in Texas.

**Response:** VRD concurs that ASL is indeed a language and is not defined as a "communication skill," so these references were removed. VRD revised the language to include, "...working with different disability populations and specializations." There is additional information further in the section regarding specific target populations and associated premiums.

**Recommendation:** Regarding Section (E), Cooperative Agreements with Private Nonprofit Organizations, RCT recommends changing "deaf," to "Deaf or hard of hearing." RCT recommends to be consistent with references to Deafness, Deaf, hard of hearing, and/or blind and visually impaired throughout the state plan.

**Response:** VRD concurs with this recommendation and made revisions where necessary. VRD will ensure that consistent language is used throughout the state plan when referencing these groups of individuals.

**Recommendation:** Regarding Section (I), Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development, RCT recommends including the American Deafness and Rehabilitation Association (ADARA), a national organization that brings together professionals from vocational rehabilitation, mental health, chemical health, education, interpreting, and related fields to share best practices in working with individuals who are deaf, hard of hearing, and deafblind to address policy and program concerns and to network.

**Response:** VRD proposes to join ADARA. Joining this association allows for additional professional development for staff that serves individuals who are deaf, hard of hearing, and deafblind and increases the quality of services provided to this population.

**Recommendation:** Regarding Section (I), Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development, RCT recommends adding the Texas School for the Deaf to the list of professionals to be included when conducting seminars or workshops for the ARD or IEP process.

**Response:** VRD concurs with RCT and added the Texas School for the Deaf to this section.

**Recommendation:** Regarding Section (J), Statewide Assessment, RCT recommends adding a goal regarding obtaining providers. VRD has lost a large number of providers, and as a result, there are either no providers in areas or a very limited number of providers. VRD must make an effort to obtain providers, including assistive technology providers.

**Response:** Increasing providers in all service areas is one of the main goals for VRD and for the Business Transformation Project. There is language in Section (O), State's Strategies, about expanding VRD's provider base. Additionally, language was revised in this section to include the word "recruit" to highlight VRD's efforts to expand the current provider base.

**Recommendation:** Regarding Section (O,) State's Strategies, RCT recommends adding and/or building more providers to provide VR services.

**Response:** VRD agrees, and there is a statement in this section that captures information about expanding the provider base.

**Recommendation:** Regarding Goal Area Two in Section (O), State's Strategies, RCT recommends that VRD add an increase in funds spent on services as a measure of success.

**Response:** VRD agrees that increasing the amount of funds spent on client services is critically important. VRD believes that Goal Area Five addresses this concern. One of the measures for Goal Area Five is an increase (accounting for seasonality) in VR engagement rate (that is, arranged, provided, or purchased VR/Pre-ETS/CCRC services), counseling and guidance, started or amended plan, employment (90-day clock), successful closure, or enrollment in education and/or training. The enhanced service delivery to VR customers and a higher engagement rate will likely lead to increases in client expenditures.

**Recommendation:** Regarding Section (O), State's Strategies, RCT recommends revising Goal Area Six to say, "Increase and enhance partnerships with employers to 1) better understand employer needs when hiring people with disabilities and working with VR and 2) build awareness about the benefits of hiring people with disabilities to increase employment opportunities for VR customers."

**Response:** VRD concurs with RCT's suggestion, and Goal Area Six was revised to include these recommended edits.

**Recommendation:** Regarding the measurement under Goal Number Six in Section (O), State’s Strategies, that states, “An increase in the number of VR customers participating in postsecondary education and training, leading to a degree, certificate or industry-recognized credential,” RCT asked, “(A) Can you explain how that measurement of success will show an increase in working with employers; and (B) could another measure of success be tracking the number of internships provided to consumers?”

**Response:** VRD understands that this is an indirect measure of success and has removed it from this goal. The proposed measure ties directly to TWC’s initiative to close the middle skills gap by providing employers with candidates who have skills for jobs that require more than high school degree but less than a four-year degree. The success measure was intended to be another way to indicate our efforts to meet employers’ need for skilled workers; however, this data is already collected and may be reported as supplemental information. In response to the latter part of the question, internships are a type of work-based learning, which is addressed in the second success measure for Goal Number Six.

**Recommendation:** Regarding the Substance Use Disorder (SUD) policy update discussed in Section (O), State’s Strategies, RCT stated that the best practice that is missing is the support that VR customers will need to achieve their employment goals. RCT recommends that VRD add support services for all individuals with a recognized SUD. Peer support is a best practice to initiate and sustain recovery. The support provided will be available throughout the VR employment process for success and recovery. RCT also asked for clarity regarding the word “treatment.” RCT understands that treatment has many modalities, practices, and paths and could be an inpatient or outpatient experience. The treatment path will be determined by the counselor and customer; however, it is also determined by the severity of the SUD or SUD assessment. There are many paths of recovery to which customers will have access, and those will come mainly from peer providers. RCT recommends that when stating treatment, VRD add support services for the SUD population. Less than 10 percent of SUD cases in Texas receive treatment. To be innovative and advance VR employment goals, mental health and SUD support services need to be advanced by VRD’s activities, education, and language.

**Response:** VRD is in the process of identifying the SUD support services that need to be put in place to support customers. VRD is currently developing a Peer Support Services pilot in Region 2 that will likely begin this fiscal year. As RCT suggested, there are several different means of treatment for SUD. VRD currently has several treatment options in the Vocational Rehabilitation Services Manual and will consider adding support services to this list.

### 3. THE DESIGNATED STATE UNIT’S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL’S INPUT OR RECOMMENDATIONS.

VRD concurred with and incorporated most of RCT’s recommendations. Where applicable, VRD offered alternate options to address RCT’s input, which are included in VRD’s responses in the previous section.

**B. REQUEST FOR WAIVER OF STATEWIDENESS**

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. A LOCAL PUBLIC AGENCY WILL PROVIDE THE NON-FEDERAL SHARE OF COSTS ASSOCIATED WITH THE SERVICES TO BE PROVIDED IN ACCORDANCE WITH THE WAIVER REQUEST;

Not applicable

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

Not applicable

3. REQUIREMENTS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN WILL APPLY TO THE SERVICES APPROVED UNDER THE WAIVER.

Not applicable



## C. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

### 1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

To ensure that individuals with disabilities receive appropriate services, VRD has the following cooperative arrangements with various federal, state, and local agencies and programs to use their services and facilities:

- Collaboration with the Texas Health and Human Services Commission (HHSC) to provide VR services to individuals eligible for home and community-based services under a Medicaid waiver or Medicaid State Plan Amendment. HHSC is the state agency that provides services to individuals with developmental disabilities. VRD also works collaboratively with the Texas Department of State Health Services to provide cooperative VR services to individuals receiving mental health services.
- Coordination with HHSC in referral processes between VR and the Blind Children's Program, the Comprehensive Rehabilitation Services Program, and the Independent Living Services Program
- Coordination with HHSC in implementation of legislation passed by the 86th Texas Legislature.
- MOUs with TEA and independent school districts (ISDs) to enhance coordination of services provided through programs like Project SEARCH and other community programs and support available to improve and expand services for transition-age students with disabilities
- Coordination with the Texas School for the Blind or Visually Impaired to provide specialized programs that prepare students for the transition to postsecondary life and the workplace
- Coordination with the Texas School for the Deaf (TSD) to provide specialized programs that prepare students on the transition to postsecondary life and the workplace
- MOU with the Texas Department of Insurance's Division of Workers' Compensation to enhance referrals for return-to-work efforts
- Coordination with the Social Security Administration (SSA) on employment incentives and support to maximize Social Security Administration/Vocational Rehabilitation (SSA/VR) reimbursement activity through the Ticket to Work Program
- MOU with the U.S. Department of Veterans Affairs to maximize case service funds through better access to comparable benefits, and to enhance the case management process while avoiding duplication of services.
- Coordination with the Texas Veterans Commission to help identify veterans who need additional support in securing benefits, gaining employment, and accessing advocacy services.

- Coordination with the Texas Coordinating Council for Veteran Services to help identify trends that have an adverse effect on the veteran population, and create strategies to address and resolve those issues at the state level
- Coordination with the U.S. Department of Labor Office of Federal Contract Compliance Programs to create statewide symposiums and job fairs to meet the federal regulation that requires federal contractors to ensure that no less than 7 percent of their workforce includes individuals with disabilities
- Coordination with the Purchasing for People with Disabilities program in providing training to CRPs
- Coordination with the Texas Center for Justice and Equity for juveniles and adults to assist and strengthen supports and employment goals by exploring career opportunities
- Coordination with the Texas Department of Transportation on addressing the issue of inadequate transportation, often a major factor in a customer's ability to maintain employment

Additionally, VRD uses TWC's internal structure to:

- verify for Texas businesses that job applicants under the Work Opportunity Tax Credit program are receiving, or have received, VR services under an individualized plan for employment;
- access electronic wage data to verify employment history and income for customers for closure data and SSA/VR reimbursement submission; and
- collaborate with Workforce Solutions Offices regarding customer training and support for employment goals, including participation in symposiums, job fairs, and providing disability awareness training.

## 2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

VRD works with organizations across the state to ensure that it meets customers' assistive technology needs, including transition services for students and youth with disabilities and pre-employment transition services for students with disabilities. The organizations include contracted assistive technology evaluation sites across the state and VRD's own Assistive Technology Unit.

Contract providers are required to participate in a thorough testing program to ensure that they meet minimal standards of proficiency to become approved assistive technology providers. VRD uses programs such as the Computer/Electronics Accommodations Program when a customer is interested in employment with the federal government

Each Texas Workforce Solutions Vocational Rehabilitation Services unit has trained assistive technology staff that are responsible for sharing knowledge and resources so that updated technology purchases can address the needs of customers with various disabilities, including those who are blind or visually impaired.

VRD now has a MOU with the Texas Technology Access Program (TTAP), the implementing entity designated by the governor under the Assistive Technology Act of 1998 (29 U.S.C. 3003) §4 whom VRD works cooperatively with to coordinate activities, including the referral of individuals with disabilities. Currently, VRD refers customers to TTAP demonstration centers

located throughout the state to ensure that they have an informed choice of assistive technology and that equipment purchased by VRD meets each customers' needs.

VRD participates in annual joint presentations with TTAP at Ability Expo in Houston, Ability Expo in Dallas/Ft. Worth, and the Texas Workforce Commission (TWC) statewide conference, which provide opportunities for customers and counselors to learn about new adaptive equipment and assistive technology that can assist in maintaining competitive, integrated employment.

### 3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

VRD coordinates with Texas A&M AgriLife Extension Service and Texas AgrAbility to assist customers with modifications of agricultural equipment and tools, allowing for agricultural producers with disabilities to continue with farming and ranching.

### 4. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

VRD works with the following:

- Community Resource Coordination Groups (CRCGs), which are local interagency groups composed of public and private providers that come together to develop individualized service plans for children, youth, and adults whose needs can be met only through interagency coordination and cooperation
- Local Workforce Development Boards that provide services to out-of-school youth

### 5. STATE USE CONTRACTING PROGRAMS.

VRD has a contract with WorkQuest, formerly Texas Industries for the Blind and Handicapped and the Texas State Use Program to provide services in support of agency and divisional operations.

## D. COORDINATION WITH EDUCATION OFFICIALS

Describe:

### 1. THE DESIGNATED STATE UNIT'S PLANS, POLICIES, AND PROCEDURES FOR COORDINATION WITH EDUCATION OFFICIALS TO FACILITATE THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO THE RECEIPT OF VR SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, AS WELL AS PROCEDURES FOR THE TIMELY DEVELOPMENT AND APPROVAL OF INDIVIDUALIZED PLANS FOR EMPLOYMENT FOR THE STUDENTS

The provision of quality VR services for Texas students with disabilities is a strategic priority for the Vocational Rehabilitation Division (VRD). VRD policies and procedures have been updated to align with the Workforce Innovation and Opportunity Act (WIOA) §413(B)(F), which sets forth that the individualized plan for employment (IPE) must be developed as soon as possible, but not later than a deadline of 90 days after the date of the determination of eligibility, unless the counselor and the eligible individual agree to an extension to a specific date.

Transition planning by VR counselors and school personnel facilitates the development and implementation of a student's individualized education program (IEP) under the Individuals with Disabilities Education Act §614(d). The goals developed in the IEP are considered in the development of the IPE. The development and approval of an IPE is initiated by a VR counselor. Planning includes conversations about informed choice and program information so that students understand the available options for additional education, training, service providers, and employment.

As a result of the COVID-19 pandemic, much of the transition planning activities and service delivery expanded to include virtual options to accommodate transition students and their families. VRD has continued to enhance virtual service delivery options and intends to maintain virtual options when providing greater opportunities to work with students and families.

### 2. INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

#### A. CONSULTATION AND TECHNICAL ASSISTANCE TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING VR SERVICES;

VRD maintains collaborative working relationships with public education entities in Texas. VRD services emphasize and provide a coordinated set of age-appropriate activities that enable transition students, parents, education personnel, and others to actively plan for and assist the student to prepare for life after leaving high school, including proactively developing partnerships with communities, service providers, and businesses to create opportunities for students to obtain postsecondary education, training, and competitive integrated employment.

#### **State Education Agency Partnership**

VRD works closely with TEA to coordinate transition planning services for students between ages 14–22 who receive special education services in Texas. As required in 34 CFR §361.22(b), VRD has collaborated with TEA to develop an MOU, current from August 31, 2017 to August 31, 2022, that outlines the responsibilities of the VRD for the provision of transition planning services as well as the fiscal responsibility of TEA for the provision of services as required by the Individuals with Disabilities Education Act.

The MOU represents each agency's commitment to collaborate and cooperatively facilitate the successful transition of students with disabilities from high school to competitive integrated employment using VR services. The MOU includes the addition of pre-employment transition services (Pre-ETS) as defined in CFR §361.48, and other Workforce Innovation and Opportunity Act (WIOA) requirements, operationalizing a referral process for students with disabilities, and a process for inviting counselors to Admission, Review, and Dismissal (ARD) meetings.

The MOU provides for consultation and technical assistance in planning for the transition of students with disabilities from school to post-school activities, including VR services; transition planning for students with disabilities that facilitates the development and completion of the IEP; clarification of the agencies' respective roles and responsibilities, including financial responsibilities for providing transition planning services to students with disabilities; and a description of procedures for outreach to and identification of students with disabilities who are in need of transition services.

#### B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

VRD develops partnerships with schools and community organizations to help students with disabilities make a smooth transition to adulthood and work. VRD's counselors throughout the state who are assigned to high schools have a role in preparing students with disabilities for entry into the workplace. VR counselors coordinate closely with high schools to ensure that appropriate students are referred to the VR program. They serve as information resources for teachers and other educational staff and provide resources and information about blindness and other disabilities to parents and transitioning students. They work closely with parents, education staff and community service providers to promote development of skills needed for students to become as independent as possible, as well as competitive in terms of integrated employment. Counselors work with schools to identify students receiving Supplemental Security Income (SSI) as early as possible in the process to address concerns regarding impact of employment on benefits and to provide resources for benefits counseling.

Pre-ETS are provided to students with disabilities. Required Pre-ETS activities are job exploration counseling, work-based learning experiences, counseling on opportunities for enrollment in postsecondary educational programs, workplace readiness training, and instruction in self-advocacy.

TWC launched the Pathways to Careers Initiative (PCI), an initiative to expand Pre-ETS to Texas students with disabilities. The first strategy launched under PCI in summer 2017 was Summer Earn and Learn. VRD partnered with each of the 28 Local Workforce Development Boards (Boards) and their employer partners to provide employability skills training and work experience for students with disabilities. Summer Earn and Learn has continued in subsequent summers. Another strategy is Charting the Course: Planning for Life after High School. This strategy engages students with disabilities and their families in a series of education, awareness, and planning events beginning with the students' eighth grade year. Engaging families earlier in preparing their children for high school promotes better planning for student transition activities in high school and supports a successful transition to further education and employment after high school. Explore STEM! is a PCI strategy that was implemented in summer 2018 and has been held in subsequent summers. Explore STEM! provides students with disabilities the opportunity to explore STEM fields, hear from professionals working in those fields, and experience hands-on activities in various STEM fields. The objective is to encourage more students with disabilities to consider careers in STEM fields.

Other PCI strategies include Capacity Building, Advise TX, Pre-ETS Tools for Students, and a Pre-ETS curriculum. Capacity Building is a strategy to operationalize the MOU between TWC and TEA by engaging VR and school personnel in a series of meetings designed to encourage and assist with relationship building, strategies for successful collaboration, and a better understanding of the VR and Special Education systems. A second initiative using the same model and focusing solely on working with younger students has been proposed to begin in 2022. Advise TX is an initiative conducted in partnership with the Texas Higher Education Coordinating Board (THECB). The program employs recent college graduates who are trained to serve as full-time, near-peer college advisers in high schools that have historically low college-going rates. Advisers provide one-to-one assistance to students with disabilities to match their academic and career goals to optimal postsecondary options. Pre-ETS Tools for Students started with the development of a Transition module to be added to the existing Texas OnCourse platform, an electronic tool focused on career and postsecondary exploration. The second phase of this strategy is the development of a resource for parents that will provide information and guidance about topics related to the transition process. It aims to identify and address gaps in existing information and targets all parents, with a concerted effort to reach parents who may not be familiar with the process of transitioning to postsecondary school or work. The tool is expected to launch in January 2022. TWC has also partnered with Texas A&M University to develop a Pre-ETS curriculum that schools can adopt and use as an elective. The curriculum is currently undergoing field testing and is expected to be finished in 2022.

Fostering Transition is an initiative designed to increase VR staff knowledge of the foster care system and develop strategies for connecting students in foster care with VR services. The initiative is currently in the planning phase.

VR has recently implemented a service called Embedded Pre-ETS. Through partnerships with the schools and providers, providers can become embedded in the schools, which allows them to provide services that build on and enhance what students are already receiving in school. Using this service, students will gain a more in-depth understanding of work-related concepts and will have greater opportunities to practice these concepts in a protected environment.

As a result of a contract with Texas A&M, the Work-Based Learning initiative has recently begun to support schools in developing work-based learning opportunities for students. The schools will develop and implement work-based learning activities that range from school-based enterprises, for example, coffee carts and greenhouses, to more traditional employer partnerships for work-based learning.

Explore Apprenticeship 2.0 is the second generation of an initiative that was implemented in 2019. Partnerships with San Jacinto College (Houston) and Dallas College (Dallas) enable students to participate in on-campus activities to learn more about apprenticeship as a path to employment. The second phase of the initiative will involve students participating in work-based learning in jobs in which apprenticeship is a typical part of the career path.

VRD also contracts with providers to deliver Pre-ETS to students with disabilities. There are currently more than 100 fee-for-service contracts in place for Pre-ETS.

VRD counselors work with the high schools to provide consultation and technical assistance regarding the VR process and appropriate services that may be available to customers, such as engaging in apprenticeships.

Consultation and technical assistance are provided at ARDs, and attendance may be in person or through alternative means, including videoconferencing or conference calls (based on 34 CFR §361.22(b)(1)).

When necessary, VRD counselors and school personnel coordinate to satisfy documentation requirements for students and youth with disabilities who are seeking subminimum wage employment, as set forth in 34 CFR §397.4(c). VRD does not pursue subminimum wage employment for customers. When a customer chooses to pursue subminimum wage employment, counseling on other employment options is provided. When, after counseling, subminimum wage employment is still the customer's choice, the VR case is closed. Those customers who choose subminimum wage employment receive counseling, guidance, and referral services within the first six months of employment and annually thereafter.

TWC has regional and state office transition specialists who provide support to VR counselors and VRD field office managers in developing collaborative partnerships with and increasing cooperation between VRD, local school districts, and other community organizations as resources for students with disabilities. These transition specialists assist with the development of policy, training, and strategies that lead to effective provision of transition services.

#### C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

Local education agencies maintain fiscal responsibility for transition services that are also considered special education or related services, and that are necessary for ensuring a free, appropriate public education to children with disabilities within Texas, including those outlined in the IEP (34 CFR §361.22(c)).

Additionally, House Bill 617, 83rd Texas Legislature, Regular Session (2013), requires that each ISD have an individual identified as the Transition and Employment Designee (TED). The TED is responsible for providing information and resources about effective transition planning and services. VRD has counselors throughout the state assigned to high schools to assist students with disabilities in preparing for entry into the workplace. Nothing related to VRD's responsibilities and requirements under WIOA should be construed as a reduction in local education agencies' responsibility under IDEA to provide and pay for special education and related services as a part of a free and appropriate education to students with disabilities (WIOA §101(c)).

VR counselors (VRCs) coordinate closely with high schools to ensure appropriate students are referred to the VR program. Transition program specialists support the work of VR counselors and VRD field office managers in developing collaborative partnerships with and increasing cooperation between VRD, local school districts, and other community organizations as resources for students with disabilities. VRD has transition VR counselors and general VR counselors who act as liaisons for high schools and partner with the educational system to more appropriately serve transition-age students seeking assistance to access adult vocational services.

VRD partnered with other health and human services agencies to assist TEA in developing the Texas Transition and Employment Guide for parents and their children who are enrolled in special education programs. The guide provides information on statewide services and programs that help facilitate the transition to life outside of the public-school system.

#### D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

Texas Workforce Commission's current MOU with TEA includes the addition of Pre-ETS, as defined in 34 CFR §361.48, and other WIOA requirements, operationalizing a consistent referral process for students with disabilities, and a process for inviting counselors to attend ARD meetings.

VRD has specialty transition VR counselors and general VR counselors who act as liaisons for high schools and partner with the educational system to more appropriately serve transition-age students seeking assistance to access adult VR services. Partnering with ISDs allows counselors to be available to students and school staff to discuss VR services, resources available through the Texas workforce system, community, businesses, and other partners necessary to build a network of support. Additionally, it allows counselors to arrange or provide relevant seminars, workshops, camps, and summer work experiences throughout the state.

Additionally, VRD has established procedures to serve students with disabilities who are designated as "potentially eligible" for services. To receive Pre-ETS and be considered potentially eligible for VR services, an individual must meet only the definition of a student with a disability. The individual is not required to apply for VR services but has the option to do so. Designating individuals as potentially eligible gives more students with disabilities the opportunity to participate in Pre-ETS.



## E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

### **Private Nonprofit Providers**

Private nonprofit providers of rehabilitation services are an important part of the VR service delivery process for many customers. VRD routinely works with national organizations, in addition to local private nonprofits to purchase and arrange services that help customers prepare for, obtain, maintain, or advance in employment. For the provision of extended services in Supported Employment, VRD makes arrangements with public and nonprofit agencies or organizations within the state, employers, natural supports, and other entities.

### **Availability of Information on Service Providers**

To assist customers in making informed choices regarding VR providers, VRD maintains ReHabWorks, an electronic case management system. ReHabWorks contains information specific to each Community Rehabilitation Provider (CRP). VRD staff shares information about qualified providers for a service, as it relates to a CRP's experience in working with different disability populations and specializations, ensuring that a customer can make an informed choice when selecting a service provider.

### **Provider Contracting Process**

VRD establishes contractual relationships with providers of VR services, including private nonprofit providers. To expand opportunities and increase efficiency related to recruiting providers, VRD posts notification of contracting opportunities on the Electronic State Business Daily (ESBD), where organizations can complete an application to become a service provider if the organization meets the requirements listed in the ESBD posting.

### **Service Provider Contracts**

The VRD Standards for Providers (Standards-SFP) are published on the TWC website and specify the scope of work for providing contracted goods and services. Contracted providers are required to follow the VR Standards, which specify the terms and conditions of the contractual relationship, approved services, expected outcomes, fees, staff qualifications, and required documentation. Revisions to the Standards are made periodically, and notices of upcoming changes are published on the TWC Provider Resource website at least 30 days in advance of the effective date of the changes. GovDelivery notices are sent out to announce posted changes, and the CRP contacts reference the VRD-SFP for updates every 30 days. Providers are contractually responsible for complying with the most recent standards and their individual contract.

Examples of services include:

- orientation and mobility;
- assistive technology training;
- diabetes education;
- communication access;
- durable medical equipment (DME);
- employment supports for brain injury;

- environmental work assessment;
- hearing aids and related accessories;
- independent living services for older individuals who are blind;
- job placement;
- job skills training;
- personal social adjustment training;
- Pre-Employment Transition Services;
- Project SEARCH;
- supervised residential services for individuals in recovery;
- self-employment, including supported self-employment;
- supported employment services;
- vehicle modifications;
- vocational adjustment training;
- vocational evaluation and assessment;
- wellness recovery action plans (WRAP);
- work adjustment training; and
- work experience.

### **Oversight and Monitoring of Contracted Service Providers**

TWC purchases services from providers that follow the VR Standards. TWC-contracted service providers are subject to both ongoing and periodic programmatic and financial monitoring. Risk assessment tools are used at the state and the regional level to identify service providers to be monitored. On-site monitoring visits may be scheduled. Additionally, service providers not identified through the risk assessment tools may also be monitored. A monitoring team includes representatives from VRD and VR Contract Oversight Monitoring. Contractors found in noncompliance with VR Standards may be placed on a corrective action plan. Sanctions vary and may include financial restitution where appropriate. All contractors are provided ongoing technical assistance. In addition to monitoring, VR Standards also require ongoing self-evaluation by each contracted service provider.

### **Credentialing Requirements**

Most VR-contracted service providers, for services such as employment services, assistive technology, orientation and mobility, and wellness recovery action plans must have one individual designated as the director for VRD communication and accountability purposes. These contracted service providers must have a director who possesses University of North Texas director credentials.

To ensure that employment service providers are fully equipped to provide the highest-quality services that support obtaining and maintaining competitive integrated employment, VRD has partnered with the University of North Texas to develop training and maintain a credentialing

system related to employment services. The current employment credentials are for work readiness, job skills training, job placement, and supported employment.

VRD also has partnered with the Center for Social Capital to develop the training and the Certified Business Technical Assistance Consultant (CBTAC) credential, which must be obtained and maintained by vendors from whom VR purchases self-employment services, including supported self-employment services. Having the CBTAC credential ensures that service providers are knowledgeable about various components of self-employment and supported self-employment. Additionally, VRD is now offering this training to select VR field staff members in order to improve knowledge and access to self-employment services. Premiums are payments made to service providers in addition to the base rate paid for services when the VRD customer and/or service provider staff meets certain criteria. Premium payments are available for services such as orientation and mobility, assistive technology, vocational adjustment training, job skills training, job placement, and supported employment.

VRD has both mileage and travel premiums available for providers to cover travel costs when serving customers in underserved areas of the state.

Other premiums are available to service providers that serve individuals who are deaf/hard of hearing, have autism, have criminal backgrounds, and/or have a bachelor's degree or higher and are seeking a professional occupation to encourage development of higher skills among the provider community. Staff members who serve Deaf customers must hold a certification from the Board for Evaluation for Interpreters, a Registry of Interpreters for the Deaf certification, or a Sign Language Proficiency Interview (SLPI) rating of intermediate or higher. For service providers to earn the premium when working with individuals with autism, they must show proof that they have retained staff possessing the Autism Specialization from the University of North Texas.

Approved providers also receive training in the field from VR counselors, state office program specialists, employment assistance specialists, University of North Texas online continuing education courses, and Criss Cole Rehabilitation Center staff. Training may include:

- disability awareness, including blindness, to give providers a better understanding of the challenges and limitations faced by customers;
- education on Americans with Disabilities Act requirements to ensure that providers understand the guidelines and law governing provision of accommodations to customers;
- education on other employment-related laws and recruitment, job matching, job customization, work accommodations, and retention; and
- Texas Confidence Builders training, which provides the philosophy VRD has adopted to help customers gain personal independence, acceptance, and adjustment to blindness, and find meaningful work.

### **Identifying and Developing Vendors**

Designated regional program specialists are responsible for identifying and developing entities that are interested in providing services described in the VR Standards. Program specialists and local provider liaisons provide technical assistance and guidance as new providers are approved and as existing providers add new services.

VRD staff works with a network of CRPs across the state, including those that provide disability education, work readiness, and employment services. To increase the competencies of these providers, VRD:

- requires Employment Service Providers (ESPs) staff to obtain training and credentialing to ensure that job skills trainers, job placement specialists, supported employment specialists, self-employment specialists, work experience specialists, and vocational adjustment trainers have the basic skills necessary to facilitate services, so the customer achieves required deliverables as defined in the VR Standards;
- requires each Standards' contractor who provides a service for customers to have a director who is credentialed to oversee staff and compliance;
- implements employment premiums to reward providers that maintain training and skills necessary to work with specific populations to increase successful outcomes, such as for customers who have a criminal background, who are Deaf, who have Autism Spectrum Disorder, and who have brain injury;
- has implemented Wage Services, which allows customers to be paid by a third party while participating in Work Experience services. Work Experience services allow youth and adult customers to participate in volunteer, internship, or paid temporary work settings. Work Experience services allows customers to explore career options, increase employability (soft and hard skills), gain experience in the field of study when a training program or degree has been obtained, or determine the individual's capacity to work when their abilities have changed due to newly acquired vocational barriers. Work Experience services can also be used for trial work evaluations as a means of providing information necessary to determine eligibility.

To improve services provided by VRD CRPs across the state, VRD:

- continually assesses the need to change or modify CRP services based on the emerging needs of customers and businesses;
- will continue to evaluate the rates paid to contracted providers to improve the retention rate, satisfaction, recruitment of providers and to ensure they are compensated at fair market value;
- will continue to form work groups with providers and VR staff to review the current documentation requirements to identify and implement a streamline processes to eliminate perceived burdens while still meeting state and federal guidelines;
- will continue to review the current curriculum taught in the credential courses, to ensure provider staff are trained on best practices, basic skills and VRD procedures, as well add new credential courses to ensure services are facilitate effectively to meet customer' needs and met the required deliverables as defined in the VR Standards for Providers;
- continues to operate an outcome-based payment system for supported employment and job placement services that require an employment plan for each customer; plans to implement and expand employment premiums to obtain providers with specialty skills and to reward providers that maintain training and skills necessary to work with specific populations, such as blindness/visual impairments and mental health to increase successful outcomes;

- continues to expand Work Experience services for youth and adults;
- continually explores opportunities to add innovative programs supportive of WIOA Pre-ETS requirements, customized employment, and other services to prepare and support customers in their long-term employment placement;
- continues to review the need for new services for youth and adult customers to assist in job readiness and in obtaining and maintaining competitive integrated employment;
- continues the use of transition educator providers. The transition educator service provider is an individual who is not currently a contracted provider; has a master's degree or a bachelor's degree in rehabilitation, counseling and guidance, psychology, education, or a related field; and is or has been an employee of a school system or a Texas education service center within the past fiscal year. These providers were added to better meet the needs of transition-age students and to provide services to customers in underserved areas of the state; and
- continues to identify strategies to increase extended service provider through cooperative agreements, as well as training providers and VR staff to use the customers naturally occurring work and social supports (including ongoing natural and paid supports) for extended services.

On July 1, 2021, the VR Standards for Providers (SFP) was updated to remove COVID-19–related procedures that required advance approval for delivery of certain in-person services. The SFP was updated to require providers to have policies and procedures that describe how they will provide in-person services to customers when the Centers for Disease Control and Prevention and federal, state (including the Texas Department of Health Services), and local governments have implemented health and safety protocols. Additionally, the implementation of remote, in-person, and combination services allows customers in underserved areas to receive services virtually and removes the necessity to travel for both providers and customers. The remote service delivery option ensures that customers have the ability to receive quality services and also enhances service ability in areas that lack providers.

The Local Provider Liaison (LPL) initiative focuses on quality assurance within VR and institutes activities for supporting the continuous improvement of SFP contractors. LPL activities include provider engagement and technical assistance to reduce audit findings and internal management issues. The LPL initiative promotes effective communication between VRD and providers and allows the provider to have a point of contact for questions and policy interpretation. This initiative also allows liaisons to collect demographic information to identify the areas the providers serve, special populations that they may work with, and other credentials to help customers make informed choices. This effort also allows VRD to identify areas of the state that are underserved.

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

Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

### **Evidence of Collaboration, Contracts, and Agreements**

To provide seamless service delivery to customers and ensure effective use of resources, TWC VRD maintains the following collaborations with community partners and other state agencies:

- VRD Program Specialists provide information and technical assistance to the appropriate Texas Health and Human Services (HHS) Medical and Social Service Divisions when changes to VR employment services occur.
- VRD works with the appropriate HHS Medical and Social Service Divisions to ensure that service definitions in the 1915(c) home-and community-based waivers accurately reflect Centers for Medicare and Medicaid Services and Rehabilitation Services Administration regulations. This partnership allows services that result in competitive integrated employment to be delivered efficiently and timely through the payer of first resort.
- VRD offers free intensive training and technical assistance to HHS' Medical and Social Services Divisions' Behavioral Health and Intellectual and Developmental Disabilities (IDD) Services Departments Special Projects Unit and community providers to become Benefits Subject Matter Resource staff.
- VRD partners with HHS' Medical and Social Services Divisions' Behavioral Health and IDD Services Departments Special Projects Unit to provide cross training on the VR Long-Term Supports and Services System.
- VRD uses its current partnership with the Social Security Administration (SSA) to encourage Employment Service Providers (ESPs) to become employment networks (ENs) under the SSA Ticket to Work Program. VRD offers incentive payments to ESP-ENs that provide: supported employment or job placement services during the provision of VR services; and extended support to Ticket to Work customers after VR case closure in order to advance employment or increase customer earnings.
- VRD partners with school districts that provide transition services to youth and considers all aspects of the cooperative agreements in place to ensure continuity and timeliness of services for those school districts that initiate supported employment services before or after a student graduates.

VRD has representation in the following:

- The Texas Council for Developmental Disabilities
- Texas Statewide Behavioral Health Coordinating Council
- Mental Health Coordination and Substance Use Disorder Party Workgroup, which is a subcommittee of the Behavioral Health Advisory Committee

- Behavioral Health Advisory Committee
- Texas Coordinating Council for Veteran Services
- State Independent Living Council
- Texas Council on Consumer Direction
- The Promoting Independence Advisory Committee
- HHS Cross Agency Liaison Initiatives
- Governor's Committee on People with Disabilities

### **Contracts**

VRD has vendor contracts with ESPs to provide specific employment services, which include supported employment services. VRD counselors may refer customers with all disabilities, including those who are blind and visually impaired, to ESPs with contracts for supported employment services. The VRD SFP manual outlines the staff qualifications, service description, process and procedures and fee for Supported Employment.

## G. COORDINATION WITH EMPLOYERS

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

### 1. VR SERVICES; AND

The Vocational Rehabilitation Division (VRD) continually seeks ways to increase the number of Texans with disabilities who successfully train for, obtain, retain, or advance in competitive integrated employment. The Business Relations Team was created to improve services to local businesses and help them achieve a diversified workforce by hiring qualified individuals with disabilities. Team members have successfully partnered to provide a coordinated array of outreach, consultation, and technical assistance services to Texas businesses.

The Business Relations Team uses the state labor exchange system, WorkInTexas.com, to report on its work with business partners in alignment with the other WIOA employer services. The Business Relations Team disseminates resources to Texas businesses through the TXHireAbility website, which provides information about the benefits of partnering with VRD.

The Business Relations Team is increasing coordination with other state and federal entities that administer employment training programs and is also working jointly with Local Workforce Development Boards' (Boards) Business Services Units. The result of this coordination is growth in the number of jointly held business symposia and job fairs in communities across Texas and more opportunities for outreach and awareness activities to inform employers about the services available through the workforce system, including those provided by VR. VRD partnerships with Boards, the US Department of Labor Office of Federal Contract Compliance Programs, Health and Human Services, the Veterans Administration, and employers help ensure that the business community and Texans with disabilities who are seeking competitive integrated employment have the greatest level of support, resources, and services available to help them succeed.

To acknowledge employers for their partnership and commitment to an inclusive workforce, TWC approved the creation of an employer recognition strategy, the We Hire Ability Employer Recognition Program (We Hire Ability), with the intention of encouraging the adoption of similar practices among other employers in the same industry or community. Like the Texas HireAbility campaign, We Hire Ability aims to raise awareness among employers and increase hiring of individuals with disabilities. This program is co-branded with TWC's existing We Hire Vets program to recognize employers for their efforts in hiring and retaining Texans of all abilities.

### 2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

The Pathways to Careers Initiative (PCI) is an initiative to expand pre-employment transition services (Pre-ETS) to Texas students with disabilities. PCI will ensure that Texas is effectively preparing students with disabilities to achieve competitive integrated employment through participation in employability skills and work-readiness training, career exploration activities, work experience, and counseling on postsecondary education.

Summer Earn and Learn (SEAL) was the first PCI statewide strategy and involves employability skills training and paid work experience for students with disabilities. It is offered in each local workforce development area (workforce area) during the summer months, when students are out of school. Boards have developed work experience opportunities with employers in their



workforce areas in high-growth occupations, skilled trades and crafts, and other high-demand occupations. During summer 2021, more than 2,100 students and over 1,000 employers participated in SEAL.

VRD is also leveraging existing business partnerships to identify additional opportunities to better prepare students for the workplace and help them obtain jobs. VRD will continue to pursue additional partnerships with businesses that have an interest in pre-employment training for students to ensure that students entering the workforce are appropriately equipped with the skills to adapt to work in the 21st century. Examples of this activity include Project SEARCH and group skills training activities.

### **Project SEARCH**

The Project SEARCH business-led pre-employment training program is a one-year school-to-work program that takes place entirely at the workplace. The program includes a combination of classroom instruction, career exploration, and hands-on training through work site rotations. Project SEARCH serves students with various disabilities, including significant intellectual and developmental disabilities. Typically, these are students who are in an Individualized Education Program (IEP) and in their last year of high school eligibility. The goal for these customers is competitive integrated employment within the business community or the business where the work site rotations occur.

Project SEARCH has expanded from one original program site, established in 1996 at Cincinnati Children’s Hospital in Ohio, to 643 sites internationally. Project SEARCH in Texas began in 2007 with Seton Healthcare Family in Austin. As of fall 2021, Texas has 29 Project SEARCH sites. Sites are led by a host business and include key partners, including VRD, independent school districts (ISDs), employment specialist providers (ESPs), and local authorities. Each Project SEARCH site typically has eight to 12 participants per year.

Due to the mitigation strategies necessary during the COVID-19 pandemic, most Project SEARCH activities could not be held on-site at the host businesses for the 2020–2021 school year. Teams worked virtually with host businesses or found alternate sites to meet in person to engage interns in real work experiences. The number of participating interns decreased slightly for that school year, to approximately 200. Sites are seeing a slight increase in intern participation for the 2021–2022 school year, and all but a few students are able to participate on-site at the host businesses.

### **Texas Project SEARCH Locations and Partners**

<b>#</b>	<b>Partner Name</b>	<b>Location</b>
<b>1</b>	Epiroc, Garland	Garland ISD, Texas Workforce Solutions–VRD, Quest Employment, Metrocare Services
<b>2</b>	Medical Center of Lewisville, Lewisville	Lewisville ISD, Texas Workforce Solutions–VRD, 29 Acres
<b>3</b>	Cintas, Fort Worth	Fort Worth ISD, Texas Workforce Solutions–VRD, MHMR of Tarrant County
<b>4</b>	Ascension Seton Williamson, Round Rock	Hutto and Georgetown ISDs, Texas Workforce Solutions–VRD, Goodwill Industries of Central Texas, Bluebonnet MHMR
<b>5</b>	Baylor Scott & White Hospital, College Station	College Station ISD, Texas Workforce Solutions–VRD, Brazos Valley Center for Independent Living, MHMR of Brazos County

#	Partner Name	Location
6	Baylor Scott & White Hospital, Brenham	Brenham ISD, Texas Workforce Solutions-VRD, The Whole Solution, MHMR of Brazos County
7	SanMar, Inc., Irving	Irving ISD, Texas Workforce Solutions-VRD, Metrocare Services
8	United Healthcare, Sugarland	Fort Bend ISD, Texas Workforce Solutions-VRD, PCSI, Texana
9	Ascension Seton Hays, Kyle	Hays Consolidated ISD, Texas Workforce Solutions-VRD, Goodwill Industries of Central Texas, Hill Country MHMR
10	Dell Seton Medical Center, Austin	Del Valle ISD, Texas Workforce Solutions-VRD, Goodwill of Central TX, Integral Care
11	The City of Lewisville, Lewisville	Lewisville ISD, Texas Workforce Solutions-VRD, 29 Acres
12	Embassy Suites Dallas Frisco Conference Center, Frisco	Frisco ISD, Texas Workforce Solutions-VRD, LifePath
13	Dow Chemical, Seadrift	Calhoun & Victoria ISD, Texas Workforce Solutions-VRD, Quest Employment
14	Baylor Scott & White Lakeway, Austin	Lake Travis ISD, Texas Workforce Solutions-VRD, Easter Seals Central Texas, Austin Integral Care
15	Christus Trinity Mother Frances Hospital, Tyler	Tyler ISD, Texas Workforce Solutions-VRD, Winning Edge Employment, Andrews Center
16	Ascension Seton Northwest, Austin	Leander ISD, Texas Workforce Solutions-VRD, Goodwill Industries of Central Texas, Bluebonnet MHMR
17	Christus Santa Rosa Children's Hospital, San Antonio	San Antonio ISD, Texas Workforce Solutions-VRD, PCSI, Alamo Local Authority
18	Texas Health Presbyterian Hospital Plano, Plano	Plano ISD, Texas Workforce Solutions-VRD, LifePath
19	Texas Children's Health Plan, Houston	Houston ISD, Texas Workforce Solutions-VRD, SCI Inc., MHMRA
20	Dow Chemical, Freeport	Brazosport ISD, Texas Workforce Solutions-VRD, SCI Inc., Gulfport Center
21	The Hospitals of Providence Memorial Campus, El Paso	El Paso ISD, Texas Workforce Solutions-VRD, Nidia Escobar, Emergence MHMR
22	Texas A&M Hotel and Conference Center, College Station	Bryan ISD, Brazos Valley CIL, Texas Workforce Solutions-VRD, MHMR of Brazos County
23	Renaissance Dallas Richardson Hotel, Richardson	Richardson ISD, Quest Employment, Texas Workforce Solutions-VRD, Metrocare
24	Texas Health Presbyterian Hospital, Richardson	Richardson ISD, Quest Employment, Texas Workforce Solutions-VRD, Metrocare
25	The City of Garland, Garland	Garland ISD, Texas Workforce Solutions-VRD, Quest Employment, Dallas Metrocare Services
26	Houston Dow Chemical, Houston	Houston ISD, Texas Workforce Solutions-VRD, SCI, Inc., MHMRA
27	Northwest Texas Healthcare System, Amarillo	Amarillo ISD, Texas Workforce Solutions-VRD, Quest Employment, Texas Panhandle Center, Texas Health and Human Services
28	The Hospitals of Providence East Campus, El Paso	Socorro ISD, Texas Workforce Solutions-VRD, Empowering Hands, Emergence MHMR

#	Partner Name	Location
29	Highland Springs Retirement Community, Dallas	Richardson ISD, Quest Employment, Texas Workforce Solutions-VRD, Metrocare

### **Group Skills Training**

At times, groups of students with disabilities may be brought together to learn vocational skills. These activities are called group skills trainings (GSTs). The following are examples of GSTs that involve coordination with employers.

### **SWEAT Program**

In collaboration with the Texas School for the Blind and Visually Impaired (TSBVI), VRD holds a five-week summer work program called SWEAT (Summer Work Experience in Austin, Texas), in which up to 15 students who are blind or visually impaired are trained in employability skills, independent living skills, and mobility training and gain four weeks of work experience with businesses in the Austin area. The program is designed to prepare students for success in the world of work and adult living through increased independence, competence, and self-confidence.

### **Work and College Opportunities (WACO) Program at Texas A&M University**

VRD collaborates with the Brazos Valley Center for Independent Living and the Texas A&M University Center on Disability & Development to hold the WACO summer work program. Participants receive development and instruction in professionalism, self-determination, teamwork, and other areas connected to employment and college experience while working 16–20 hours a week in the community and living on campus.

### **Working and Living in the Community (WALIC)**

WALIC is a four-week residential work-based learning and employment skills program for 15 eligible VR customers who are visually impaired students 16 years of age or older and have additional disabilities. This program is designed to be shorter in duration with a higher level of support for students with disabilities who have not previously participated in a work-based learning experience. Students participate in approximately 16 hours a week of work-based learning activities with only moderate support from a work experience trainer. VRD coordinates with local employers to identify and develop jobsites for this program.

Additionally, students receive a stipend for the work experience. Concurrent with the work-based learning activity, TSBVI staff provides employability skills training and independent living skills training (including home management, money management, personal care, travel skills, food preparation, community opportunities for recreational and leisure activities, and social interaction skills with peers, coworkers, and staff) to prepare the customers for the jobsite. Students are expected to participate at a level consistent with their abilities, ranging from full independence to basic exposure to adult living and various levels of work readiness.

### **Mastering the Real World of Work**

Mastering the Real World of Work combines a vocation-based residential training component (Phase I) followed by paid work experience in the customer’s own community (Phase II). The paid work experience consists of 100 hours of part-time work at four hours a day, five days a week, at employer partner CVS stores. The purpose of the GST is to ensure that blind and visually impaired customers are properly equipped for working in the real world.

## **Job Opportunities for Blind Students (JOBS)**

JOBS is a three-week residential summer work experience program for 16 students ages 14 to 22 who are blind or visually impaired. This community-based program is designed to engage students with disabilities in the pre-ETS categories outlined in WIOA.

## **Easy Virtual Fair**

In 2020, VRD implemented a strategy to offer virtual opportunities for students to engage with employers through activities hosted on the Easy Virtual Fair (EVF) platform. Through this platform, VR counselors and other staff members were able to stay in contact with students and provide them opportunities to interact around career and college exploration, transition, and more traditional job fairs. The platform offers a virtual job fair format where individual entities can establish “booths” to share information and interact with customers. To date, VRD has hosted approximately 70 events, with interaction from approximately 5,000 individuals.

## H. INTERAGENCY COOPERATION

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

### 1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

#### **Texas Health and Human Services Commission**

VRD will continue to collaborate with the Texas Health and Human Services Commission (HHSC), the state agency responsible for providing services to individuals with developmental disabilities and administering the state Medicaid plan under Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.).

Collaboration occurs in the delivery of VR services, including extended services, for individuals with the most significant disabilities who have been determined to be eligible for home and community-based services under a Medicaid waiver, Medicaid state plan amendment, or other authority related to a state Medicaid program. VR counselors provide information to mutually served customers to assist them in understanding how to navigate the long-term support and services system. VRD continues to collaborate with HHSC's Office of Disability Services Coordination to recruit Supported Employment (SE) providers already established with HHSC to ensure a seamless transition from one program to another, when applicable.

Additionally, VRD works with HHSC Medicaid/CHIP to resolve individual and system issues involving mutually served customers, particularly those transferring from Supplemental Security Income (SSI) to Title II Childhood Disability Beneficiaries to ensure continuation of Medicaid 1915(c) waiver services.

VRD coordinates with the Social Security Administration (SSA) to encourage Employment Services Providers (ESPs) to become employment networks (ENs) under SSA's Ticket to Work Program. VRD offers incentive payments to ESP-ENs that provide:

- supported employment or job placement services during the provision of VR services; and
- extended supports to Ticket to Work customers after VR case closure in order to advance employment and/or increase customer earnings.

### 2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

VRD continues to collaborate with HHSC, the state agency responsible for providing services to individuals with developmental disabilities, and administers the state Medicaid plan under Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.).

Collaboration occurs in the delivery of VR services, including extended services, for individuals with the most significant disabilities who have been determined to be eligible for home and community-based services under a Medicaid waiver, Medicaid state plan amendment, or other authorities related to a state Medicaid program. VR counselors provide information to mutually served customers to assist them in understanding how to navigate the long-term support and services system.

Additionally, VRD works with HHSC Medicaid/CHIP to resolve individual and system issues involving mutually served customers, particularly those transferring from Supplemental

Security Income (SSI) to Title II Childhood Disability Beneficiaries to ensure continuation of Medicaid 1915(c) waiver services.

SSA and HHSC have a data exchange agreement that allows HHSC to access SSA data. Through a third-party agreement (State Verification and Exchange System), VRD is able to obtain SSA data regarding cost reimbursement from HHSC.

VRD works in collaboration with HHSC on legislative reports. In December 2018, a joint HHSC and VRD report regarding occupational skills training (OST) programs for individuals with intellectual and developmental disabilities (IDD) was submitted to the Texas legislature as required by Senate Bill 2027 (SB2027) 85th Legislature, Regular Session (2017). The SB2027 report addressed the current state and validity of OST opportunities in Texas for individuals with IDD and identified regions in the state where training programs should be improved or expanded, as well as strategies for placing program graduates with IDD into fulfilling jobs by means of existing, improved, or expanded programs. The report also provided information about postsecondary and training programs offered in Texas for individuals with IDD and noted a lack of OST programs for this population. External stakeholder recommendations presented in the report recommended that VRD produce a report on possible funding sources for OST programs for individuals with IDD and identify specific occupations requiring a certificate that would be appropriate for individuals with IDD within in-demand industries.

As a result of the SB2027 report, the legislature passed SB2038, 86th Legislature, Regular Session (2019), which mandated VRD to submit a report to the legislature identifying potential funding sources for postsecondary certifications, occupational licenses, or other workforce credential programs for individuals with IDD, as well as identify specific occupations in high-demand industries in Texas for which some type of workforce credential is required and may be appropriate for individuals with IDD. The SB2038 report was submitted to the legislature in October 2020 and included information on potential funding sources and occupations pertaining to OST for individuals with IDD. The report also identified 15 postsecondary programs for students with IDD funded through the US Department of Education.

### **Texas Higher Education Coordinating Board**

Texas Education Code (TEC), §61.06641, authorized through the passage of SB1017, 86th Legislature, Regular Session (2019), requires the Texas Higher Education Coordinating Board (THECB) to periodically review the policies and practices that increase access to higher education opportunities, distribute educational outreach marketing materials, and establish an advisory council on postsecondary education for individuals with IDD. VRD has a member serving on this advisory council.

The statute requires a report to be written that includes historic and current higher education data and recommendations for changes to support success and achievement for individuals with IDD in accessing higher education (TEC §61.06641(k)). The advisory council submitted its first report in November 2020. Future reports are to be submitted to the governor and members of the legislature by December 1 of each even-numbered year.

### **3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.**

#### **Mental Health**

Working with HHSC, VRD promotes mental health evidence-based practices and other evidence-informed models of service that will improve competitive integrated employment outcome strategies for customers.

Other examples of collaboration include:

- increasing coordination and developing new partnerships with other state and community organizations—mental health organizations, local authorities, and universities—that serve individuals with developmental or intellectual impairments and mental health disorders to develop resources, increase knowledge, and implement best practices;
- working with the HHSC Office of Mental Health to identify and implement best practices, engage potential community partners, and facilitate service coordination; and
- participating in the Mental Health First Aid training conducted by local mental health authorities, which teaches VR counselors and other professionals how to assist someone experiencing a mental health crisis.

Training is another area that emphasizes interagency cooperation. VRD program specialists provide the following training:

- Annual training on the VR programs to Home and Community-Based Services waiver providers, service coordinators and case managers, the Private Provider Association of Texas, Providers Alliance for Community Services of Texas members, community centers staff, including customer benefits officers, and the Statewide Intellectual and Developmental Disabilities Consortium
- Training on VRD services and benefits and work incentives to HHSC Managed Care Organization service coordinators and management, and other service providers and Medicaid waiver case managers
- Training on VRD employment services, benefits, and work incentives to members of the seven-statewide mental health peer-operated support groups
- Training on benefits and work incentives every six months for VRD staff, ESPs, HHSC providers, and IDD and mental health staff
- Overview of benefits and work incentives to HHSC staff, providers, and other community stakeholders throughout the year
- Overview of VRD services and best practices for mutually served customers for HHSC service coordinators, case managers, private providers, and other staff members
- Overview of Wellness Recovery Action Plan (WRAP) for community partners
- Training to ESPs statewide on best practices in the provision of employment services to individuals with the most significant disabilities
- Training on assistive technology for community partners

## I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

### 1. SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

#### A. QUALIFIED PERSONNEL NEEDS

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

##### I. THE NUMBER OF PERSONNEL WHO ARE EMPLOYED BY THE STATE AGENCY IN THE PROVISION OF VR SERVICES IN RELATION TO THE NUMBER OF INDIVIDUALS SERVED, BROKEN DOWN BY PERSONNEL CATEGORY;

The Texas Workforce Commission (TWC), Vocational Rehabilitation Division (VRD) is committed to ensuring that customers receive services from qualified rehabilitation professionals as set forth in §101(a)(7) of the Rehabilitation Act of 1973 as amended by WIOA and 34 C.F.R. §361.18. VRD has established procedures to support the Comprehensive System of Personnel Development (CSPD). The Rehabilitation Council of Texas (RCT) provides input to VRD in addressing issues related to personnel development. The Policy, Procedures, and Personnel Development Committee of RCT meets quarterly to discuss the development and maintenance of policies and procedures in support of the CSPD standard.

VRD requires an employee who serves in a position functionally classified as a Vocational Rehabilitation Counselor (VR counselor), Transition Vocational Rehabilitation Counselor (transition VR counselor), or Unit Support Coordinator (USC) to meet the Comprehensive System of Personnel Development (CSPD) standard as required by the TWC Qualified Vocational Rehabilitation Counselor (QVRC) program. The QVRC program specialists closely monitor counselor hiring and educational needs, as well as work in close coordination with management to evaluate salaries and benefits.

As of July 2, 2021, the Vocational Rehabilitation Division (VRD) had 1,122 full-time employment (FTE) staff positions to provide direct services to 61,629 VR participants, broken down as follows:

- Vocational Rehabilitation Counselors (VRCs)
- Transition Vocational Rehabilitation Counselors (TVRCs)
- Unit Support Coordinators (USCs)
- Vocational Rehabilitation Teachers (VRTs)
- Rehabilitation Assistants (RAs)

As of October 8, 2021 VRD's average caseload size is 72.

The number of VR participants served has declined recently. As a result, staffing projections will be held constant for the next two years; however, staffing needs will be reassessed annually as VRD implements outreach and awareness strategies to engage with more individuals with disabilities, including students with disabilities. Additionally, VRD has initiated staff recruitment



and retention initiatives. As the number of counselors stabilizes and newer counselors gain experience, VRD expects to increase the number of customers served. As the number of customers served increases, the number of support staff and in-house service providers is expected to remain constant for the next two years and will be assessed to ensure sufficient staff to meet the expected need. VRD anticipates that it will be able to identify additional capacity for service delivery efforts within existing staffing levels during the current biennium through current and future Rapid Process Improvement (RPI) activities and other quality improvement activities.

**Table: Vocational Rehabilitation Division Attrition Rate as of July 1, 2020.**

<b>Job title</b>	<b>Average Workforce (average filled positions)</b>	<b>Total Separations</b>	<b>Volun</b>	<b>Invol</b>	<b>Retire</b>	<b>Other (transfer to outside agency)</b>	<b>Year-to-date (YTD) Rate</b>	<b>Vol YTD Rate</b>
<b>VRC</b>	472.75	79	46	10	20	3	16.71%	9.73%
<b>TVRC</b>	148	17	10	2	3	2	11.49%	6.76%

Table notes:

- YTD Rate calculated by dividing Total Separations by Average Strength
- Vol YTD Rate calculated by dividing Volume by Average Strength
- Attrition Rate information provided by TWC Human Resources

Outreach activities will continue to be conducted to broaden the population of individuals with disabilities being served by VRD. Outreach, education, and awareness efforts will be targeted to unserved populations such as transition students, veterans, and individuals with neurodevelopmental disorders (including autism), and psychological disorders such as bipolar disorder or schizophrenia.

**II. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND**

Column one of following table identifies the number of VRD staff needed to provide direct customer services currently.

**Table: Vocational Rehabilitation Division Current Personnel Needs**

<b>Job Title</b>	<b>PY'21 Number of Positions Currently Needed as of 7/1/20</b>
<b>VR Counselor</b>	519
<b>Transition VR Counselor</b>	162
<b>Unit Support Coordinator</b>	29
<b>Criss Cole Rehabilitation Center VRC</b>	7
<b>Vocational Rehabilitation Teacher (Field)</b>	33
<b>Vocational Rehabilitation Teacher (CCRC)</b>	32

<b>Job Title</b>	<b>PY'21 Number of Positions Currently Needed as of 7/1/20</b>
Rehabilitation Assistants	350

Table notes:

- Total positions as of July 1, 2020, per Active Position Report.

III. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES IN 5 YEARS BASED ON PROJECTIONS OF THE NUMBER OF INDIVIDUALS TO BE SERVED, INCLUDING INDIVIDUALS WITH SIGNIFICANT DISABILITIES, THE NUMBER OF PERSONNEL EXPECTED TO RETIRE OR LEAVE THE FIELD, AND OTHER RELEVANT FACTORS.

VRD will maintain current number of personnel in all personnel categories. The impact of the COVID-19 pandemic has resulted in data anomalies outside previous projection models for VRD to maintain present staffing levels. VRD will be prepared for increased demand for VR services as the economy improves and more people resume looking for work and career advancement opportunities.

#### B. PERSONNEL DEVELOPMENT

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

##### I. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM;

During the Fall 2019 to Summer 2020 school year, VRD worked with six Texas university master's degree rehabilitation counseling programs and clinical rehabilitation counseling programs. While there are other universities in Texas which offer a master's degree in rehabilitation counseling, the listed universities are the ones most used by VRD.

- Stephen F. Austin University
- University of North Texas
- University of Texas at Austin
- University of Texas at Rio Grande Valley
- Texas Tech University
- University of Texas at El Paso

##### II. THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

A total of 402 students enrolled in Fall 2019 to Summer 2020 from the universities listed in the below table with credentials of academic preparedness to meet national rehabilitation counselor certification requirements. Additionally, there may be periodic changes in the academic preparedness in meeting certification requirements due to changing laws, public regulations, and/or delivery of rehabilitation services as practiced in the United States. The different university rehabilitation counseling programs may also vary accordingly, which would affect academic certification requirements.

**Table: Fall 2019 – Summer 2020 Students Enrolled and Previous-Year Graduates**

<b>Institution</b>	<b>University Students Enrolled</b>	<b>University Graduates from the Previous Year</b>
<b>Texas Tech University</b>	100	24
<b>University of North Texas</b>	106	31
<b>University of Texas at Rio Grande Valley</b>	157	5
<b>University of Texas at Austin</b>	10	10
<b>Stephen F. Austin University</b>	9	3
<b>University of Texas at El Paso</b>	20	10
<b>TOTAL</b>	402	83

III. THE NUMBER OF STUDENTS WHO GRADUATED DURING THE PRIOR YEAR FROM EACH OF THOSE INSTITUTIONS WITH CERTIFICATION OR LICENSURE, OR WITH THE CREDENTIALS FOR CERTIFICATION OR LICENSURE, BROKEN DOWN BY THE PERSONNEL CATEGORY FOR WHICH THEY HAVE RECEIVED, OR HAVE THE CREDENTIALS TO RECEIVE, CERTIFICATION OR LICENSURE.

A total of 83 students graduated in Fall 2019 to Summer 2020 from the universities listed in the table above (Section II).

**2. PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL**

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

VRD has developed productive, proactive working relationships with Texas universities that train rehabilitation professionals. Involvement with Texas universities results in student requests for practicum and internship placements within VRD. Internships have been offered since 1999 for students completing master’s degrees in Rehabilitation Counseling, Clinical Rehabilitation Counseling or Rehabilitation. In PY’20, VRD hosted 16 internships. Evaluations of student interns come directly from certified, licensed, or Qualified Vocational Rehabilitation Counselor (QVRC) internship supervisors and department advisors from the intern’s university.

Job vacancy notices are routinely posted on WorkInTexas.com, TWC’s statewide online job search website that also serves and the state labor exchange system. Hiring supervisors can also request a broader distribution of vacancy notices by having them posted to additional websites such as Indeed.com, Monster.com, and others.

Recruitment continues for bilingual Spanish- and English-speaking candidates to fill positions located in areas with high Spanish-speaking populations. Opportunities to promote employment to all community sectors are achieved by sharing job postings with universities.

VRD encourages the hiring of qualified individuals with disabilities and strives to ensure that staff represents ethnic diversity and thereby reflects the population of Texas and the customers we serve. Ethnic distribution of VRD employees and Texas residents is shown below.

**Table: Ethnic Distribution of VRD Employees and Texas Residents**

<b>Ethnic Group</b>	<b>VRD Employees</b>	<b>Texas Residents</b>
<b>Caucasian</b>	37.53%	50.13%
<b>Hispanic</b>	30.16%	39.26%
<b>African American</b>	27.73%	12.19%
<b>Asian</b>	1.24%	5.44%
<b>American Indian/Alaska Native</b>	0.04%	0.96%
<b>Native Hawaiian/Other Pacific Islander</b>	0.10%	0.12%
<b>More Than Two</b>	2.60%	17.61%

SOURCES: Texas Workforce Commission Human Resources, U.S. Census Bureau 2013-2017 American Community Survey 5-Year Summary File, Texas Demographic Center, and Texas Department of Transportation, Texas Department of Motor Vehicles. Additionally, approximately 7.5 percent of VR employees have reported a disability, such as blindness/visual impairment, Deaf/hard of hearing, physical and mental.

For the purpose of calculating the agency turnover, losses are counted only when an individual terminates employment with the agency. Losses do not include vacancies created because of employee promotions, reclassifications, demotions, or transfers within the agency.

VRD has established several strategies for recruitment, preparation, and retention of qualified personnel. Plans reflect continued annual needs assessment, quarterly review of strategies and interventions for recruitment, and updated review of the QVRC program following each semester to ensure satisfactory progress.

### **Recruitment of Qualified Personnel**

VRD has a recruitment plan that identifies in-state and out-of-state entities from which qualified personnel may be hired. VRD also has designated recruitment coordinators who work closely with each of these organizations. For each identified organization, the coordinator makes contact to establish specific recruitment strategies for each program. The recruitment plan coordinator regularly reviews and updates the plan. Depending on location, size, and nature of the class, and need of the institution, VRD employs the following approaches to recruitment:

- Participates in advisory committees for partnering universities allowing access and contribution to program improvement processes and to students for on-site visits;
- Conducts classroom orientations and distributes recruitment information for graduating students;
- Collaborates with the administration of distance-learning programs to determine effective processes for recruiting distance-learning students;
- Sends job postings regularly to VR graduate programs of more than 90 U.S. universities;

- Coordinates with universities for graduate VR internships to recruit rehabilitation counselors; and
- Participates in job fairs and employment conferences to recruit individuals from minority backgrounds and individuals with disabilities.

### **Preparation of Qualified Personnel**

VRD has a system to recruit and hire individuals as VR counselors who have master's degrees in Rehabilitation Counseling. The QVRC database is maintained to monitor counselors who are required to meet CSPD qualifications. Monitoring also includes the number of counselors with master's degrees in Rehabilitation Counseling or closely related fields, as well as the number who are Certified Rehabilitation Counselors (CRCs) or Licensed Professional Counselors (LPCs). As of July 1, 2020, there were 710 positions (including 56 vacancies) required to meet the CSPD standard. Of the 649 filled positions, 463 counselors met the standard and 186 had not yet met it.

Applicants who meet the CSPD standard are preferred for counselor positions. The hiring manager must obtain a transcript for any candidate for a counselor position who has a bachelor's degree or higher prior to making a salary offer. For counselor candidates with a master's degree or a current CRC or LPC certification, the manager must provide the transcript or license certificate to the CSPD coordinator for review. The CSPD coordinator will verify whether an applicant meets the educational requirements or CSPD standard. The verification must be completed before the hiring manager makes a salary offer.

If a candidate is hired who does not meet the CSPD standard, he or she must participate in the QVRC program and complete the required coursework within seven years after completing the initial training year.

Counselors are required to sign the QVRC Acknowledgment form within 30 days of hire. By signing this required form, the counselor agrees that to hold a counselor position, they must meet the CSPD standard at the time of employment or by completing the educational requirements within the established CSPD timeline. Counselors not achieving the standard within the prescribed time are not allowed to continue functioning in this capacity. VRD provides funding for master's degrees in Rehabilitation Counseling, if alternate funding sources are not available.

Growth and development for all levels of staff is essential. VRD staff attend external trainings provided by such agencies as the American Association of Diabetes Educators, the Texas Association for Education and Rehabilitation of the Blind and Visually Impaired, the Association for Education and Rehabilitation of the Blind and Visually Impaired, the Assistive Technology Industry Association, the Council of State Administrators for Vocational Rehabilitation, and the National Council of State Agencies for the Blind. Staff are encouraged to attend national, state, and local conferences related to VR, including the Association of People Supporting Employment First National Conference, Texas Association of Vocational Adjustment Coordinators, Southeast Regional Institute on Deafness training, Assistive Technology Industry Association International Conference, and the Capacity Building Institute regarding building capacity for postsecondary transition of students with disabilities. In so doing, they can receive training and network with other professionals.

Additionally, trainings are conducted within the regions by designated training staff, and within the field offices by senior counselors, unit program specialists, supervisors, managers, and others.

Staff members also participate in training modules, such as vocational rehabilitation job-specific training, developed by the TWC Training and Development department's VR counselors. Training needs and priorities are identified on an ongoing basis. Past training has been in the areas of diabetes, substance abuse, caseload management, employment assistance, worker's compensation, criminal background checks, mental health first aid, counseling and adjustment to blindness, career choice counseling, autism, and self-employment. During their first year of employment, counselors attend internal training conducted by TWC Training and Development to enhance skills and develop a basic understanding of policy and how to implement caseload management processes.

### **Retention of Qualified Personnel**

The Texas legislature sets the state's classification schedule, which determines pay grades for counselors and other classified positions as well as the salary schedule for the pay range agencies must use for compensation. VRD supports a wide range of learning activities for all classifications of employees. Staff views professional growth and development activities as a benefit that enhances retention. All staff has professional development plans created in coordination with managers as part of the performance management process. Other retention strategies are as follows:

- Flexible work schedules allow for four- or four-and-a-half-day workweeks, as well as teleworking opportunities, when feasible;
- A career ladder for counselors ranging from VRC I-IV, with respective salary compensation;
- New Salary Guidelines for VR counselors and Rehabilitation Assistants (RA) which increases starting salaries and offers salary adjustments for education level advancements;
- A variety of training opportunities in leadership skills development;
- VRD will cover the cost of the CRC and LPC exams, as well as renewals, and in-state travel to achieve the examination;
- A recognition award program is in place to highlight staff achievement;
- Access to training to support credential maintenance is available at no cost to the employee; and
- An educational reimbursement program is in place for support staff working toward attainment of a bachelor's degree.

### **3. PERSONNEL STANDARDS**

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

- A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND**

Qualified Vocational Rehabilitation Counselors

VRD is committed to ensuring its workforce is highly skilled, professionally trained, and duly prepared to serve Texans with disabilities with the highest quality service delivery. Toward this goal, VRD has a plan to achieve standards for counseling staff in compliance with §101(a)(7) of the Rehabilitation Act as amended by WIOA and 34 C.F.R. §361.18.

There are no state-approved certifications or licensing requirements for VR counselors in Texas. Therefore, VRD has established standards for academic preparedness focused on the national requirements of the Commission on Rehabilitation Counselor Certification (CRCC) for Certified Rehabilitation Counselor (CRC) certification. However, the national requirements are subject to change as our laws, public regulations or delivery of rehabilitation services evolve. As mentioned previously, the different university rehabilitation counseling programs may also affect certification requirements.

VRD ensures that staff is well-qualified to assist individuals with disabilities. There is emphasis of educational requirements at the bachelor's, master's, and doctoral levels in fields related to rehabilitation. However, the degree field may include other degrees that prepare individuals to work with customers and employers. For example, bachelor's degrees might include not only VR counseling, but also social work, psychology, disability studies, human resources, special education, or another field that reasonably prepares individuals to work with customers and employers. For individuals hired at the bachelor's level, there is a requirement for at least one year of paid or unpaid experience related to direct work with individuals with disabilities.

VRD recognizes master's or doctoral degrees in fields of specific study, such as VR counseling, clinical rehabilitation counseling, behavioral health, behavioral science, disability studies, human relations, human services, marriage and family therapy, occupational therapy, psychology, psychometrics, rehabilitation administration/services, social work, special education, vocational assessment/evaluation, or another field that reasonably provides competence in the employment sector in a disability field or rehabilitation-related fields.

A counselor meets the CSPD standard by holding a master's degree in VR counseling; master's degree in "counseling or counseling-related field" with specific coursework; master's, specialist, or doctoral degree in specific majors with specific coursework; current CRC certificate from CRCC; or current LPC licensure.

Therefore, a counselor with a master's degree in counseling or a counseling-related field must, at a minimum, complete a graduate course in the Theories and Techniques of Counseling and successfully complete six graduate courses with a primary focus in the following areas:

- one course on assessment;
- one course on occupational information or job placement;
- one course on case management and rehabilitation services;
- one course on medical aspects of disabilities;
- one course on psychosocial aspects of disabilities; and
- one course on multicultural issues.
- A counselor with a master's or doctoral degree in one of the listed specific fields of study must complete a graduate course on the Theories and Techniques of Counseling, and successfully complete six graduate courses each with a primary focus in the areas listed, plus one course on Foundations of Rehabilitation Counseling.

Although VRD has taken steps to hire rehabilitation counselors with master's degrees in VR counseling, several factors pose challenges to this undertaking. A significant barrier to hiring counselors with master's degrees in rehabilitation counseling is the expanse of Texas that must be served. VR affords rehabilitation assistants (RAs) who attain an undergraduate degree the opportunity for employment in VR as VR counselors. The years of knowledge and experience on a caseload coupled with their undergraduate degree have proven beneficial to VR.

**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.**

NOTE: Please see Section 4(a) for additional detail on training.

VRD strongly encourages formal education and training of our staff who provide direct support to Texans with disabilities. The VRD training curriculum is planned to assist staff in understanding the current workforce and how to best serve our customers. Moreover, VRD provides specialized training for specialty caseloads such as blind and visual impairments, Deaf and hard of hearing, just to mention a few.

With today's pandemic environment, VRD is very creative in establishing training environments that benefit our staff, while having the safest environment available. For example, most of our training is virtual, but can be delivered through classroom, webinar, or teleconference.

Examples of Specialized Training:

Vocational Rehabilitation and Blindness training is a 32 hour training attended by all newly hired VR staff members, except for part-time employees. Participants develop an awareness of the nature of blindness and the impact it has on all aspects of a person's life.

Immersion Training is a four to six-week program. Application of the Texas Confidence Builder philosophy, using the least restrictive adaptation model, structured discovery, problem solving, and adult learning theory includes techniques to facilitate emotional adjustment to blindness. The Orientation and Mobility portion of Immersion Training allows for individualized training and opportunity for immediate feedback.

Many of the courses in the Master's in Rehabilitation Counseling degree provide opportunities to develop skills and learn about assistive technology, including screen readers, voice-activated software, special keyboards, braille devices, closed circuit televisions, portable note takers, etc., as part of the intensive Employment Assistance Training program. VR Teachers (VRTs) are provided with a three-year individual training plan that includes the following:

- Four weeks wearing a blindfold at the Criss Cole Rehabilitation Center participating in classes with customers;
- Three weeks of training in teaching, process, procedures, and employment assistance training for VRTs;
- Extensive braille training—all VRTs must demonstrate competency annually by completing The Annual Braille Project and submitting it for review by the VRT Program Specialist; and
- Training transcripts, letters of recommendation from a certified VRT, and funding to help interested teachers become academy certified.



Many customers and staff members who are blind or visually impaired need alternative formats for printed communications. Staff in the Assistive Technology Unit prepare documents in braille, large print, or electronic format. Dedicated computers with braille translation software and braille embossers are available in each field office

Additionally, VRD employs Assistive Technology Specialists to support staff using assistive programs with standard agency software to complete their job duties.

Also, the DeafBlind Unit serves customers who have a dual sensory loss affecting both hearing and vision. Specialists with knowledge related to both hearing loss and vision impairment consult with caseload-carrying staff, customers, and community resources to develop and implement plans and services. VRD also purchases state-certified interpreter services as needed.

VRD is committed to maintaining support for in-service and academic training that ensures all staff receives the necessary knowledge and skills to be successful and that provides developmental activities for new and emerging leaders. The focus of statewide training is typically programmatic to enhance direct service delivery to customers. All staff has access to training opportunities through the professional development plan created through the management chain's professional development process.

VRD managers receive training on a variety of management issues, including ethics, communication, leadership, monitoring for quality service delivery and compliance, and management information system tools.

VRD also partners with organizations such as the National Council on Rehabilitation Education to ensure the active dissemination of research development for the field of rehabilitation. Additionally, VR uses studies from the Institute on Rehabilitation Issues to assist in the development of practices for service delivery.

#### 4. STAFF DEVELOPMENT

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

A. A SYSTEM OF STAFF DEVELOPMENT FOR PROFESSIONALS AND PARAPROFESSIONALS WITHIN THE DESIGNATED STATE UNIT, PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

VRD is committed to ensuring that its diverse workforce is highly skilled, professionally trained, and thoroughly prepared to provide the highest quality service to Texans who are disabled. Additionally, VRD strongly supports specialized training and maintaining specialty caseloads in the areas of blindness and visual impairments, deaf and hard of hearing, and transition, to name a few. Our training curriculum is designed to help staff gain a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

All staff members have access to internal and external training designed to develop the knowledge and skills necessary to achieve success in their positions, provide developmental activities for new and emerging leaders, and enhance service delivery for customers. Trainings are delivered through classroom, webinar, and teleconference.

Vocational Rehabilitation and Blindness training is a 32 hour training attended by all newly hired VR staff members, except for part-time employees. Participants develop an awareness of the nature of blindness and the impact it has on all aspects of a person's life.

Introduction to Blindness training is a two-week program that introduces participants to the nonvisual blindfold training strategy. Under blindfold, staff members experience the key emotional factors and learn alternative techniques in the adjustment to blindness process, discovering that blindness does not preclude an individual from living an independent and successful life.

Immersion Training is a four- to six-week program. Application of the Texas Confidence Builder philosophy, using the least restrictive adaptation model, structured discovery, problem solving, and adult learning theory includes techniques to facilitate emotional adjustment to blindness. The Orientation and Mobility portion of Immersion Training allows for individualized training and opportunity for immediate feedback.

Eye Medical is a three-day training designed to provide staff members with a basic understanding of the anatomy of the eye, familiarize them with pathological conditions causing vision loss, and develop a referential body of knowledge related to diagnostics, treatment, training, and long-term vocational implications.

Individual training plans are developed for all new counselors. Training plans for new employees foster competencies in skills required for different job categories. TWC's Training and Development provides or coordinates more formal, extensive trainings for caseload carrying staff.

Many of the courses in the Master's in Rehabilitation Counseling degree provide opportunities for practical application on actual caseloads. Counselors and other staff learn about assistive technology, including screen readers, voice-activated software, special keyboards, braille devices, closed circuit televisions, portable note takers, etc., as part of the intensive Employment Assistance Training program. VR Teachers (VRTs) are provided with a three-year individual training plan that includes the following:

- Four weeks wearing a blindfold at the Criss Cole Rehabilitation Center participating in classes with customers;
- Three weeks of training in teaching, process, procedures, and employment assistance training for VRTs;
- Extensive braille training—all VRTs must demonstrate competency annually by completing The Annual Braille Project and submitting it for review by the VRT Program Specialist; and
- Training transcripts, letters of recommendation from a certified VRT, and funding to help interested teachers become academy certified.

All staff members participate with their supervisors in planning annual goals and identifying training needs and goals. Combined with input received from VR managers and administrators, this process assesses training needs and determines annual training calendar offerings.

VRD meets adaptive communication needs. For example, with the Limited English Proficiency (LEP) Language Line, staff members can establish communication with customers in numerous languages, including those commonly found in Texas.

Many customers and staff members who are blind or visually impaired need alternative formats for printed communications. Staff in the Assistive Technology Unit prepare documents in braille, large print, or electronic format. Dedicated computers with braille translation software and braille embossers are available in each field office. Staff members use these to produce documents, such as letters to customers or meeting agendas.

VRD employs Assistive Technology Specialists to support staff using assistive programs with standard agency software to complete their job duties. The specialists assess staff skill levels, recommend and implement training approaches, and coordinate service delivery statewide.

The DeafBlind Unit serves customers who have a dual sensory loss affecting both hearing and vision. Specialists with knowledge related to both hearing loss and vision impairment consult with caseload-carrying staff, customers, and community resources to develop and implement plans and services. VRD also purchases state-certified interpreter services as needed.

VRD works closely with the education system in transitioning students with disabilities from high school to postsecondary training or employment. Transition VR counselors participate in training covering the Admission, Review, and Dismissal (ARD) process as well as the Individualized Education Program (IEP). When conducting seminars or workshops for the ARD and IEP process, trainers may also include parents and professionals from:

- TEA's Special Education Division
- Regional education service centers and local education agencies (LEAs)
- Disability Rights Texas
- Partners Resource Network, Inc.
- Texas School for the Blind and Visually Impaired
- Texas School for the Deaf

Additionally, VRD staff members participate in cross-trainings with other entities involved in education for students with vision loss or visual impairment, such as the Texas Association for Education and Rehabilitation of the Blind and Visually Impaired, and sponsors and participates in workshops and seminars to help education staff members develop expertise in working with these students.

VRD is committed to maintaining support for in-service and academic training that ensures all staff receives the necessary knowledge and skills to be successful and that provides developmental activities for new and emerging leaders. While there are several positions within VRD that support field operations, the focus of statewide training is typically programmatic to enhance direct service delivery to customers. All staff has access to training opportunities through the professional development plan created through the management chain's professional development process. Training content for field staff is typically developed within the system of statewide training product modules disseminated through field management staff. Content learning includes topics that directly relate to the knowledge, skills, abilities, and attitudes necessary to perform jobs as expected by management and as detailed in job descriptions. Content training strategies include the following:

- Continued focus on the foundations of the VR process for counselors and RAs, including accurate eligibility determination, inclusion of customers in planning for service delivery, thorough assessment and planning practices, models for VR counseling, informed customer choice, service to culturally diverse populations, purchasing

practices, supported employment, customized employment, and other strategies for quality employment assistance, service delivery, and effective case note documentation;

- Training in working with employers and customers to increase knowledge of the Americans with Disabilities Act, the Rehabilitation Act Amendments of 1998, the Olmstead decision, available independence initiatives, and WIOA to enhance employment options and employment knowledge;
- Training in the Individuals with Disabilities Education Act, appropriate options and alternatives for effective transition services and Social Security work incentive programs, including programs under the Ticket to Work and Work Incentive Improvement Act of 1999;
- Training in assessing appropriate rehabilitation technology interventions;
- Extending opportunities to take advantage of training available from external sources for ongoing dissemination of timely trends related to disability and treatment modalities within the field of rehabilitation;
- Coordinating with the Texas Administrators of Continuing Education and other entities as appropriate to develop localized training in targeted disability areas; and
- Implementation of training for new counselors that focuses on critical thinking and sound decision making.

#### B. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO DESIGNATED STATE UNIT PROFESSIONALS AND PARAPROFESSIONALS.

VRD will initiate outreach and increase staff knowledge and skills in effective rehabilitation strategies for serving such customers by:

- researching and implementing best practices;
- building staff capacity and expertise to serve individuals who are blind and have additional disabilities (e.g., through the implementation of the Mental Health First Aid training, a full-day course that should be taken by all staff members who have direct contact with customers); and
- increasing coordination and developing new partnerships with other state and community organizations, including mental health organizations, HHSC's Office of Mental Health Coordination, and the Helen Keller National Center for DeafBlind youth and adults.

VRD managers receive training on a variety of management issues, including ethics, communication, leadership, monitoring for quality service delivery and compliance, and management information system tools.

VRD has also developed partnerships with organizations such as the National Council on Rehabilitation Education to ensure the active dissemination of research development for the field of rehabilitation. Additionally, VRD uses studies from the Institute on Rehabilitation Issues to assist in the development of practices for service delivery.

#### **New Counselors**

All new counselors are trained using a sequence of learning events. The sequence includes an assigned coach who uses a published quick start guide, which includes a learning plan for on-the-job training and required and optional courses. The learning plan guides the new counselor's learning activities during the initial probationary period. Based on the learning plan, training is provided throughout the initial year through a series of required courses, peer training, and coaching sessions that focus on learning to guide each customer to successful achievement of his or her employment and/or independent living goals. Training covers VR policies and procedures as well as values-based decision making, informed customer choice, employment assistance, and successful closures. Additionally, new counselors learn effective strategies for caseload management, working with Community Rehabilitation Program (CRP) providers, assessing employment trends, matching employer needs to qualified consumers, and building successful partnerships with customers, businesses, schools, and other community resources. Following completion of the probationary period, the counselor and supervisor create a professional development plan, which addresses the required educational standards of their position. The professional development plan is updated annually regarding training activities and progress toward meeting educational requirements.

### **New RAs**

All new RAs are trained using a sequence of learning activities. The sequence includes an assigned coach and a quick start guide, which includes a learning plan for on-the-job training and required and optional courses. Training is provided throughout the initial year through attendance at a required course on RA fundamentals, other courses as assigned by the RA's supervisor, peer training, and coaching sessions. The fundamentals course focuses on the roles of the RA in facilitating successful employment outcomes for customers. The required course addresses both internal and external customer service, purchasing, disability etiquette, and an overview of values-based decision making and the RA's role in the VR process. Following completion of the initial training period, the RA and supervisor develop a professional development plan that identifies additional training and development activities to support the RA's successful performance.

### **New Vocational Rehabilitation Managers/Supervisors**

New VR managers/supervisors also participate in a sequence of learning activities to develop their skills and competencies. This sequence includes a regional orientation followed by a series of self-directed activities guided by a comprehensive orientation outline. These activities provide training for new managers in VR program management, effective coaching, and values-based decision making. Following completion of the initial learning activities, the new manager receives professional development training in management courses, which may be through the Governor's Center for Management Development and other available resources. A regional director guides the new manager through this process. VR managers comply with TWC's performance planning and review policy for evaluating the performance of VR staff within the division. This system requires that supervisory personnel formally evaluate an employee's performance in the essential functions of the employee's position as per TWC Human Resources policies.

This system promotes clear understanding between the supervisor and the employee of the priorities and objectives for the upcoming period. In reviewing performance against expectations, emphasis is placed on results achieved through service delivery, identification of reasons for variance from expected results, and establishment of appropriate development plans that serve to deliver skill-enhancing, practical learning opportunities.

RCT has the opportunity to review and comment on the policies, procedures, and programmatic direction of the VRD. RCT representatives are invited to fully participate in development and review of policies and procedures. VR directors meet quarterly with RCT to present updates and share input regarding knowledge, skills, and abilities of VR staff and overall VR program outcomes.

In summary, a comprehensive and overarching training design is in place to meet the learning needs of all VR staff. While these activities are provided in a myriad of venues and through multiple modalities, all opportunities for training are specifically directed toward skill enhancement and credential building to form the most qualified staff possible to deliver services to customers in Texas. Although all staff members do not have direct customer contact, all staff members have a direct impact on the success of the VR program by providing vocational services and an increased opportunity for independence.

#### 5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

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

One way VRD meets adaptive communication needs is by using the LEP Language Line. This allows staff to communicate with customers in numerous languages, including those commonly found in Texas.

Many customers and staff members who are blind or visually impaired need alternative formats for printed communications. Staff in the Assistive Technology Unit prepare documents in braille, large print, or electronic format. Dedicated computers with braille translation software and braille embossers are available in each field office. Staff uses these to produce documents, such as letters to customers or meeting agendas.

VRD employs Assistive Technology specialists to support staff using assistive programs with standard agency software to complete their job duties. Specialists assess staff skill levels, recommend and implement training approaches, and coordinate service delivery statewide.

The DeafBlind Unit serves customers who are who have a dual sensory loss affecting both hearing and vision. Specialists fluent in sign language consult with caseload carrying staff, customers, and community resources to develop and implement plans and services. VRD also purchases state-certified interpreter services as needed.

Additionally, VR staff participates in cross-trainings with other entities involved in education for students with visual loss, such as the Texas Association for Education and Rehabilitation of the Blind and Visually Impaired, and sponsors and participates in workshops and seminars to help education staff members develop expertise in working with these students.

ReHabWorks (RHW) is the electronic case management system used by VRD. RHW contains information specific to each CRP vendor. VR staff has access to and shares provider information regarding qualifications, services provided, location, experience in working with target populations, foreign languages, and other communication skills (for example, Braille).

VRD continues to provide effective modes of communication for staff, applicants, eligible individuals with disabilities, and its community partners and stakeholders based on individualized needs. Alternative formats include, but are not limited to, American Sign Language interpreters, Spanish interpreters, and AT&T Language Line interpreters for languages such as Vietnamese, Cambodian, Chinese dialects, etc. Also available are captioning,

braille through the Assistive Technology Unit, large print, reader services, and electronic formatting and screen readers. VRD also recruits bilingual staff for caseloads with high concentrations of customers who speak languages other than English.

Some unit management decisions lead to the development of specialty caseloads in which a concentration of customers' needs services requiring additional counselor skills. For example, counselors and RAs who are hired to serve caseloads with a concentration of deaf and hard-of-hearing customers are preferred to have manual communication skills at the time of hire. These counselors and RAs receive ongoing professional development specific to this target population. The professional development plan created for these individuals includes specific skills maintenance or enhancement activities that may be accessed through external training providers, in addition to traditional training opportunities within VRD.

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

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

VRD is committed to ensuring that its diverse workforce is highly skilled, professionally trained, and thoroughly prepared to provide the highest quality service to Texans who are blind or visually impaired and/or have other disabilities. Our training curriculum is designed to help staff gain a 21st century understanding of the evolving labor force and the needs of individuals with disabilities, and all procedures and activities related to personnel development described are responsive to WIOA and the amendments made to the Rehabilitation Act of 1973, the Americans with Disabilities Act, and the Individuals with Disabilities Education Act. VRD develops partnerships with high schools, education service centers, and TEA to assist with professional development for personnel who work with students with disabilities.

VRD has specialty transition VR counselors and general VR counselors who act as liaisons for high schools and partner with the educational system to serve transition-age students seeking assistance to access adult vocational services. Partnering with ISDs allows counselors to use office space on campus to ensure that student customers have access to resources available through the workforce investment system, community, businesses, and other partners necessary to build a network of support. The increase in the number of students with autism, physical and neurodevelopment disabilities, and psychiatric or dual diagnoses reinforces the need to continue best practices components of IDEA. Staff works closely with TEA, centers for independent living, communities, and businesses to achieve collaboration, effective programming, and customer satisfaction. As a result, these efforts improve the effectiveness of VR services for transition customers. Such collaborations take on many different forms in training VRD and educational staff, as well as in impacting families. VRD staff will continue to collaborate with ISDs in the provision of Pre-ETS as specified in WIOA. Additionally, counselors are often invited to education service centers to participate in educator training and to present training, particularly for more effective transition planning for students. VRD staff works with schools in creating job fairs that allow students to meet with employers and gather information about the labor market. Family nights are hosted in some areas to invite interested members of the public to VRD offices to share resource information, discuss service delivery issues, and give input regarding best practices that would better support students and their families.

In some areas, community partners such as churches, Workforce Solutions Offices, and community centers assist in providing training to school personnel on understanding cultural

diversity in Texas. Training objectives that include sensitivity to cultural issues are integrated in the provision of the principles of ethics in service delivery. Given the cultural diversity within the expanse of Texas, this is an issue often addressed in external conferences with presentations to ensure that staff is sensitive to and aware of the manner in which the VR process is applied.

VRD continues to enhance partnerships with TEA, high schools, community colleges, stakeholders, and businesses to leverage relations that better prepare students to transition to postsecondary education and the workforce.



## J. STATEWIDE ASSESSMENT

1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

A. WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;

Per §101 of the Rehabilitation Act of 1973 (RA73), the 2020 CSNA described the VR service needs of Texas residents with disabilities. This CSNA summary report covers the first triennial period since the reorganization of the VR program was completed on October 1, 2017. Based on a routine review of certain Texas state agencies conducted by the Texas Sunset Commission, the 84th Texas Legislature passed Senate Bill 208 to reorganize the administering agencies of the VR program.

Senate Bill 208 required:

- the VR program to move to TWC by September 1, 2016;
- blind services and general services to be combined into one DSU by October 1, 2017; and
- VR staff to integrate into the Workforce Solutions Offices (American Job Centers) across Texas.

Throughout the DSU combination and reorganization, TWC aimed to eliminate duplicative management structures, realign staff positions, and increase VR counselor positions to meet customer demand.

### Methodology

The 2020 CSNA used a mixed-methods approach that combined quantitative evidence of VR service patterns with qualitative insights from customers, staff, and other stakeholders, especially providers.

The five principal information sources for the 2020 CSNA are the following:

1. **One local (Austin) and four statewide virtual town hall meetings** using the ZOOM webinar platform (523 attendees). An online SurveyMonkey town hall questionnaire allowed people who were unable to attend to provide input (108 respondents).
2. **An internet-based VR needs assessment survey** of customers, staff, and providers contracted with the Public Policy Research Institute (PPRI) at Texas A&M University (1,283 respondents). This survey focused on satisfaction with systems, processes, and specific VR services.
3. **13 key informant interviews**, including one VR manager and one counselor from each of the six integrated service areas, in addition to one supervisor from the Criss Cole Rehabilitation Center (CCRC)
4. **Customer satisfaction surveys** conducted for VR by Westat
5. **Data from ReHabWorks** (the automated case management system used by the Texas VR program)

### Identified Vocational Rehabilitation Service Needs

As part of its focus, the 2020 CSNA studied trends that were first identified in the 2017 and previous CSNA cycles. Goals previously established by the VR program, in coordination with the

RCT, remain relevant. The Texas VR program will continue to assess gathered data to consider opportunities and solutions as the newly reorganized VRD matures.

Per the 2020 CSNA, the state's three overarching categories of VR service needs are:

1. **Provider Network:** recovering and maintaining a robust network of providers to ensure access to equitable and diverse services;
2. **Process Improvement:** streamlining procedures and approval processes to remove any unnecessary administrative processes for staff, providers, and customers; and
3. **Staffing and Expertise:** recovering and maintaining sufficient staff and expertise to effectively serve job seekers with disabilities.

### **Summary of Themes and Needs**

A common and prominent CSNA theme that emerged in town hall meetings and online surveys was the need to reduce wait time for receiving services by streamlining paperwork and internal procedures. All CSNA information sources also emphasized the need for VR offices to consistently offer accurate and up-to-date information and concise explanations of VR services and policies. Customers in particular complained about communication and service interruptions due to prolonged vacancies or high counselor turnover.

When comparing the 2020 and 2017 CSNAs, one notices a considerable increase in feedback about the need for informed customer choice and a perceived lack of service provider options. At the town halls, providers stated that new policies put into place during the program reorganization resulted in additional paperwork processes, especially for outcome-based services such as supported employment. They also noted the need for rate revisions to bring contracted prices into closer alignment with standard market values. Six town hall attendees identified as providers who had left the VR network for these reasons. Current providers asked for expanded opportunities for constructive engagement with VR management to provide feedback and discuss policy changes. Respondents to the town hall question regarding customer choice frequently commented on the limited number of VR provider options rather than no options. Likewise, eight of the 13 key informants (VR managers and counselors) mentioned deficits of specialty service providers outside of large metro areas.

The present reality of a declining service provider network helps to explain perception gaps between staff and VR program participants. In other words, staff may be following procedures as specified, but due to current provider network circumstances, customers still may feel that they have not been offered a satisfactory choice in services. Participants also highlighted the need for expanded labor market knowledgeability by VR staff, together with employer education and awareness, to cultivate a greater diversity of employment options after exiting the VR program.

### **Most Significant Disabilities**

To be considered as having a significant disability, a VR customer must have serious limitations in one or more functional areas and require multiple VR services over an extended period. Having a most significant disability means that the VR customer must have serious limitations in three or more functional areas (for example, mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) and require multiple VR services over an extended period. Additionally, if an individual is an SSI or SSDI recipient, then he or she is presumed eligible and considered to have at least one significant disability.

As shown in Table 1, Employment Rate for FFY'17-'19 by Severity of Disability, individuals with significant and most significant disabilities have less success in achieving employment with VR

services. Formulating strategies aimed at mitigating the impact of disability significance will prove helpful for the next triennium.

**Table 1. Employment Rate for FFY'17-'19 by Severity of Disability**

Source: I|3, ReHabWorks Closure Aggregates

<b>Disability Significance</b>	<b>Closures</b>	<b>Successful</b>	<b>Employment Rate</b>
<b>No Significant Disability</b>	6,001	5,202	86.69%
<b>Significant Disability</b>	44,233	26,537	60.0%
<b>Most Significant Disability</b>	18,729	9,638	51.46%

#### B. WHO ARE MINORITIES;

When data collection for the 2020 CSNA began in January 2020, there were about 3,153,000 Texans with disabilities, representing approximately 12 percent of the state’s population. Of that number, 50 percent were male, 50 percent were female, 32 percent identified as Hispanic or Latino, and 23 percent identified as belonging to a minority racial group. The approximately 219,000 VR participants<sup>1</sup> served during FFY'17-'19 generally matched these demographics; 31 percent were Hispanic and/or Latino, and 27 percent belonged to a minority racial group. However, only 45 percent of VR participants were female, which reflects the lower levels of participation by females in the Texas labor force. In FFY'19, about 60 percent of VR participants achieved a desired employment outcome, otherwise known as a successful VR case closure.

#### C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

##### **Underserved Populations**

Based on data in the 2020 CSNA, likely underserved populations and unmet needs include the following:

- Individuals who are age 55 years or older and unemployed at the time of application to the VR program
- Individuals who need supported employment to find their first jobs
- Individuals who are pursuing career advancement
- Individuals who live outside of major metropolitan areas and have neurodevelopmental disabilities such as autism spectrum disorder (ASD) or an intellectual developmental disorder (IDD) or who have psychosocial disabilities such as depressive mood or personality disorders and need access to specially trained staff, providers, and employers
- Individuals who are stroke survivors or who have traumatic brain injuries and need new service providers after an open enrollment period failed to attract specialized vendors
- Students who live in rural or disadvantaged school districts and need preemployment and other transition services

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<sup>1</sup> Rounded sum of annual FFY participant counts (76,338 in FFY'17, 72,494 in FFY'18, and 70,146 in FFY'19)

- Veterans who have disabilities, need information about TWC services, and may not be aware of the Texas VR program
- Individuals with blindness or visual impairments (BVI) who need expanded access to providers of BVI and independent living services to support vocational goals
- Individuals who receive public benefits and need easily accessible information about how employment may impact those benefits

**Meeting the Needs of Underserved Populations**

Because individuals with the most significant disabilities have around one-third less success in employment, more strategic attention dedicated to this population should deliver specific strategies to improve employment rates.

During FFY’17-’19, the number of VR participants declined by 8 percent, from 76,338 to 70,146, whereas the program’s employment rate declined by 6 percentage points, from 66 percent to 60 percent. On a year-to-year basis, the sharpest decrease occurred in FFY’18 and was accompanied by an approximately 20 percent decrease in VR service expenditures for that fiscal year. The beginning of FFY’18 coincided with the completion of the reorganization of the VR program into one DSU on October 1, 2017. According to feedback from the town halls and VR needs survey, a shrinking provider network coupled with increased counselor vacancies has impacted the consistency of customer engagement and continuity of service delivery.

**Table 2: Racial and Ethnic Distribution**

Source: Texas American Community Survey Table S1810 (2018, 5-Year Estimates), ReHabWorks Tables (aggregate counts for FFY’19), TWC HR data as of August 31, 2019

<b>Population</b>	<b>Hispanic Ethnicity</b>	<b>Racial Minorities</b>
TWC-VRD Staff	30%	31%
VR Participants	31%	27%
Texas Disability Population	32%	23%

VRD encourages the hiring of qualified individuals with disabilities and strives to ensure equal opportunity employment so that its staff can represent the ethnic diversity of its customer base. There were no needs mentioned in the town halls or key informant interviews that were specifically associated with race or ethnicity.

**D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND**

The VR program aims to increase VR counselors’ knowledge of work incentives and the effect of earnings on Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI). This will improve the quality of VR’s provision of counseling on decisions that impact employment.

Respondents to the 2020 PPRI VR needs survey overwhelmingly identified a concern about the loss of government benefits as a chief challenge to successful VR outcomes: 78 percent said it was sometimes or often a challenge, which was the highest proportion for any of the items on the survey. Moreover, 74 percent of respondents identified a lack of accessible information on government benefits and work incentives as sometimes or often a challenge. VR customers who

receive SSI or SSDI benefits during their case are about 20 percent less likely to achieve successful employment outcomes than those who do not receive benefits.

During FFY'17-'19, the employment rate for customers receiving SSI or SSDI declined at a higher rate (9 percent decrease) than for customers not receiving these benefits (5 percent decrease). Moreover, the proportion of successful closures made up of cases with customers receiving government benefits has gradually declined, from around 23 percent in FFY'17 to 19 percent in FFY'19.

Compared to the 2017 CSNA, the proportion of staff and VR participants in the 2020 PPRI VR needs survey who indicated they were "very knowledgeable" about the relationship between employment, government benefits, and disability-related services remained constant at 29 percent of staff and 13 percent of participants. Conversely, the proportion of survey respondents who indicated they were "not knowledgeable" about the relationship between employment, government benefits, and disability-related services increased from 15 percent in 2017 to 29 percent in 2020. This overall increase could reflect the higher representation of VR participants in the 2020 survey.

Work incentive and benefits counseling ranked among the lowest rated of all VR services regarding customer satisfaction, with only 57 percent of VR participants indicating that they agreed or strongly agreed that this type of service met their expectations for quality and timeliness. However, this still represents a significant increase in satisfaction, compared to 43 percent for participants in 2017.

VRD has worked to increase collaboration and coordination with Boards, employers, and other stakeholders to increase competitive integrated employment outcomes and work-based learning experiences, which may include in-school or after-school opportunities such as internships, volunteer positions, and summer and year-round work experience programs.

TWC has data agreements with other federal and state agencies, including the VA and the State Wage Interchange System (SWIS). These agreements help forge the way for collaboration and coordination of services and resources.

The Summer Earn and Learn (SEAL) program is offered in each of the 28 local workforce development areas. VRD contracts with each Board to contract out employability skills training, work site identification, placement, and monitoring and to pay student wages and associated costs for SEAL participants. Local VRD staff works in partnership with each Board to identify students who might benefit from the program, to conduct outreach and recruitment activities, to identify work sites, and to provide any additional services needed for students to complete the program.

VRD is also an active partner in Project SEARCH, a full-year school-to-work program that offers classroom instruction, career exploration, and hands-on training through work site rotations. Although Project SEARCH is a business-led program, referring and preparing students with disabilities involves partnering with independent school districts (ISDs), education service centers, and local Workforce Solutions Offices as well as VRD. As of the end of FFY'19, Texas had 29 Project SEARCH sites. Sites are led by a host business, and key partners include VRD, ISDs, CRPs, and local authorities. Each Project SEARCH site typically has eight to 12 participants per year. Approximately 225 students participated in Project SEARCH for the 2018-2019 school year. Project SEARCH sites were active not only in the largest metropolitan areas but also in other cities and towns, including El Paso, Lubbock, College Station, Brenham, Tyler, and Amarillo.

The results of an I|3 evaluation of Project SEARCH outcomes from FFY'15-'18 illustrate the impact of the program. The success rate for Project SEARCH participants was 89.6 percent, compared to 53.5 percent for nonparticipants. Compared to customers aged 18–24 at exit who did not receive the service, Project SEARCH participants were about 68 percent more likely to achieve successful employment outcomes and about 32 percent more likely to retain employment in the second and fourth quarters following exit from the VR program. These differences are statistically significant at the 95 percent level of confidence.

There were 299 Project SEARCH participants identified and 299 standard VR participants sampled. Standard VR participants were sampled from the same management units and counties where their counterparts received Project SEARCH services. All participants in the study were between the ages of 18 and 24 at exit, had an intellectual or learning impairment, and did not have an impairment resolved prior to program exit.

Additionally, VRD has implemented Group Skills Trainings (GSTs) to teach vocational and self-advocacy skills in coordination with employers. For instance, the SWEAT program (Summer Work Experience in Austin, Texas) is a five-week summer work program conducted by the Texas School for the Blind and Visually Impaired (TSBVI) in which up to 15 students who are blind or visually impaired are trained in employability skills, independent living skills, and mobility training. VRD also provides training opportunities for deaf and hard-of-hearing customers at the Texas School for the Deaf. Additionally, VRD collaborates with the Brazos Valley Center for Independent Living and Texas A&M Center on Disability and Development to hold the WACO (Work and College Opportunities) at Texas A&M summer work program. Participants receive development and instruction in professionalism, self-determination, and teamwork. They typically experience and learn about college opportunities and work in the community 16 to 20 hours a week while living on campus.

VRD aims to leverage existing business partnerships to identify additional opportunities to better prepare students for the workplace and help them obtain jobs. In addition to the State office team, each of VRD's six regions has a Business Relations Team consisting of two Business Relations Coordinators, two Employment Assistance Specialists who specialize in BVI (except for the East Texas region, which only has one), and other staff at the management unit level identified as part of the Outreach and Service Coordination regional teams. Together, these staff members work with local employers to learn about their open positions as well as to help employers understand and see the value in hiring individuals with disabilities. With many of these partnerships, special hiring and/or training programs have been developed with the intent of helping ensure that VR customers have not only the skills for the open positions but also access to positions within the companies. Nevertheless, these efforts have not yet been evaluated for effectiveness.

Meanwhile, the Independent Living Services for Older Individuals Who Are Blind (IL-OIB) program has been retained by TWC within the VR program. As a result, referral processes and policies have been developed to expand the network of providers for individuals who need independent living services.

Other collaboration with local education agencies (LEAs), higher education, and Boards aims to expand customer access to postsecondary opportunities that provide training and employment in meaningful higher-paying jobs.<sup>2</sup> VRD will continue to focus on developing and enhancing partnerships and broad collaboration, not only because they are emphasized in WIOA, but also

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<sup>2</sup> VRD currently has contracts with 15 colleges and universities for 39 different programs, activities, and camps.

because they promise to help cultivate a more responsive and effective service delivery system that will benefit customers.

The full CSNA report was published in June 2021. The VR service needs identified by the report are guiding VRD in programmatic improvements and enhancements for meaningful employment outcomes for customers as well as strategies to better leverage relationships with employers and collaboration with partners.

**E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.**

The VR program aims to expand and improve vocational rehabilitation services, including pre-employment transition services (Pre-ETS) for students with disabilities who are transitioning from high school to postsecondary education and/or employment, and to improve coordination with state and local secondary and postsecondary educational entities.

VR participants 24 years or younger have the lowest employment rate of any age cohort. During FFY'17-'19, the average employment rate for youth was 51 percent, while the corresponding rate for customers with student status (a subset of youth) was 46 percent. The decrease in the employment rate for both youth and students mirrored that of the VR average (6 percentage points). After an initial decline of around 10 percent in FFY'18, the absolute number of employment outcomes (successful closures) for students and youth increased by about 9 percent in FFY'19 relative to FFY'18.

During FFY'17-'19, the number of VR participants with youth status (age 14–24) remained stable.<sup>3</sup> At the same time, the number of Pre-ETS customers steadily increased over the period, from around 18,400 in FFY'17 to approximately 29,800 in FFY'19. This includes both potentially VR eligible Pre-ETS customers (prior to VR program eligibility determination) and VR eligible Pre-ETS customers receiving authorized and other VR services.

Mentions about Pre-ETS service needs figured prominently in town hall meetings and key informant interviews. Table 3 depicts Pre-ETS need and progress categories ranked by the number of mentions in each category.

**Table 3. Pre-ETS Specific Need and Progress Mentions**

Source: I|3 Content Analysis of the 2020 Town Halls and Key Informant Interviews

<b>Category</b>	<b>Need Mentions</b>	<b>Progress Mentions</b>	<b>Total Mentions</b>
Collaboration/Communication	18	9	27
Readiness and Work-Based Learning	14	10	24
Transportation/Remote Delivery	11	3	14
Labor Market and Career Guidance	9	2	11
Marketing and Community Outreach	6	1	7

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

<sup>3</sup> In FFY'17 there were 29,465 VR participants with youth status, compared to 29,448 in FFY'19. Due to the decline in adult VR participants (age 25 and over), the proportion of youth among all VR participants increased from 39 percent in FFY'17 to 42 percent in FFY'19.

As part of its focus, the 2020 CSNA studied trends that were first identified in the 2017 and previous CSNA cycles. Goals previously established by the VR program, in coordination with the RCT, remain relevant specifically pertaining to CRPs.

Additional initiatives in follow-up to the 2020 CSNA include:

- **Ongoing Dialogue:** In collaboration with the RCT member representing CRPs, VRD is conducting quarterly virtual meetings with providers to receive feedback on opportunities and challenges they experience when working with VRD, with the goal of increasing the effectiveness of services for VR customers.
- **Enhanced Communication and Support:** VRD has initiated the Standards for Providers Local Provider Liaison initiative to enhance continuous improvement of Standards for Provider contractors. This initiative is currently for Employment Services providers and focuses on building active relationships between VR staff and providers, promoting effective communication between VR staff and providers, providing technical assistance and training to providers and VR staff, and monitoring provider performance.
- **Rate Review:** VRD has initiated a rate review project to ensure that rates are current and competitive for services listed in the Vocational Rehabilitation Services Manual and the Standards for Providers Manual. Services under rate review include, but are not limited to, supportive residential services for persons in recovery, employment services, and rates for consultants. Rate methodologies will be updated as needed, and VRD will take action to update rates.
- **Business Transformation Project—Purchase of Goods and Services for VR Customers:** TWC has initiated a multi-division business transformation project aimed at improving the availability of qualified providers to deliver goods and services that meet VR customer needs. The project strives to improve efforts to attract, recruit, and retain quality providers, simplify and streamline processes, enhance communication, and ensure that rates paid to providers are sufficient. VRD has engaged with providers to ensure that their perspectives and views on current issues are reflected in the project.

3. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT.

LEAs maintain fiscal responsibility for transition services that are also considered special education or related services and that are necessary for ensuring a free, appropriate public education to children with disabilities within Texas, including those outlined in the IEP (34 CFR §361.22(c)).

Additionally, House Bill 617, 83rd Texas Legislature, Regular Session (2013), requires that each ISD have an individual identified as the transition and employment designee (TED). The TED is responsible for providing information and resources about effective transition planning and services. VRD has counselors throughout the state assigned to high schools to help students with disabilities prepare for entry into the workplace. Nothing related to VRD's responsibilities and requirements under WIOA should be construed as a reduction in LEAs' responsibility under IDEA to provide and pay for special education and related services as a part of a free and appropriate education to students with disabilities (WIOA §101(c)).

VRD has specialty transition VR counselors and VR counselors who act as liaisons for high schools and partner with the educational system to serve transition-age students seeking assistance to access adult vocational services. Partnering with ISDs allows counselors to use



office space on campus, helping to ensure that student customers have access to resources available through the workforce investment system, community, businesses, and other partners necessary to build a network of support. The increase in the number of students with autism, physical and neurodevelopment disabilities, and psychiatric or dual diagnoses reinforces the need to continue best practices components of IDEA.

Staff works closely with the Texas Education Agency (TEA), centers for independent living, communities, and businesses to achieve collaboration, effective programming, and customer satisfaction. As a result, these efforts improve the effectiveness of VR services for transition customers. Such collaborations take on many different forms in training VRD and educational staff, as well as in impacting families. VRD staff will continue to collaborate with ISDs in the provision of Pre-ETS as specified in WIOA. Additionally, counselors are often invited to education service centers to participate in educator training and to present training, particularly for more effective transition planning for students. VR staff works with schools in creating job fairs that allow students to meet with employers and gather information about the labor market. Family nights are hosted in some areas to invite interested members of the public to VRD offices to share resource information, discuss service delivery issues, and give input regarding best practices that would better support students and their families.

In some areas, community partners such as churches, Workforce Solutions Offices, and community centers assist in providing training to school personnel on understanding cultural diversity in Texas. Training objectives that include sensitivity to cultural issues are integrated into the provision of the principles of ethics in service delivery. Given the cultural diversity within the expanse of Texas, this is an issue often addressed in external conferences with presentations to ensure that staff is sensitive to and aware of the manner in which the VR process is applied.

The following strategies will expand and improve VR services for students and youth with disabilities who are transitioning from high school to postsecondary education and/or employment and improve coordination with state and local secondary and postsecondary educational entities:

- providing supported employment services to youth with the most significant disabilities and enhanced coordination to ensure that extended support is in place for customers to achieve and maintain employment outcomes;
- evaluating, revising, and developing policy, procedures, and staffing strategies to improve consistency and increase effectiveness in the provision of transition services;
- expanding and increasing partnerships with schools to facilitate the coordination and provision of Pre-ETS to students with disabilities;
- continuing Project SEARCH to assist students and youth with developmental disabilities to successfully transition to competitive integrated employment;
- developing and delivering a transition training module on best practices pertaining to provision of transition services, guidance and career exploration, postsecondary options, job readiness, and encouragement of customer self-advocacy;
- collaborating with TEA, education service centers, LEAs, and postsecondary education institutions to improve access and transition for students moving from secondary to postsecondary education and training;

- developing additional work experience options such as part-time, summer, and volunteer work experiences and other work-based learning opportunities; and
- enhancing existing statewide Pre-ETS initiatives that leverage partnerships with Boards, secondary and postsecondary education institutions, and employers.

## K. ANNUAL ESTIMATES

Describe:

### 1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES

The 2018 *Disability Status Report* (DSR) published by the Cornell University Employment and Disability Institute estimates the percentage of noninstitutionalized working-age (ages 21 to 64) Texans with disabilities. The 2018 DSR uses data from the 2018 *American Community Survey* (ACS).

Per the DRS, in Calendar Year 2018 (CY'18), the prevalence of disability in Texas for working-age individuals was 9.7 percent. Working-age individuals with disabilities numbered about 1,569,300 out of a total working-age population of 16,194,400. The highest prevalence rate was for ambulatory disability, with 4.6 percent of working-age Texas residents reporting this type of impairment. The lowest prevalence rate was for self-care disability, with 1.8 percent of working-age Texas residents reporting this type of impairment. About 7.2 percent of working-age individuals with disabilities were not working but seeking jobs, whereas 15.6 percent of working-age individuals without disabilities were not working but seeking jobs. The employment rate for working-age individuals with disabilities was 40.8 percent compared to 78.8 percent for working-age individuals without disabilities.

Based on the information above, DRS estimates that somewhere between a greatest lower bound of 112,990 (the 7.2 percent of working-age individuals with disabilities who were not working but seeking jobs) and a least upper bound of 753,265 (including the 40.8 percent of working-age individuals with disabilities who were employed but may need supports to retain employment) individuals with disabilities may consider applying for vocational rehabilitation (VR) services in Texas if they are aware of the opportunity. However, assuming that only about 50 percent of working-age individuals with disabilities who are already employed would apply for the VR program (which aligns with VR customer demographics for CY'18), the maximum number of individuals that could be expected to apply for services is most likely closer to 320,000. This is a moderately liberal estimate because not all disabilities qualify for VR services and the ACS tends to overestimate disability prevalence due to self-reporting.

Of the estimated 320,000 Texans who could benefit from VR services, 66,000 individuals (20.6 percent) were participants in the VR program during CY'20. This means that outreach efforts have the potential to recruit 254,000 more participants. A total of 65.6 percent of Texas households have broadband internet, which means that 166,000 of these potential participants could be recruited by online initiatives like Start My VR.

The potential for additional online outreach means that approximately 75,000 to 90,000 VR-eligible customers (the number of customers that the VR program has historically served per year) is a reasonable estimate for meeting actual service needs.

The following table shows the actual number of applicants and eligibility determinations for Federal Fiscal Years 2018–2021 (FFY'18–'21) and projections for FFY'22–'23. In view of historical service trends and estimated service needs per the ACS, VR anticipates that the number of individuals who apply for VR services will remain stable in FFY'22–'23. It takes three to nine months for most applicants to become participants. Additionally, many participants stay active in the VR program for 20 to 70 months. VR anticipates that the total number of eligible customers served and expenditures will continue to decrease slightly in 2022 because of decreased numbers of applicants during prior years. The total number of eligible customers served is not expected to start increasing again until FFY'23.

**Table 1: Actual and Projected Applications for VR Services FFY'18-'23**

Year	Applicants	Percent Change from Prior Year	Eligibility Determinations	Percent Change from Prior Year
2018	30,241	-15.28%	25,508	-17.04%
2019	29,477	-2.53%	25,188	-1.25%
2020	23,828	-19.16%	20,769	-17.54%
2021	27,199	14.15%	22,200	6.89%
2022	27,265	0.24%	22,151	-0.22%
2023	27,125	-0.51%	22,318	0.75%

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

The following table shows the actual number of eligible VR customers served by Title I funds from FFY'18-'21 and projections for FFY'22-'23. For this purpose, "customers served" is defined as customers receiving purchased services. This table does not include customers who received a service with a supported employment service category code during a given federal fiscal year (that is, Title VI).

**Table 2a: Actual and Projected Number of Eligible VR Customers Served by Title I Funds FFY'18-23**

Year	Program	Number Served	Percent Change from Prior Year
2018	Vocational Rehabilitation - Title I	80,528	-5.53%
2019	Vocational Rehabilitation - Title I	77,705	-3.51%
2020	Vocational Rehabilitation - Title I	70,577	-9.17%
2021	Vocational Rehabilitation - Title I	70,493	-0.12%
2022	<b>Vocational Rehabilitation - Title I</b>	<b>71,808</b>	<b>1.87%</b>
2023	<b>Vocational Rehabilitation - Title I</b>	<b>75,026</b>	<b>4.48%</b>

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

The following table shows the actual number of eligible VR customers served with Title VI funds from FFY'18-'21 and projections for FFY'22-'23. For this purpose, "customers served" is defined as customers receiving purchased services. This table only includes customers who received a service with a supported employment service category code during a given federal fiscal year.

**Table 2b: Actual and Projected Number of Eligible VR Customers Served by Title VI Funds FFY'18-23**

Year	Program	Number Served	Percent Change from Prior Year
2018	Supported Employment - Title VI	2,861	-17.83%
2019	Supported Employment - Title VI	2,676	-6.47%
2020	Supported Employment - Title VI	2,314	-13.53%
2021	Supported Employment - Title VI	1,654	-28.52%
<b>2022</b>	<b>Supported Employment - Title VI</b>	<b>1,040</b>	<b>-37.13%</b>
<b>2023</b>	<b>Supported Employment - Title VI</b>	<b>702</b>	<b>-32.49%</b>

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION.

Texas is not under an order of selection.

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

Texas is not under an order of selection.

4. THE COST OF SERVICES FOR THE NUMBER OF INDIVIDUALS ESTIMATED TO BE ELIGIBLE FOR SERVICES. IF UNDER AN ORDER OF SELECTION, IDENTIFY THE COST OF SERVICES FOR EACH PRIORITY CATEGORY.

VR anticipates average and total expenditures on services to continue to increase steadily in FFY'22 and FFY'23 for Title I funding. While total Title VI funding is expected to continue to decrease, average expenditures are expected to rise due to the anticipated decrease in Title VI numbers served. For this purpose, "customers served" is defined as customers with an individualized plan for employment (IPE) and with purchased service during the program year to more accurately represent average and total cost.

**Table 3: Estimated and Projected Caseloads and Costs FFY'18-23**

Year	Program	Number Served	Average Cost	Total Cost
2018	Vocational Rehabilitation - Title I	71,202	\$1,496.73	\$106,570,276.90
2019	Vocational Rehabilitation - Title I	69,301	\$1,516.15	\$105,071,038.69
2020	Vocational Rehabilitation - Title I	64,936	\$1,480.62	\$96,145,844.11
2021	Vocational Rehabilitation - Title I	64,897	\$1,527.19	\$99,110,082.70
<b>2022</b>	<b>Vocational Rehabilitation - Title I</b>	<b>66,675</b>	<b>\$1,524.33</b>	<b>\$101,634,463.95</b>
<b>2023</b>	<b>Vocational Rehabilitation - Title I</b>	<b>69,582</b>	<b>\$1,473.10</b>	<b>\$102,500,414.19</b>
2018	Supported Employment - Title VI	2,823	\$2,574.98	\$7,269,161.98
2019	Supported Employment - Title VI	2,651	\$2,711.74	\$7,188,821.18
2020	Supported Employment - Title VI	2,303	\$2,359.95	\$5,434,967.82
2021	Supported Employment - Title VI	1,654	\$2,740.68	\$4,533,090.97*
<b>2022</b>	<b>Supported Employment - Title VI</b>	<b>1,067</b>	<b>\$3,459.26</b>	<b>\$3,691,610.93</b>
<b>2023</b>	<b>Supported Employment - Title VI</b>	<b>745</b>	<b>\$4,567.89</b>	<b>\$3,404,926.70</b>

If current trends continue, VR believes there are funds available to serve all individuals currently eligible for VR services and individuals in plan status. VR anticipates having the necessary funds to cover the cost of expected eligibility determinations and planned services. Factors that could change the VR estimates include:

- changes in federal and state appropriations; and
- changes in state statutes.

If more information becomes available about the impacts of these changes on VR programs, projections will be updated.

## L. STATE GOALS AND PRIORITIES

The designated State unit must:

1. IDENTIFY IF THE GOALS AND PRIORITIES WERE JOINTLY DEVELOPED AND AGREED TO BY THE STATE VR AGENCY AND THE STATE REHABILITATION COUNCIL, IF THE STATE HAS A COUNCIL, AND JOINTLY AGREED TO ANY REVISIONS

TWC-VRD and RCT collaborated to establish goals and priorities to advance the continued provision of high-quality VR services to eligible customers. With the input and data expertise of the TWC Division Information Innovation & Insight (I|3), both VRD and RCT jointly developed and agreed to the state goals and priorities outlined in section 2.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS

TWC VRD identified six primary goals and priorities to carry out the VR and supported employment programs. The primary goals also include strategies to improve the design and delivery of supported employment services. For more information specific to provision of supported employment services, refer to section (n) Goals and Plans for Distribution of Title VI Funds.

### **Goal Area One: Improve provider recruitment, retention, and support.**

VRD must recruit and retain a robust network of providers, including providers of supported employment services, to ensure that customers have access to the full array of services they need no matter where they reside in the state. VRD is working to improve provider onboarding by decreasing the time from contract initiation to direct service delivery to customers. Additionally, VRD is committed to providing timely feedback to providers for both contractual and programmatic questions. VRD has initiated several strategies to ensure that customers have access to and receive quality goods and services to assist with achieving a successful employment outcome.

### **Goal Area Two: Streamline VR policy, process, and procedure and improve workflow processes and tools to facilitate timely service delivery.**

VRD's priority is to help more Texans with disabilities achieve better employment outcomes through an efficient and easily accessible service delivery system that maximizes the use of available resources. To achieve this priority, VRD will focus on streamlining procedures and approval processes to remove unnecessary administrative tasks for staff, providers, and customers. VRD is also redesigning the current supported employment service delivery model, including policies, procedures, and forms.

### **Goal Area Three: Recruit and retain VR staff.**

VRD is committed to creating team capacity to serve Texans with disabilities by recruiting, retaining, and engaging VR staff. A career with VRD must offer meaningful work that helps change lives for the better. VRD will continue to provide career growth, advancement, and opportunities for staff to specialize in areas of interest. VRD is committed to making team engagement a priority. VRD will work diligently to provide the necessary training and resources for continuous improvement.

### **Goal Area Four: Improve and develop additional user-friendly resources to maximize customer choice.**

VRD needs simple, accessible information to help customers make informed decisions about how to explore their local labor market, how employment may affect their benefits, and the availability and ratings of service providers.

**Goal Area Five: Improve VR staff knowledge and system capacity to enhance service delivery to customers.**

VRD is committed to increasing opportunities for staff to specialize in areas of interest, such as neurodevelopmental disorders, blindness and visual impairments, deaf and hard of hearing, brain injury, transition students, veterans, behavioral health, and others. VRD will also continue to enhance and expand training in labor market information, work incentives and benefits, serving individuals with multiple disabilities, and how to work with employers. Providing tools, such as desk aids, and increasing staff capacity through process improvement and innovative service delivery approaches will also assist counselors to serve customers effectively and efficiently.

**Goal Area Six: Increase and enhance partnerships with employers to 1) better understand employer needs when hiring people with disabilities and working with VR collaboratively, and 2) build awareness about the benefits of hiring people with disabilities to increase employment opportunities for VR customers.**

VRD values its partnerships with employers and will continue to build system capacity to promote and support hiring, retention, and advancement of individuals with disabilities across industries. Additionally, VRD will collaborate with its Texas workforce system partners to participate in joint strategies that address employers' workforce needs.

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

Data from the FFY'20 Comprehensive Statewide Needs Assessment (CSNA) were used to establish VRD goals and priorities. Refer to the Statewide Assessment section for a more detailed discussion of 2020 CSNA findings pertaining to the identified Goal Areas, an evaluation of prior CSP Goal Areas, and the priorities associated with each.

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

VRD is currently reporting on five of the six combined performance and accountability measures. The measures are:

- Measurable Skill Gains
- Credential Attainment
- 2nd Quarter After Exit Median Earnings
- 2nd Quarter After Exit Employment Rate
- 4th Quarter After Exit Employment Rate

VRD is piloting the Effectiveness in Serving Employers measure.



C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDINGS AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.

Information obtained from the following sources was used to establish VRD's goals and priorities:

- WIOA Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions Final Rule published August 19, 2016;
- RCT Annual Report;
- FFY 2020 CSNA
- Texas Workforce Investment Council plan;
- State and Legislative Budget Board measures;
- Reports to RCT on the DSU's progress in implementing strategies and priorities in the VR state plan, etc.; and
- Input from customers and advocacy organizations, such as Disability Rights Texas.

M. ORDER OF SELECTION

Describe:

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION.  
IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR  
SERVICES

The State of Texas is not under a selection order.

B. THE JUSTIFICATION FOR THE ORDER

The State of Texas is not under a selection order.

C. THE SERVICE AND OUTCOME GOALS

The State of Texas is not under a selection order.

D. TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH  
PRIORITY CATEGORY WITHIN THE ORDER; AND

The State of Texas is not under a selection order.

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR  
SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES

The State of Texas is not under a selection order.

2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS,  
REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC  
SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT

The State of Texas is not under a selection order.

## N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS

### 1. SPECIFY THE STATE'S GOALS AND PRIORITIES FOR FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

The Vocational Rehabilitation Division (VRD) provides supported employment (SE) services for customers with the most significant disabilities, including youth with the most significant disabilities. Funds received under Title VI, Part B §622 (also known as the supported employment program) of the Rehabilitation Act of 1973, as amended, are used to serve these individuals.

Texas' provision of supported employment services is integral to the state's overall plan to provide services that result in competitive integrated employment outcomes for VRD customers.

Out of the six main goals identified by VRD, the following three goals incorporate priorities and strategies for the provision of supported employment services.

#### **IMPROVE PROVIDER RECRUITMENT, RETENTION, AND SUPPORT**

VRD is focused on recruiting and retaining a robust network of providers, including qualified supported employment providers, to meet customer needs. Strategies to improve provider recruitment, retention, and support include reducing vendor requirements;, ensuring that payment rates are competitive and equitable;, strengthening provider recruiting efforts;, enhancing provider- related training, guidance, and support;, and ensuring that the list of providers is useful, current, and accurate. Multiple projects are underway within these strategy areas, with initial strategic focus being placed on reducing vendor requirements and ensuring that payment rates are competitive and equitable.

#### **STREAMLINE VR POLICY, PROCESS, AND PROCEDURE AND IMPROVEMENT WORKFLOW PROCESSES AND TOOLS TO FACILITATE TIMELY SERVICE DELIVERY**

VRD collaborated with supported employment providers, VR staff, and external partners to redesign the VRD service delivery model for Supported Employment. Work groups met during a series of work sessions and provided input on the current benchmark system, policy, forms, payment rates, and training for both staff and providers. VRD is in the process of updating the service delivery model for supported employment by decreasing the paperwork burden, streamlining the benchmark system, and changing benchmark payments. Additionally, VRD will establish ongoing, comprehensive training for both VR staff and providers to ensure that customers receive quality supported employment services that lead to successful employment outcomes.

#### **IMPROVE VR STAFF KNOWLEDGE AND SYSTEM CAPACITY TO ENHANCE SERVICE DELIVERY TO CUSTOMERS**

VRD provides training, tools, and resources to assist VR staff and providers with the implementing of Supported Employment, including extended services to ensure long term employment for the customer. Additional training and resources will be provided to VR staff, including transition VR counselors and other VR counselors, to strengthen and increase expertise and specialization in serving customers who meet the definition of youth with disabilities and customers who have specific disabilities that meet the criteria of most significant.

In addition to these goals, priorities for funds received under Section 603 of the Rehabilitation Act of 1973 as amended are to increase the number of customers receiving supported employment services who achieve employment outcomes and to the number of supported employment services providers statewide.

## **Funding**

WIOA §110 funding is available statewide to VR counselors to serve Texans in most significant disabilities. These funds are used to secure competitive, integrated employment positions for VR customers. At case closure, or at the conclusion of any time-limited post-employment services, the services paid for with §110 funds are concluded.

When no other extended service providers are identified, extended services and support involving on- or off-site assistance or monitoring may be provided by VRD using WIOA §110 funds. These funds are to be used for customers who meet the definition of youth with a disability for up to four years or until the individual turns 25 years of age.

For individuals 25 years of age and older, VR assists with coordinating extended services. Extended services and support may be funded and facilitated by sources other than VRD and may include the employer, natural supports, and paid or funded supports. Both natural supports and paid supports, including long-term supports and services provided by other state and federal programs, may be used to facilitate extended services.

VRD's supported employment services may be authorized for up to 24 months unless there is justification and management approval to provide services for a longer period.

Potential funding sources for extended services may include the Social Security Administration's Ticket to Work Program and the Texas Health and Human Services Commission's (HHSC) programs such as:

- The 1915(c) state Home and Community-based Services (HCS) Medicaid waivers;
- Employment services provided through general revenue funds
- 1915(k) Community First Choice; and
- Title XX community services.

## **2. DESCRIBE THE ACTIVITIES TO BE CONDUCTED, WITH FUNDS RESERVED PURSUANT TO SECTION 603(D), FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING:**

### **A. THE PROVISION OF EXTENDED SERVICES FOR A PERIOD NOT TO EXCEED 4 YEARS; AND**

A customer's extended services are identified and documented in the customer's Individualized Plan for Employment. As customers progress through the supported employment process, VRD may use naturally occurring work supports as extended services. As appropriate, paid support is administered through other state agencies or community resources not funded by VRD. When extended services are not available for youth with disabilities, VRD provides extended supports, such as job skills training, for up to four years or until the individual turns 25 years of age. VRD continually evaluates the customer's need for extended services and seeks other resources to provide the necessary extended services.

### **B. HOW THE STATE WILL LEVERAGE OTHER PUBLIC AND PRIVATE FUNDS TO INCREASE RESOURCES FOR EXTENDED SERVICES AND EXPANDED SUPPORTED EMPLOYMENT OPPORTUNITIES FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.**

Potential funding sources include the Social Security Administration's Ticket to Work Program and the HHSC programs. Collaboration with community organizations and other state agencies, to develop, and implement cooperative agreements and partnerships, is essential to achieving successful employment outcomes for customers with the most significant disabilities.

Additionally, VRD works with HHS Medicaid/CHIP to resolve individual and system issues involving mutually served customers, particularly those transferring from Supplemental Security Income (SSI) to Title II Childhood Disability Beneficiaries to ensure continuation of Medicaid 1915(c) waiver services.

VRD coordinates with the Social Security Administration (SSA) to encourage Employment Service Providers (ESPs) to become employment networks (ENs) under SSA's Ticket to Work Program. VRD offers incentive payments to ESP-ENs that provide:

- supported employment or job placement services during the provision of VR services; and
- extended supports to Ticket to Work customers after VR case closure in order to advance employment or increase customer earnings.

## O. STATE'S STRATEGIES

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

### 1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES

To expand and improve services to all individuals with disabilities, VRD will:

- work to transform the customer experience by reducing the complexity of both processes and forms,
- maximize the use of technology whenever possible;
- work to expand the provider base, thus allowing easier customer access to VR services;
- build and sustain partnerships with employers, community organizations, partner agencies, and referral sources;
- increase coordination with mental health organizations, local school districts, postsecondary education institutions, and HHSC's Medical and Social Services Division-IDD and Behavioral Health Services Special Project Unit;
- build staff capacity and expertise by using internal and external subject matter experts to provide training to counselors working in specialized areas including autism, blind or visually impaired, epilepsy, mental health, spinal cord injury, and brain injury;
- continue to refine the VRD quality assurance process, and quality improvement program, to evaluate and monitor performance; and
- increase VRD use of labor market and career information and data available for identifying target occupations and placement and/or advancement opportunities for program participants.

### 2. HOW A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES WILL BE PROVIDED TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS

A broad range of assistive technology (AT) services and devices may be provided at each stage of the rehabilitation process. AT services and tools are parts of a technology-based approach used to maintain, increase, or improve the functional capabilities of individuals with disabilities as part of the rehabilitation process. It is a primary goal of VRD to expand the knowledge, access, and use of AT for all customers, staff, employers, and community partners. Examples of VRD strategies include:

- consultation on and assistance with vehicle modifications, workplace modifications, and residential modifications;
- research regarding new and emerging technologies; and
- exploring ways in which AT may be more efficiently applied as a part of VR services to students with disabilities and VRD services to employers.

AT from the University of Texas' Texas Technology Access Program (TTAP) is a viable resource for customers. This program has updated equipment, and VRD will enhance its partnership with the University of Texas' TTAP.

VRD will continue to work cooperatively with TTAP, the implementing entity designated by the state governor under the Assistive Technology Act of 1998 §4 (29 USC 3003), to coordinate activities, including the referral of individuals with disabilities. Currently VRD refers customers to TTAP demonstration centers located throughout the state to ensure that customers have an informed choice of AT.

VRD participates in annual joint presentations with TTAP at the Ability Expo in Houston, the Ability Expo in Dallas/Fort Worth, and TWC's statewide conference, which provides opportunities for customers to learn about new adaptive equipment and AT that may help them maintain competitive integrated employment.

VRD continues to maintain a state office Assistive Technology team, staffed with two Program Specialists for Assistive and Rehabilitation Technology (PSARTs). The PSARTs maintain a selection of current commonly used AT for demonstrations, staff trainings, displays, and conferences. These items are periodically refreshed to ensure that they are current. Additionally, the PSARTs are available to staff cases with counselors and demonstrate use of equipment through videos or Microsoft Teams.

A state office mailbox is available so that field staff may send questions and obtain consistent responses from the PSARTs. Frequently asked questions and answers will be used to create an FAQ tool and made available to all staff.

The AT needs of VR customers are assessed on an individual basis. When AT needs are identified, counselors consult with the state office PSARTs to determine the available AT options that may meet the customers' needs to reduce impediments to employment and training. Additionally, VRD contracts with private vendors to provide AT evaluations. Through these evaluations, customers and counselors are presented with AT options that may best meet the customers' needs.

The AT team is expanding staff capacity in AT by training regional teams to become subject matter experts in AT. Additionally, each field unit has an assistive technology specialist (ATS) to help counselors determine the AT needs of their customers. By having more AT subject matter experts, VRD will ensure that appropriate equipment is loaned to customers and/or purchased.

VRD implemented a new vehicle modification policy in March 2021. Using a Rapid Process Improvement approach, the project team collaborated and conducted interviews with customers, stakeholders from community organizations, vendors, and staff members from across the agency. The team recommended and implemented policy revisions that include removing the current emphasis on public transportation or relocation, streamlining and simplifying the vehicle modification process by reducing and combining required forms, reducing the number of approvals, establishing a state level budget for vehicle modifications to minimize budget disruptions at the unit level, and centralizing the process with the team of ATSS across the state. The project team also developed a centralized tracking process to track the status of each vehicle modification.

Furthermore, VRD has maintained an Assistive Technology Unit (ATU) laboratory in the Criss Cole Rehabilitation Center under the Office of Blind Services and Support. The ATU lab is staffed by three AT unit evaluators and an administrative assistant. ATU staff members deliver direct customer evaluation services to blind and visually impaired customers. The ATU lab is stocked

with the latest AT products including AT equipment, software, and devices. In addition to maintaining the lab, the ATU staff tests AT, trains customers on various AT products and programs for BVI contract service providers, and works with product providers to test new products for accessibility and ease of use for the customers. The ATU lab offers in-person services and services delivered remotely through the use of teleconference and video platforms.

### 3. THE OUTREACH PROCEDURES THAT WILL BE USED TO IDENTIFY AND SERVE INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES, INCLUDING THOSE WITH THE MOST SIGNIFICANT DISABILITIES, AS WELL AS THOSE WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM

In the past three years, VRD has developed several strategies to enhance its visibility in the communities it serves, as well as through statewide branding and new program efforts.

Key to the success of these outreach efforts is VRD's continued close partnership with the Governor's Committee on People with Disabilities, the state's 28 Local Workforce Development Boards (Boards), the installment of a six-member team of Regional Community Outreach and Awareness Specialists, in addition to outreaching to important stakeholder groups, such as the medical, health care, social service, employer groups, and local chamber and mayoral committees on disabilities.

Using an identifiable brand and logo, VRD has introduced a new self-referral system, called Start My VR, to attract a broader audience and communicate how individuals may qualify for VR services. A new employer-recognition program, named We Hire Ability, engages employers that employ a staff composed of 10 percent or more of individuals with disabilities. These employers may be influential and inspire their industry peers to follow their lead in using disability hiring as a workforce retention and engagement strategy.

As part of an integrated workforce network, VRD is positioning its services to be referred wherever appropriate in the intake process. This includes promoting services in the state job exchange system, WorkInTexas.com, throughout an individual's orientation process, and a two-way referral system for VR and workforce staff at local workforce centers.

Collaboration between VR business services staff and Board business service units also ensures that employers understand their critical role in increasing hiring of people with disabilities while providing a resource to answer questions and help refer qualified individuals with disabilities.

VRD employs several strategies to identify underserved populations, including minorities, and individuals with significant, neurodevelopmental disorders (such as autism), psychological disorders (such as bipolar disorder or schizophrenia), and veterans with disabilities.

#### **Outreach to Individuals with Disabilities Who Are Minorities**

VRD engages in numerous programs and activities designed to inform and make available VR and Supported Employment services to minorities and to those who have the most significant disabilities. Examples of these activities include:

- required training in language services for individuals who are limited English proficient (LEP) for all VRD staff (this training provides guidance on best practices and specific resources for effectively communicating with our unique population of LEP customers; it also includes web-based instruction and desk references for quick access to information);



- ongoing outreach initiatives with colleges and universities that have historically served African American students;
- collaboration with the Alabama-Coushatta Tribe of East Texas to make services available to Native Americans with disabilities;
- customer access to the Language Line as a resource for those who are not fluent in English;
- VRD staff attendance at community job fairs held for the Hispanic population and meeting with groups, such as the Hispanic Chamber of Commerce, Casa de Amigos, the League of United Latin American Citizens, and Catholic Charities
- outreach activities with African American groups such as the local Sickle Cell Anemia Association, Minority Business Alliance, African American Family Conference, and NAACP;
- collaboration with the American G.I. Forum, which targets the needs of Hispanic veterans and has assigned bilingual counselors who have completed the Social Security work incentive training to work with veterans with significant disabilities receiving SSDI benefits and wanting to work;
- counselor participation in training to learn to speak other languages and to learn sign language;
- specialized caseloads for certain disabilities to help develop the expertise needed to most benefit the customers served;
- active recruitment of Spanish-speaking VR counselors;
- development of relationships with local referral sources that serve individuals who are minorities who have the most significant disabilities; and
- engagement with the faith-based community to educate and inform minority and other allied congregations about VRD services.

### **Outreach to Serve Individuals with Disabilities Who Have Been Unserved or Underserved by Vocational Rehabilitation**

Texas veterans with disabilities are an underserved VR customer group. To better serve this population, VRD will increase VR services to veterans with disabilities and improve coordination with other federal and state entities providing veterans' services by:

- evaluating policies, procedures, and rules specific to veterans to provide seamless and efficient access to services for veterans with disabilities;
- ensuring that staff is aware of the existing MOU between VRD and the US Department of Veterans Affairs, which details the referral process between the two entities and coordination of services on behalf of eligible veterans;
- enhancing coordination with other entities that serve veterans with disabilities in order to help veterans more easily navigate available programs and services;
- expanding the Veterans Think Tank, which consists of internal and external subject matter experts who share knowledge, resources, and strategies to more efficiently and effectively coordinate services and case management activities; and

- increasing collaboration with veterans' stakeholder organizations and service providers to include the following:
  - TWC's Texas Veterans Leadership Program
  - Texas Veterans Commission
  - HHS
  - US Department of Veterans Affairs

**4. THE METHODS TO BE USED TO IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POSTSECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES)**

A Pre-ETS mailbox was developed in 2014 so that field staff may ask questions and obtain consistent responses from the state transition program specialists leading up to implementation of Pre-ETS.

The following strategies will expand and improve VR services for students and youth with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities by:

- providing Supported Employment services to youth with the most significant disabilities, and enhanced coordination to ensure that extended support is in place for customers to achieve and maintain employment outcomes;
- evaluating, revising, and developing policy, procedures, and staffing strategies to improve consistency and increase effectiveness in the provision of transition services;
- expanding and increasing partnerships with schools to facilitate the coordination and provision of Pre-ETS to students with disabilities;
- continuing Project SEARCH to assist students and youth with developmental disabilities to successfully transition to competitive, integrated employment;
- delivering a transition training module on best practices pertaining to provision of transition services, guidance and career exploration, postsecondary options, job readiness, and encouragement of customer self-advocacy;
- collaborating with TEA, education service centers, LEAs, and postsecondary education institutions to improve access and transition for students moving from secondary to postsecondary education and training;
- developing additional work experience options such as part-time, summer, and volunteer work experiences and other work-based learning opportunities; and
- enhancing existing statewide Pre-ETS initiatives that leverage partnerships with Boards, secondary and postsecondary education institutions, and employers; and
- continuing to develop new Pre-ETS services and strategies based on identified needs.

The Summer Earn and Learn (SEAL) program was the first Pathways to Careers initiative, which began in summer 2017. In the time since its inception, the SEAL program has occurred every

summer, except for 2020, when it was canceled due to COVID-19. The numbers served each year have steadily increased with a total of approximately 2,500 students served in 2019. The year 2021 was a recovery year for the SEAL program, as partners, families, students, employers, and communities returned to pre-pandemic activities, while also adjusting plans due to the continued prevalence of the pandemic. VRD had 2,147 students who received work readiness training and were placed in paid work experience during summer 2021.

VRD has recently implemented a service called Embedded Pre-ETS. Through a mutual partnership, providers may become embedded in schools to provide services that build on and enhance what students are already receiving in school. Through this service, students will get a more in-depth understanding of work-related concepts and will have greater opportunities to practice these concepts in a protected environment.

#### 5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE

In July 2021, VRD submitted TWC's Establishment Authority Internal Control Procedures to the Rehabilitation Services Administration (RSA) for review and approval. RSA approved the internal control procedures on September 30, 2021. These procedures provide a process for determining whether the use of establishment authority is warranted. Based on the process conducted as a part of the agency's internal control procedures, VRD has determined that exercising establishment authority provisions is not warranted at this time.

#### 6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA

VRD established a framework of quality assurance and quality improvement. This framework addresses the concept of continuous quality assurance and quality improvement using mission and strategic planning, leadership, communication, customer satisfaction results, data analysis, monitoring, and performance evaluation. This involves strategies to improve performance with respect to WIOA §116 performance accountability measures and includes the following actions:

- VRD, in cooperation with the TWC Division of Information Innovation & Insight (I|3) will collect, monitor, and evaluate data for the WIOA core measures, and develop strategies to address gaps in performance that are identified through routine reports, quarterly performance reports through budget and performance reviews, and the quality assurance program.
- In 2020, VRD published the Data Integrity and Data Validation Policies and Procedures and established a data integrity team made up of state and regional VR program representatives and staff from the TWC Division of Information Innovation & Insight. These actions were specifically targeted toward improving performance and accountability for WIOA performance measures. In 2020 and 2021, VRD saw significant improvements in data collection and reporting on measurable skill gains. VRD also developed staff training and desk aids and tools to improve source document collection to substantiate reported outcomes. Data integrity case reviews began in early 2021 to ensure that reporting is accurate and source documents are being collected and to establish a continuous improvement cycle for data integrity.
- VRD will assess and identify staff training needs and opportunities to build competency and increase capacity to assist program participants with identification of an employment goal and development of the Individualized Plan for Employment.

- VRD will implement training courses and develop new community partnerships to focus on postsecondary education to increase employment in high-skill, high-wage occupations by increasing the number of customers receiving postsecondary education and training.
- VRD will replicate initiatives such as Project SEARCH to provide training and certificates as well as on-the-job skills gains and/or credentials for employment.
- VRD will continue to use the Business Relations Team, which is composed of Business Relations Coordinators (BRCs) who work with regional and field management and staff to provide a variety of services to employers.
- VRD will continue to enhance its system to assess and monitor effectiveness in serving employers. The VR BRCs will coordinate more closely with Boards, and work in partnership and as team members in the Business Services Units.

#### 7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES

As a division of TWC, VRD participates in the planning for and evaluation of the Texas workforce system conducted by the Texas Workforce Investment Council (TWIC), which serves as the state workforce investment board. These activities include:

- participating in the development and implementation of the state-mandated strategic plan for the Texas workforce system;
- participating in TWIC meetings and serving on the TWIC Apprenticeship and Training Advisory Committee; and
- reporting quarterly and annually as requested by TWIC on the division's activities to implement goals and objectives in the Texas workforce system strategic plan.

VRD works closely with other TWC departments to provide information, partner on community initiatives, and enhance customer referral processes.

Ongoing collaborative efforts between VRD and each of the 28 Boards have resulted in projects, initiatives, and processes such as joint community outreach and awareness events, summer youth initiatives, employer symposia and job fairs, customer referrals, coordination of services, and cross-training for staff.

Student HireAbility Navigator (SHN) positions have been in place since 2018 in all 28 Boards, with the first student hired in March 2018. Since that time, the SHNs have helped support the work of the VR program by building infrastructure in their communities. The primary modes for creating this support network are fostering meaningful relationships with community partners (including schools and employers), providing training and guidance, and sharing information about the services that the VR program provides. In 2021, a mentor position was added to the SHN policy as a quality assurance measure to use highly rated SHNs to provide mentoring to those who are new or struggling to build these connections.

VRD reviewed multiple Workforce Development Letters, Technical Assistance Bulletins, Adult Education and Literacy Letters, and program guides to ensure that workforce partners receive policy guidance that is clear, concise, and timely. This enables workforce partners to provide workforce services and training to customers in accordance with state and federal rules, regulations, and program requirements. Additionally, due to the COVID-19 pandemic, some

Boards identified service delivery methods that allowed for virtual service delivery and training. Boards were encouraged to share their best practices with their peers for possible replication.

In February 2020, TWC held a Career Navigators Conference Day with support from TRAIN PD. This meeting, designed specifically for career navigators, included the following session topics: AEL Integration with Vocational Rehabilitation, Employer Engagement, Serving Internationally Trained Professionals, and Services for Reentry.

Additionally, an internal work group of TWC staff members is developing a plan for a more integrated workforce system in Texas that effectively and efficiently serves all customers, including those with disabilities.

#### 8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

##### A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

#### **Goal Area One: Improve provider recruitment, retention, and support**

VRD must recruit and retain a robust network of providers, including providers of supported employment services, to ensure that customers have access to the full array of services they need no matter where they reside in the state. VRD is working to improve provider onboarding by decreasing the time from contract initiation to direct service delivery to customers. Additionally, VRD is committed to providing timely feedback to providers for both contractual and programmatic questions. VRD has initiated several strategies to ensure that customers have access to and receive quality goods and services to assist with achieving a successful employment outcome.

#### **Strategies:**

- Streamline vendor requirements, processes, procedures, and documentation.
- Ensure that payment rates are competitive and equitable.
- Ensure that a process is established for regular rate review and updates.
- Strengthen provider recruiting efforts.
- Enhance provider support and training.
- Ensure that internal systems for provider identification by a VR counselor are useful, current, and accurate.

#### **Success will be measured by:**

- an increase (accounting for seasonality) in the percentage of active VR service providers and total number of available providers:
  - statewide;
  - by integrated service area (VR region); and
  - by RSA service type category.

#### **Goal Area Two: Streamline VR policy, process, and procedure and improve workflow processes and tools to facilitate timely service delivery**

VRD's priority is to help more Texans with disabilities achieve better employment outcomes through an efficient and easily accessible service delivery system that maximizes the use of available resources. To achieve this priority, VRD will focus on streamlining procedures and approval processes to remove unnecessary administrative tasks for staff, providers, and

customers. VRD is also redesigning the current supported employment service delivery model, including policies, procedures, and forms.

**Strategies:**

- Streamline or redesign policy, procedure, forms, and approval processes to improve ease of navigation and application for VR staff.
- Facilitate coordination of services with providers and improve responsiveness to customers.
- Improve workflow processes and business systems to improve timeliness, efficiency, and consistency of VR service provision.

**Success will be measured by:**

- a decrease (accounting for seasonality) in median time from initial contact to participant status in the VR program; and
- an increase (accounting for seasonality) in the percentage of those determined eligible who move into an individualized plan for employment (IPE).

**Goal Area Three: Recruit and retain VR staff**

VRD is committed to creating team capacity to serve Texans with disabilities by recruiting, retaining, and engaging VR staff. A career with VRD must offer meaningful work that helps change lives for the better. VRD will continue to provide career growth, advancement, and opportunities for staff to specialize in areas of interest. VRD is committed to making team engagement a priority. VRD will work diligently to provide the necessary training and resources for continuous improvement.

**Strategies:**

- Identify and implement strategies to improve staff recruitment and retention, including options for remote work, opportunities for professional development, staff recognition, and other activities that promote a positive, engaging work environment.
- Redesign training and resources for new counselors and new rehabilitation assistants.
- Establish management development training, specific to VR program management, for new, current, and aspiring VR managers.

**Success will be measured by:**

- a decrease in annual (SFY) turnover rate; and
- an annual (SFY) increase in the proportion of Qualified Vocational Rehabilitation Counselors (QVRCs).

**Goal Area Four: Improve and develop additional user-friendly resources to maximize customer choice**

VRD needs simple, accessible information to help customers make informed decisions about how to explore their local labor market, how employment may affect their benefits, and the availability and ratings of service providers.

**Strategies:**

- Provide training and resources for VR staff on labor market information and tools.

- Develop and enhance tools to aid VR staff and customers in the identification of available providers.
- Update training, tools, and policies related to work incentive programs and benefits counseling and provide user-friendly resources and/or fact sheets to help customers make decisions.

**Success will be measured by:**

- an increase in the proportion of SSI or SSDI customers who receive benefits counseling or counseling on work incentives; and
- an increase in the percentage of customers indicating they agree (that is, respond “yes”) that they have input in choosing service providers in the quarterly customer satisfaction survey (Westat).

**Goal Area Five: Improve VR staff knowledge and system capacity to enhance service delivery to customers**

VRD is committed to increasing opportunities for staff to specialize in areas of interest, such as neurodevelopmental disorders, blindness and visual impairments, deaf and hard of hearing, brain injury, transition students, veterans, behavioral health, and others. VRD will also continue to enhance and expand training in labor market information, work incentives and benefits, serving individuals with multiple disabilities, and how to work with employers. Providing tools, such as desk aids, and increasing staff capacity through process improvement and innovative service delivery approaches will also assist counselors to serve customers effectively and efficiently.

**Strategies:**

- Provide additional training and resources for VR staff to strengthen and increase expertise and specialization in serving customers with specific disabilities and those with multiple disabilities.
- Develop, pilot, and replicate innovative approaches to implementing the VR process, including standardized workflow and new methods for deploying staff and resources that maximize staff capacity and expertise.
- Enhance and increase training for transition VR counselors and other VR counselors with school assignments regarding services to students with disabilities, including pre-employment transition services.
- Review transition VR counselor and VR counselor capacity and structure and adjust as necessary to strengthen capacity to serve students with disabilities.
- Provide training, tools, and resources to assist staff with implementing process improvements, including standardized workflow.
- Enhance options for remote service delivery.

**Success will be measured by:**

- an increase in the percentage of customers indicating that they agree (that is, responding “yes”) that VR staff provides the guidance the customer needs in the quarterly customer satisfaction survey (Westat);
- an increase in the percentage of customer’s indicating they agree (that is, responding “yes”) that the counselor maintains communication regarding the process of their case in the quarterly customer satisfaction survey; and

- an increase (accounting for seasonality) in VR engagement rate (that is, arranged, provided, or purchased VR, Pre-ETS, or CCRC services; counseling and guidance; started or amended plan; employment (90-day clock); successful closure; or enrollment in education and/or training).

**Goal Area Six: Increase and enhance partnerships with employers to 1) better understand employer needs when hiring people with disabilities and working collaboratively with VR, and 2) build awareness about the benefits of hiring people with disabilities to increase employment opportunities for VR customers**

VRD values its partnerships with employers and will continue to build system capacity to promote and support hiring, retention, and advancement of individuals with disabilities across industries. Additionally, VRD will collaborate with its Texas workforce system partners to participate in joint strategies that address employers' workforce needs.

**Strategies:**

- Continue to expand efforts to raise awareness among employers of the benefits of hiring people with disabilities and the services available through VRD to support them.
- Implement and expand employer partnerships that increase employment opportunities for individuals with disabilities through training and work-based learning opportunities for students and adults with disabilities.
- Participate in TWC's initiative to Close the Middle Skills Gap, ensuring that VR customers are included in strategies and activities to increase awareness of and access to training in the employment opportunities and occupations in demand by Texas employers.

**Success will be measured by:**

- an increase in the number of employers participating in disability awareness and inclusion activities, including through the Texas HireAbility and We Hire Ability campaigns; and
- an increase in the number of employers participating in training and work-based learning opportunities for students and adults.

**System of Quality Assurance**

VRD's system for monitoring and performance management includes having a robust system of case review requirements. State statute requires that VRD review 10 percent of all cases each year. Statistically valid sampling methodology is used to determine the unit specific goals based on customers served. Consideration also is given to actual cases that meet the risk criteria and other trends observed during case reviews and data analysis. The quarterly unit case review plan has specific focus area goals to be performed at the unit level. An important goal is to review a minimum of 10 percent of all cases, with a focus on cases that present a higher risk due to case cost, case length, lack of engagement, or failure to render timely services within federally mandated parameters. Review information and detailed data analysis is used to develop, enhance, or modify current training, policy, and/or coaching needs at all levels. As previously mentioned, data integrity case reviews were added in 2021 to ensure that reporting is accurate and source documents are being collected and to establish a continuous improvement cycle for data integrity.

**B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND**



For VRD, a portion of federal funds allocated were used for Innovation and Expansion (I&E) activities, including, but not limited to, the following strategic initiatives consistent with the requirements of the Rehabilitation Act.

### **Solutions to Support Customer Access and Remote Service Delivery**

As a result of the COVID-19 pandemic, much of the VR service delivery expanded to include virtual options. VRD has continued to enhance virtual service delivery options and intends to maintain virtual options to provide a greater opportunity to work with customers, providers, employers, and stakeholders.

To enhance engagement with customers, VRD is prepared to pilot a texting solution called SARA an automated attendant system that enables ongoing communication between counselors and customers and documents that communication in the customer's case file. It is intended to allow VR counselors to more readily and efficiently engage with customers and to help facilitate the provision of information, such as appointment reminders, training activities, and job opportunities, without requiring additional time to document their efforts.

VRD is also developing and implementing a virtual case file system to be integrated into ReHabWorks (RHW), which will enable VR providers and customers to electronically submit documents, allow for electronic storage of that information, and link those documents, as required, to the customer's VR case in RHW.

### **State Rehabilitation Council Support**

The Rehabilitation Council of Texas (RCT) partners with VRD to fulfill the requirements of the Rehabilitation Act for the delivery of quality, customer-responsive VR services. Its stated mission is to partner with TWC to advocate for Texans with disabilities in the VR process.

RCT is a valued and active partner in the development of VR goals, priorities, and policies. Funds are allocated by TWC for the operation of RCT to meet its mandate and obligations. RCT reviews, analyzes, and advises TWC on:

- performance related to eligibility;
- the extent, scope, and effectiveness of VR services; and
- functions performed by TWC.

RCT also reviews findings from quarterly customer satisfaction surveys and assists with the VRD state plan and the comprehensive statewide needs assessment.

### **C. OVERCOME IDENTIFIED BARRIERS RELATING TO EQUITABLE ACCESS TO AND PARTICIPATION OF INDIVIDUALS WITH DISABILITIES IN THE STATE VR SERVICES PROGRAM AND THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM.**

### **Updated Service Delivery Methods and Initiatives**

On March 30, 2020, in the wake of the pandemic in Texas, VRD implemented the first of several rounds of exceptions to its business processes and procedures in the Vocational Rehabilitation Services Manual (VRSM) and Standards for Providers (SFP) manual. The goal of these exceptions was to streamline and automate processes for both staff and providers in order to enable continuity of services, both remote and in-person, to VRD customers. In the subsequent months, VRD observed improved efficiencies using these temporary exceptions. As a result, on September 1, 2020, VRD incorporated many of the exceptions into its standard operations in the VRSM and SFP.

In March 2020, guidance was issued to inform staff about options providers may use to meet the continuity of care needs of customers through alternative means of telehealth and telerehabilitation. Telerehabilitation is the delivery of rehabilitation services over telecommunication networks and the internet and is an option for numerous services listed in the SFP manual. Telehealth options are available for the following services:

- Autism Spectrum Disorder Supports
- Applied Behavior Analysis
- Psychological Services
- Medical Services

The Business Transformation Project was commissioned in March 2021 to address the lack of qualified providers to meet customer needs. The project team identified strategies and suggested tactics to pursue based on an extensive root cause analysis. The project team identified five strategies and associated teams to address the root causes, which include reducing vendor requirements; ensuring that payment rates are competitive and equitable; strengthening provider recruiting efforts; enhancing provider related training, guidance, and support; and ensuring the provider list in the electronic case management system is useful and accurate. Multiple projects are underway within these strategy areas.

In October 2019, the employment supports for brain injury policy was implemented to improve services for individuals with brain injuries. The new policy integrated therapeutic services and employment services geared to address the continuum of needs demonstrated in the community of individuals with brain injury. Additionally, a community of practice was developed with counselors who maintain a brain injury specialty caseload. Brain injury specialty counselors are selected based on:

- experience in VR caseload management;
- interest in developing a caseload with a primary brain injury focus;
- willingness to gain knowledge in brain injury disabilities, treatment, and resources;
- skills in communicating with partners external to VRD;
- knowledge of brain injury services;
- skills in working as a team members with partners external to VRD;
- ability to organize and manage work systems that allow for extended time in out-of-office meetings; and
- passion for working with individuals with the most significant disabilities.

Brain injury specialty counselors are trained to work collaboratively with Community Rating System staff to facilitate referrals to and from the CRS program.

VRD provides Supported Employment (SE) services to youth and other individuals with the most significant disabilities who require long-term supports to achieve and maintain competitive integrated employment. VRD initiated a project in October 2020 to review and improve procedures for SE. A work group of SE providers and VR staff provided input on the SE benchmark system, policy, forms, rates, and training for staff and providers. The work group identified both constraints in the current SE benchmark system and ideas for improvement. VRD has worked to streamline the SE process and forms and to improve training for staff

members and providers to ensure that there are quality employment outcomes for customers who receive SE.

The Substance Use Disorders policy was updated in March 2021 to remove the sobriety clause. The sobriety clause required customers to maintain and document a minimum of 30 days of sobriety prior to eligibility determination for VR services. Additionally, if a customer in services failed to maintain sobriety, the customer had to maintain sobriety for 30 days prior to resuming services. The updated policy changed the eligibility requirements to be more inclusive, to help customers reach their potential for recovery and success in line with their employment goal, and to align with best practices for the population. Customers will still be expected to recognize their disability and understand the need for services, participate in treatment and the VR program, and make progress in completing their treatment and achieving goals established in their employment plan.

Additionally, VRD maintains a Vocational Diagnostic Unit (VDU) staffed by four psychology associates to ensure that customers who are blind or have visual impairments (BVI) have access to comprehensive assessments that are normed against the blind population and may yield the most accurate results. VDU evaluators teleworked when COVID-19 restrictions prevented in-person services. To address the limitations of comprehensive psychological and vocational evaluation delivered remotely during the pandemic, VDU developed the Vocational Diagnostic Unit Career Assessment (VDUCA). Unlike the Comprehensive Vocational Evaluation System that VDU used in the past, The VDUCA may be administered remotely to blind and visually impaired customers. Popular with counselors and customers alike, the VDUCA provides BVI customers with an opportunity to discuss career interests with a psychology associate. VDU continues to work on test batteries that may be adapted to accommodate the unique needs of BVI customers.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

Describe:

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

**Goal Area 1: Target Populations**

**Priorities:**

- Improve customer employment outcomes for individuals with the most significant disabilities to include individuals who are blind or significantly visually impaired, individuals who are from minority backgrounds, individuals with neurodevelopmental disorders (including autism, intellectual disabilities, and learning disabilities), individuals with mental health disorders, and veterans with disabilities.
- Increase counselors’ knowledge of work incentives and the effect of earnings on Social Security Disability Insurance and Supplemental Security Income to improve counselors’ provision of vocational counseling on decisions impacting employment.
- Provide a customer service delivery system that makes information available to customers on their options for services, providers, careers, and other areas, to (1) enable informed customer choice and (2) deliver quality and timely services.

**Measures:** Provide VR services that support quality employment outcomes for individuals with the most significant disabilities by meeting or exceeding performance goals.

Name of Measure:	Goal	PY’20 Performance	Percent of Goal
Number of Customers Who Achieved Employment Outcomes – VR	11,369	10,253	90.18%
Percent of Customers Who Achieve Employment Outcomes – VR	55.8%	47.88%	85.8%

**Measure:** An increase in the number of participants served with neurodevelopmental disabilities, psychological disabilities, and participants who are veterans.

Populations PARTICIPANTS[1] SERVED	PY’19[2]	PY’20[3]
with neurodevelopmental disability[4]	26,587	25,044
with psychological disability[5]	18,398	16,627
veterans	1,645	1,517

The table above compares the PY’19 and PY’20 performance for service to customers with neurodevelopmental disability or psychological disability, or customers who are veterans.

In PY’20, VRD served 25,044 customers with a neurodevelopmental disability, a decrease of 1,543 from PY’19.

In PY'20 VRD served 16,627 customers with a psychological disability, a decrease of 1,771 customers from PY'19.

In PY'20 VRD served 1,517 veteran customers, a decrease of 128 from PY'19.

**Measure:** An increase in the number of successful employment outcomes for target populations.

Populations SUCCESSFUL OUTCOMES	PY'19	PY'20
with neurodevelopmental disability	3,177	2,660
with psychological disability	2,278	1,855
veterans	282	295

The table above compares PY'19 and PY'20 VRD successful employment outcomes for target populations with neurodevelopment disability or psychological disability or customers who are veterans.

In PY'20, VRD saw successful employment outcomes for 2,660 customers with neurodevelopmental disability, a decrease of 517 from PY'19.

In PY'20, VRD saw successful employment outcomes for 1,855 customers with psychological disability, a decrease of 423 from PY'19.

In PY'20, VRD saw successful employment outcomes for 295 customers who are veterans, an increase of 13 from PY'19.

**Goal 1 Strategies Contributing to the Success of Goals:**

- Strengthening and expanding collaboration, outreach, and education with various partners to efficiently and effectively use existing resources.
- Assessing business processes, policy, training, and organizational capacity in an ongoing basis to make consistent improvements in employment outcomes.
- Increasing employer knowledge and awareness regarding the benefits of hiring individuals with disabilities.
- Increasing customer knowledge and awareness of VRD services and benefits offered to individuals with disabilities, and other state and federal assistance programs.
- Promoting the use of the Language Line as a resource for those who are not fluent in English.
- Actively recruiting VR counselors who are Spanish speakers to better serve the Spanish-speaking population.
- Strengthening and developing relationships with local referral sources that serve individuals who are minorities who have the most significant disabilities.
- Providing eye exams to Hispanic individuals in South Texas who lack other medical resources.

**Goal Area 2: Services to Students (Ages 14–22) and Youth (Ages 14–24) with Disabilities**

Priorities

- Expand and improve VR services, including Pre-ETS for students with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities.
- Provide supported employment services to youth and other individuals with the most significant disabilities who require extended support to achieve and maintain a successful competitive integrated employment outcome.

**Measure:** An increase in successful outcomes for students with disabilities and youth.

Populations SUCCESSFUL OUTCOMES	PY'19	PY'20
Youth only	1,414	885
Student & Youth	3,100	2,722

The above table compares the successful employment outcomes in PY 2019 and PY 2020 for student and/or youth populations in VRD services.

In PY'20, VRD saw successful employment outcomes for 885 youth-only (not a student, because a customer can be a youth without being a student) customers, a decrease of 529 from PY'19.

In PY'20, VRD saw successful employment outcomes for 2,722 students and youth-only customers, a decrease of 378 from PY'19.

**Goal 2 Strategies Contributing to Success of Goals:**

VRD developed a formalized method of reviewing proposed ideas and initiatives for Pre-ETS. This method includes the establishment of a core group of staff members who review proposed ideas for Pre-ETS biweekly. Additionally, a Pre-ETS mailbox was developed so field staff can ask questions and obtain consistent responses from the state transition program specialists leading up to implementation of Pre-ETS. The following strategies were implemented to expand and improve VR services for students and youth with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities:

- Provide supported employment services for youth with the most significant disabilities, and enhanced coordination to ensure extended supports are in place for customers to achieve and maintain employment outcomes.
- Evaluate, revise, and develop policy, procedures, and staffing strategies to improve consistency and increase effectiveness in the provision of transition services.
- Develop a transition training module, which will provide guidance and best practices pertaining to provision of transition services.
- Expand and increase partnerships with state and local secondary and postsecondary educational institutions and organizations to facilitate the identification of best practices, leveraged resources, and improved coordination.
- Continue the Pathways to Careers Initiative (PCI) which expands Pre-ETS to students with disabilities. PCI includes eight strategies: Summer Earn and Learn, Charting the Course: Planning for Life after High School, Explore STEM! Pre-ETS Tools for Students, Pre-ETS Elective Curriculum, Capacity Building, Advise Texas, and Student HIREability Navigators. Through PCI, students with disabilities will be better prepared to achieve

competitive-integrated employment through participation in employability skills and work readiness training, career exploration activities, work experience, and postsecondary education.

- Non-PCI Pre-ETS strategies were expanded to include Year-Round Paid Work Experience, Group Skills Trainings, and Explore Apprenticeship.

### **Goal Area 3: Partnerships**

#### **Priorities:**

Enhance collaboration and coordination with Workforce Development Boards (Boards), employers, and other stakeholders to increase competitive integrated employment outcomes and work-based learning experiences, which may include in-school or after-school opportunities, such as internships, volunteer positions, and summer and year-round work experience programs.

**Measure:** An increase in services provided to businesses to support hiring, retention, and advancement strategies of the businesses.

In PY'20, there were 80 VRD services provided to 459 different employers. In previous PY's, VRD was unable to track the number of services provided due to the lack of access to a tracking system. The VR Business Team is now using the state labor exchange system, WorkInTexas.com, which allows the VRD to show the specific VR services provided. Additional collaboration with Boards have strengthened VRD's ability to outreach and engage with employers and industry organizations

**Measure:** An increase in work-based learning experiences.

In PY 2020, 3,026 customers participated in work-based learning opportunities across the state. The number of participants did decrease from the previous PY since many opportunities were not offered due to COVID. Some of the work-based learning programs included Summer Earn and Learn, Project SEARCH, WINCO, Walgreens Distribution Center and REDI, WACO Project, and year-round paid work experience.

**Measure:** An increase in the number of partnerships for special initiatives and ongoing coordination of services to businesses.

In PY'20, there were 52 partnerships for special initiatives with businesses, compared to 45 in PY'18.

#### **Goal 3 Strategies Contributing to Success of Goals:**

VRD implemented the following strategies to strengthen partnerships with Boards and enhance strategies to develop and maintain employer relationships that result in competitive integrated employment outcomes and work-based learning experiences:

- Continuing to collaborate on special initiatives and activities for youth, veterans, and other individuals with disabilities;
- Developing and implementing summer work experience programs with Boards;
- Increased participation in Board committees;
- Increased coordination with Board Business Service Units and other business intermediaries such as local chambers of commerce;

- Providing information to VR partners pertaining to various disabilities, assistive technology, and suggestions for reasonable accommodations;
- Developing and implementing agency-wide business relationships strategies with a regional focus that creates a unified, comprehensive approach to serving businesses;
- Providing dual customer service to staff to instruct on how to best contact and meet the needs of our business partners; and
- Aligning counseling critical thinking processes with employment opportunities and data to engage customers in defining their optimal vocational opportunities.

**Goal for VRD**

In addition to the goals listed above, priorities for funds received under the Rehabilitation Act §603 are to increase the number of customers receiving supported employment services who achieve employment outcomes and the number of supported employment service providers statewide, and to maintain the number of customers receiving supported employment services within their home communities.

Goal: Provide supported employment services to individuals with the most significant disabilities who require extended supports to achieve and maintain an employment outcome.

**Measure:** 50 percent or greater of VRD customers exiting the VR program after receiving supported employment services will achieve an employment outcome.

PY'20	Goal	Above/Below Target
67.28%	50%	(+) 17.28%

In VRD, 67.28 percent of customers achieved employment outcomes after receiving supported employment services, exceeding the target by 17.28 percent.

[1] Customers active with an IPE or closed after IPE

[2] Program Year 2019

[3] Program Year 2020

[4] Neurodevelopmental Disability: Based on primary, secondary, or tertiary disability cause code of Attention-Deficit Hyperactivity Disorder (ADHD) (code 07), Autism (code 08), Cognitively Impaired (previously Mental Retardation) (code 25), or Specific Learning Disabilities (code 34).

[5] Psychological: Based on primary, secondary, or tertiary disability cause code of: Alcohol Abuse or Dependence (code 02), Anxiety Disorders (code 04), Depressive and other Mood Disorders (code 15), Drug Abuse or Dependence (other than alcohol) (code 18), Eating Disorders (code 19), Mental Illness (code 24), Personality Disorders (code 29), or Schizophrenia and other Psychotic Disorders (code 33).

**B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES**

**Goal Area 1: Target Populations**

Priorities:



- Improve customer employment outcomes for individuals with the most significant disabilities to include individuals who are blind or significantly visually impaired, individuals who are from minority backgrounds, individuals with neurodevelopmental disorders (including autism, intellectual disabilities, and learning disabilities), individuals with mental health disorders, and veterans with disabilities.
- Increase counselors' knowledge of work incentives and the effect of earnings on Social Security Disability Insurance and Supplemental Security Income to improve counselors' provision of vocational counseling on decisions impacting employment.
- Provide a customer service delivery system that makes information available to customers on their options for services, providers, careers, and other areas, to (1) enable informed customer choice and (2) deliver quality and timely services.

**Goal 1: Factors That Impeded Achievement of the VRD Goals and Priorities:**

- Following the onset of the COVID-19 pandemic in March 2020, VRD, like many VR programs across the country, experienced a significant decrease in the number of customers served and in successful employment outcomes. Availability of some services was limited for a time, due to implementation of COVID-19 mitigation strategies. Specifically, approximately 52% of customers with active cases surveyed in SFY 2020 following the outbreak of the pandemic reported interruptions in VR service delivery due to the COVID-19 pandemic (Westat customer satisfaction survey). As the pandemic persisted throughout 2020 and 2021, so too did the impact on the VR program and its participants. While numbers served began to recover in 2021, VRD continues to work toward full recovery through implementation of a variety of strategies, including continued implementation of robust virtual service delivery options to accompany the return to in-person service delivery
- Additional research is needed to better identify factors that may be impeding achievement of goals and priorities for individuals with psychological disabilities.
- There are numerous federal and state programs available to assist veterans, some focusing specifically on veterans with disabilities. Veterans may be accessing these services prior to applying for VR services or may not be aware that VR is also available to assist them with achieving their employment goals. An increase in training by state office staff for counselors with specialty caseloads, such as counselors with psychological and veteran caseloads, may be needed to enhance outreach efforts and improve coordination with federal, state, and community programs.
- A decrease in the number of applicants may be attributed in part to a low unemployment rate and a tight labor market, which means fewer people exiting the program.
- An increase in counselor vacancies affected consistency of customer engagement, which impacted achievement of successful outcomes.

**Goal Area 2: Services to Students (Ages 14–22) and Youth (Ages 14–24) with Disabilities**

Priorities

- Expand and improve VR services, including Pre-ETS for students with disabilities who are transitioning from high school to postsecondary education and/or employment, and

improve coordination with state and local secondary and postsecondary educational entities.

- Provide supported employment services to youth and other individuals with the most significant disabilities who require extended support to achieve and maintain a successful competitive integrated employment outcome.

**Goal 2: Factors That Impeded Achievement of the VRD General Goals and Priorities for Youth and Students:**

- Significant staff effort has been focused on engaging students earlier to provide more Pre-ETS services, which are described in the WIOA regulations as services provided early in a student’s career exploration continuum and well before a student will achieve his or her employment goal. As a result, in the initial years of implementing WIOA, the number of successful closures will decrease while the length of time students is served by VR is anticipated to increase.
- For youth with disabilities, WIOA increases the length of time and depth of services being provided in supported employment. This results in cases being open longer and, therefore, fewer cases being closed successfully in the initial years of WIOA implementation.
- The VRD increased the number of counselors focused solely on serving students. Additionally, VR established a State Office Transition and Preemployment Transition Services (Pre-ETS) team, composed of a program manager, project manager, and five program specialists whose focus is on policy development, training, guidance to field staff on Pre-ETS and transition, and program development and coordination with other agencies.

**Goal Area 3: Partnerships**

**Priorities:**

Enhance collaboration and coordination with Boards, employers, and other stakeholders to increase competitive integrated employment outcomes and work-based learning experiences, which may include in-school or after-school opportunities, such as internships, volunteer positions, and summer and year-round work experience programs.

**Goal 3 Partnerships: Factors That Impeded Achievement of the VRD General Goals and Priorities for Youth and Students:**

None identified

2. AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

In addition to the goals listed above, priorities for funds received under the Rehabilitation Act §603 are to increase the number of customers receiving supported employment services who achieve employment outcomes and the number of supported employment service providers statewide, and to maintain the number of customers receiving supported employment services within their home communities.

## Goal for VRD

Provide supported employment services to individuals with the most significant disabilities who require extended supports to achieve and maintain an employment outcome.

**Measure:** 50 percent or greater of VRD customers exiting the VR program after receiving supported employment services will achieve an employment outcome.

PY'20	Goal	Above/Below Target
67.28%	50%	(+) 17.28%

In VRD, 67.28 percent of customers achieved employment outcomes after receiving supported employment services, exceeding the target by 17.28 percent.

The following strategies contributed to the achievement of the goal:

- Continued development and implementation of improved benchmark system for the provision of specific supported employment services statewide.
- Developed and implemented complimentary services for specific populations, such as individuals who are deaf and those with autism
- Developed a supported employment technical assistance training model for staff members to improve their ability to determine when supported employment services are needed.
- Developed tools to help staff members monitor and provide guidance to supported employment contract providers.
- Continued to require credentialing for Supported Employment providers to educate and train best practices and improve service delivery.
- In late 2018, a workgroup was formed with ESPs, field staff, and the state office to review the forms and SE policies. The workgroup recommended changes to the forms to reduce the time spent completing forms and that instead could be better used to provide supports for SE customers.
- State office staff is working to develop training to educate ESPs on best practices and how to work with customers who are visually impaired or blind. The training will result in additional payments for assisting our visually impaired and blind customers similar to the payments for assisting our customers with autism or who are deaf.

### B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

- Additional research is needed to better identify factors that may be impeding achievement of goals and priorities for individuals with psychological disabilities.
- A decrease in the number of applicants may be attributed in part to a low unemployment rate and a tight labor market, which means fewer people exiting the program.
- An increase in counselor vacancies affected consistency of customer engagement, which impacted achievement of successful outcomes.

**3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA**

ROW	PERFORMANCE CATEGORY	FFY2018*	PY19	PY20	PY21	PY22	PY23
1	Number of total applicants	30,241	25,277	25,250	26,192**	27,460***	28,257***
2	Number of total eligible individuals	25,297	22,664	20,513	20,375**	20,851***	21,586***
3	Agency implementing order of selection (Y/N)	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
4	Number of individuals on order of selection waiting list at year-end	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
5	Percent of eligible individual with an IPE who received no services	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Number of individuals in plan receiving services**	74,025	70,230	65,835	63,503***	63,809****	66,219****

\*FFY 2018 (FFY'18) the final RSA-113 report has been submitted. RSA has discontinued the RSA-113 report; therefore, there will not be an FFY' 19 iteration.

\*\*Defined as a the number of customers with an IPE during a given PY, including cases that closed during the PY.

\*\*\*It is not clear to VRD whether the decrease in numbers for PY20 will become normative or if they are atypical. Additionally, VRD cannot know what to expect after July 1, 2021. Consequently, the projected PY21 totals reflect lower totals accordingly.

\*\*\*\* VRD cannot reasonably anticipate whether the decrease in numbers experienced in PY19 and carrying into PY20 will have a similar impact on future PY data. Additionally, there are no solid precedents from which we can model given that we do not know what the continuing impact of COVID-19 may be nor do we know how quickly the job market will stabilize..

**4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED**

For VRD, a portion of federal funds allocated were used for Innovation and Expansion (I&E) activities, including but not limited to, the following strategic initiatives consistent with the requirements of the Rehabilitation Act.

**Solutions to Support Customer Access and Remote Service Delivery**

VRD established a small State Office unit of temporary staff to serve as intake specialists and to process calls for individuals interested in VR services. This group is known as the Rapid Engagement Team (RET). They monitor the email mailbox for customers providing information electronically for follow-up and receive calls through a hotline number. These options for engaging with VR are posted on the agency website and in VR outreach materials.

VRD introduced an online self-referral option for customers to begin the process of inquiring for VR services called Start My VR. This option was configured using the Service Now ticketing system that offers a convenient way for prospective VR customers to inquire about services and be connected to a VRD staff member. VR outreach materials were updated to incorporate this platform as another option for customers to access services.

VRD utilized the Easy Virtual Fair (EVF) platform to significantly expand virtual outreach efforts to current and new customers. Event types include Transition and Pre-employment Services; Job/Career Fairs; Community-wide and training events. Technology devices with accessibility features were made available for attendees to participate in events conducted by VRD.

## Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES

Include the following:

### 1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES

The Vocational Rehabilitation Division (VRD) is committed to providing quality services to customers with the most significant disabilities, including youth between ages 14–24 with the most significant disabilities. VRD uses supported employment (SE) and supported self-employment services (SSE), which are outcome-based services.

VRD-supported employment (SE) offers competitive integrated employment in the community for customers with the most significant disabilities who need individualized assistance finding the most appropriate job match and require extended services, also known as long-term support within the work, community, and home environment, to maintain employment after VRD closes the VR case. Customers who benefit from VRD SE are those for whom traditional VR approaches have not been effective. Although customers in SE have the ability to compete in the open job market, they often require ongoing supports and assistance to learn how to interact with potential employers and perform job tasks and responsibilities. They also must require extended services (long-term support) not funded by VR to maintain long-term competitive integrated employment once VRD closes their case. Common resources that provide extended services for customers include nonprofits, as well as other county, state, and federal programs, as well as family and friends. Customers receiving VRD SE often have no or very limited work history in competitive integrated employment, have been excluded from community services through institutionalization, or have only participated in segregated work programs, such as enclaves, day habilitation programs funded by the Texas Health and Human Services Commission (HHSC).

VRD SE services offer the best possible match between customer skills, interests, abilities, support needs, and an employer's unmet needs. VRD uses the "place, then train" concept, a two-part process to describe SE. The first step is to place customers with the most significant disabilities into a competitive integrated job based on their preferences, interests, assets, and abilities, as identified during a community-based assessment and a SE planning meeting. The second step is to provide training and support to the customer directly related to the job and then coordinate and train the designated extended service providers, or natural supports, to ensure a smooth transition with no interruption in service delivery prior to VRD case closure.

Furthermore, 68 percent of VR participants surveyed from April to June 2020 reported satisfaction with the quality of services from VR service providers. VRD works in partnership with public and private nonprofit organizations, employers, and other appropriate resources for extended supports (long-term supports) to meet a customer's individual needs that are necessary for the customer to maintain long-term competitive integrated employment obtained through SE. In PY'19, 23,961 participants with most significant disabilities received VRD services, of whom 1,684 received VRD SE services. During PY'19, 871 participants who had received SE services exited the VR program, of whom 630 (72.33 %) exited with a successful employment outcome. In PY'20, 22,613 participants with most significant disabilities received VRD services, of whom 995 received VRD SE services. During PY'20, 767 participants who had received SE services exited the VR program, of whom 516 (67.28%) exited successfully with an employment outcome.

To achieve a smooth transition from VR SE services to HHSC SE services (extended long-term supports and services), TWC collaborates with HHSC on each agency's responsibilities and timelines for the provision of services. VR counselors are encouraged to invite HHSC providers and staff to plan meetings and maintain contact with the service coordinator, case manager, or other long-term support and services staff throughout the process. Additionally, VRD participated with HHSC in crafting the 1915(c) Medicaid home- and community-based waivers employment services definitions to ensure that the transition from VR to HHSC SE is as seamless as possible, without interruption in service delivery. With appropriate customer releases, HHSC shares the customer's individual-directed plan and plan of care with VRD, and VRD provides HHSC with the Individualized Plan for Employment. VRD will provide SE services for a period not to exceed 24 months. Extended services will be provided to youth with the most significant disabilities for a period not to exceed four years or when they reach 25 years of age; the extended services are provided by the designated state unit with the funds reserved under 34 C.F.R. §363.22 and §363.4(a)(2).

VR counselors work with Employment Service Providers (ESPs) SE specialists, HHSC providers, or service coordinators/case managers, and customers' natural support networks to develop short- and long-term support strategies based on individual needs. This ensures the appropriate amount of support is available and provided so that employment can be maintained. Extended services, known in Texas as long-term support and services, can be publicly funded, "natural" or "in-kind," or paid by the customer through SSI, Social Security Disability Insurance (SSDI), or another Social Security Administration Title II work incentive program. Examples of extended services include, but are not limited to, consulting with a customer's job supervisor regarding areas of concern or training needs; creating supports and strategies to improve work performance through job coaching; providing assistance with medication management or hygiene; and identifying and training on transportation options. All HHSC waivers include employment services, and TWC and HHSC have a partnership focusing on training community providers and 1915(c) local authorities in employment services.

## 2. THE TIMING OF TRANSITION TO EXTENDED SERVICES

SE cases remain open for a 90-day period after being identified as "stable," with stable defined as the customer:

- performing in a competitive, integrated job to the employer's satisfaction;
- satisfied with the job placement;
- having the necessary modifications and accommodations at the worksite;
- having reliable transportation to and from work; and
- having extended services in place and support needs met and working without intervention from SE or SSE providers.

Additionally, during the 90-day period between "Job Stability" and "Service Closure" for supported employment, ESPs do not provide services to customers.

In supported SE, "stability" is defined as:

- the business is in operation with all supports necessary to run the business for at least eight weeks; and
- the customer is working without support from the VRD-funded ESP.

The customer's business must operate for an additional 90-day period with no support from the SSE provider ESP to reach case closure.

If VRD SE or SSE providers provide direct services to customers between stability and closure of the service, another "stability" period must be achieved before final outcomes are achieved for service closure. Once customers successfully maintain stability with extended services from by non-VRD resources only, the VRD SE or SSE case is closed.

A customer's extended services are documented, including the identified extended service provider, for both SE and SSE services in the customer's Individualized Plan for Employment.

Collaboration with community organizations and other state and federal agencies to identify, develop, and implement cooperative agreements and partnerships is essential to achieving successful employment outcomes for customers, particularly those with the most significant disabilities.

VRD identifies and makes arrangements, including entering into cooperative agreements with other state agencies and other appropriate entities, to assist in the provision of SE and SSE services. With respect to the provision of extended services, VRD makes arrangements with other public or nonprofit agencies or organizations within the state, employers, natural supports, and other entities.

Funding through WIOA Title VI and the Rehabilitation Act of 1973 §110, as amended, is available statewide to all VR counselors to serve Texans with the most significant disabilities. At case closure, or at the end of any time-limited post-employment services, the services paid for by Title VI, Part B and/or §110 funds are terminated.

Additional potential funding sources include the Social Security Administration's Ticket to Work Program, HHSC programs (Mental Health, IDD, Medicaid including waivers), and Centers for Independent Living (CILs).

Additionally, HHSC is the operating authority for:

- the majority of 1915(c) state Home and Community-based Services (HCS) Medicaid waivers;
- 1915(k) Community First Choice;
- Title XX social services; and
- employment services provided through state general revenue funds.

#### VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

States must provide written and signed certifications that:

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY WIOA[14], AND ITS SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT[15];

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Texas Workforce Commission Vocational Rehabilitation Division



2. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (ENTER THE NAME OF DESIGNATED STATE AGENCY)[16] AGREES TO OPERATE AND ADMINISTER THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[17] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[18] , POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER SECTION 111 OF THE REHABILITATION ACT ARE USED SOLELY FOR THE PROVISION OF VR SERVICES AND THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

ENTER THE NAME OF DESIGNATED STATE AGENCY

Texas Workforce Commission

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY AGREES TO OPERATE AND ADMINISTER THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[19] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[20] , POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER TITLE VI ARE USED SOLELY FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES AND THE ADMINISTRATION OF THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

4. THE DESIGNATED STATE AGENCY AND/OR THE DESIGNATED STATE UNIT HAS THE AUTHORITY UNDER STATE LAW TO PERFORM THE FUNCTIONS OF THE STATE REGARDING THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Cheryl Fuller

8. THE (ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND THE SUPPLEMENT FOR SUPPORTED EMPLOYMENT SERVICES;

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

Vocational Rehabilitation Division Director

9. THE AGENCY THAT SUBMITS THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT HAS ADOPTED OR OTHERWISE FORMALLY APPROVED THE PLAN AND ITS SUPPLEMENT.

FOOTNOTES

[14] Public Law 113-128.

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

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

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

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

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

[20] Applicable regulations, in part, include the citations in footnote 6.

CERTIFICATION SIGNATURE

Signatory information	Enter Signatory information in this column
Name of Signatory	Cheryl Fuller
Title of Signatory	Vocational Rehabilitation Division Director
Date Signed	

## ASSURANCES

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

The State Plan must include	Include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: Administration of the VR services portion of the Unified or Combined State Plan:	
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	
3.b.(A) "is an independent State commission" (Yes/No)	No
3.b.(B) "has established a State Rehabilitation Council" (Yes/No)	Yes
3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	
3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	
3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No

The State Plan must include	Include
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	No
3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	
3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	
4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	Yes
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	

The State Plan must include	Include
4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act	
4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act	
4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs	
4.j. With respect to students with disabilities, the State,	
4.j.i. Has developed and will implement,	
4.j.i.I. Strategies to address the needs identified in the assessments; and	
4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and	
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	
5. Program Administration for the Supported Employment Title VI Supplement:	
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act	
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act	
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	
6. Financial Administration of the Supported Employment Program:	

The State Plan must include	Include
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act	
7. Provision of Supported Employment Services:	Yes
7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act	
7.b. The designated State agency assures that:	
7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act	
7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act	

## VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

### **Performance Goals for the Core Programs**

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

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the

Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2022 Proposed/Expected Level	PY 2022 Negotiated/Adjusted Level	PY 2023 Proposed/Expected Level	PY 2023 Negotiated/Adjusted Level
Employment (Second Quarter After Exit)	57.8%		58.2%	
Employment (Fourth Quarter After Exit)	54.4%		54.9%	
Median Earnings (Second	\$5,500		\$5,600	



Performance Indicators	PY 2022 Proposed/Expected Level	PY 2022 Negotiated/Adjusted Level	PY 2023 Proposed/Expected Level	PY 2023 Negotiated/Adjusted Level
Quarter After Exit)				
Credential Attainment Rate	44%		45%	
Measurable Skill Gains	43.0%		44.0%	
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> "Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2022 State Plans.