VR Portion of WIOA State Plan for the State of Connecticut

Program-Specific Requirements for Vocational Rehabilitation (General)

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

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

A. Input of State Rehabilitation Council (General)

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; (General)

The mission of the State Rehabilitation Council (SRC) is to provide assessment, advice and recommendations to the Bureau of Rehabilitation Services (BRS or the Bureau) and others regarding coordination and effectiveness of programs and strategies that promote community—based competitive employment for persons with disabilities. The SRC maintains an ongoing collaboration with BRS. The SRC is comprised of volunteers, many of whom are current or former vocational rehabilitation (VR) consumers or family members of VR consumers. They are appointed by the Governor to review and assess the effectiveness and delivery of vocational rehabilitation services provided for individuals with disabilities who are seeking employment.

The SRC has participated in the following endeavors in FY 2017 and 2018:

- a) Development of the BRS 2018 State Plan updates;
- b) 2017 Statewide Annual VR program Meeting;
- c) National Council of State Rehabilitation Councils (NCSRC) Teleconferences;
- d) SRC Meetings (six per year);
- e) Review of the 722 Report regarding Administrative Hearing Outcomes;
- f) Participated in the development of the 2017 Comprehensive Statewide Needs Assessment

WIOA

In July, 2014, Congress passed the Workforce Innovation and Opportunity Act (WIOA) to unify the state programs that provide employment services. This bill established some significant changes to the Vocational Rehabilitation (VR) program. BRS Director David Doukas has informed the SRC of

program changes and implementation of various requirements of the WIOA regulations. The SRC has worked to better understand WIOA requirements, and has offered feedback related to changes being proposed and implemented upon employment services for people with disabilities. The SRC also began to contribute to the development of new policies, both as they relate to new WIOA requirements, and changes in the delivery of certain services.

Agency Update

BRS Director David Doukas has consistently attended SRC meetings and provided members with information and updates about the VR program. On July 1, 2017 Kerri Fradette assumed responsibilities as BRS liaison to the SRC. The SRC looks forward to continuing to work collaboratively with, and strengthening their positive relationship with both Mr. Doukas and Mrs. Fradette to continue to improve the quality of services for people in the program.

BRS Public Meetings

BRS and the SRC hosted public meetings in January 2016 to review the VR portion of the 2016 Unified State Plan. In February 2018, the latest public meeting was held to review proposed 2019 State Plan updates and the BRS decision to implement an Order of Selection. Consumers, their families, and others interested in the VR program were invited to review the draft of the 2019 Unified State Plan updates that feature VR program specific information, and employment information and goals among the state partners. Their feedback informed the final version of the Unified State Plan.

SRC Recommendations to BRS

Outlined below is the designated state unit's response to the Council's input and recommendations. Several of these recommendations appeared last year, but the SRC believes they are ongoing issues that warrant continued attention this year.

- Recommendation 1: We support BRS as it seeks new locations to better serve VR consumers. We applaud efforts to ensure better visibility of BRS offices. We continue to recommend that signage to enable optimum visibility be a priority of all offices. The SRC is requesting that updates on signage and access to all buildings continue to be provided at SRC meetings
- **Recommendation 2**: The accessible parking in the Waterbury office is on a grade that makes it difficult for consumers who use wheelchairs to transfer out of and into vehicles. The SRC recommends that when the parking lines are repainted, the accessible spaces be moved further right where the grade is not difficult to maneuver.
- **Recommendation 3**: Some consumers are still confused upon arrival at offices shared with DSS. It would be beneficial to consumers and families if BRS expands the website to include pictures of offices and perhaps a virtual tour of each office so consumers will know where to park and what to expect when entering the building.

Recommendation 4: The SRC recommends BRS strengthen communication between counselors and consumers, especially when consumer cases are being transferred to

another counselor. We would like to know what BRS expects of staff regarding response time to consumer telephone calls and emails. We would also like to have reports on how staff are meeting that expectation. Also, what is the procedure to ensure consumer contact is not lost when cases are transferred to new counselors?

- Recommendation 5: The SRC has a continued interest in all of the state agency collaborative projects including the Department of Mental Health and Addiction Services (DMHAS)/BRS agency collaborative regarding services and employment options for consumers with psychiatric issues, the Department of Developmental Services (DDS)/BRS agency collaborative, and the Bureau of Education Services for the Blind (BESB)/ BRS agency collaborative. Please provide updates at the SRC meetings about any achievements that have been attained, the strategies that have been developed to improve outcomes, the training that is available to staff, and any activity that will occur as a result of BRS' attendance at the CSAVR conference.
- Recommendation 6: The Business Committee will continue efforts to make presentations about BRS to businesses and Chambers of Commerce to help publicize the VR program. The Committee would like to work closely with BRS to develop a brochure to distribute on these occasions. The SRC requests regular updates regarding new projects and initiatives that will benefit the business community.
- **Recommendation 7:** The SRC recommends that BRS increase engagement with businesses to increase hiring of VR consumers.
- 2. The Designated State unit's response to the Council's input and recommendations; (General)
 - BRS Response 1: The Bureau continues to be very active in its endeavor to improve the physical locations of our offices. We have completed two critical re–location projects in the first quarter of FFY 2016 and are planning additional moves within this year. We agree that both exterior and interior signage at our offices could be improved, and have been systematically working toward addressing this. In many locations, municipal building codes, landlord issues and physical space itself limits our signage options, but efforts to maximize our visibility are to be made wherever possible.

Update: With the implementation of WIOA, the Bureau has focused on establishing presence of the VR program within American Job Centers. To this end, the Bureau has collaborated with Regional Workforce Boards and under Infrastructure Cost Agreements will establish, by the onset of FFY 2019, full-time presence in three locations and part-time presence in seven locations.

BRS Response 2: The Bureau has been and will continue to work closely with the Connecticut Department of Administrative Services and the lessor of our Waterbury office related to the re–grading and expansion of the parking lot. We will continue to pursue improvement at this location, ensure no issues are present at newly established locations, and also address any additional issues that are identified at other existing office locations.

Update: The Bureau continues to pursue improvements at this location, but must do so under the terms of a new lease. BRS continues to work closely with DAS in this endeavor.

BRS Response 3: BRS continually updates website content, including information related to BRS offices. We will look into providing pictures of the locations. We will also update the directions to include parking and building entrance instructions. The State of Connecticut is implementing a new website portal that we hope will be functional in 2016. Once this website is implemented, we plan to provide user friendly and accessible information for the general public, which will include BRS office information in detail. In addition, we will continue to utilize social media to provide outreach to consumers and the public to increase awareness of office locations and services.

Update: The Department of Rehabilitation Services (DORS) is scheduled to have its website redesigned on the new CT website portal in FFY 2019. We will work to ensure the new site is designed in a user-friendly manner, with full 508 compliance and accessibility to individuals with disabilities. We will work to include information and directions to all BRS offices accordingly.

BRS Response 4: The VR Supervisors oversee case transfers and will continue working on a resolution to this concern. Going forward, consumers can expect that within two weeks of requesting a transfer to another counselor and/or office they will be contacted by the new counselor, (or his/her designee) to schedule an appointment. In the instance of case transfers happening due to a caseload vacancy, consumers receive a letter as soon as the vacancy occurs, with contact information to be used until the position is filled. Mechanisms for formally tracking transfer cases and yielding metrics related to response times will be investigated and, to the extent possible, developed.

Update: BRS continues to adhere to the principles listed in our original response.

BRS Response 5: BRS continues to maintain Memoranda of Understanding/Agreement (MOU/A) and active, robust partnerships with various state agencies. We are committed to routinely sharing information about these collaborations and will continue to do so.

Update: The Bureau has executed all necessary MOU/A's with partner agencies as required under WIOA.

BRS Response 6: BRS supports the SRC in their reaching out to businesses and Chambers of Commerce to market our services. We have a variety of materials developed that are geared toward highlighting the benefits of employers working with the VR program. We would be interested in presenting these materials to the SRC and developing any additional brochures that are determined necessary. The Bureau will also offer regular updates regarding initiatives and projects with the employment community at SRC meetings.

Update: BRS has continued to support the SRC's effort to develop and print the requested materials. Funding was provided during 2018 for this endeavor and the materials have been produced.

BRS Response 7: BRS remains very committed to engaging with businesses. This is evident in BRS housing a Business Services Unit, and Connect—Ability Staffing, which are responsible for business outreach and development throughout Connecticut. BRS plans on expanding Connect—Ability Staffing's capacity for outreach in order to facilitate more connections with businesses and, ultimately, more employment opportunities for VR consumers.

Update: Although BRS has not been able to expand the capacity of its Business Service uUit, it has maintained its capacity while most other aspects of the VR program have been forced to contract due to budgetary constraints. The Bureau remains committed to providing services to businesses and collaborating with business service teams of each of the regional Workforce Boards.

3. The Designated State unit's explanations for rejecting any of the Council's input or recommendations. (General)

The Designated State unit did not reject any of the Council's input or recommendations.

B. Request for Waiver of Statewideness (General)

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; (General)

The Bureau of Rehabilitation Services is not requesting a Waiver of Statewideness.

2. The Designated State unit will approve each proposed service before it is put into effect; and (General)

Not applicable.

3. All State plan requirements will apply (General)

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. (General)

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; (General)

BRS has Memoranda of Agreement (MOA) and Memoranda of Understanding (MOU) with the following entities:

- a) Social Security Administration: Information Exchange Agreement to receive data regarding consumers' work history.
- b) The Connecticut Department of Veterans' Affairs MOU enables collaboration of services for veterans.
- c) The Connecticut Distance Learning Consortium MOA enables BRS to create and host the Connect—Ability Distance Learning Initiative (DLI) which provides over 50 free online e—learning modules for job seekers with disabilities, employers, Community Rehabilitation Providers CRP), vocational rehabilitation staff and others. Modules are accessible and some are available in Spanish or American Sign Language. BRS also uses the DLI as a training registration platform for staff trainings. This year we added a new module in order to provide Career Counseling for sub-minimum wage employees in Connecticut.
- d) The Department of Social Services (DSS) MOA enables DORS/BRS to receive select administrative supports and access to information systems, applications and networks from DSS. It also formalizes the transfer of funding to conduct Learning Disability evaluation services related to the collaboration in serving potentially eligible consumers receiving Temporary Assistance for Needy Families (TANF).

Update: The Bureau has executed a new agreement related to DSS information system access, which is discussed in (i) below. The VR TANF agreement sunsets effective 7/1/2017.

- e) The Mashantucket Pequot Tribal Nation (MPTN) MOU enables collaboration and coordination of vocational rehabilitation services with the 121 program.
- f) Through the Secure Jobs Connecticut Pilot, a Letter of Agreement enables BRS and the Departments of Education (SDE), Housing (DOH), Labor (DOL), and Social Services (DSS) to collaborate with the Community Foundation for Greater New Haven, the Connecticut Coalition to End Homelessness, the Connecticut Women's Education and Legal Fund, Fairfield County's Community Foundation, the Hartford Foundation for Public Giving, the Liberty Bank Foundation, the Melville Charitable Trust, the Office of Early Childhood, the Partnership for Strong Communities, the United Way of Greater New Haven, and the United Way of CT to end homelessness by 2015 for Veterans, 2016 for those experiencing chronic homelessness, and by 2022 for families with children and youth.
- g) BRS also has agreements with Central Connecticut State University, Southern Connecticut State University and Springfield College to train student interns.
- h) BRS has a newly executed MOU with the Department of Labor (DOL) which enables the exchange of client information for the purposes of federal reporting and performance accountability under WIOA Legislation. BRS client records are matched to DOL's Unemployment Compensation Database enabling BRS to report on consumers employed during the 2nd and 4th quarters post exit, as well as the median earnings in the 2nd quarter post exit. In addition, this MOU enables the exchange of information related to program involvement among all participating WIOA partners, and a centralized location for the development of WIOA Unique ID's.
- i) BRS has executed a 3-way MOU with the Department of Social Services (DSS) and the Department of Labor (DOL) for the exchange of client records necessary for BRS to process cost reimbursement cases with the Social Security Administration (SSA). Under this agreement, BRS is able to run a batch file process with DSS. A resultant file is generated by DSS using DOL Unemployment Compensation data to assist BRS with identifying cases that qualify for cost reimbursement through The Social Security Administration (SSA).

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

The Connecticut Assistive Technology (AT) Act Program is housed within DORS along with BRS, therefore an MOA is not needed. The Program Director for the AT Act program serves in the role of AT Consultant to the VR program and a strong relationship has been established. The AT Act program operates an AT device lending service specifically for VR consumers. The Program Director provides AT demonstrations when needed, and assists VR consumers in participating in reuse activities. Additionally, VR consumers are able to utilize the alternate financing program operated by the AT Act program to assist in paying for needed devices that the VR program may not be able to provide, such as vehicles, which can then be modified by the VR program.

The following are formal agreements that have been established to provide activities under Section 4 of the AT Act:

- a. The State Education Resource Center (SERC) MOU enables SERC to provide Assistive Technology device demonstrations and loans primarily to educators, other school personnel, family members and students.
- b. The Southern Connecticut State University MOA enables laptops and iPads with specific software to be loaned to CT K–12 schools for up to four months to allow students to try devices before they are purchased.
- c. Department of Labor MOA allowed us to establish Assistive Technology device demonstration centers at two American Job Centers (AJC) in CT, allowing AJC customers to borrow the devices while they participate in AJC services, as well as allow employers to borrow the devices for their employees with disabilities.
- 3. Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture; (General)

None.

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

None.

- 5. State use contracting programs. (General)
 - a) The Office of the Attorney General MOA enables review and approval of Community Rehabilitation Providers (CRPs) contracts and legal representation at Administrative Hearings for consumers.
 - b) The Office of the State Comptroller MOU provides approval and processing of expenses for consumers and staff.

D. Coordination with Education Officials (General)

Describe:

1. Designated State Unit's plans (General)

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 (IPE'S) for the students.

With the passage of WIOA, the BRS Transition Committee has collaborated with the State Department of Education (SDE) and a number of entities to implement pre–employment transition services including the Connecticut Transition Community of Practice, the North East Transition Group, Regional Transition Committee, Transition Task Force, Collaboration Across the Life Span, Education Transition Liaisons, Southern Connecticut State University Career Advisory Committee, CT–AHEAD/Higher Education Schools, the Department of Labor (DOL), and the WDBs.

Prior to initiation of pre—employment transition efforts, BRS had liaison counselors assigned to each high school to work directly with students and collaborate with education administrators to sign a referral protocol yearly. With implementation of WIOA, 10 VR counselors have been assigned to work exclusively with students with disabilities.

SDE and BRS have staff that serve on each other's advisory committees (Transition Task Force and BRS Transition Committee). Program staff attends common training regarding the Individualized Education Plan (IEP), secondary transition services and WIOA. SDE and BRS collaborated to develop a statewide CT Transition Community of Practice (COP) with a broad stakeholder base as a single portal for transition resource development, professional development, and interagency collaboration. SDE and BRS initiated statewide strategic planning with agencies, school districts, families and other stakeholders.

Information on the formal interagency agreement with the State Department of Education (SDE) includes the following:

With the passage of WIOA, BRS has expanded focus to include both Level Up Committee and Transition Committee to focus on service delivery for students enrolled in high school and also collaborated with the State Department of Education (SDE) and a number of entities to implement pre—employment transition services including the Connecticut Transition Community of Practice, the CT Transition Alliance, Regional Transition Networks, Transition Task Force, Charting the Life Course: Life Course Planning, Education Transition Liaisons, CT—AHEAD/Higher Education Schools, the Department of Labor, and the WDBs.

BRS has liaison counselors assigned to each high school to work directly with students and collaborate with education professionals to sign a referral protocol yearly. With implementation of WIOA, 10 VR counselors have been assigned to work exclusively with students with disabilities.

SDE and BRS have staff that serve on each other's advisory committees (Transition Task Force and BRS Transition Committee and Level Up Committee). Program staff attends common training regarding the Individualized Education Plan (IEP), secondary transition services and WIOA. SDE and BRS collaborated to develop a statewide CT Transition Community of Practice (COP) with a broad stakeholder base as a single portal for transition resource development, professional development, and interagency collaboration. SDE and BRS initiated statewide strategic planning with agencies, school districts, families and other stakeholders.

2. Information on the formal interagency agreement with the State educational agency with respect to: (General)

- 3. 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; (General)
 - a) The responsibilities of BRS under the formal interagency agreement are as follows:
 - i. Collaborate with the SDE in coordinating, providing, and documenting the provision of pre-employment transition services to students with disabilities;
 - ii. Provide vocational rehabilitation services to students and youth who meet the eligibility criteria of BRS:
 - iii. Work with the LEA to make the best effort to develop an Individual Plan for Employment (IPE) for each student eligible for adult VR services before the student leaves the school setting;
 - iv. Provide consultation and technical assistance to aid LEA inplanning for the transition of eligible students;
 - v. Coordinate with the SDE for training and technical assistance regarding transitioning youth with disabilities and interagency service linkages, including but not limited to, presenting at statewide events and supporting the statewide transition website of the Connecticut Transition Community of Practice (COP);
 - vi. Satisfy the documentation requirements of section 511 of WIOA and 34 C.F.R. 397 for students with disabilities who seek subminimum wage from employers who hold special wage certificates under the Fair Labor Standards Act, 29 U.S.C. 214 (c), including the provision of documentation of notice that pre-employment transition services were available to that individual under 34 C.F.R. 361.48, documentation of an application for vocational rehabilitation services and the result thereof, and, if the individual was found eligible for vocational rehabilitation services, documentation that the individual had an IPE, was unable to achieve the employment outcome specified in the IPE, and had a closed case record meeting the requirements of 34 C.F.R. 361.47:
 - vii. Collaborate with the SDE to provide trainings to schools about Science, Technology, Engineering and Math (STEM) careers and Customized Employment for youth with disabilities;
 - viii. Collaborate with the SDE to coordinate training and technical assistance regarding assistive technology;
 - ix. Provide a VR staff member to participate on and support or co-chair the SDE Transition Taskforce, BRS Transition Committee and the Connecticut Transition COP; and
 - x. Satisfy the career counseling and information and referral requirements of WIOA, including its documentation requirements, for each youth with a disability who seeks, or obtains, subminimum wage employment.
 - b) The responsibilities of SDE under the formal interagency agreement are as follows:
 - Provide general supervision of the implementation of the IDEA's requirements for special education and related services to ensure a free appropriate public education for children and youth with disabilities;
 - ii. Collaborate with BRS to coordinate, provide, and document the provision of preemployment transition services to students with disabilities;

- iii. Facilitate partnerships between BRS and LEA, including the identification of a contact person in each organization, as mutually identified by the parties, to facilitate communication:
- iv. Collaborate with BRS and LEA to develop new pre-employment transition services;
- v. Assist BRS with training schools about STEM careers and customized employment for youth with disabilities;
- vi. Assure that IEPs developed by LEA for youth with disabilities aged 16 or over include plans for the provision of educationally-related "transition services" as defined in 34 C.F.R. 361.22(b)(4) and 34 CF.R. 300.43. Educationally-related transition services shall also include such activities identified by the LEA as are based on the child's needs, consider the child's preferences, and are designed to facilitate movement from school to post-secondary activities, including employment:
- vii. For each student with a disability with an IEP or Section 504 Accommodation Plan that the LEA has reason to believe may pursue subminimum wage employment following their exit from the school system, SDE shall assure that LEA document the provision of transition services in accordance with the documentation requirements of 34 C.F.R. 397.30(b)(1), including, at a minimum, the child's name, a description of the service or activity completed, the dated signature of the responsible educational official documenting the completion of the required service or activity, and the dated signature of the responsible educational official who transmits the documentation of the provision of transition services to BRS upon the request of BRS;
- viii. For each student with a disability that the LEA has reason to believe may pursue subminimum wage employment following their exit from the school system, SDE shall assure that LEA transmit documentation of the provision of educationally-related transition services to BRS by June 15 of the year in which the youth exits the school system. Such transmission of documentation to BRS shall include a cover sheet identifying the transmitted documentation that has been provided and shall be made in a manner that ensures confidentiality in accordance with the requirements of the Family Education Rights and Privacy Act and the Individuals with Disabilities Education Act;
- ix. Collaborate with BRS to disseminate information about and train school personnel on how to coordinate services for students with disabilities as they transition to life after high school, including those students interested in supported, subminimum wage, or other employment in compliance with WIOA;
- x. Coordinate with BRS to distribute information for LEA to provide to students referred to BRS beginning at age 16;
- xi. Provide information about BRS and related services on the SDE Secondary Transition and other relevant website pages;
- xii. Facilitate the provision of transition services through LEA, based on funding responsibilities identified in IDEA and WIOA;
- xiii. Collaborate with BRS to coordinate training and technical assistance regarding assistive technology;
- xiv. Provide an SDE staff member to actively participate on and support or co-chair the BRS Transition Committee, SDE Transition Taskforce and the Connecticut Transition COP; and
- xv. Assure that neither the SDE nor the LEA will enter into a contract with an entity for the purpose of operating a program under which a youth with a disability is engaged in work compensated at a subminimum wage.

- 4. Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs; (General)
 - a) The responsibilities of BRS under the formal interagency agreement are as follows:
 - Assist the LEA in providing transition planning for students with disabilities that facilitates the development and implementation of their individual educational programs (IEPs) under section 614(d) of the IDEA;
 - b) The responsibilities of SDE under the formal interagency agreement are as follows:
 - Coordinate with BRS to provide training and technical assistance regarding the IDEA, transition and Individualized Education Program (IEP) requirements for special educators and vocational rehabilitation counselors, including but not limited to presenting at statewide events and supporting the statewide transition website of the Connecticut Transition COP;
- 5. Roles and responsibilities, including financial responsibilities of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services; (General)

The responsibilities of BRS and SDE for Financial responsibility and dispute resolution under the formal interagency agreement are as follows:

- a) BRS and the SDE agree to maintain independent financial responsibility for the services they are mandated to provide under applicable federal and state laws and regulations;
- b) SDE shall ensure that the LEA meet their obligations under the IDEA to provide or pay for transition services that are also considered special education or related services and that are necessary for ensuring a Free Appropriate Public Education (FAPE) to children with disabilities. BRS will fund pre-employment transition services under WIOA; and
- c) In the event BRS or an LEA provide or pay for transition services to a youth or students with disabilities and such Party believes that the services should have been provided or paid for by the other Party, that Party shall seek reimbursement from the other Party in writing along with evidence that the services in question were in fact provided, and the legal basis for such claim. In the event the other Party disputes the claim for reimbursement and the Parties cannot resolve the dispute themselves, the agency representatives shall consult with the Office of the Attorney General for a legal opinion or interpretation, if necessary.
- 6. Procedures for outreach to and identification of students with disabilities who need transition services. (General)
 - a) The responsibilities of BRS under the formal interagency agreement are as follows
 - Assist Local Education Authorities (LEA) in providing outreach and identification of students with disabilities who are in need of transition services to be provided by the LEA and pre-employment transition services to be provided by BRS;
 - b) The responsibilities of SDE under the formal interagency agreement are as follows

Coordinate with BRS in disseminating information to LEA regarding effective, results-based practices for preparing students with disabilities for postsecondary education, vocational training, competitive employment (including supported employment), continuing and adult education, adult services, independent living, or community participation;

E. Cooperative Agreements with Private Nonprofit Organizations (General) (Formerly known as Attachment 4.8(b)(3)).

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

BRS has partnership agreements with several Community Rehabilitation Programs (CRP); we procure CRP services through Purchase of Service (POS) contracts.

Through a POS contract with the Connecticut Association for Human Services (CAHS), consumers who are 18 or older and are eligible for Social Security Benefits receive Individualized Financial Capability Coaching to improve their knowledge of finances.

F. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services (General) (Formerly known as Attachment 4.8(b)(4)).

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

The Bureau provides supported employment and extended services to consumers with significant disabilities, as appropriate. Vocational Rehabilitation counselors work with each individual consumer to identify necessary services. In the process of developing an Individual Plan for Employment (IEP), the counselor and consumer make decisions about the need for supported employment or extended services. When the services are deemed necessary, the counselor and consumer identify a source of long—term funding and meet with a representative case manager, if appropriate. Once long—term supports are obtained, the plan can be executed. Supported employment and extended services are provided in partnership with our statewide network of Community Rehabilitation Programs (CRP's). These arrangements are based on fee—for—service contracts. We use a series of strategies to accomplish the goals of supported or extended employment, including the following:

- The statewide Ongoing Employment Supports Committee is a resource for identifying supported employment funding opportunities on a case by case basis;
- Cooperative agreements with CRPs, American Job Centers and Independent Living Centers (ILCs) allow for additional employment supports through the Ticket to Work program; and
- The Interagency Employment Practice Improvement Collaborative for staff in BRS, the Department of Mental Health and Addiction Services (DMHAS), and CRPs is designed to increase successful employment outcomes to an underserved target population.

G. Coordination with Employers (General) (Formerly known as Attachment 4.8(b)(5)).

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

1. VR services; and (General)

BRS employs a Business Services Unit, Connect–Ability (CA) Staffing Employment Consultants, which are responsible for employer outreach efforts across Connecticut. The CA Staffing Employment Consultants build relationships with employers to identify their workforce development needs. Through these mutually beneficial relationships, CA Staffing offers business services such as disability awareness trainings, candidate pre–screening, working interviews, on–the–job trainings and industry specific training and placement programs. In turn, the CA Staffing Employment Consultants obtain real–time labor market information that is shared with VR Counselors and participants of the vocational rehabilitation program as part of their career path exploration and decision making process. This dual–customer approach allows BRS to prepare VR consumers for long–term, sustained employment in a constantly evolving labor market.

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

BRS will procure transition services for students with disabilities that include placement with employers to participate in work—based learning experiences and work place readiness training, as defined in WIOA. The scope of services will include social skill development, independent living and instruction in self—advocacy, peer mentoring, and assistive technology. Upon graduation, youth will benefit from transition services to prepare for, seek and maintain employment and secure supports needed to be successful.

H. Interagency Cooperation (General)

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; (General)

The State Medicaid plan under Title XIX of the Social Security Act is a program operated by the Department of Social Services (DSS). For over 20 years until 2014, BRS functioned as a Designated State Unit with DSS serving as its Designated State Agency. As a result of this long–term relationship, BRS has a close working relationship with DSS programs such as TANF, the Medicaid Buy–In, and Money Follows the Person. We offer technical assistance through our Vocational Rehabilitation and Benefits Counseling programs. BRS intends to work with DSS to develop an agreement that formalizes these referral and service processes.

2) The State Agency responsible for providing services to individuals with developmental disabilities; and (General)

The Department of Developmental Services (DDS) MOU enables coordinated vocational employment services for people with intellectual disabilities to minimize overlap of resources.

3) The State Agency responsible for providing mental health services. (General)

The Department of Mental Health and Addiction Services (DMHAS) MOA enables BRS to partially fund a shared position to improve service delivery and collaboration for consumers of both programs.

I. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development (General) (Formerly known as Attachment 4.10)).

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

- 1. Data System on Personnel and Personnel Development (General)
 - a) Qualified Personnel Needs. (General)

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; (General)

BRS maintains a computerized record system for personnel needs, resources, and training. In addition to this information, the Bureau annually uses a caseload management program and results of ongoing needs assessments to analyze personnel needs.

BRS assisted 8,330 consumers in Federal Fiscal Year (FFY) 2017. With 61 VR counselors, the ratio of VR counselors to all consumers is 1:113; the ratio of VR supervisors to consumers is 1:1,388. The ratio of all staff to consumers is 1:76. Of the 8,330 total annual consumers, 2,554 developed an Individualized Plan for Employment (IPE). Based on the same number of VR counselors, the ratio of staff to all consumers with an IPE is 1:42; VR supervisors to consumers with an IPE is 1:426; and all staff to consumers with an IPE is 1:23.

Personnel Category Total Positions:

Support (Administrative Assistant, Fiscal, Secretary) 26

Central Office Consultants 8.5

District Directors 3

Managers 2

VR Supervisors 7

VR Counselors 61

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

Personnel Category Current Vacancies:

Support (Administrative Assistant, Fiscal, Secretary) 0

Central Office Consultants 0

District Directors 0

Managers 0

VR Supervisors 1

VR Counselors 0

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. (General)

Personnel Category Projected Vacancies Over the Next 5 Years

Support (Administrative Assistant, Fiscal, Secretary) 4

Central Office Consultants 0

District Directors 0

Managers 0

VR Supervisors 2

VR Counselors 15

b) Personnel Development (General)

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; (General)

We analyze the graduate information from the regional Council on Rehabilitation Education (CORE) – accredited universities to find schools that offer required courses or graduate degrees in rehabilitation counseling. We also check with local

CORE schools for the availability of distance learning opportunities for the required CSPD courses. In the state of Connecticut, there is one CORE–accredited institution of higher education that is preparing vocational rehabilitation professionals: Central Connecticut State University (CCSU). All rehabilitation counseling graduates from this college will be eligible to sit for the Certified Rehabilitation Counselor (CRC) exam.

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

Currently, there are 88 students enrolled in the CCSU Vocational Rehabilitation Program.

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. (General)

Last year, there were nine (9) graduates from the CCSU program. This year, the total number of expected graduates is 16.

1) Plan for Recruitment, Preparation and Retention of Qualified Personnel (General)

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.

BRS sends announcements for Counselor positions to all regional CORE—accredited institutions of higher education that train VR Counselors. We have initiated contacts with these universities so that we can continue to find well—qualified staff for the vacancies we anticipate in the future. In addition to the Connecticut—based CORE institution listed above, we are in close contact with the regional institutions from which we have traditionally found Counselor applicants (Assumption and Springfield College in MA, and Salve Regina in RI); we have staff that serve on advisory boards or teach at these institutions.

The Bureau has recruited qualified staff representative of the population of Connecticut: the 37% diversity of our staff exceeds the 19% diversity of our state. We have recruited 11% of our staff from individuals that have disabilities. Our primary challenge has been finding Master's level counselors who are proficient with Spanish or American Sign Language (ASL). We will continue the following steps to ensure there is a sufficient pool of qualified counselors for future openings:

- Increase our on-campus college recruitments;
- Increase recruitment, and continue online recruitment.
- Increase undergraduate internships.

In Connecticut, there are several factors that ensure retention of staff. The majority of staff leave because of retirement. BRS attributes the reasons for retention success as follows:

- BRS recruits staff committed to the importance of VR work;
- In–service training is available to staff at all levels;

- Staff may give input into decisions that affect the way they work; and
- Staff can participate in ongoing committees related to: Staff Training, Regional Training, Community Rehabilitation Providers, Transition, Autism Spectrum, and the BRS Annual Meeting.

The committees ensure that staff have input into the work of the Bureau. The committees also give staff opportunities for leadership experiences that will help them prepare for other positions in BRS.

BRS offers staff an opportunity to create Individual Staff Development Plans (ISDP) to identify areas of an employee's current job that need further development, areas that could be developed to prepare for a future job in the agency, and training needed for either. ISDPs encourage staff to pursue areas of their strength and interest. This activity helps to identify staff training needs and prepares staff for growth needed to meet future succession challenges.

2) Personnel Standards (General)

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that Designated State Unit professional and paraprofessional personnel are adequately trained and prepared, including:

 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 (General)

The current requirements for CSPD are based on the national standards for Certified Rehabilitation Counselors (CRC). The National Standard is determined by the Commission on Rehabilitation Counselor Certification (CRCC). BRS hires counselors that meet the following:

- i. Master's in Rehabilitation Counseling from a CORE-accredited institution; or
- ii. Master's and current Certified Rehabilitation Counselor (CRC) certification; or
- iii. Master's in Counseling with one integrated or two separate graduate level courses with the primary focus on the Theories and Techniques of Counseling course(s) as part of the required curriculum; or
- iv. Master's, Specialist, or Doctoral degree in one of 13 qualifying majors (as specified by CRCC) granted from a college or university accredited by a recognized regional accrediting body at the time the degree was conferred.

Even though BRS bases its educational standards for VR Counselors on the national standards for Certified Rehabilitation Counselors (CRC), it does not require counselors to have CRC certification. However, applicants with a CORE–accredited rehabilitation Master's degree should be able to sit for the CRC exam.

BRS employees interested in CRC Certification are encouraged to contact the Commission on Rehabilitation Counselor Certification at the following website: http://www.crccertification.com/ for more specific information on their credentials and experience. BRS does not guarantee that the above criteria will entitle a counselor to sit for the CRC exam. The Bureau provides training at no cost, and offers Continuing Education Units (CEU's), which will count toward the ongoing training requirements by CRC.

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. (General)

BRS will pay for and require the following graduate courses for new counselors in permanent positions with a Master's in Counseling as described in (a) above. The number of additional required courses will depend on the previous education of the new employee as well as total months of vocational rehabilitation counseling experience. The Bureau's definition of education, course curriculum, and experience is based on current standards for the national Certified Rehabilitation Counselor certification:

- 60 months of vocational counseling experience accepted by the Credentialing Committee no additional courses are required. CSPD requirements are met.
- Individuals with less than 60 months of vocational counseling experience will be required to take up to nine additional courses, based on a review of the graduate transcript. These specific required courses are determined by CRCC as Theories of Counseling, Techniques of Counseling, Foundations of Rehabilitation Counseling, Assessment, Occupational Information or Job Placement, Medical Aspects of Disability, Psychosocial Aspects of Disability, Multicultural Issues, and Case Management and Rehabilitation Services.

In addition to education requirements, BRS encourages staff to pursue certification in their field. The Bureau embraces the CSPD process to ensure a 21st century understanding of the evolving labor force and the needs of individuals with disabilities; continuous organizational development, and, continuous improvement of the competencies of all staff.

BRS also seeks continuous improvements in service delivery, the continuation of a professional level VR staff that can consistently achieve quality employment outcomes as specified in the Rehabilitation Act and promised in the Americans with Disabilities Act. In addition, we continually seek ways to meet the needs of our consumers and deliver a complete array of services based on the goals of employment, community participation, and informed consumer choice. The Bureau has hired a qualified, diverse, flexible and progressive rehabilitation staff to serve our current and future consumers. BRS strives toward the continuous development of desired consumer outcomes: sustained jobs, jobs with future growth, and jobs with sufficient earnings.

4. Staff Development. (General)

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

a) System of staff development (General)

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

BRS systematically provides adequate and ongoing training to staff. In–service training addresses assessment, vocational counseling, and job placement. All staff development activities support the Bureau's mission to increase the quality of services and the number and quality of employment outcomes for people with disabilities. In–service training is available to all staff. The Bureau bases its plan for staff development on a multi–faceted comprehensive needs survey. BRS uses all available information for ongoing analysis of training needs including the following:

- Public Meetings
- Comprehensive Statewide Needs Assessment results;
- Rehabilitation Services Administration (RSA) 107 Review;
- Key training personnel collaboration with New England Training Directors
- Management reports; and
- Manager, District Director, Consultant, and Supervisor feedback.

In addition to ensuring that staff meets CSPD requirements, BRS provides Foundations of CT VR, a year–long series of in–service training that is mandatory for new staff and available for staff that need refresher training. This includes a broad array of topics pertaining to VR such as: core BRS policies and practices, trainings on the specific populations, independent living, transition, and community rehabilitation services. A variety of training methods are utilized to assure that training activities are diverse enough to address individual learning styles.

Training is provided on assistive technology. BRS helped create and is a member of the NEAT (New England Assistive Technology) Center at Oak Hill. The Center is the largest assistive technology (AT) center in Connecticut where one can try AT devices for personal use, observe AT device demonstrations, donate or buy used equipment that is refurbished and recycled, obtain loans of AT devices and receive training on the latest adaptive equipment.

The Connecticut Tech Act Project Director provides training and consultation for BRS staff. Other in–service trainings on specific disability populations contain information on technological solutions for consumers.

The biannual statewide Assistive Technology Conference, hosted by the Connecticut Tech Act Project (entities carrying out State programs under section 4 of the Assistive Technology Act of 1998) specifically offers content and training sessions for vocational rehabilitation counselors and several BRS staff participate in this conference.

b) Acquisition and dissemination of significant knowledge (General)

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

BRS continually analyzes all consumer data to identify areas where it needs to increase training or vary approaches. Acquired updated information and research is disseminated to all BRS staff by Central Office staff.

5. Personnel to Address Individual Communication Needs (General)

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:

BRS addresses individual communication needs of applicants for, and recipients of, vocational rehabilitation through the services of others able to communicate in alternate languages, appropriate modes, or in native languages. Approximately 10% of the current staff is bilingual in English and Spanish. The Bureau employs staff who speak other languages as well as staff who use both American Sign Language (ASL) and English. The Bureau is organized into three regions that geographically divide the state. The list below indicates the languages spoken by current staff and the regions in which they work:

- American Sign Language (ASL) Northern, Southern, Western
- French Northern
- French Italian Southern
- Polish Northern
- Portuguese Northern
- Spanish Northern, Southern, Western.

BRS can also hire interpreters in most languages and can access interpreter services over the phone for all languages.

Each district has Rehabilitation Counselors for the Deaf (RCD) on staff to work with individuals who are deaf or hard of hearing. These Counselors are equipped with videophones. BRS also contracts interpreter services as necessary.

The Bureau does not serve many consumers who use Braille since there is a public Vocational Rehabilitation program through the Connecticut Bureau of Education and Services for the Blind (BESB) that serves the majority of consumers who have visual disabilities. When needed, BRS can provide Braille materials for consumers or staff. The Bureau's goal is to provide any communication support necessary for staff or consumers with disabilities.

6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act (General)

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.

BRS co–funds an Education Consultant position with the Connecticut State Department of Education's Bureau of Special Education who has been active in the Department of Education's Comprehensive System of Personnel Development Council. The Bureau routinely plans training with input from the Consultant in the co–funded position. This Consultant provides annual training for all Bureau professional staff on transition and other provisions of the IDEA. The Consultant also meets with the management team of BRS semi–annually to review current collaborative training and other provisions of the IDEA. This collaboration allows for coordination of the Bureau's human resource plan and personnel development under the IDEA.

- J. Statewide Assessment (General) (Formerly known as Attachment 4.11(a)).
- 1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the state, particularly the VR services needs of those: (General)
 - a) With the most significant disabilities, including their need for supported employment services; (General)

In FFY 2017, BRS, under the advisement of the State Rehabilitation Council, commissioned San Diego State University (SDSU) to conduct a Comprehensive Statewide Needs Assessment (CSNA) to examine the needs of individuals with the most significant disabilities including their need for supported employment and to assist the Bureau with establishing goals and priorities. Relevant excerpts from the CSNA report as issued by SDSU appear below.

The CSNA identified the following Barriers to Employment, Barriers to Services and Agency Performance:

Barriers to employment

- i. Key informants agreed that barriers to employment are heightened for individuals with most significant disabilities because they have greater needs and often multiple diagnoses, requiring more support in the community, service network and workplace. In particular, their employment is likely to require long-term workplace supports which are costly or scarce.
- ii. Forty-four per cent of all BRS applicants receive Social Security benefits, providing a measure of the segment of this population who may settle for working below their full potential because they fear that full time work will jeopardize their benefits.
- iii. Over 3,500 individuals in Connecticut are earning less than minimum wage. This was attributed to the state's historically high utilization of "group employment" (sheltered workshops) for many individuals with intellectual and developmental disabilities who receive services from the Department of Developmental Services. Key informants identified this as a barrier to competitive, integrated employment, but acknowledged that measures are under way to begin to limit this option, pursuant to the Workforce Innovation and Opportunity Act (WIOA).

Barriers to services

- i. Both the quantitative and qualitative data show that the delivery system's capacity to serve individuals with most significant disabilities is extremely limited. This is especially true where Supported Employment is concerned, and even more so for Customized Employment which is virtually non-existent in Connecticut. There was agreement that the causes include insufficient funding, inconsistent policy and programming across state agencies and limited staff proficiency.
- ii. These same factors play into BRS' own challenges in serving individuals with most significant disabilities. Dedicated BRS funding for Supported Employment is in fact limited, as are system resources for long-term supports. A financial literacy pilot program for SI/SSDI recipients ended in December 2016. BRS has yet to expand customized employment training, but is working actively with system partners to improve services for this population going forward, consistent with the WIOA requirements.

Agency Performance

- i. The disability types likely to be classified as most significantly disabled and require long-term supports (communications, Intellectual Disabilities/Developmental Disabilities and mental health impairments) represented 80% of BRS consumers in 2016. The disability type comprising the largest proportion served by BRS was mental health impairment, and yet the agency's rehabilitation rate for individuals with mental health impairments was by far lowest of all disability categories.
- ii. Individuals with most significant disabilities represented 56% of BRS consumers in 2016, a slight decline from 60% in the two previous years. Transition-age youth made up 70% of BRS consumers with most significant disabilities.
- iii. Eighty-one individuals with most significant disabilities received Supported Employment services from BRS in 2016, down 39% since 2014. It was unclear from data and key informant feedback what types of services were provided to the balance (1,783) of consumers with most significant disabilities. The rehabilitation rate for individuals receiving Supported Employment services declined slightly from 51% to 47%. VR Supported Employment Foundations Training was expanded to two days to increase staff capacity to deliver this service.
- iv. To comply with WIOA requirements pertaining to individuals earning subminimum wage, BRS and partners are holding regional information fairs. It was too early to measure the outcomes of this strategy but most observers gave it mixed reviews.
- v. Performance data available for this report are not current enough to reflect BRS' recent efforts to address the new WIOA requirements pertaining to Supported or Customized Employment and employment outcomes for individuals with most significant disabilities.

b) Who are minorities; (General)

The 2017 Comprehensive Statewide Needs Assessment identified the following Barriers and Agency Performance relative to minorities:

Barriers

Key informants were in general agreement that the barriers to both employment and services for individuals who are ethnic and racial minorities are of the same nature as for the general population of individuals with disabilities but are even more challenging, due in part to language and cultural issues. Next most frequently identified as barriers were BRS operational and programmatic issues (slow service delivery, not meeting with consumers in the community, difficulties with or inadequate services) as well as geographic access.

Agency Performance

- i. Race/Ethnicity- While close to two-thirds of White and Asian cases were closed rehabilitated in 2016, Black and Hispanic cases were lower by 21 and 14 percentage points respectively, which could be an indicator of cultural and language barriers to services for these populations.
- ii. Overall assessment- Most key informants indicated that the list has not changed significantly in the last ten years, and that despite the state's efforts to serve these populations, their employment outcomes continue to lag behind those of other target groups. They considered BRS' strategies with these populations to be a good effort given the resources at their disposal and the new regulations under WIOA but encouraged the agency to continue to seek creative and collaborative solutions.

c) Who have been unserved or underserved by the VR program; (General)

The 2017 Comprehensive Statewide Needs Assessment identified the following Barriers and Agency Performance relative to unserved or underserved individuals with disabilities:

Barriers

Key informants were in general agreement that the barriers to both employment and services for individuals who are from unserved and underserved populations, are of the same nature as for the general population of individuals with disabilities but are even more challenging, due in part to the lack of specialization in the service provider community to address their employment-related needs. Next most frequently identified as barriers were BRS operational and programmatic issues (slow service delivery, not meeting with consumers in the community, difficulties with or inadequate services) as well as geographic access.

Agency Performance

- i. Individuals most frequently identified as unserved or underserved by BRS include individuals with psychiatric and developmental/ intellectual disabilities, those with autism spectrum disorder and those transitioning from school to post-secondary education or work. (These groups of individuals are in addition to individuals from minority backgrounds, whom BRS identifies as an underserved population, that are discussed in Section 1. B. above.)
- ii. Overall assessment- Most key informants indicated that the list has not changed significantly in the last ten years, and that despite the state's efforts to serve these populations, their employment outcomes continue to lag behind those of other target groups. They considered BRS' strategies with these populations to be a good effort given the resources at their disposal and the new regulations under WIOA but encouraged the agency to continue to seek creative and collaborative solutions.

d) Who have been served through other components of the statewide workforce development system; and (General)

The 2017 Comprehensive Statewide Needs Assessment identified the following Barriers and Agency Performance relative to the needs of individuals who are served through other components of the statewide workforce investment system:

Barriers

While there is generally little quantitative data on individuals with disabilities served by AJCs, it is widely acknowledged that AJC utilization and successful results are limited unless staffs are collocated or programs are jointly sponsored with VR. This tends to be due to inconsistent policy and programming across state agencies, inadequate staff training and accessibility issues. Quantitative and qualitative data analyzed in this study suggest that Connecticut is no exception. Key informants indicated that where there is co-location, there is better integration and greater likelihood of successful outcomes; otherwise they do not typically find AJCs to be user-friendly for individuals with disabilities who they said feel overwhelmed with paperwork and processes.

Agency Performance

BRS staff participating in interviews indicated that they do make referrals to CT Works, but the agency recorded a total of only 37 referrals from AJCs over the entire three-year period under review, 17 of those occurring in 2016. Twenty-two per cent of consumers surveyed indicated that they had tried to access CT Works services. At the systems level, BRS is collaborating in statewide efforts to fulfill the WIOA mandate for an integrated workforce system. In addition to participating in state level planning and implementation, this includes regional and local partnerships, involvement on the state and local Workforce Investment Boards (WIBs) and multiple examples of staff co-location.

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

The 2017 Comprehensive Statewide Needs Assessment identified the following Barriers to Employment, Barriers to Services and Agency Performance relative to the needs of youth with disabilities and students with disabilities:

Barriers to employment

Survey participants ranked lack of job preparedness as the top barrier to employment for youth in transition, followed by challenges with basic needs, including geographic access to jobs. Staff added that lack of family supports is a third factor. These barriers are even more of a challenge for youth than in the general population because so many have never ventured outside the home and school safety net, most have never worked and schools typically do not expose them to realistic work and life experiences.

Barriers to services

- Staff and partner survey respondents had shared perceptions of the primary barriers to services for youth, ranking difficulty with or inadequacy of BRS programs, and BRS operational issues, as the top two, followed by lack of family supports and low expectations.
- Key informants identified lack of continuity among the 169 school districts, coupled with
 the changes in design and implementation of BRS' Pre-Employment Transition Services
 (Pre-ETS) program, Level Up, as barriers to service delivery. Observers did find that the
 strategy had given greater visibility to the need for strong, reality-based transition
 programming. Respondents all agreed that the dramatic reduction in work-based
 experiences was the most regrettable casualty of the reversal.

Agency Performance

• Increased efficiencies- BRS significantly increased the number of transition Plans developed (+87%) over the three-year period. This corresponded to a 47% decrease in the average number of days from eligibility to Plan (compared to a 38% decrease agency-wide) and a simultaneous increase in the proportion of agency Plans accounted for by youth cases, from 18% to 25%.

 Outcomes and Expenditures- The increased efficiencies did not translate to improved outcomes or expenditures over this same period. BRS' rehabilitation rate for transition cases decreased from 50% to 42%, with a 32% increase in cost per case. Likewise, the cost for transition cases closed unsuccessfully increased by 35%, in contrast to a 7% agency-wide decrease in that same time.

2. Identify the need to establish, develop, or improve Community Rehabilitation Programs within the State; and (General)

The CSNA assessed the need to improve Community Rehabilitation Programs within the state. To complete the CSNA, Community Rehabilitation Providers (CRPs), BRS counselors, consumers and key informants were surveyed. The results indicated that only about 2/3 of respondents felt CRPs meet the employment needs of individuals with disabilities. In 2017 BRS issued a new procurement process, based on recommendations from the previous CSNA, aimed at improving the quality of services through CRPs while decreasing the cost to the Bureau. These new contracts and services will begin in 2018, so the results cannot be assessed yet.

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 . (General)

In response to WIOA requirements and input from stakeholders including youth with disabilities, BRS developed and implemented the Level Up program (pre-employment transition services). This includes designated BRS counselors in the high schools, an application the youth can access on their phones, and pre-employment transition services developed and provided by both CRPs and BRS staff.

BRS maintains a Memorandum of Agreement that enables joint funding for SDE/BRS Consultant position to coordinate transition services as outlined under IDEA.

K. Annual Estimates (General) (Formerly known as Attachment 4.11(b)).

Describe:

1. The number of individuals in the state who are eligible for services; (General)

According to the most recent US Census Bureau American Community Survey, Connecticut had 3,535,139 residents who were non-institutionalized in 2016. There were 2,229,098 persons between 18-64 years of age. 8.3% or 185,907 of these individuals had a disability (+/- 0.3 margin of error). Census data from 2016 also shows that Connecticut had 373,802 non-institutionalized persons with disabilities ages 16 and over, and of that number 24.3% were employed. The remaining 75.7% were unemployed.

These statistics reveal that a considerable number of persons with disabilities in the State of Connecticut are not working. A measurable number of these individuals may be transition-aged youth. In addition, a portion of 24.3% of persons with disabilities who are employed may be underemployed. Some of the individuals may also require services to attain or retain employment consistent with their strengths, resources, priorities, concerns, abilities, interests, and informed choice.

These statistics make it difficult, if not impossible, to accurately estimate the number of potentially eligible consumers of VR services. That number is many times more than BRS has historically served or has the resources to serve.

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

a) The VR Program; (General)

For Federal Fiscal Year (FFY) 2018, the Bureau of Rehabilitation Services (BRS) projects that it will serve 5,473 eligible consumers in Individual Plans for Employment (IPEs) under Part B of Title I of the Rehabilitation Act. This represents a 7% decrease from FFY 2017, when 5,891consumers received services in IPEs under Part B of Title I of the Rehabilitation Act.

BRS had a spike in consumers being served in IPEs in FFY 2016. This coincides with BRS' implementation of WIOA requirements surrounding Pre-Employment Transition Services (Pre-ETS) and the establishment of Pre-ETS Counselor positions to exclusively serve this population of students. These Counselors became connected directly to school systems throughout our state and began working to identify and serve potentially eligible students in our communities during that year. Such efforts created an influx of youth who both entered and advanced within our system. BRS also tightened policies and procedures in FFY 2016 around IPE development within 90 days, further contributing to the increase in consumers being served. In FFY 2017, BRS' production trended back closer to recent norms, and thus realized a decline in IPE development of 3.1% as compared to FFY 2016. A contributing factor associated with this decline was a decrease in new applicants by 3.1%.

For many years prior to FFY 2013 BRS was operating under an Order of Selection (OOS) and serving eligible individuals determined to be Priority 1 (Most Significant Disability) and Priority 2 (Significant Disability). At the onset of FFY 2013 (10/1/12) the Bureau opened the OOS and also began serving eligible individuals determined Priority 3 (Non-Significant Disability). The Bureau's decision to open the OOS and serve all Priority levels was in accordance with regulations and with respect to the principle that at that time the program had both sufficient fiscal and personnel resources to attempt to serve the total population of eligible individuals seeking vocational rehabilitation services. The Bureau has functioned outside of an OOS since this time as indicated by approximately 8% of the consumers assisted in FFY 2017 having non-significant disabilities. Utilizing time tested budget projection methods the Bureau has analyzed the program's ability to continue at the current service levels and determined that this is not sustainable. Examination of resources and revenue versus projected expenditures yields an untenable result of the Bureau having an approximate \$2 million funding shortfall if it were to maintain the current service levels throughout FFY 2019. It should be noted that this potential shortfall had been anticipated during previous budget cycles and various cost containment measures such as staffing pattern reductions, purchase of service controls and local field office closures have already been and continue to be implemented. Unfortunately, these measures have not been adequate in comparison to reductions in state funding appropriations, escalations in employee fringe costs and sharp declines in federal reallottment awards over the past two vears.

The Bureau is currently making preparations to move back into an Order of Selection effective 10/1/18. Based on available funding and staff capacity the Bureau intends to serve Priority 1 individuals, with a waiting list being established for those of a lower priority. The Bureau intends to analyze funding and capacity on a quarterly basis and offer services to individuals on this waiting list as resources permit. In addition, as permitted under WIOA, the Bureau has elected to continue to serve individuals with disabilities that require vocational rehabilitation services to maintain competitive employment regardless of priority designation.

Based upon historical data, current trends and expected changes to OOS, the Bureau expects to serve approximately 5,263 eligible consumers in Individual Employment Plans (IPEs) under Part B of Title I of the Rehabilitation Act in FFY 2019; a decrease of 4% from 2018 projections. On the surface, this number demonstrates a significant reduction in the number served and it may be construed that the OOS implementation will not be impactful. However, the Bureau believes that the modest reduction for FFY 2019 represents just the beginning of what will be a longer term trend in reduced aggregate caseload size. Due to the large number of consumers of all priority levels expected to be served at the onset of FFY 2019 (3,316) the impact of the OOS implementation is not expected to be felt as an abrupt moment in time reduction, but rather a slower downsizing in client base as individuals of lower priority exit the program.

In addition to Title I services to be provided to individuals under IPE's during FFY 2019, the Bureau forecasts providing PRE-ETS to 1,027 individuals that are either eligible or potentially eligible for Vocational Rehabilitation.

b) The Supported Employment Program; and (General)

During FFY 2017, BRS purchased services for 94 consumers eligible for Supported Employment funding under Title VI-B of the Rehabilitation Act, utilizing \$156,275. This expenditure represents 33% decrease as compared to FFY 2016. This spending decrease is related to the new WIOA requirement that 50% of Supported Employment funding must be expended exclusively in providing on the job support services to youth ages 24 and younger. Only \$15,194 of the total grant expenditure was allocated to this population during this FFY.

Thus far in 2018, BRS has purchased services for 17 individuals, expending \$13,969 in Title VI-B funds. This is a 53% reduction as compared to the same point (quarter 1) FFY 2017, but is representative of the fact that the Bureau has fully expended the unrestricted adult services portion of its FFY 2017 Supported Employment grant award. The Bureau does continue to have a significant amount of the Youth Supported Employment portion of the grant available, but only projects a minimal ability to expend these funds by the end of the carry forward year. In total, BRS projects that 25 consumers will be served with 2017 Title VI-B funds in during 2018 at a projected cost of \$20,000. In combination with the 5,473 individuals who the Bureau projects will receive services under Title I, the total number of individuals to be served by BRS in 2018 will be 5,498.

For FFY 2019, the Bureau anticipates that 45 individuals could have potentially received services funded under Title VI-B if this grant were to have continued to exist. It is anticipated that only a small amount of 2017 carry forward Title VI-B will be able to be expended in the first quarter of FFY FFY 2019. As long term support and extended services will be provided utilizing Title I funds, the count of individuals projected to receive these services are imbedded in Title I projections. Thus, the total number of individuals who could be served in IPE's during FFY 2019 is unchanged from above and remains at 5,263.

c) Each priority category, if under an Order of Selection; (General)

For FFY 2019, the Bureau anticipates the following service levels by Priority Category:

OOS Category 1: 3,579

OOS Category 2: 1,369

OOS Category 3: 315

3. The number of individuals who are eligible for VR services, but are not receiving such services due to an Order of Selection; and (General)

In 2018 no individuals fall into this category as BRS is not currently under an OOS.

As a result of the implementation of an OOS, the Bureau anticipates that approximately 600 eligible individuals will not receive services and will be offered the opportunity to be placed on a waiting list.

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. (General)

Total Title I purchase of services (POS) costs for all eligible consumers in FFY 2017 was \$13.4M. This figure represents a \$2.0M decrease as compared to FFY 2016 expenditures. As the Bureau examined fiscal projections that revealed challenges related to available funding in future years, internal controls were put in place to influence overall costs of POS by encouraging staff to increase the provision of assessment and job readiness services internally, thus reducing the extent of reliance on Community Rehabilitation Provider (CRP) for these services. As a result of these controls, the Bureau realized a \$1.4M decrease in spending related to services purchased from CRPs in FFY 2017 as compared to FFY 2016.

Thus far in 2018, the Bureau has expended \$2.4M through the first quarter of FFY 2018. Based upon clients presently being served and expenditure patterns the Bureau projects a POS expenditure of \$10.8M in general VR services, with an additional expenditure of \$2M in Pre-Employment Transition POS for a total cost of services of \$12.8M.

The Bureau projects a POS expenditure of \$10.4M in general VR services, with an additional expenditure of \$2M in Pre-Employment Transition POS for a total cost of services of \$12.4M. This continued reduction in POS costs is considered possible through the reduction in clients served as a result of implementation of OOS, a recent competitive procurement of CRP services that will result in lower per - service unit costs across a myriad of community-based rehabilitation services, collaboration with and leveraging of American Job Center services, and the continued effort to develop and refine in-house services as a mechanism to supplant outsourced vendor services wherever cost effective to do so.

It must be noted that based on budget projections, the Bureau does not consider a \$12.4M POS pattern to be sustainable in the future, and our year projections must contain lower POS costs for the VR program not to resort to spending freezes. It must also be noted that reduction in POS is not the only strategy being implemented to mitigate the Bureau's dire financial outlook. The Bureau has implemented a variety of administrative cost containment strategies such as field office closures, reductions in sponsorships, and elimination of duplicative information technology items with ongoing recurring expense. Most notably, beginning in FFY 2017, the Bureau commenced an effort to reduce its overall staffing pattern through attrition, by only refilling vacancies regarded to be absolutely critical to the program mission. This action is evidenced by a staff labor hour reduction of 14% or 20 Full-Time Employees (FTE) when comparing FFY 2016 versus FFY 2017. This reduction is expected to continue throughout 2018 and is expected to result in an overall staff contraction of 35 FTE's (or 25%) by the close of FFY 2019.

With respect to the number of consumers projected to receive services during FFY 2019, the Bureau forecasts an expenditure of \$12.4M in Title I funds, with \$2M allocated to Pre-Employment Transition Services. Expenditure of Title VI Supported Employment funding during the FFY 2019 will no longer be allowable due to the elimination of the Supported Employment grant.

Category	Title I or Title VI	Estimated Funds	Estimated Number to be Served	Average Cost of Services
OOS Priority Category 1	Title I	\$7,074,500	3,579	\$1,976
OOS Priority Category 2	Title I	\$2,704,000	1,369	\$1,976
OOS Priority Category 3	Title I	\$624,000	315	\$1,976
Pre-Employment Transition Services	Title I	\$2,000,000	1,027	\$1,947
Totals		\$12,402,500	6,290	\$1,972

L. State Goals and Priorities (General)

The designated State unit must:

1. Identify if the goals and priorities were jointly developed (General)

Identify if the goals and priorities were jointly developed and agreed to by the State VR Agency and the State Rehabilitation Council (SRC), if the State has a Council, and jointly agreed to any revisions.

The Bureau, in collaboration with the State Rehabilitation Council (SRC), conducted a comprehensive statewide assessment of the rehabilitation needs of people with disabilities and identified four major goal areas. The goals and priorities listed in section L.2. below are derived from this assessment and will be used to carry out the Supported Employment and Vocational Rehabilitation programs. The SRC jointly agrees with BRS on these goals and priorities for the coming year.

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

The Bureau, in collaboration with the State Rehabilitation Council (SRC), identified four major goal areas. These goals and priorities will be used to carry out the Supported Employment and Vocational Rehabilitation programs.

Each of the goal areas contain a set of priority areas that the Bureau could address in the coming year. We cannot address every issue identified as a need, but attempted to build goals broad enough to address the major themes. Four priority areas were chosen based on their frequency of occurrence in the assessment. One additional goal was developed to address implementation of WIOA.

Goal 1: To implement the provisions of WIOA specific to the VR program.

Priority areas:

- Pre–employment transition services
- Employer services
- Service delivery
- Performance accountability measures
- Subminimum wage

Goal 2: To improve the quality of vocational rehabilitation services for individuals with disabilities.

Priority areas:

- Customer service and provision of information
- Ongoing skill development
- Use of social media
- Provision of information on resources, labor market information and training/education programs

Goal 3: To increase employment outcomes for individuals with disabilities, particularly those individuals from unserved or underserved populations.

Priority areas:

- Individuals from minority backgrounds
- Young adults with disabilities
- Individuals with psychiatric disabilities
- Individuals with autism spectrum disorders (ASD)

Goal 4: To increase access to services for all individuals with disabilities.

Priority areas:

- Services for individuals who are Deaf/Hard of Hearing
- Services for individuals whose primary language is Spanish
- Cultural competencies for staff

Goal 5: To create effective partnerships designed to advance employment for Connecticut citizens with disabilities.

Priority areas:

- Businesses
- Community Rehabilitation Providers (CRPs)
- State Agencies with a specific emphasis on core WIOA partners

These broad goals are intended to be five—year goals, with the priority areas being flexible enough to change from year to year if necessary.

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

The Bureau, in collaboration with the State Rehabilitation Council (SRC), conducted a comprehensive statewide assessment of the rehabilitation needs of people with disabilities and identified four major goal areas. The goals and priorities listed in section L.2. below are derived from this assessment and will be used to carry out the Supported Employment and Vocational Rehabilitation programs. The SRC jointly agrees with BRS on these goals and priorities for the coming year.

b) The State's performance under the performance accountability measures of section 116 of WIOA; and (General)

We will establish baseline measures based on 2017 data along with Core Partners.

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

BRS is currently focusing on improving its ability to develop an Individualized Plan for Employment (IPE) for transition students within the 90–day deadline set by the Rehabilitation Services Administration (RSA).

M. Order of Selection (General)

Describe:

- Whether the designated State unit will implement an Order of Selection. If so, describe: (General)
 - a) The order to be followed in selecting eligible individuals to be provided VR services. (General)

If services cannot be provided to all eligible individuals who apply, the Director of BRS will implement an Order of Selection (OOS) as set forth in this Section. After determining

eligibility, counselors must assign a priority category and follow the Order of Selection set forth below for the provision of services. Individuals determined eligible, and with an approved Individual Plan for Employment (IPE) prior to the date of implementation of the Order of Selection will continue to receive services. The Bureau will notify all eligible individuals of the priority categories in the Order of Selection. Eligible individuals in priority categories not currently being served will be notified in writing of their assignment to a particular category and advised of their right to appeal their category assignment.

Whether in an Order of Selection or not, The Bureau has assigned all applicants to an OOS category as a means of determining the distribution of the programs' collective caseload across priority categories of disabilities. The priority categories assigned have been, and will continue to be based on their level of significance of disability. "Level of significance of disability" means one of the following: Priority Category 1, "Most Significant Disability"; Priority Category 2, "Significant Disability"; or Priority Category 3, "disabled" as set forth below. Individuals with disabilities shall be served first, based on significance of disability and second, by date of eligibility in the following priority order:

- i. Priority Category 1: "Most Significant Disability" means an eligible individual who meets the following criteria:
 - (1) Meets criteria for "Significant Disability" as defined below; and
 - (2) A severe physical or mental impairment that seriously limits four or more functional capacity areas in terms of an employment outcome. Functional capacity areas are: mobility, work tolerance, communication, self-care, interpersonal skills, self-direction, or work skills;
- ii. **Priority Category 2:** "Significant Disability" means an eligible individual who meets the following criteria:
 - (1) A severe physical or mental impairment that seriously limits one or more functional capacity areas in terms of an employment outcome. Functional capacity areas are: mobility, work tolerance, communication, self-care, interpersonal skills, self-direction, or work skills;
 - (2) Vocational rehabilitation can be expected to require multiple vocational rehabilitation services;
 - (3) Vocational rehabilitation can be expected to require services over an extended period of time; and
 - (4) Who has one or more physical or mental disabilities determined on the basis of an assessment for determining eligibility, and vocational rehabilitation needs to cause substantial functional limitation.
- iii. Priority Category 3: "individual with a disability" means an eligible individual.

Eligible individuals, who do not meet the Order of Selection category currently being served, will have access to services through information and referral. Individuals will be appropriately referred to other programs, including those of other core WIOA partners.

b) The justification for the order. (General)

For many years BRS has successfully employed a four year budget projection model. Over recent years, this model displayed increasing costs that were outpacing annual funding levels. The reason for this discrepancy in annual aggregate federal grant, state appropriation and program income revenue versus expenditures, was multi-faceted and did not occur as a result of large scale program expansion. Rather, the imbalance can be attributed to marked increases in employee fringe rates set by the CT Office of the State Comptroller, decreases in state appropriation to the VR program, and escalations in POS costs. Over recent years this structural funding deficit was masked by historically large federal re-allotment awards. At the conclusion of FFY 2016, BRS received a much smaller percentage in re-allotment funding relative to what was requested than it had in the preceding six years. This smaller than requested re-allotment award, coupled with the impact of the WIOA required 15% Title I set-aside for Pre-Employment Transition Services, exacerbated BRS concerns over the potential shortfall in funding. A budget mitigation plan was immediately implemented to, as gradually as possible, drive program operating costs downward to a more sustainable level. To mitigate the challenges related to unavailability of funding in future years, internal controls were put in place to influence the largest category of POS costs. By increasing oversight on purchasing, and encouraging staff to increase the internal provision of assessment and job readiness services to the extent possible, the amount of expenditures to contracted Community Rehabilitation Providers (CRPs) for these services was reduced. As a result of this tactic, the Bureau realized a \$1.4M decrease in spending related to services purchased from CRPs in FFY 2017 as compared to FFY 2016. In FFY 2019 the Bureau intends to continue to pursue reductions in POS costs through a number of approaches. It is anticipated that resultant contracts from a recent competitive procurement of CRP services will result in lower per-service unit costs across a myriad of community-based rehabilitation services. Collaboration with and leveraging of American Job Center services, along with the continued effort to develop and refine in-house services as a mechanism to supplant outsourced vendor services, wherever cost effective to do so, should also continue to lower overall POS costs.

The cost containment and reduction efforts detailed above are not expected to result in sufficient funding being returned to the program budget to remain outside of an Order of Selection. Absent the implementation of an Order of Selection, the Bureau projects the untenable scenario of ending FFY 2019 with an approximate \$1.9M shortfall.

The State Rehabilitation Council has been consistently advised of this issue, and recognizing little alternative, this council has offered feedback and support for the implementation of an Order of Selection. Additionally, multiple phone calls were held with RSA to apprise them of the situation.

c) The service and outcome goals. (General)

CT anticipates implementing an Order of Selection as of October 1, 2018. After that date, BRS plans to initiate new IPE's and serve all eligible clients in Category 1, as well as eligible consumers requiring specific services to maintain employment. This will be in addition to all

clients being served under IPE's on 9/30/18. The projected overall numbers of clients to be served under an IPE in FFY 2019 is 5,263. The proposed case service budget is \$12,402,500. The expected services provision by priority category is as follows:

OOS Category 1: 68% or \$7,074,500

OOS Category 2: 26% or \$2,704,000

OOS Category 3: 6% or \$624,000

Based on successful employment closures in FFY 2017, CT BRS projects employment closures as follows:

OOS Category 1: 68% or 816

OOS Category 2: 26% or 312

OOS Category 3: 6% or 72

Total Projected Successful Outcomes: 1,200

The distribution of service and outcome levels across OOS categories is expected to trend toward a higher percentage of Category 1 clients in 2020. This is based on the expectation that beginning in October of 2018 the majority of new service plans being initiated will be for Individuals determined to be Priority Category 1.

d) The time within which these goals may be achieved for individuals in each priority category within the order. (General)

Priority 1: BRS will assist as many individuals determined to be Priority 1 as possible to achieve service and outcome goals.

Priority 2: This priority category will be closed upon implementation of the Order of Selection, with only those individuals with an approved IPE at that time receiving services. An exception will be made for individuals determined to be of this priority needing specific services or equipment to maintain employment. Review of the Bureau's capacity to serve these individuals will be reviewed quarterly with the category being re-opened for the number of individuals that resources are projected to reasonably allow.

Priority 3: This priority category will be closed upon implementation of the Order of Selection, with only those individuals with an approved IPE at that time receiving services. An exception will be made for individuals determined to be of this priority needing specific services or equipment to maintain employment. Review of the Bureau's capacity to serve these individuals will be reviewed quarterly with the category being re-opened for the number of individuals that resources are projected to reasonably allow.

e) How individuals with Most Significant Disabilities (MSD) are selected for services before all other individuals with disabilities:

While in the Order of Selection, only eligible individuals who have most significant disabilities will be offered the opportunity to develop an IPE and receive vocational rehabilitation services (see VR Portion, Section M. 1 A). BRS will assess its financial and personnel resource capacity quarterly and will open the order to serve numbers of individuals with Significant Disabilities and individuals with disabilities for which sufficient funds are projected to be available.

2. If the Designated State Unit has elected to serve individuals regardless of any established Order of Selection, who require specific or equipment to maintain employment (General)

Yes, the Bureau has elected to serve individuals regardless of any established Order of Selection, who require specific services or equipment to maintain employment.

N. Goals and Plans for Distribution of Title VI Funds. (General)

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. (General)

The ability to obligate Supported Employment Grant funding will expire 9/30/18 and future obligations for ongoing supports will be encumbered against Title I funds from that point forward.

- 2. Describe the activities to be conducted, with funds reserved pursuant to Section 603(d), for youth with the most significant disabilities, including: (General)
 - a) The provision of extended services for a period not to exceed 4 years; and (General)

The ability to obligate Supported Employment Grant funding will expire 9/30/18 and future obligations for ongoing supports will be encumbered against Title I funds from that point forward,

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. (General)

Extended Services

- a) Services can be provided for a period up to, but not to exceed four years to youth with the most significant disabilities expending Title I funds.
- b) Prior to WIOA, these services were not previously permitted for youth with disabilities under VR program or Supported Employment program.

Transition to Extended Services

All Bureau services are authorized and provided based on the individual needs of the consumer. BRS will work with relevant state agencies, private non–profit organizations and our other partners to transition consumers from Title I funding to the identified provider of the extended services funding as soon as the funding is available and transition is appropriate.

Coordination and Collaboration

BRS oversees one of the three state—funded extended services programs. The Bureau is engaged in facilitating systemic changes in how supported employment services are delivered in the community. The Bureau works with relevant State Agencies, private non—profit organizations and other partners to transition consumers from the Title I funding to an appropriate extended services program. These efforts have led to internal and external improvements in our state system and have built a foundation for a strong Supported Employment service program in this state.

O. State's Strategies (General)

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. (General)

BRS will use the following objectives to expand and improve services to individuals with disabilities:

- c) Work with WIOA core partners to ensure that individuals with disabilities are effectively supported in the newly designed state employment system.
- d) Implement its strategic plan for delivering Pre–Employment Transition Services.
- e) Focus on timely progress through each step of the case management process.
- f) Maintain a dedicated staff resource to manage the BRS training program, and maintain a separate line item within the Bureau's budget to offer necessary training.
- g) Continue to use social media to connect job seekers with opportunities to pursue jobs with employers.
- h) Develop materials on resources, labor market information and training/education programs to post on the BRS and Connect–Ability websites to provide consumers consistent access to information.
- i) Continue to dedicate a specific unit of VR staff to support employers as dual customers to create more business partnerships and more employment opportunities through direct job placement, the use of On–the–Job (OJT) Trainings and Industry Specific Training and Placement Programs (ISTPPs).
- j) Participate in cross agency trainings through the Association of People Supporting Employment First (APSE) to strengthen state agency partnerships.
- k) Continue to develop and disseminate Distance Learning Modules for staff and consumer use.
- 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. (General)

BRS makes Assistive Technology (AT) available to individuals with disabilities through collaboration with the Connecticut Tech Act Project (Connecticut's statewide assistive technology program) throughout the rehabilitation process across the state in the following ways:

- a) VR counselors may solicit the Bureau's Assistive Technology Consultant for guidance and assistance to ensure that AT devices and services are considered throughout the consumer's vocational rehabilitation process as appropriate.
- b) The AT consultant can conduct comprehensive AT evaluations with consumers and can provide training in the use of newly–acquired AT, as needed.
- c) Through the Assistive Technology Device Loan Program at BRS, VR consumers may borrow and try out devices to help them make informed decisions about whether the AT device is appropriate and if it will remove or reduce barriers, as expected. The inventory for this program includes a wide range of devices across the AT continuum from low to high tech, across disability categories (i.e.: hearing, vision, mobility, computer access, cognitive, communication, etc.), and across potential work environments.
- d) VR Counselors and the AT Consultant collaborate with other entities such as school systems, colleges/universities, employers, independent living centers, state Medicaid waiver programs, and insurance plans to facilitate the provision of AT devices and services.
- e) The AT consultant distributes an electronic newsletter and maintains a website to provide information about AT trends for anyone interested in AT.
- f) The Connecticut Tech Act Project hosts a bi-annual full day Assistive Technology Conference with a focus on AT for employment, community living and education. There are generally 12 to 15 sessions, up to 30 exhibitors and approximately 200 plus participants.
- 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. (General)

BRS has targeted a number of ways to better serve minority and unserved/underserved consumers:

- a) Work with the Bureau's Latino Committee to develop new approaches to working with consumers who are Latino. Members of the Latino Committee and Employment Consultants will attend each other's meetings for ongoing updates and dialogue.
- b) Produce all new publications in Spanish and pursue options to add required forms on the BRS Intranet for staff use.
- c) Implement pre-employment transition services.
- d) Translate distance learning modules into Spanish and American Sign Language.
- e) Continue to partner with Local Mental Health Authorities and the state Mental Health Department to increase the number of employment outcomes and amount of earnings for individuals with psychiatric disabilities.
- f) Hold three meetings of the Autism Spectrum Disorder (ASD) Committee to develop more responsive services for individuals with autism spectrum disorders. Provide joint staff training for BRS and Department of Developmental Services (DDS) staff on Autism Services.
- g) Conduct targeted outreach to employers to increase employment outcomes for individuals who are deaf. BRS will continue to disseminate an Interview Preparedness Tip Sheet on Deaf Culture issues to stakeholders as needed.
- h) Provide opportunities to strengthen cultural competencies for staff.

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). (General)

BRS will use the following methods to improve and expand VR services for students with disabilities:

- a) Align existing VR services with Pre–Employment Transition Services as defined in WIOA 2014
- b) Serve students with disabilities ages 16–21 enrolled in high school by providing preemployment transition services from existing community rehabilitation providers, companies, community agencies, education entities, colleges and universities statewide.
- c) Assign 10 vocational rehabilitation (VR) counselors to school systems statewide to serve students enrolled in high school. Allocate 100% of their time and funding for serving students enrolled in high school.
- d) Improve partnerships with school systems by providing transition services to students.
- e) Strengthen partnerships with State Department of Education, local school systems, community providers, higher education entities, other state agencies, and employers.
- f) Create and disseminate effective marketing and messaging to target school systems, students and their families, to educate and inform them about the BRS shift in service delivery to students as outlined in WIOA regulations.
- g) Continue to strengthen and broaden collaboration resources with employers, two and four year colleges and universities, WDBs/American Job Centers and DOL grant training programs for students, youth, and young adults with disabilities.
- 5. If applicable, plans for establishing, developing, or improving Community Rehabilitation Programs within the State. (General)

BRS will develop the capacity of Community Rehabilitation Providers (CRPs) to meet the needs of VR consumers in the following ways:

- a) Continue to conduct annual performance reviews on all CRPs to ensure quality service delivery.
- b) Develop and implement service models designed to provide flexibility to CRP's in developing job sites and in providing services specific to client needs.
- c) Meet quarterly with CRPs in each district.
- d) Provide opportunities for CRPs to meet statewide, both in targeted committee meetings and at an annual forum.
- e) Participate in the Job Development Leadership Network.
- f) Continue to disseminate Distance Learning Modules focused on service delivery and fiscal process for CRPs to interact with BRS.
- g) Implement minimum training requirements for frontline CRP staff.
- h) Increase the number of providers who will serve underserved populations, including Deaf and Hard of Hearing and Monolingual Spanish.
- i) Explore procurement opportunities for specialized services.
- 6. Strategies to improve the performance of the State with respect to the performance accountability measures under Section 116 of WIOA. (General)

BRS will work with the larger workforce investment system to set thresholds for the new WIOA performance accountability measures.

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

BRS is actively engaged in the implementation of WIOA in Connecticut with representatives on all planning committees. BRS assigned staff to participate on the four distinct planning committees to fully understand the changes WIOA would make and how VR services would be integrated:

- a) Administration/Governance development and maintenance of the MOU among state partner agencies and a regional MOU template.
- b) Technology, Data, Outcomes development of a strategy to use existing IT systems to obtain aggregate data on common customers and program outcomes.
- c) Service Design and Delivery development of strategies and models for the coordinated delivery of effective workforce system services.
- d) Employer Engagement development of a strategic plan to promote employer engagement in effective industry partnerships.

BRS will review the adequacy of existing Memoranda of Understandings with workforce boards and partners, and continue to attend workforce board meetings. BRS will also continue to seek a representative from the workforce board to serve as a member of the State Rehabilitation Council.

8. How the Agency's strategies will be used to: (General)

a) Achieve goals and priorities by the State, consistent with the comprehensive needs assessment; (General)

The strategies mentioned above align with the Bureau's goals and will be employed to address barriers to employment and services, as well as to improve general Bureau performance. relative to equitable access to VR services.

b) Support Innovation and Expansion activities; and (General)

BRS anticipates using innovation and expansion (I&E) funds in FFY 2019 to support the activities of the State Rehabilitation Council. Other proposals will be assessed upon submission and considered based on the alignment with the State's goals and priorities.

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. (General)

The strategies mentioned above align with the Bureau's goals and barriers identified in the CSNA surrounding barriers to equitable access to VR services. Equal access to services will remain a consideration in the employment of all strategies contained within the plan.

P. Evaluation and Reports of Progress: VR and Supported Employment Goals (General)

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: (General)
 - a) Identify the strategies that contributed to the achievement of the goals. (General)

Goal 1: To improve the quality of vocational rehabilitation services for individuals with disabilities.

Priority areas:

- i. Customer Service and Provision of Information
 - a) Both the BRS and Connect–Ability websites provide information related to VR services that are updated, as needed. Staff responsible for maintaining these websites anticipate the State of Connecticut will implement a new portal platform scheduled for FFY 2019.
 - b) Response to Consumer Requests During FFY 2017, BRS responded to over 300 inquiries for information through the BRS e-mail submissions.
- ii. Ongoing Skill Development we have identified two major goals:
 - a) **Goal I**: To improve the skills of all BRS staff by providing training and development in vocational rehabilitation service provision, responsiveness to consumers, Bureau mission and programs, awareness of state and community resources.
 - b) **Goal II**: To improve recruitment and retention of BRS staff by providing career development and succession planning activities to assist counselors in defining appropriate career paths and to assist the Bureau to maximize its resources, while continuing to meet CSPD requirements.

BRS provides Foundations of CT VR, a year–long series of in–service training mandatory for new staff and available to staff for refresher training. This includes a broad array of topics pertaining to VR such as: Foundations of CT VR Training, trainings on specific populations, independent living, transition, and community rehabilitation services. A variety of training methods are utilized to assure that training activities are diverse enough to address individual learning styles.

The Bureau developed an integrated program of training, education, and development activities for staff to gain the necessary skills, knowledge, and experiences to improve the quality of services and the number and quality of employment outcomes for people with disabilities.

BRS also maintains a dedicated staff resource to manage the Bureau's training program and will maintain a separate training line within the Bureau's budget that equals the level of funds available under WIOA.

iii. Social Media -

Job seekers, employers, advocates and providers use social media to communicate and network. In order to keep pace with technological advancements, BRS added the use of social media as a form of communication to help consumers gain access and become familiar with online job information. BRS formed a Social Media Committee that continues to meet regularly to oversee the Bureau's social media activities. The committee developed Social Media Policy and Guidance that was the basis for staff training. BRS has a presence on Facebook, LinkedIn and Twitter. Staff are encouraged to have a presence on these platforms for work–related activity only. Staff may assist consumers in developing a presence on these platforms to access information from BRS and employment information and opportunities. Consumers may be referred to the Department of Labor for LinkedIn training as well.

For Federal Fiscal Year 2016, BRS social media activity reports the following:

- Facebook Analytics reports we have 57 followers.
- LinkedIn Analytics reports we have 314 "Connections."
- Twitter Analytics reports that we have 272 followers that have enabled BRS to reach over 32,800 Twitter users via tweets about the VR program and services, job openings and disability related information.

Goal 2: To increase employment outcomes for individuals with disabilities, particularly those individuals from unserved or underserved populations.

Priority areas:

Individuals from minority backgrounds

BRS initiated a Request for Applications from qualified Community Rehabilitation Providers to procure Summer Youth Employment Program (SYEP) services in an effort to give youth in high school and young adults out of school an opportunity to have summer work experiences. Particular emphasis in the procurement application was placed on serving young adults who are in the priority areas of underserved populations, including Deaf and Hard of Hearing, Monolingual Spanish speaking, Individuals with Autism and young adults with psychiatric disabilities. The procurements were awarded to agencies that would be able to serve specific geographical areas and took into account the underserved populations in those areas. The results of the procurement produced a small set of CRPs who were able to serve the capacity.

The SYEP provided work experiences to a significant number of young adults, both in school and out of school. These young adults were given the opportunity to be better prepared to gain employment, giving them work related experiences for resume building.

Training: BRS provided the following training to improve employment outcomes for unserved or underserved populations:

Deaf Culture – different communication methods of persons who are deaf:

- Ethics and Multicultural Counseling Competency cultural issues in counseling; and
- Using the Myers–Briggs and Strong Inventories in VR using these inventories in career counseling; and
- BRS also offered World of Work Inventory (WOWI) that provides tools for staff
 to use to accommodate consumers who have different levels of English,
 consumers with hearing loss, consumers with visual impairments and Spanish
 speaking consumers.

As a result of these efforts, BRS assisted 403 Individuals from minority backgrounds achieve successful employment outcomes in FFY 2017.

ii. Young Adults with Disabilities

BRS has met quarterly with SDE and representatives from the Regional Education Service Centers (RESCs) to continue providing current transition information. This group now includes the Department of Developmental Services Education Liaisons and Transition Consultants.

BRS has met quarterly with SDE and representatives from the Regional Education Service Centers (RESCs), Department of Developmental Services Education Liaisons and Transition Consultants, now called, CT Transition Alliance to continue providing current transition information. BRS, SDE and the CT Community of Practice (CT COP) maintain partnership with the IDEA National Transition Community of Practice. This partnership led to the creation of a state stakeholder run website called CTTransition.Org. The CT COP represents a core team of stakeholders and initial practice groups that include the BRS Transition & Level Up committees and the Transition Task Force. The CT COP continues to uphold the National Collaborative on Workforce and Disability (NCWD) Guideposts for Success as a framework for secondary transition activities and information. This is the same framework BRS has used for Transition since 2010.

As a result of these efforts, BRS assisted 280 Young Adults with Disabilities achieve successful employment outcomes in FFY 2017.

iii. Individuals with Psychiatric Disability

BRS continues to partner with Local Mental Health Authorities and the State Mental Health agency to increase the number of employment outcomes and amount of earnings for individuals with psychiatric disabilities. As a result of these efforts, BRS assisted 454 Individuals with Psychiatric Disabilities achieve successful employment outcomes in FFY 2017.

iv. Individuals with Autism Spectrum Disorders

BRS held 10 meetings of the Autism Spectrum Disorder (ASD) Committee in order to develop more responsive services for individuals with autism spectrum disorders. As a result of these efforts, BRS assisted 135 Individuals with Autism Spectrum Disorders achieve successful employment outcomes in FFY 2017.

Goal 3: To increase access to services for all individuals with disabilities.

Priority areas:

Services for Individuals who are Deaf

BRS employs three full-time and one part-time Rehabilitation Counselor for the Deaf. Additional services, including Hearing Assistive Technology Services (HATS) and HATS Evaluation services, for individuals who are Deaf or Hard of Hearing are also made available. HATS products may be approved for purchase when required for a consumer to maintain employment, comparable devices of lesser cost have been explored, and the products are not available as a reasonable accommodation through their employer. Examples include T Coil Loops and Silhouettes, FM Systems, Amplified or Bluetooth Stethoscopes, Pocket Remotes, Bluetooth accessory adapters, and HATS products produced by hearing aid manufacturers that only work with one's personal hearing aids. BRS has translated five of 14 distance–learning modules into American Sign Language (ASL), the remaining nine are scheduled for translation over the next two years.

ii. Services for individuals whose primary language is Spanish

BRS has translated five of 14 distance learning modules into Spanish.

iii. Cultural Competencies for Staff

BRS is committed to assisting individuals with the most significant disabilities to achieve competitive employment outcomes. Efforts have been initiated and specialized training has been offered on how to work with underserved target groups (mental health disorder, substance abuse, learning disabilities, Deafness, Autism Spectrum) has been provided, or is scheduled to be provided. Trainings are comprised of both in–person and online modules.

Goal 4: To create effective partnerships designed to advance employment for Connecticut citizens with disabilities.

Priority areas:

Businesses

In FFY 2016, BRS negotiated 117 On–the–Job Training (OJTs) opportunities. BRS also contracted with the following Industry–Specific Training and Placement Programs (ISTPPs):

- Southeastern Employment Services/Lowes Distribution Center
- Community Enterprises/Mohegan Sun
- Community Enterprises/Walgreens Retail Stores
- Ability Beyond/Walgreens Retail Stores
- Ability Beyond/Crowne Plaza

- Community Enterprises/Mystic Aquarium
- Community Enterprises/Home Goods Distribution Center
- Kennedy Center/CVS Retail.

From these ISTPP partnerships, 108 individuals participated in training; 65 individuals were hired permanently upon successful completion of the training.

ii. Community Rehabilitation Providers

BRS completed the CRP Distance Learning Modules created for staff in CRP agencies to understand the core services that BRS contracts with providers. The first module is a CRP overview, which is also available to the public in the Connect–Ability Website. The following modules are only available to CRP agencies: Assessment Services, Job Placement Services, On–the–Job Training, Job Coaching Services, Interview Preparedness Services and Fiscal Services. These modules are effective ways to increase knowledge about BRS services for the CRPs who traditionally have high staff turnover and lack the capacity to train new employees in a timely manner. BRS has the capability of monitoring Bureau participation of staff that enrolls in the training. These tools were developed in conjunction with the CRP agencies through the BRS CRP Committee.

As part of the Annual Review Process, each CRP agency reports to BRS on the staff that have taken the Distance Learning Modules as well as staff who have participated in one of three BRS CRP trainings that are offered throughout the year. Four new CRPs were developed during this fiscal year.

iii. State Agencies With the implementation of WIOA

BRS has collaborated with the core partners to unify the job services available for consumers seeking employment opportunities.

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

The Bureau did not identify factors that impeded achievement of goals and priorities.

- 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: (General)
 - a) Identify the strategies that contributed to the achievement of the goals. (General)

Supported Employment goals were achieved using the following strategies:

- i. VR Supported Employment Foundations Training is provided to new VR Counselors. Senior VR counselors are also invited to the training to get a refresher on the current SE environment as well as provide technical assistance to the training.
- ii. In addition, a BRS and DMHAS protocol document remains in place for both agencies to provide technical assistance on Supported Employment Policy and

Procedures for both agencies. Both agencies participated in a combined training for VR staff, mental health staff, CRP staff on an ongoing basis.

iii. Collaborative meetings are held quarterly with partners.

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

Impeding Factors for Achieving Goals and Priorities

- Consistent policies and practices in and between agencies administering Supported Employment programs continue to be a challenge for all stakeholders, including providers.
- ii. Staff turnover is frequent and coordinating collaborative trainings and providing technical assistance is difficult. While this has been a challenging effort, training is still a priority for VR and partner agencies and providers.

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

BRS anticipates becoming able to assess performance on accountability indicators in Performance Year 2019.

4. How the funds reserved for Innovation and Expansion (I&E) activities were utilized. (General)

I&E funds were used in the following three areas:

- a) Individualized Financial Capability Coaching is available to BRS consumers at age 18 who receive Social Security Benefits. Participants receive Benefits Counseling to understand the impact of earnings on benefits and an opportunity to plan for the future using the following topics and tools:
 - i. One-on-one Financial Coaching:
 - ii. Personal Financial Education Sessions;
 - iii. Work vs Benefits Discussion;
 - iv. Goal-Setting Support;
 - v. Help to Create a Working Budget;
 - vi. Debt Reduction Tools; and
 - vii. How to Make Tax Credits Work.

BRS initially intended to fund a pilot specifically tailored to meet the needs of individuals receiving Social Security benefits through an award to the Connecticut Association for Human Services (CAHS), a private non–profit agency. Although BRS was not able to fund this pilot, significant technical assistance was provided. CAHS was able to develop internal capacity and is now equipped to provide financial literacy services free of charge to individuals with disabilities in CT state wide which include the following: financial literacy and instruction to budget a household, create realistic goals, understand credit scores (and demonstrate actions to maintain or improve them), increase self–sufficiency, obtain employment/increase wages, and go off of SSDI and/or SSI benefits with an emphasis on acquiring new checking, savings or equivalent accounts.

b) State Independent Living Council During fiscal year 2017

The State Independent Living Council (SILC) received \$51,500 in Innovation and Expansion (I&E) funds to support the general operation of the Council. This included salaries for two full—time staff, office rent, supplies, phone and computer services, and SILC meeting expenses such as transportation, interpreter services, CART, and other accessibility costs. In addition to the administration and operation of the federally mandated SILC, staff is responsible for developing, implementing, and evaluating the State Plan for Independent Living (SPIL). The I & E funds also supported the development of the Standards of Performance for the CILs and the development of SPIL Goal 2 to expand the capacity and build sustainability for the five CILs.

As detailed in the 2017-2019 SPIL BRS will not provide I & E funding for SILC operations in FFY 2019.

c) The State Rehabilitation Council (SRC) received funding to support efforts to assist BRS in assessing programs and services provided to vocational rehabilitation consumers. The SRC incurs travel expenses to in–state meetings and sign–language interpreters, when needed. When desired by the Council, I & E funds are utilized to send an SRC delegate to attend out–of–state conferences for the National Coalition of State Rehabilitation Councils (NCSRC) and the Council of State Administrators for Vocational Rehabilitation (CSAVR). The SRC is an organizational member of the NEAT Marketplace, a Connecticut facility that provides training and support with assistive technology devices. BRS has supported the SRC's effort to develop and print informational materials concerning the VR program for distribution to employers and other stakeholders. Funding was provided during 2018 for this endeavor and the materials have been produced.

Q. Quality, Scope, and Extent of Supported Employment Services. (General)

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. (General)

Program Status

BRS will no longer receive a Supported Employment Grant.

WIOA changes the way Supported Employment and Extended services will be delivered.

Supported Employment services

Extension of SE services timeframe from 18 to 24 months; and

Extended Services:

a) Services can be provided for a period up to, but not to exceed 4 years to youth with the most significant disabilities expending supported employment Title VI funds; and

- b) Prior to WIOA, these services not previously permitted for youth with disabilities under VR program or Supported Employment program.
- c) As the need for SE is established and funding identified for extended services, VR plans can be amended to Supported Employment Plans.
- d) Utilization of short term plans as a means towards assuring better opportunities for transitioning youth who are expected to be in our system for longer periods of time.

For Transition to Extended Services, BRS will work with relevant State Agencies, private non-profit organizations and our other partners to transition consumers from Title I funding to the identified provider of the extended services funding as soon as the funding is available and transition is appropriate. Use of Title I funds will vary, based on the needs of the individual consumer, but will generally not exceed 24 months in length.

2. The timing of transition to extended services. (General)

Coordination and Collaboration

BRS is engaged in facilitating systemic changes in how Supported Employment services are delivered in the community. The Bureau works with relevant state agencies, private non–profit organizations and other partners to transition consumers from the Title I funding to an appropriate extended services program. The Bureau oversees one of the three state–funded extended services programs and spent approximately \$450,000 in serving VR consumers after VR services were completed. These efforts have led to internal and external improvements in our state system and have built a foundation for a strong Supported Employment service program in this state.