

State Plan Attachment (2020 – 2024)

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

(a) Input of State Rehabilitation Council.

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

- (1) input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;*
- (2) the Designated State unit's response to the Council's input and recommendations; and*
- (3) the designated State unit's explanations for rejecting any of the Council's input or recommendations.*

The Pennsylvania Rehabilitation Council (PaRC) used the following sources to develop its recommendations to the Office of Vocational Rehabilitation (OVR):

1. the PaRC annual report (Federal Fiscal Year 2018 - 2019);
2. OVR Customer Satisfaction Surveys;
3. review of items in 2018 State Plan Attachment (description a);
4. comments received at 2018 and 2019 Public State Plan Meetings;
5. participation in the Rehabilitation Services Administration (RSA) monitoring (2019);
6. Comprehensive Statewide Needs Assessment (CSNA) FFY 2016 - 2018 OVR/Institute on Disabilities at Temple University;
7. local Citizen Advisory Committees (CAC) meetings and/or minutes; and
8. quarterly reports received from OVR at PaRC Council meetings.

Commendation: The Council supports OVR in their efforts to open the order of selection as soon as possible for the benefit of Pennsylvanians with disabilities seeking employment services through OVR.

1. The Closure of the Order of Selection (OOS) for All Categories

Issue: The closure of the Order of Selection (OOS) for all categories represents a significant challenge to people with disabilities having access to employment services when they are needed. OVR must develop appropriate internal controls and other adjustments in order to re-open the OOS as soon as possible and update the PaRC regarding progress on at least a quarterly basis.

RECOMMENDATIONS / MEASURABLE GOALS:

- A. OVR provides quarterly reports (at a minimum) to the PaRC on how many people were added to and removed from the waiting list in each category each quarter.
- B. OVR provides quarterly reports (at a minimum) to the PaRC and the State VR Board on new application response times.
- C. OVR establishes a clear deadline for reopening the OOS with intermediate steps and goals to re-open the OOS on time. OVR provides quarterly reports (at a minimum) to the PaRC on progress and factors affecting progress toward achieving the goal of re-opening the OOS on a permanent basis by the deadline.
- D. Identify resources and opportunities outside of OVR for organizations to provide employment services to OVR customers on the waitlist.

2. Hiram G. Andrews Center (HGAC)

Issue: OVR's current fiscal problems require a review of HGAC's return on investment.

RECOMMENDATIONS/MEASURABLE GOALS:

- A. OVR should conduct a study at a minimum of every 3 years and report on the return on investment (compared to community-based VR services) for students attending HGAC. HGAC's yearly budget averages approximately \$23 million, which includes staff, operations, brick and mortar and other costs. Overall, the cost per customer is reported as significantly higher at HGAC than that of non-HGAC customers. The report must include:
 - (1) an analysis on return on investment.
 - (2) an impact statement on customer choice.
 - (3) a review of the extent to which its programs are provided in an integrated setting.
 - (4) an assessment of the availability of HGAC programs in the community; and
 - (5) a determination of what other partners like the Pennsylvania Department of Education (PDE) should be paying/contributing.

- 3. Conduct a review of OVR's statutory and regulatory obligations to obtain public comment and/or consult with stakeholders, providers, VR staff, and individuals with disabilities in the development, implementation, and amendment of OVR's policies and procedures.

Issue: Pursuant to 34 CFR 361.20, OVR is required to solicit public participation when it proposes to develop, amend, or otherwise modify substantive policies/procedures affecting OVR services.

RECOMMENDATIONS/MEASURABLE GOALS:

- A. OVR should provide quarterly information on the number and names of new/amended policies, such as a college policy or vehicle modification policy, being developed or in consideration for future development/modification, including how

they differ from any existing policy and the potential number of customers impacted by the policy.

- B. Inclusion of the Council in the development/amendment of the policy/procedure, the proposed timeline of implementation, including schedule of public comments and plans to educate stakeholders on the new/amended policy/procedure.

4. Strengthen Collaboration and Partnerships with Stakeholders

Issue: OVR has made significant changes to services without including key stakeholders throughout the change development process. OVR needs to make sure that those changes will not unnecessarily reduce the achievement of outcomes in terms of quantity and quality.

RECOMMENDATIONS / MEASURABLE GOALS:

- A. Before OVR makes any substantive changes, the PaRC will be informed of what needs to change and why, and what affected stakeholder representatives are being included in the change development process.
- B. OVR provides (at a minimum) quarterly reports to the PaRC on all substantive changes either anticipated or currently in development with information on progress, including key stakeholder representative involvement and contributions to the process.
- C. OVR provides annual reports (at a minimum) on feedback survey information from key partners.
- D. OVR provides quarterly progress reports with measures of quality and quantity of outcomes for partnerships, programs, and services including pre-employment transition services, local workforce development boards, supported and customized employment, business services and PA CareerLinks®.

5. Review of OVR Policies and Procedures

Issue: Clarification is required regarding public participation in the adoption or amendment of OVR policy, and OVR's obligation to consult with the PaRC, among others, on matters of general policy arising in the administration of the VR services portion of the State Plan.

RECOMMENDATIONS / MEASURABLE GOALS:

- A. OVR reports to the PaRC on a quarterly basis substantive policies and procedures under review which are subject to public meetings, non-substantive administrative changes, and policies on matters of general administration of the VR program which require consultation. Additionally, include quarterly reports on workgroups.