

State Plan Attachment (2024-2028)

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

State Rehabilitation Council.

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

(A) is an independent State commission.

(B) has established a State Rehabilitation Council.

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

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

1. PaRC Annual Report (State Fiscal Year [FY] 2021-2022)
2. OVR Customer Satisfaction Surveys
3. Review of items in the 2022 State Plan Attachment (Description A)
4. Comments received at 2022/2023 State Plan Meetings
5. Comprehensive Statewide Needs Assessment (CSNA) Program Years (PY) 2019-2022
OVR/Institute on Disabilities at Temple University
6. Local Citizen Advisory Committees (CAC) meetings and/or minutes
7. Quarterly reports received from OVR at PaRC Full Council meetings

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

Commendation: The Council commends OVR for reopening the Order of Selection (OOS) and their work on the Financial Needs Test (FNT) and College Policy, thus providing many more opportunities for people across the Commonwealth to participate in VR and secure Competitive Integrated Employment (CIE).

Recommendations:

1. Empower Individuals paid subminimum wages through 14(c) Waivers to obtain CIE.

Issue: Many individuals who are paid subminimum wages through employers that hold certificates issued under section 14(c) of the Fair Labor Standards Act have stated a desire to receive the supports necessary to move into CIE. Potential barriers may include lack of contacts available outside of the workshops for families and individuals, communication between workshops and families, family resistance or decisions being made by families on behalf of individuals, individuals determined in-eligible for services, and a lack of benefits counseling during initial contact with providers.

Recommendations/Measurable goals:

1. Expedite the Integrated Vocational Engagement & Support Team (InVEST) Project to assist individuals with disabilities, families, and community businesses with CIE engagement, supports and services/resource coordination.

OVR Response: Year One is in progress to establish foundation according to the proposal submitted to the Rehabilitation Services Administration (RSA) in preparation for Year Two when the InVEST Project will begin implementation.

2. Upon availability, OVR shares reports and data identifying the main cause of individuals remaining in 14(c) workshops.

OVR Response: Currently, there is no report as to why individuals choose to remain in 14(c) facilities; however, our Section 511 VR Specialists continue to conduct informational presentations to those individuals within the 14(c) facilities and complete applications for those interested in OVR services.

3. It is imperative that people with disabilities are: 1) included in the process of identifying how these barriers are removed, and; 2) provided creative solutions/presentations from people with full professional and lived experiences to ensure better outcomes for participants.

OVR Response: Our Section 511 VR Specialists will continue to provide information on how a person in a 14(c) facility can transition to CIE. They will also provide referrals to District Offices for any person interested in CIE. Through in InVEST Project, OVR is running advisory committees and will use the feedback to implement further strategies to help Customers in 14(c) facilities exit to CIE.

2. Leverage resources, heighten understanding, and provide additional staff trainings in OVR District Offices to better serve Customers with mental health needs

Issue: According to the findings listed in the CSNA, people with mental health needs have been identified as one of the most underserved communities in the Commonwealth of Pennsylvania (PA) because, “many individuals with mental health needs do not recognize themselves as part of the disability community and understand that they can access VR services. This lack of understanding coupled with stigma results in individuals not getting access to necessary accommodations. There is also a lack of training and funding for providers to support individuals with mental health needs.”

Recommendations/Measurable Goals:

1. All OVR District Offices will collaborate with local mental health providers and obtain resources within their region to:
 - a. Provide necessary accommodations for people with mental health needs seeking VR services.
 - b. Perform community outreach and inform people with mental health needs about their rights to VR services.
 - c. Provide training, information, and resources to OVR counselors, staff, and VR providers to help identify behaviors that may exhibit the need for mental health services.

OVR Response: OVR will continue to provide outreach and onboard new providers to enhance services to those with mental health disorders. OVR will make training available to all staff through in-service trainings and outsource trainings as appropriate and collaborate with the PA Office and Mental Health & Substance Abuse Services (OMHSAS).

3. Recovery Efforts from the many impacts of COVID-19

Issue: Since March 2020, when physical distancing protocols began in PA, issues with VR services have been exacerbated on all sides, including those who have experienced the lasting effects from COVID-19 or

long-COVID, delayed VR services, disruptions to Pre-Employment Transition Services (Pre-ETS), and the lack of communication, interaction, and response for those seeking services.

Recommendations/Measurable Goals:

1. Expedite all VR services/cases that have been delayed since March 2020 due to the impacts of COVID-19.

OVR Response: Currently all cases on the waitlist have been served and those who were not able to participate in OVR services during the pandemic for health, personal, or other reasons, will be encouraged to apply. The OVR OOS is open to all three categories based on internal priority selection policies.

2. Provide a timeline for expedited services for those who have experienced delays with Pre-ETS due to the impacts of COVID-19.

OVR Response: Rapid Engagement initiatives have been put into place since October 2022 to expedite the referral, application, and eligibility processes. OVR's referrals and Pre-ETS participation rates continue to increase steadily. OVR will continue to outreach to schools and other stakeholders to generate other referrals.

3. Within 30 days of the adoption of the State Plan, interact personally at least one time with individuals whose cases have been delayed or inactive since March 2020 either by phone, in-person meeting, or virtual meeting.

OVR Response: Through the months of April-June 2023, OVR conducted a Lean 5S Project requiring all staff to reach out to existing customers and ensure they are actively engaged. If they were not actively engaged, staff updated those cases to reflect current goals or closed cases when they were unable to connect with a customer. Customer engagement remains a central piece of OVR's Rapid Engagement strategy and staff will continue to make sure customers are continuously engaged with our system. Staff are also responsible for maintaining continued Rapid Engagement strategies to ensure cases progress timely, and office managers and supervisors have been tasked with developing monitoring and supervisory procedures to ensure compliance with federal service provision timeframes.

4. Strengthen Collaboration between Bureau of Vocational Rehabilitation Services (BVRs) and Bureau of Blindness and Visual Services (BBVS)

Issue: VR services that provide job readiness, training, education, and a pathway to competitive employment are not fully accessible to all customers, particularly BBVS customers.

Recommendations/Measurable goals:

1. OVR will provide a heightened level of cross training and resources between BBVS and BVRs staff to meet the capabilities of all customers.

OVR Response: OVR has initiated mandatory monthly in-service staff trainings which include topics that provide cross training and resources for staff in all Bureaus.

2. OVR will increase BBVS and BVRs staff to focus on providing additional services, programs, and resources for students and customers.

OVR Response: OVR continues to submit employment postings supported by existing complement positions and works with the Governors' Office of Talent Acquisition to assist with talent recruitment.

3. OVR will consult with credible sources outside the Agency to provide training related to specific disabilities to enhance current training provided by OVR.

OVR Response: OVR has initiated mandatory monthly in-service staff trainings which include topics that provide cross training and resources for staff in all Bureaus. Within these topics, outside presenters are often included to ensure staff are aware of the most current information.

4. OVR will provide Innovation & Expansion grant opportunities to entities interested in providing specific blindness skills training to Pre-ETS and BBVS customers enrolled in VR services.

OVR Response: OVR will explore the need for Innovation & Expansion opportunities and will also continue to do community outreach to encourage additional providers to work with OVR and provide services to customers.

5. Promoting Competitive Integrated Employment Workplace Settings

Issue: Organizations located within PA with the goal to hire a majority of employees with disabilities may be implementing hiring initiatives and policies detrimental to the continued development of competitive, integrated workplace settings, thus negatively impacting existing employment models.

Recommendations/Measurable goals:

1. WIOA defines CIE as work that is performed on a full-time or part-time basis for which an individual is: 1) compensated at or above minimum wage and comparable to the customary rate paid by the employer to employees without disabilities performing similar duties and with similar training and experience; 2) receiving the same level of benefits provided to other employees without disabilities in similar positions; 3) at a location where the employee interacts with other individuals without disabilities; and 4) presented opportunities for advancement similar to other employees without disabilities in similar positions. OVR will provide education and outreach to organizations that it partners with to help ensure PA's workplace settings align with the WIOA definition of CIE.

OVR Response: OVR's policy and review process is aligned with WIOA's definition of CIE and OVR's Business Services & Outreach Division (BSOD) will be providing information and education materials to new employers with whom they engage. When necessary, OVR goes conducts site visits with employers to ensure they are compliant with the CIE policy.

2. OVR will collect and analyze customer data such as wages, location/interaction, natural supports, advancement opportunities, and equal pay and benefits to measure the competitive environments and economic opportunities for people with disabilities.

OVR Response: OVR utilizes RSA's data when analyzing pay and areas of placement. OVR's Business Services staff work to ensure the placement of persons with disabilities meets the above requirements. OVR collects data in accordance with requirements of the RSA-911 file. OVR can use this information to analyze this type of information to ensure OVR customers are obtaining sustainable employment opportunities that provide a living wage and career advancement opportunities.

3. OVR will inform and educate their partner organizations on the importance of, and opportunities for, upward mobility, career advancement, best practices, location with interaction, collaboration within the workplace, natural supports, and equal pay and benefits to ensure the workplace is maintaining CIE.

OVR Response: Provider trainings and other regularly scheduled meetings are held on an ongoing basis. Local District Offices maintain contact with their partner organizations to ensure they are aware of the above measures.

6. Customer Satisfaction Surveys

Issue: The PaRC reviews OVR Customer Satisfaction Surveys monthly to assist with developing the State Plan and evaluate and make recommendations regarding the effectiveness of PA's VR services; however,

efforts to rectify concerns regarding low response rates and the lack of accessibility for customers to provide input on their experiences with VR services and programs remain insufficient.

Recommendations/Measurable goals:

1. OVR will increase Customer Satisfaction Survey accessibility and response rates by 10% each year.

OVR Response: OVR will continue to evaluate its Customer Satisfaction process and look for creative ways to increase the response rate.

2. To increase response rates, OVR will consider using Summer Interns to call customers and complete the surveys using the communication method which best meets the needs of the customer.

OVR Response: OVR currently has a devoted staff member who handles the above but will certainly consider additional resources to complete these tasks.

7. Identification of populations served by BVRS and BBVS.

Issue: There is no discrimination between employment outcomes specifically defined for customers of BVRS and BBVS, or separate fiscal reports provided for each Bureau.

Recommendations/Measurable Goals:

1. OVR will provide separate lists of employers for each BVRS and BBVS Bureau.

OVR Response: OVR District Offices work with employers that provide career services for all Pennsylvanians with disabilities. Each placement is unique to the individual's strength and abilities.

2. OVR will provide a fiscal report for each BVRS and BBVS Bureau outlining the expenditures for customers in their respective VR programs.

OVR Response: OVR will provide a fiscal report regarding expenditures of services.