### Program-Specific Requirements for State Vocational Rehabilitation (Blind)

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

#### a. State Rehabilitation Council.

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

*Select A or B:*

*(A) is an independent State commission*  
  
*(B) has established a State Rehabilitation Council*

(A) is an independent State commission

##### 2. In accordance with Assurance (a)(1)(B), if selected, please provide information on the current composition of the Council by representative type, including the term number of the representative, as applicable, and any vacancies, as well as the beginning dates of each representative’s term.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open [this link to the blank table](/node/578511). You can copy and paste the table into the narrative field, and start over if needed.

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

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

n/a

##### 4. 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.

n/a

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

List each recommendation/input followed by the VR agency response

n/a

#### b. Comprehensive Statewide Needs Assessment (CSNA).

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

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

###### A. Individuals with the most significant disabilities and their need for Supported Employment;

The following themes emerged in the area of the needs of individuals with the most significant disabilities including their need for supported employment:

* Supported Employment (SE) is a necessary service for people with the most significant disabilities and needs, which is an area that ICBVI could improve. Access to providers and extended services are a challenge.
* Participants expressed that there is a need to improve the quality of services provided by ICBVI to individuals with the most significant disabilities, particularly those with comorbidity/multiple disabilities.
* Having employees who are ready and able to provide employment to individuals with blindness and visual impairments is a necessity.
* Overall, ICBVI is doing a great job in preparing people for independence and employment, though some individuals feel financially prepared while others do not. Identifying best practices and increasing financial literacy/benefits counseling services could improve ICBVI's ability to serve people with the most significant needs related to sustainability.
* The rehabilitation needs of individuals with the most significant disabilities that were cited the most frequently (beyond SE) include transportation, job skills, training, job coaching, access to technology, employer support, and little to no work experience.

The data from the 2023 CSNA indicates that for all three years of the study, individuals with visual impairments constituted the largest percentage of applicants, total number of cases served, and the total number of plans developed for ICBVI. Over the three-year period, the number of applicants and total number of cases decreased for all other disability categories apart from Communicative Impairments. For this category, the numbers increased by 1 in 2021. Physical Impairments and Communicative Impairments were the next largest disability categories during the three-year period but include limitations in comparisons due to the low numbers.

###### B. Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program;

Data for ethnicity is obtained from 2021 American Community Survey one-year and five-year estimates. The ethnic demographic averages for each area are calculated by adding population totals for each ethnic group and dividing by the total population.

The State averages are below the National averages for ethnic diversity in the categories for Hispanics and Latino, Blacks and African American, and Asian.

Whites comprise over 78% of Idaho's population and the State's average is 20.6% higher than the National average of 58.1%. R4's average for Whites is the lowest in the State (70.4%) and the average is 12.3% higher than the National average. Note that five of R4's eight counties are considered to be over 49.5% urban.

Hispanic and Latinos comprise the second largest ethnic group in the State (13.3%), with an average that is 5.5% lower than the National average. Four regions have over 11.5% of individuals reporting Hispanic and Latino ethnicity. R4's average for individuals of Hispanic/Latino ethnicity exceeds the State average by 5.5%, exceeds the State's urban average by 3.2%; and exceeds the other region averages by up to 20.3%.

The State's average for Asians (1.4%) is significantly lower than the National average by 4.2 percentage points. The region with the highest percentage rate of Asian residents is RTV (1.8%).

The National average for Black or African Americans is almost 12% and the State of Idaho's average is significantly lower than the National average as Blacks comprise less than 1% of Idaho's population. RTV has the highest average of Black Americans in the State (1%).

The following themes emerged in the area of the needs of individuals with disabilities from different ethnic groups, including individuals who may have been unserved or underserved by the ICBVI:

* The groups most commonly cited as potentially underserved include Hispanics, low economic families, and those living in rural areas.
* Limited access to services by some groups is magnified if they live in rural areas.
* Unemployment rates and lack of participation in the workforce for individuals with disabilities continue to be low. This coincides with poverty rates and other needs across Idaho, resulting in the need for ICBVI to consider job-driven training programs and sustainable employment in Idaho's workforce for individuals with blindness and visual impairments.
* Due to the growth rate in the State of Idaho, ICBVI needs to focus on growth and outreach and continue to assess changes to the population and areas of the State with increased needs.

###### C. Individuals with disabilities served through other components of the workforce development system; and

The following information was gathered from the individuals interviewed for this assessment in the area of the needs of individuals with disabilities served through other components of the Statewide Workforce Development System (from the 2023 CSNA):

* Overall, access and engagement within AJCs is lacking; therefore, many people did not have much experience accessing their services.
* There was concern that the AJCs did not understand how to work with individuals with blindness and visual impairments, so they either do not get help, or get referred elsewhere (i.e., ICBVI).
* Low incidence disabilities can be challenging for community partners who do not work with them often. ICBVI should be trusted and used as the expert for consultation, strategic planning, and advocacy.
* ICBVI could improve its collaboration with the Workforce Development System through sharing data, increased cross-referral, leveraging resources, sharing consumers, and developing youth program partnerships.

The following recommendations are offered to ICBVI based on the results of the research in the Needs of Individuals with Disabilities served through other Components of the Statewide Workforce Development System area (from the 2023 CSNA):

* ICBVI should develop regular opportunities for cross-training among local level WIOA core partner staff to learn about available services and increase the level of consumers with ICBVI and other workforce programs to leverage resources and serve Idahoans together.
* ICBVI is encouraged to identify effective ways to share consumer data and develop joint opportunities to increase the level of partnership at the local level.
* ICBVI should continue efforts to improve services for individuals with blindness and visual impairments in the larger Idaho workforce system by maintaining partnerships and the level of engagements of ICBVI within the WIOA core programs. For example, ICBVI can provide ADA training, disability awareness and etiquette training, community accessibility, blind-specific training, assistive technology, etc., to workforce agencies as well as community partners.

###### D. Youth with disabilities, including students with disabilities and their need for pre-employment transition services. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under IDEA.

According to the 2023 CSNA, the most common themes that emerged in this area are:

* ICBVI will need to monitor the increasing demands of students, educators, and families across the State to ensure there are adequate resources available to meet the demand.
* Students and youth need access to transportation and education. These seem to be the most important services and the lack thereof creates barriers faced by youth with blindness and visual impairments.
* Relationships with educators have greatly increased, which has resulted in students having more access to ICBVI and other workforce system partners. However, there seems to be a continued lack of understanding and support by parents, indicating a need for ICBVI to increase direct communication with parents and families of students and youth with disabilities served by the organization.

Recommendations for improving service needs for students and youth with disabilities (from the 2023 CSNA):

* ICBVI is encouraged to continue efforts to identify needs and programs for implementing Pre-ETS. The agency should consider adding some tiered approaches that will enhance the delivery of Pre-ETS to SWD who may have multiple disabilities. In addition, ICBVI is encouraged to develop strategies, either through direct or contracted services, to increase the delivery of Pre-ETS to all areas of the State.
* ICBVI is encouraged to focus outreach efforts to students and youth with disabilities that are not traditionally known to ICBVI through collaboration with special education services. The agency should consider increasing marketing and outreach to mainstream educators, 504 coordinators, school counselors, school nurses, and eye/pediatric medical providers in the community. As outreach results in increased referrals and applications by these populations, ICBVI is encouraged to tailor services to meet the diverse needs of these individuals.
* ICBVI is encouraged to increase marketing, communication, and expectations directed toward parents and families of youth with disabilities.
* ICBVI should consider assessing the availability of education and training services that could lead to in-demand jobs to increase educational engagement and workforce participation in youth.
* ICBVI is encouraged to assess its ability to support youth in accessing transportation to increase their independence, access to education and training ,and ability to enter into the workforce.

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

From the 2023 CSNA, the following themes were recurring from the individuals interviewed for this assessment in the area of the need to establish, develop or improve community rehabilitation programs serving individuals with disabilities in Idaho:

* Overall, ICBVI seems to struggle with having access to qualified CRPs. Similar concerns were expressed, but one particular description stood out regarding consumers not having enough options or access in order to make informed decisions about CRP services: "Choice is not informed choice."
* CRPs are generally viewed as caring with the desire to provide high quality services; however, they need extensive training and support in order to do this successfully. Implementing qualification standards was suggested; however, it was followed up by fear of that limiting further access and options.
* Pre-employment transition services have created additional opportunities for CRPs. This is seen as a great opportunity for all involved, but the level of quality varies.
* The provision of Pre-ETS has helped vendors grow a better understanding of SWD impairments.
* Training was identified as a need that would increase CRP knowledge of working with individuals with blindness and visual impairments. Cross-training with ICBVI staff, CRPs and others could greatly improve understanding and service delivery.

The following recommendations are offered to ICBVI based on the results of the research in the Need to Establish, Develop or Improve Community Rehabilitation Programs in ICBVI (from the 2023 CSNA):

* ICBVI should consider statewide training opportunities (regularly) to increase the skills of CRPs and understanding of working with individuals with disabilities, particularly those with blindness and visual impairments.
* Develop and implement improved screening protocol that examines the knowledge of the CRP prior to contracting with the provider. This could help identify ongoing needs and supports that could be provided by ICBVI or through continued collaboration. Areas to investigate include the following:
  + Knowledge of disability services/ resources in the local area;
  + Experience advocating for workplace accommodations with employers;
  + Experience working with consumers with blindness and visual impairments;
  + Knowledge and use of American Job Centers;
  + Employers with whom provider has built relationships; and
  + Knowledge and use of medical and community resource organizations in the local area.
* ICBVI is encouraged to consult and partner with CRP staff to engage in a collaborative process to revise policies and fees for service that are agreed upon by both groups, especially if increased qualification standards are set for staff.
* If this does not already exist, consider adding feedback questions related to CRP services to the participant satisfaction surveys sent by ICBVI.

#### c. Goals, Priorities, and Strategies

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

##### 1. Describe how the SRC and the VR agency jointly developed and agreed to the goals and priorities and any revisions; and

ICBVI does not have a SRC. The goals and priorities were developed from the 2023 CSNA.

##### 2. Identify measurable goals and priorities in carrying out the VR and Supported Employment programs and the basis for selecting the goals and priorities (e.g., CSNA, performance accountability measures, SRC recommendations, monitoring, other information). As required in Section 101(a)(15)(D), (18), and (23), describe under each goal or priority, the strategies or methods used to achieve the goal or priority, including as applicable, description of strategies or methods that—

###### A. Support innovation and expansion activities;

###### B. Overcome barriers to accessing VR and supported employment services;

###### C. Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post-secondary education, employment, and pre-employment transition services); and

###### D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

A. ICBVI is not engaging in any innovation and expansion activities in PY2024.

B. Overcoming Barriers

**Goal 1 – Reduce barriers to employment for individuals who are blind or visually impaired.**

Narrative: The most significant themes that emerged from the 2023 CSNA include:

* Lack of transportation
* Lack of information about services
* The groups most commonly cited as potentially underserved include Hispanics, low economic families, and those living in rural areas.

***Priority 1:*** Address transportation barriers for individuals who are blind or visually impaired.

***Strategies for Priority 1***

1. Have all ICBVI regions apply to serve on their regional transportation boards/councils.
2. Develop policies to improve client engagement during the planning process and throughout the IPE to ensure transportation is always addressed.
3. Include in the client satisfaction survey questions relating to transportation.

***Performance Measure for Priority 1:***

1. Results of the client satisfaction survey: >70% of participants who exit the program satisfied with transportation services provided through their IPE.

***Priority 2:*** Increase outreach to community partners about ICBVI services.

***Strategies for Priority 2***

1. Ensure materials are up to date, address any improvements to the website.
2. Attend community events, with special focus on rural communities.

***Performance Measure for Priority 2***

1. Number of new referrals, applications, eligibilities, and new IPE’s. Targets are based on an increase of 4% (annual estimates):

|  | PY2024 | PY2025 |
| --- | --- | --- |
| Referrals | 112 | 116 |
| Applications | 87 | 90 |
| Eligibilities | 73 | 75 |
| Initial IPE's | 58 | 60 |

Applications

***Priority 3:*** Improve outreach to the unserved/underserved.

***Strategies for Priority 3:***

1. Participate in councils and committees that serve Hispanics, migrants, and low income individuals.
2. Attend community events that cater to Hispanics, migrants, and low income populations.

***Performance Measures for Priority 3:***

1. Increase number of applicants, by 10% over the previous PY, to the VR program who identify as a minority population.
2. Increase applications, by 10% over the previous PY,  specifically for the Hispanic population.
3. Increase applications, by 15% over the previous PY,  for individuals who identify as low income.

C. Students with Disabilities

**Goal 2: Improve transition services for students.**

Narrative:  The most significant themes that emerged from the 2023 CSNA include:

* Students and youth need access to transportation and education. These seem to be the most important services and the lack thereof creates barriers faced by youth with blindness and visual impairments.
* There seems to be a continued lack of understanding and support by parents, indicating a need for ICBVI to increase direct communication with parents and families of students and youth with disabilities served by the organization.

***Priority 1: Increase training around post-secondary education opportunities and transportation.***

Strategies for Priority 1:

1. Utilize a tiered approach to delivering Pre-ETS.
2. Increase focus on transportation needs during assessment and workplace readiness training.
3. Develop an annual review with students and families that evaluates satisfaction of training on addressing transportation needs.

Performance Measures for Priority 1:

1. Number of students who become enrolled in post-secondary education. (≥ 35%).
2. Satisfaction rate of 70% or greater with respect to transportation.

***Priority 2: Improve outreach and education of Pre-ETS***

***Strategies for Priority 2:***

1. Develop an annual review process with students and parents that focuses on the delivery and quality of Pre-ETS.
2. Improve outreach to those underserved / unserved LEA’s.

***Performance Measures for Priority 2:***

1. 70% or greater satisfaction rate with Pre-ETS in each annual review.
2. 30% of new referrals each PY from LEA’s outside of the city where the regional office resides.
3. Revise our intake process for students and parents to have a significant focus on Pre-ETS. Create accessible materials for parents to take home.
4. Revise the transition services part our website to market more toward students and parents.

D. Improve the performance of the VR program

**Goal 3: Improve services to businesses and other components of the WDS.**

Narrative: Emergent themes from the 2023 CSNA include:

* Business partnerships may not be considered an area of strength for ICBVI; however, it is a focus, and efforts are growing to serve this dual consumer under WIOA.
* Perceptions/stigmas and education for employers related to the skills and abilities of hiring people with disabilities, including dispelling myths still exist with employers.
* The partnerships between ICBVI and the local workforce system appear to be lacking when it comes to partnering with business. There is some perception that workforce has strong relationships and access to employers, yet ICBVI is not included in these business partnerships at a statewide level.
* Businesses who responded to the survey were open to receiving help in a variety of ways, but the low response rates reveal that ICBVI needs stronger engagement with employers.

***Priority 1: Increase outreach to our business partners***

***Strategies for Priority 1:***

1. ICBVI will implement strategies to develop work-based learning experiences for ICBVI consumers to increase awareness and opportunities with employers, focusing adults and other consumers who do not qualify for Pre-ETS.
2. ICBVI will market success stories that include business and ICBVI consumers.
3. ICBVI will utilize state and national strategies to reach out to existing and new business.

***Performance Measures for Priority 1:***

1. Counselors will arrange, at minimum 5 WBLE for participants in their regions who are not eligible for Pre-ETS in PY 24.
2. ICBVI will create, at minimum, 5 success stories that include consumers and business partners, and post them on the website.
3. ICBVI will increase, by 20%, employment outcomes over the previous PY.

***Priority 2: Increase participation in the Idaho One-Stop System.***

***Strategy for Priority 2:***

1. ICBVI will develop a plan to increase its partnership with IDVR and IDOL in the area of services to employers, and collectively provide services and education to employers in Idaho.

***Performance Measure for Priority 2:***

1. ICBVI will participate in, at minimum, 3 workplace tours or other educational activities in each region during this PY.

#### d. Evaluation and Reports of Progress: VR and Supported Employment Goals

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

##### 1. Progress in achieving the goals and priorities identified for the VR and Supported Employment Programs;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

**Goal 1 - Increase independence and employment outcomes through quality rehabilitation services.**

* Results of the participant satisfaction survey in PY 22:  All client's who exit the program with an IPE are emailed a link to the survey. A total of three surveys were completed in PY 22 with a 100% satisfaction rate.
* Services to Businesses: The Commission completed Intensive Technical Assistance (ITA) with the VRTAC-QE in May of 2022. The Commission has also increased inter-agency collaboration with IDVR, and conduct quarterly staff trainings for both IDVR and ICBVI staff.
* Students with Disabilities: In PY 22, ICBVI provided Pre-employment transition services to 127 students with disabilities.

***Performance Measures for Goal 1:***

These statistics represent total numbers for each of the following in PY22:

* Number of client's who achieved competitive integrated employment- 22
* There were no participants who exited the VR program with a supported employment outcome.
* Measurable Skills Gains: 86
* Pre-Employment Transition Services provided – 185
* Average hourly wage at program exit – $21.03

**Goal 2 - Reduce barriers to employment for individuals who are blind or visually impaired.**

In PY22, ICBVI engaged in Technical Assistance with the VR-TAC QE in regards to transportation, one of the most significant barriers to employment for clients of the ICBVI VR program. Strategies for addressing transportation will be discussed in the goals and objectives for this plan.

ICBVI continued it's practice of engaging employers in educating them around blindness and visual impairments. The last time this element was measured was in PY 2019, in which there were a total of 29 recorded employer contacts. In PY 2022, at total of 80 outreach visits to employers were made across the state. This represents an increase of 64%.

***Performance Measures for Goal 2:***

These statistics represent total numbers for each of the following in PY22:

Total number of referrals to the VR program: 125

Total number of applications: 92

Total number of individuals found eligible for services: 85

Total number of individuals with an approved IPE: 76

Total number of Hispanic individuals served: 37

*Outreach performance (defined as substantial information shared about the VR program and services)*

Number of contacts to CRP's: 11

Number of contacts to LEA's: 96

Number of contacts to employers: 80

**Goal 3 – Improve transition services for students.**

During PY22, ICBVI increased it's outreach to Local Education Agencies (LEA's), students and parents. Assessment and Training Center  (ATC) staff continued it's practice traveling around the state to educate parents, teachers, and others who provide services to blind and visually impaired students, to educate them on serving this population. A total of 3 seminars were held across the state. As well, one high school was so impressed with the seminar that they sent several of their staff to the ATC for 3 days for additional training.

In PY22, ICBVI had a record number number (18) of students engaged in our summer programs. During this PY, ICBVI piloted some spring outreach activities (virtual meetings and in-person activities) to educate and engage parents and students in pre-employment transition services.

***Performance Measures for Goal 3:***

These statistics represent total numbers for each of the following in PY22:

Total number of students served: 95

Total number of state-wide training seminars conducted by our ATC: 3

**Goal 4:**Improve VR program efficiency through continuous quality improvement activities.

***Performance Measures for Goal 4:***

* In PY 2022, the Idaho legislature approved a new position for ICBVI (Business Analyst). This individual was hired in November 2023, and is responsible for the RSA-911 and program evaluation and quality assurance activities for the VR program.
* The annual VR program audit was revised to focus only on critical case documentation, which includes file evidence required for the primary indicators of performance. Results of PY 22 / 23 audits have indicated a trend of improvement in this area over the past two years:

|  | PY2022 | PY2023 |
| --- | --- | --- |
| MSG | 22% | 9% |
| Credential | 29% | 16% |
| Employment | 11% | 7% |

* In PY 22, several of the VR policy manuals were combined in to one manual to improve efficiency in accessing information for field staff.
* The VR Payment Policy was updated to reflect current rates of payment. These new rates were based on national, regional and local data sources. The results of doing this was less restriction on the counselors, and improved service delivery for participants.

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

| **Performance Indicators** | **Negotiated Level** | **Actual** |
| --- | --- | --- |
| Employment (Second Quarter After Exit) | 59.5% | 64.5% |
| Employment (Fourth Quarter After Exit) | 57.8% | 62.33% |
| Median Earnings (Second Quarter After Exit) | $4,400 | $4,950.03 |
| Credential Attainment Rate | 42.8% | 60.93% |
| Measurable Skill Gains | 55.1% | 55.32% |

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

n/a

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

##### 1. Acceptance of title VI funds:

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

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

n/a

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

Supported employment services are provided to our blind or visually impaired clients who have multiple disabilities, who have the most significant disabilities, who are consequently are eligible to receive supported employment services. These multiple disabilities include developmental disabilities, traumatic brain injuries, and mental illness or a combination of these disabilities. SE services are provided by the community rehabilitation programs which are accredited by CARF or RSAS.

Supported Employment Services include the following:

Time limited services needed to include job coaching and communication with the employers, to support training while the individual is employed.  Continued funding of SE cases is contingent upon progress toward learning the essential functions of the job and/or fading hours of ongoing support to the level of employer satisfaction immediately prior to the assessment of initial stability.

Any other service that would be identified as requisite to the targeted supported employment outcome after placement ahead of transfer to externally funded ongoing support services.

SE may also include Customized Employment elements, after placement.

Extended services for youth are available for qualifying youth in the absence of other ongoing support services available in the community.

ICBVI and IDVR provide the upfront training until the clients are stabilized on their jobs and at that point they are transferred to the long-term support services through Health and Welfare HCBS waiver or the IDVR Extended Employment Services (EES) Program.

Extended services are available to youth with most significant disabilities for up to 4 years, or until the individual turns 25 years old and no longer meets the definition of a “youth with a disability”, whichever comes first.

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

In 2018, ICBVI relinquished all of its Title VI, Part B funds to the Idaho Division of Vocational Rehabilitation (IDVR). As a result, IDVR now manages the supported employment (SE) program for the state.

ICBVI and IDVR agree to the following:

* ICBVI and IDVR agree to collaborate on all supported employment (SE) cases when the individual has a disability profile which includes blindness or visual impairment meeting the eligibility criteria of ICBVI.
* ICBVI agrees to fund services related to addressing the visual disability.
* IDVR agrees to fund employment related services.

Furthermore, ICBVI has adopted IDVR’s policies around SE, which include service provider standards.

The VR program policy around the arrangement of supported employment services and extended employment services includes:

Supported employment means competitive integrated employment (CIE), including customized employment (CE), or employment in an integrated work setting in which an individual with a most significant disability, including a youth with a most significant disability, is working on a short-term basis toward competitive integrated employment that is individualized, and customized, consistent with the unique strengths, abilities, interests, and informed choice of the individual, including ongoing support services for individuals with the most significant disabilities.  SE can be provided by the state VR programs for a period of time not to exceed 24 months, unless the VRC and client jointly agree to extend the time to achieve the employment outcome identified in the IPE.

SE refers to support services (such as job coaching) provided after placement and before the individual reaches initial stability, and prior to utilization of extended services (long-term supports).

Extended Services (ES) are those services, including extended services for youth, are provided after the assessment of initial stabilization when required for an individual to maintain employment (to sustain employment stability).

Extended Services for Youth: The state VR program makes extended services for youth available when youth have no comparable ES resources available in the community. Extended services can continue to be provided until:

* Comparable benefits become available (External funders are identified) OR
* Extended services are provided for four years OR The individual reaches the age of 25 and no longer qualifies under the definition of ‘youth’.

Supported Employment services are only offered by qualified providers as identified under IDVR standards.

ICBVI is committed to the advancement of opportunities for Idaho citizens with disabilities, including youth with the most significant disabilities, and encourages employment in the least restrictive and most integrated environments possible. ICBVI and IDVR have established and continues to maintain strong working relationships with pertinent state agencies such as the Department of Health and Welfare (H&W). Under H&W, Home and Community Based Services (HCBS) Waiver and Aged and Disabled Waiver are the two main extended services funding sources for Idahoans in need of Supported Employment. The third funding source is the Extended Employment Services Program. This program is funded through State appropriations only. The primary service providers for long term supports under the three main funding sources are CRPs.

ICBVI and IDVR utilize the State’s Extended Employment Services program as well as the Medicaid Home and Community-Based Services (HCBS), and Aged and Disabled (A&D) waivers for long term support. The VR program will continue to work closely with each agency overseeing these resources to streamline the referral process and improve utilization of this external source of extended services funding.  The following provides more detail on the working relationship between each ES entity and IDVR.

The Supported Employment Agency Recommendation must be completed, and this is done by IDVR on behalf of both state VR agencies when transitioning from vocational rehabilitation services or by the Supported Employment Agency (Community Rehabilitation Provider) identified on the plan or addendum. Documentation must include:

* Amount of Service
* Level of Support Needed
* Employment Goals
* Transition Plan

The ICBVI counselor is a member of the Person-Centered Planning Team and participates in all planning and coordination activities.

EES extended services are provided under EES policy which requires the certification of an extended employment service provider.  These providers are approved by the EES program administrator on a case by case basis.  All EES approved providers are also CRPs which are initially approved as CRPs under IDVR’s accreditation requirement.

If a youth with a disability has been determined to need an SE strategy and an extended service funding source is not available yet, IDVR will utilize VR funds for the required timeframes or until the funding becomes available for the long-term support.

Extended services for youth can be provided up to four years as needed for youth under the age of 25 following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. Upon exhaustion of Title VI funds reserved for youth supported employment, IDVR will continue to support extended services with Title I funds, as required by WIOA, and will continue to leverage other sources of extended services.

ICBVI and IDVR support the utilization of Natural Supports where available and encourages the development of Natural Supports for all SE customers.  Natural Supports are supports and services typically available to other employees OR supports created to provide supports through people or other resources typically available in the work, home, and community environment.

ICBVI works collaboratively with IDVR through the entire life of the SE case, and will continue to provide any supportive services needed to address the visual disability of the participant up to program exit.

#### f. Annual Estimates

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

##### 1. Estimates for next Federal fiscal year—

###### A. VR Program; and

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Note, please do not edit the table header or formatting. Only edit the table contents.

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| Priority Category (if applicable) | No. of Individuals Eligible for Services | No. of Eligible Individuals Expected to Receive Services under VR Program | Costs of Services using Title I Funds | No. of Eligible Individuals Not Receiving Services (if applicable) |
| --- | --- | --- | --- | --- |
|  | 457 | 453 | $655,000 | 0 |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |

Number of eligible individuals is based on our annual estimates. The number of eligible individuals expected to receive services takes into account attrition between eligibility and IPE. ICBVI is currently not on an order of selection.

###### B. Supported Employment Program.

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| Priority Category (if applicable) | No. of Individuals Eligible for Services | No. of Eligible Individuals Expected to Receive Services under Supported Employment Program | Costs of Services using Title I and Title VI Funds | No. of Eligible Individuals Not Receiving Services (if applicable) |
| --- | --- | --- | --- | --- |
| n/a | 8 | 8 | $14,900 | n/a |

The number of eligible individuals expected to receive supported employment services has been stable over the past 2 years, and ICBVI does not anticipate an increase. Estimated cost of services using Title 1 funds is based on expenditures made in SFY 2022 for  eligible individuals. ICBVI is currently not on an Order of Selection.

#### g. Order of Selection

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

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

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

##### 2. For VR agencies that have defined priority categories describe—

###### A. The justification for the order

n/a

###### B. The order (priority categories) to be followed in selecting eligible individuals to be provided VR services ensuring that individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and

n/a

###### C. The VR agency’s goals for serving individuals in each priority category, including how the agency will assist eligible individuals assigned to closed priority categories with information and referral, the method in which the VR agency will manage waiting lists, and the projected timelines for opening priority categories. NOTE: Priority categories are considered open when all individuals in the priority category may be served.

n/a

##### 3. Has the VR agency elected to serve eligible individuals outside of the order of selection who require specific services or equipment to maintain employment?

Yes

#### h. Waiver of Statewideness.

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

Services provided under the State Plan are available in all political subdivisions of the state.

#### i. Comprehensive System of Personnel Development.

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

##### 1. Analysis of current personnel and projected personnel needs including—

###### A. The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and

###### B. The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;

###### C. Projections of the number of personnel, broken down by personnel category, who will be needed by the VR agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

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| Personnel Category | No. of Personnel Employed | No. of Personnel Currently Needed | Projected No. of Personnel Needed in 5 Years |
| --- | --- | --- | --- |
| Administrator | 1 | 0 | 0 |
| VR Chief | 1 | 0 | 1 |
| Managers | 4 | 0 | 0 |
| Counselors | 6 | 1 | 2 |
| VRA | 5 | 0 | 0 |
| Data Coordinator | 1 | 0 | 0 |
| Business Analyst | 1 | 0 | 0 |
| Financial | 2 | 0 | 1 |
| BEP | 2 | 0 | 0 |
| Instructors | 13 | 1 | 0 |
| Reader/Drivers | 4 | 2 | 0 |

ICBVI projects 2 counselors retiring in the next 5 years. The VR Chief is expected to retire in 2025, and a fiscal officer is expected to retire in 2026. There is currently a vacancy in a counselor position, as well as an Instructor of the Blind position in the Assessment and Training Center.  These are anticipated to be filled in PY 24

###### D. Ratio of qualified VR counselors to clients:

ICBVI anticipates serving up to 457 individuals during FY 2025. Therefore, the VRC to client ratio would be 1:76.

###### E. Projected number of individuals to be served in 5 years:

This estimate is based on the number of individuals in Idaho who have reported a visual disability (including but not limited to blindness) and who are in the potential labor force (defined here as 18 to 64 years old). Using data and age-adjusted prevalence rates from the 2019 American Community Survey (ACS) combined with current and projected working-age population from the Idaho Department of Labor, it is estimated that there are approximately 22,763 Idahoans with some form of visual disability in the working-age population. If age-adjusted prevalence rates remain stable, it is expected that this number will grow to 23,664 by 2024 and 24,634—approximately 4%--by 2029 based on IDOL’s population growth projections. Ada, Canyon, Kootenai, and Bonneville counties will have the largest populations of blind or visually impaired persons based on the 2019 ACS data.

As of December 2023, ICBVI has 420 clients with an IPE in place. Based on the 4% growth rate noted previously:, this gives a projection of:

FFY25 - 457 / FFY26 - 475 / FFY27 - 494 / FFY28 - 514 / FFY29 - 535 / FFY30 - 556

##### 2. Data and information on personnel preparation and development, recruitment and retention, and staff development, including the following:

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

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Note, please do not edit the table header or formatting. Only edit the table contents.

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| Institute of Higher Education | Type of Program | No. of Students Enrolled | No. of Prior Year Graduates |
| --- | --- | --- | --- |
| Idaho State University | Master in Clinical Rehabilitation Counseling | 20 | 5 |
| Portland State University | MS in Clinical Rehabilitation Counseling | 36 | 10 |
| Portland State University | Graduate Certificate in Orientation and Mobility | Did not report | 19 |
| Western Oregon University | MS in Rehabilitation Counseling | 47 | 12 (4 more in 12/23) |
| Western Washington University | MA in Rehabilitation Counseling | 36 | 14 |

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

ICBVI plans for recruitment will be to continue to recruit qualified staff from the Idaho State University and at other regional and national institutions of higher education. We maintain contact with Western Washington University, Utah State University, Portland State University, Western Oregon University, University of Wisconsin-Stout, University of Northern Colorado and Montana State University, all of which have Master’s programs in Rehabilitation Counseling.

ICBVI also uses the following for recruitment of Senior VR Counselors and Senior Instructors for the Blind:

* Commission on Rehabilitation Counselor Certification (CRCC)
* The Association for Education and Rehabilitation of the Blind and Visually Impaired (AER) website
* The internet as utilized by the Idaho Division of Human Resources
* Internships and practicums completed by students with ICBVI
* Personal contact with instructors in university programs
* National Federation of the Blind (NFB) website
* CSAVR and NCSAB
* Region X Coalition

ICBVI has provided practicums and internships for Master’s level students in the Rehabilitation Counseling program over the last five years and anticipates that it will provide an additional one to three practicums or internships in the next two years.

 Training and continuing education is provided to VR staff   from a variety of venues:

* National Rehabilitation Association (state and national conferences)
* The Association for Education and Rehabilitation of the Blind and Visually Impaired (AER)
* Helen Keller National Institute
* State and regional conferences and workshops
* Collaborative trainings with IDVR
* Technical Assistance Centers (e.g. WITAC, YTAC)
* Annual in-service training
* Webinar based trainings

 Presently, ICBVI employs 13 individuals are blind or visually impaired and 3 individuals are from a minority background.

ICBVI participates in Career Fairs around the state to encourage and seek out individuals from diverse backgrounds including individuals with disabilities and from minority backgrounds.

ICBVI salaries compare favorably with the surrounding states in the Pacific Northwest. The agency also encourages and supports, costs, training/education time of staff and formal education and certification for staff.

ICBVI hires any person into a permanent position from a temporary position if they have met the minimum standards for that position as determined by the State of Idaho’s Department of Human Resources for that classified position.

Current personnel needs for the VR Program: 1 Vocational Rehabilitation Counselor, 1 Instructor for the Blind

Project needs for the VR program due to retirements during the course of this plan: 1 Rehabilitation Services Chief, 2 Vocational Rehabilitation Counselors, 1 Financial Technician.

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

i. Particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

ii. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.

Specific areas of training that are emphasized are:

* The Rehabilitation Act and its regulations, as amended by WIOA;
* The Workforce Innovation and Opportunity Act (WIOA)
* Social Security Work Incentives and Employment;
* Transition planning for students with blindness and visual impairment;
* Continuing education on the medical aspects of vision related disabilities; and
* Assistive Technology for the blind and visually impaired.

All agency personnel have an annual evaluation of his or her performance, goals and plans. It is during this process that ICBVI assesses how training has impacted an employee’s ability to perform the essential functions of his or her position, and to set new goals and priorities for the next year.

##### 3. Description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency professional and paraprofessional personnel are adequately trained and prepared, including—

###### A. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

###### B. The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

A.

Standards that are consistent with any national or State-approved or — recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services;

The State of Idaho does not require a state licensure for rehabilitation counselors. Educational standards for personnel established by ICBVI for qualified rehabilitation professionals (QRP) are intended to meet a base level of quality expected of the counselors by the Commission.

ICBVI’s minimum standards for Senior VR Counselor for the Blind are consistent with the national standard of CRC. ICBVI places great importance on recruiting, hiring and retraining staff that are appropriately and adequately trained to provide services to our blind and visually impaired clients. We currently have eight staff with CRC certification, including the Chief of Rehabilitation Services. In addition, we have 14 Instructors for the Blind and six of them have Master’s degrees and/or AER Certification in Rehabilitation Teaching or Orientation and Mobility.

ICBVI tracks and monitors each employee’s individual training and development. Special emphasis is placed on training required to maintain CRC or AER certification. This includes training on disability topics, vocational counseling, ethics, case management, assessment, job placement strategies and especially assistive technology for the blind and visually impaired. Specific development needs identified for each employee are  addressed during annual performance evaluations.  While specific priorities evolve year-to-year, ICBVI consistently addresses WIOA, data collection and reporting, assessment, counseling and guidance, vocational planning, job placement, as well as assistive and rehabilitation technology.

B.

ICBVI is committed to providing all employees with development opportunities which will enhance employee job performance; support the agency’s mission, values and goals; and lead to successful employment outcomes for individuals with disabilities. With emphasis on workforce development, ICBVI will also concentrate on providing training to strengthen business relationships and increase knowledge of labor market relevance and employer needs.

Through an increased emphasis on data-driven decisions, ICBVI will increase utilization of the most recently available labor marked information to promote more informed decision making on the part of client’s when selecting potential employment options.

In 2022, ICBVI started using  Next Steps Idaho. Next Steps Idaho is a homegrown, statewide initiative designed to support and guide Idahoans at different stages of life as they seek education, training, career change or advancement, and that “dream job.” Sponsored by the Idaho State Board of Education, in partnership with Idaho’s employers and the state’s Workforce Development Council, this comprehensive clearinghouse of resources and tools pertaining to education, training, and career exploration and development.

As well, in order for staff to have a 21st century understanding of the evolving labor force and needs of individuals with disabilities, ICBVI continues to use the following resources:

* Idaho Labor Market Information
* The Career Index Plus
* Career Pathways

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

ICBVI employs a counselor who is fluent in Spanish, and assists other counselors in serving the needs of the Hispanic communities located throughout the state.

ICBVI also utilizes Language Link for translation services.

ICBVI purchases sign language interpreting services for individuals who are deaf. In cases where the client is deaf and blind, ICBVI will often work collaboratively with the general VR agency and the Helen Keller’s national and regional centers to provide services. If ICBVI has a client who is monolingual speaking an interpreter will be hired by the agency.

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

ICBVI VR counselors, under the direction and supervision of the Rehabilitation Services Chief, will facilitate the required coordination with the State Department of Education and provision of Pre-employment Transition Services, as required under WIOA.

The Rehabilitation Services Chief will facilitate the required coordination with the State Department of Education and provision of Pre-employment Transition Services, as required under WIOA.

Training and education will be identified for staff regarding service provision, coordination, and best practices in serving students with disabilities. A VR counselor is assigned as an active member of the Idaho Interagency Council on Secondary Transition and the Special Education Advisory Panel, which promotes interagency cooperative planning, information sharing, and the collaborative use of resources at the state and local level. This Council works to ensure that training needs are adequately identified and then addressed through shared training opportunities.

Training opportunities offered by ICBVI which are relevant to both educators and vocational rehabilitation professionals will be opened to school staff for participation when practicable. For example, every fall, ICBVI in collaboration with IDVR, IESDB and the State Department of Education host a conference (Transition Institute). This conference is attended by educators, VR staff, and other agencies and individuals who service transition age youth. The Transition Coordinator also frequently attends Management Team meetings to share progress and development of pre-employment transition services .

VR counselors throughout the state will serve on regional Special Education and Transition Boards and Councils.

#### j. Coordination with Education Officials.

In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act—

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

ICBVI VR Counselors and the Idaho Education Services for the Deaf and Blind (IESDB) staff coordinate with regional education officials to identify blind and visually impaired students in the K-12 school system. VR counselors regularly meet with the special education teachers, teachers of the visually impaired (IESDB Staff), school counselors, school nurses and other personnel involved in school to work transition. A transition Individualized Plan for Employment (IPE) is developed within 90 days of eligibility determination (unless an extension is agreed upon) to assist the student with their successful transition from school to work.

To facilitate the transition of students with the disabilities, the following cooperative agreements have been established:

Interagency Agreement agreement between the State Department of Education (SDE), IDVR and ICBVI - Amended agreement effective March 2023.

Idaho Educational Services for the Deaf and Blind - November 2021 (under current review for update)

Pre-Employment Transition Services (Pre-ETS): In collaboration with local educational agencies (LEA’s), IESDB, and IDVR are required to offer to transition age students with disabilities (ages 14-21), Pre-Employment Transition Services (CFR 361.48(a)).

Pre-ETS are available to students with disabilities who are potentially eligible and eligible for ICBVI VR services.

In 2020, ICBVI and IDVR administration agreed to a minimum age of 14 years old that students with disabilities may begin receiving Pre-Employment Transition Services. This agreed lower threshold will be effective upon approval of this plan.

Pre-ETS include:

* Job exploration counseling;
* Work-based learning experiences, (which may include in-school or after school opportunities, experience outside the traditional school setting including internships that are provided in an integrated environment);
* Counseling on opportunities in comprehensive transition or enrollment in post-secondary educational programs;
* Workplace readiness training to develop social skills; and
* Independent living instruction in self-advocacy/peer mentoring.

In order to reach those goals, each ICBVI region is ensuring they have a strong relationship with the local school districts, Transition Councils, and One-Stop partners.  State-wide Pre-Employment Transition Services and programs have been implemented and will continue to expand as the population of high school students we serve increases.

Under the direction of the Rehabilitation Services Chief, VR counselors collaborate with LEA’s to educate and inform them of Pre-ETS activities. The Rehabilitation Services Chief provides oversight with all staff engaged in the delivery of Pre-ETS to help develop and enhance existing referral and outreach strategies within schools.

**Youth seeking subminimum wage employment**

ICBVI has created a checklist for youth seeking subminimum wage employment, which includes the documentation requirements and responsibilities under Section 511.  The checklist includes the requirement for a transition or Pre-ETS service to be completed prior to youth verification of Career Counseling and Information and Referral (CCI&R) under Section 511.

Under a memorandum of understanding, the Idaho Division of Vocational Rehabilitation provides CCI&R services for the state.

*Responsibilities of the VR program:*

The ICBVI checklist includes:

* Documentation of the provision of transition services or pre-employment transition services;
* Application for VR services;
* The provision of Career Counseling, and Information and Referral Services.

*Responsibilities of the Local Education Agency (LEA):*

Documentation of completion of appropriate transition services for a youth with a disability under IDEA, which includes:

* Youth’s name
* Description of the service or activity completed
* Name of the provider of the required service or activity
* Date required service or activity completed

*Career Counseling, and Information and Referral Services (CCI&R)*

Counselors providing the service address the following elements of the VR process which includes a discussion of competitive integrated employment and services available at VR to assist the individual in making an informed choice whether or not to continue pursuit of employment with a 14(c) certificate holder.

CCI&R activities include:

* Counseling in self-advocacy, self-determination and high expectations
* Review of any assessment information available (e.g. Interest inventories)
* Person-centered planning
* Discussion of marketable skill
* Soft skills
* Review of labor market information
* SSA benefits planning

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

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

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

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

###### D. Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals;

###### E. Coordination necessary to satisfy documentation requirements set forth in 34 C.F.R. part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and

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

The formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains a number of provisions designed to promote communication and the sharing of technical expertise in transition planning. The agreement stipulates that the vocational rehabilitation agency must provide consultative and technical assistance services to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including employment. The agencies agree that:

* They will encourage staff to work closely with LEAs to ensure coordination between education services, pre-employment transition services, and vocational rehabilitation services.
* ICBVI and IDVR counselors will provide training and information to school district personnel, students and families on pre-employment transition and vocational rehabilitation services, including their role as IEP team members.
* ICBVI and IDVR counselors are available to consult with educators concerning preemployment transition and vocational rehabilitation services for students to assist them toward employment.
* ICBVI and IDVR counselors will collaborate with the LEAs in their service area to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.
* ICBVI and/or IDVR counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and/or student’s parent or legal guardian. VR counselors may attend either in person or via video or telephone. The ICBVI and/or IDVR counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
* ICBVI and IDVR counselors will consult with educators concerning referral of students to ICBVI and/or IDVR for rehabilitation services, including pre-employment transition services. Students with blindness or visual impairments should be referred to ICBVI.
* Students with multiple disabilities may have dual cases with both IDVR and ICBVI to provide rehabilitation services.
* ICBVI and IDVR counselors will accept referrals for pre-employment transition or vocational rehabilitation services, when appropriate, and will work collaboratively with input from the student’s IEP team, for service provision and/or to develop an IPE. The vocational rehabilitation counselor, student, student’s parent or legal guardian, and members of the student’s IEP team will collaborate to identify required vocational rehabilitation services that will move the student towards their employment goal.

The Idaho Interagency Council on Secondary Transition is established by the Superintendent of Public Instruction to advise, review, analyze, and monitor the implementation of the State’s Interagency Agreement on Secondary Transition. The authority to establish this Interagency Council lies in IDEA Section 640(b)(1)(A) and regulation 300.154. ICBVI continues to be involved in the Idaho Interagency Council on Secondary Transition with the purpose of ensuring that students with disabilities experience a collaborative, comprehensive system that facilitates a smooth transition from secondary school to adult life. The goal of this group is to increase the number of youth with disabilities who are actively engaged in postsecondary education, employment, and community activities. Interagency cooperative planning, information sharing, and the collaborative use of resources assist in accomplishing ICBVI’s mission at the state and local level.

#### k. Coordination with Employers

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

Recurring themes in the 2023 CSNA include the following:

* Through ICBVI's Pre-ETS efforts, transition-age youth have more access to employers than ever before. Work-based learning experiences are showing employers the abilities of students and youth with disabilities, which is increasing the number of employers willing to provide these experiences, particularly in rural areas.
* Business partnerships may not be considered an area of strength for ICBVI; however, it is a focus, and efforts are growing to serve this dual consumer under WIOA.
* Business/Employers were not interviewed; however, ICBVI business needs and employer barriers were discussed by ICBVI staff and partners, which included the following:
  + Perceptions/stigmas and education for employers related to the skills and abilities of hiring people with disabilities, including dispelling myths; and
  + New and updated strategies for serving business.
* The partnerships between ICBVI and the local workforce system appear to be lacking when it comes to partnering with business. There is some perception that workforce has strong relationships and access to employers, yet ICBVI is not included in these business partnerships at a statewide level.
* Businesses who responded to the survey were open to receiving help in a variety of ways, but the low response rates reveal that ICBVI needs stronger engagement with employers.

To address the needs of employers, ICBVI will pursue the following strategies:

* ICBVI will market success stories that include business and ICBVI consumers.
* ICBVI will implement strategies to develop work-based learning experiences for ICBVI consumers to increase awareness and opportunities with employers, focusing adults and other consumers who do not qualify for Pre-ETS.
* ICBVI will develop a plan to increase its partnership with IDVR and IDOL in the area of services to employers, and collectively provide services and education to employers in Idaho.

In addition to the CSNA, the Commission launched a new web site. In this site is a link for employers to request services / contact from ICBVI. As of December 2023, there have been a few requests from employers.

#### l. Interagency Cooperation with Other Agencies

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

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

The state program which carries out the statewide Assistive Technology program for Idaho is the Idaho Assistive Technology Project (IATP), housed by the Center on Disabilities and Human Development at the University of Idaho.

IATP’s goal is to increase the availability of assistive technology devices and services for older persons and Idahoans with disabilities. ICBVI and IATP have had a long-term working relationship to assist client's with assistive technology services and devices specific to the blind and visually impaired. ICBVI also has representation on the IATP Council.

The collaboration between ICBVI and IATP has improved access to AT services and devices for those individuals with blindness or visual impairments who can benefit from these services. This collaboration includes ICBVI's participation in the planning and delivery of the Tools for Life Fair.

Tools for Life is for transitioning youth with disabilities and all who support them. Attendees include educators, special educators, therapists, counselors, service providers, job developers, other rehabilitation specialists, and especially high school students with disabilities and their families.

Each year, the Fair is held in a different city in Idaho. This helps to make it more accessible to students and families across the state. The Fair travels between North Idaho, Boise and southeast Idaho.

##### 2. Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

ICBVI does not engage in any programs carried out by the Under Secretary for Rural Development of the U.S. Department of Agriculture.

##### 3. Non-educational agencies serving out-of-school youth;

While ICBVI does not engage in any cooperative agreements with any noneducational agencies who serve out of school youth, the Commission does collaborate with all WIOA Core partners to identify and engage those out of school youth in the state who are blind or visually impaired.

Out-of-school youth are encouraged to complete their high school education or pursue a formal GED program whenever possible to increase their options and access to postsecondary opportunities.  This includes referral to Idaho Career & Technical Education’s Adult Education program.  Idaho Job Corps now maintains a partnership with Idaho Universities to offer a path to a high school diploma or GED for those age 16-24.

ICBVI also connects appropriate youth to The Youth Apprenticeship Program. This program  connects people, ages 16-24, to training and careers in Idaho. The Youth Apprenticeship program provides education, work experience, and access to postsecondary education, training, and certifications.

ICBVI also partners with Job Corps to develop ways to provide students with access to paid work experiences, work readiness training, and instruction in self-advocacy in addition to attending their Job Corps courses. Job Corps is now housed in regional Universities, which makes the program and other educational opportunities much more accessible for individuals serviced by the Commission.

The Commission collaborates with IDVR for the purpose of expanding apprenticeships in the state. IDVR coordinates apprenticeships for the Title IV programs.

##### 4. State use contracting programs;

ICBVI does not engage in any state use contracting programs.

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

The Idaho Department of Health and Welfare (H&W) maintains all related programs in the state including the state Medicaid program, the state Developmental Disabilities Program, and the state Mental Health program. Under Medicaid H&W operates the Idaho Home and Community Based Services project.

Since IDVR manages the SE program for both state units, they oversee the development of policies and procedures for the program.

IDVR has collaboratively developed a draft agreement with H&W as it relates to Title XIX of the Social Security Act.

ICBVI participates in H&W sponsored trainings to support the VR staff on Medicaid services and benefits.  This training enables VR staff to assist clients and families identify how those services can support success in an employment outcome.

##### 6. State agency responsible for providing services for individuals with developmental disabilities;

ICBVI has a partnership with the Adult Developmental Disabilities Services (ADDS) program under the Department of  Health &Welfare (H&W). While there currently is no formal agreement; H&W is a WIOA core partner. ICBVI works closely with IDVR (who manages the SE program for the state) in the provision of VR services to individuals with developmental disabilities. ICBVI have also had trainings to educate VR staff on Medicaid services and benefits thus allowing ICBVI staff to better assist clients in achieving their employment goals.

The Commission has also strengthened our collaboration with the Idaho Educational School for the Deaf and Blind, and now serve an increasing number of students with developmental disabilities. These individuals are served by both the general and blind programs, resulting in a more robust model of service delivery for these individuals with the most significant disabilities.

##### 7. State agency responsible for providing mental health services; and

Under a memorandum of understanding, ICBVI and IDVR agree to collaborate on all cases in who meet ICBVI eligibility criteria and who also have secondary severe and persistent mental health diagnosis.

This team approach is used to ensure that the Idahoans served by this agreement will benefit as to remaining de-institutionalized and successfully integrated into their respective communities from a psychological, psychosocial, and employment perspective. Those client's  who have a severe and persistent mental illness deemed not eligible for the H&W-Behavioral Health program will be provided necessary VR services through ICBVI and IDVR.

ICBVI leverages the relationship with IDVR in the provision of services to individuals who are blind and visually impaired and who have significant mental health challenges. In the past two years, IDVR has represented the Title IV programs on the State Planning Council on Behavioral Health.  The purpose of this Council is to “serve as an advocate for adults with serious mental issues, children with severe emotional disturbances, and others with mental health or substance use needs. Expand, improve, notify or transform Behavioral Health service delivery system for individuals with severe mental illness, serious emotional disturbance, and substance use disorders to ensure access to treatment, prevention, and rehabilitation services, including those services that go beyond the traditional behavioral health system.

The partnership has resulted in program participants experiencing more rapid engagement in the program, a broader scope of wrap around services, and leading to more opportunities for competitive integrated employment.

##### 8. Other Federal, State, and local agencies and programs outside the workforce development system.

ICBVI has the following cooperative agreements:

**Idaho Educational Services for the Deaf and Blind (IESDB):** This agreement outlines how the two agencies will coordinate referrals, data sharing, services and communication to benefit the transition of students with blindness and visual impairments throughout the state.

**Idaho Division of Vocational Rehabilitation (IDVR)**: This Memorandum of Understanding (MOU)  establishes guidelines and policies to delineate the services both agencies will provide to individuals with disabilities. Furthermore, this agreement enhances cooperation and collaboration between the two agencies, improves inter-agency communication, and establishes staff cross-training opportunities.

ICBVI works cooperatively with the general agency, IDVR. They act as the DSE and receive the funding for Independent Living for the state of Idaho.  IDVR provides that funding (Title VII Part B) to ICBVI, as well as the State Independent Living Council (SILC) and the Centers for Independent Living (CILS) in Idaho.  ICBVI then provides the services to Idahoans who are blind or visually impaired and in need of independent living skills such as helping them re-learn to utilize their home appliances, set up their home in an accessible manner, assist them with learning the skills of shopping, communication, handling finances or other areas to improve and enhance their ability to continue to live independently.

**Tribal VR (Nez Perce Tribe, Coeur d’Alene Tribe, Shoshone/Bannock Tribe, and Shoshone/Paiute Tribe):** ICBVI, along with IDVR entered into one collaborative cooperative agreement with three of the four federally funded Tribal VR programs in the state, while also maintaining a single cooperative agreement with the fourth Tribal VR program. These revised cooperative agreements include the WIOA requirements, specifically to include address transition services to students and youth with disabilities.

**State Department of Education (SDE)**: ICBVI, along with IDVR and the Idaho SDE established and approved a Memorandum of Understanding for Transition Services for Students with Disabilities, which includes the provision of Pre- Employment Transition Services, and clarifies the roles and responsibilities of each agency.

##### 9. Other private nonprofit organizations.

ICBVI does not have cooperative agreements with private nonprofit service providers as we pay fee for service.

ICBVI has a Policy and Service Provision Agreement with several Community Rehabilitation Providers (CRP) that is updated as requested by either party. This agreement includes:

* Policies regarding the ICBVI authorization process and invoicing
* Staffing of referrals
* Dispute resolution
* Billable services
* Requirements for employment verification
* Policies around the provision of Pre-Employment Transition Services

This agreement also includes the provision of services, which include:

* All five of the required Pre-Employment Transition Services
* In-house vocational evaluations
* Community-based work evaluations
* Job search assistance
* Job readiness training
* On the job supports - short term
* On the job supports - supported employment

#### Assurances

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

**The VR agency must select the “Edit” button to review and agree to the VR State plan Assurances.**

| The State Plan must include |
| --- |
| 1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act. |
| 2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140. |
| 3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: |
| 3.a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act. |
| 3.b. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. |
| 3.c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act. |
| 3.d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3). |
| 3.e. as applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. |
| 3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. |
| 3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. |
| 3.h. the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act. |
| 3.i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act. |
| 3.j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act. |
| 3.k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act. |
| 3.l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A). |
| 3.m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act. |
| 4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will: |
| 4.a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act. |
| 4.b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act. |
| 4.c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act. |
| 4.d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act. |
| 4.e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act. |
| 4.f. comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act. |
| 4.g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act. |
| 4.h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act. |
| 4.i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs. |
| 4.j. with respect to students with disabilities, the State: |
| 4.j.i. has developed and will implement, |
| 4.j.i.A. strategies to address the needs identified in the assessments; and |
| 4.j.i.B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and |
| 4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113). |
| 4.j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services. |
| 5. Program Administration for the Supported Employment Title VI Supplement to the State plan: |
| 5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act. |
| 5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act. |
| 6. Financial Administration of the Supported Employment Program (Title VI): |
| 6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(H) and (I) of the Rehabilitation Act. |
| 6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act. |
| 7. Provision of Supported Employment Services: |
| 7.a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act. |
| 7.b. The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act. |

Do you attest that these assurances will be met?  
Yes

#### Vocational Rehabilitation (Blind) Certifications

States must provide written and signed certifications that:

##### 1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by title IV of WIOA[1], and its State Plan supplement under title VI of the Rehabilitation Act;

[1] Public Law 113-128.

###### Enter the name of designated State agency or designated State unit, as appropriate

Idaho Commission for the Blind and Visually Impaired

##### 2. In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (designated State agency or the designated State unit when the designated State agency has a designated State unit)[2]agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[3], the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations[4], policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;

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

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

[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

###### Enter the name of designated State agency

Idaho Commission for the Blind and Visually Impaired

##### 3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency, or the designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the administration of the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[5], the Rehabilitation Act, and all applicable regulations[6], policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;

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

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

##### 4. The designated State unit or, if not applicable, the designated State agency has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c);

##### 5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

##### 6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

##### 7. The (enter the name of authorized representative below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;

###### Enter the name of authorized representative below

Beth Cunningham

Administrator

##### 8. The (enter the title of authorized representative below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;

###### Enter the title of authorized representative below

Mike Walsh - Rehabilitation Services Chief

Beth Cunningham - Administrator

##### 9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

##### [1] Public Law 113-128. [2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph. [3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act. [4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361. [5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act. [6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

[1] Public Law 113-128.

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

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

[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

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

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

##### Certification Signature

**To review and complete the Certification section of the VR portion of the State plan, please select the “Edit” button.**

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open [this link to the blank table](/node/578531). You can copy and paste the table into the narrative field, and start over if needed.

| Signatory information | Enter Signatory information in this column |
| --- | --- |
| **Name of Signatory** | Beth Cunningham |
| **Title of Signatory** | Administrator |
| **Date Signed** | 2/26/2024 |

#### Vocational Rehabilitation Program Performance Indicators

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan’s approval (section 116(b)(3)(A)(iv) of WIOA).

**Effectiveness in Serving Employers**

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

| Performance Indicators | PY 2024 Expected Level | PY 2024 Negotiated Level | PY 2025 Expected Level | PY 2025 Negotiated Level |
| --- | --- | --- | --- | --- |
| Employment (Second Quarter After Exit) | 64.9% | 65.5% | 64.9% | 66.0% |
| Employment (Fourth Quarter After Exit) | 62.7% | 63.2% | 62.7% | 63.7% |
| Median Earnings (Second Quarter After Exit) | $4,951 | $5,000 | $5,075 | $5,075 |
| Credential Attainment Rate | 63.7% | 63.7% | 65.2% | 65.2% |
| Measurable Skill Gains | 57.5% | 57.5% | 58.9% | 58.9% |
| Effectiveness in Serving Employers | Not Applicable [1](#footnote-1) | Not Applicable [1](#footnote-1) | Not Applicable [1](#footnote-1) | Not Applicable [1](#footnote-1) |

*1*

*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

#### GEPA 427 Form Instructions for Application Package - Vocational Rehabilitation

**EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES**

OMB Control Number 1894-0005 Expiration 02/28/2026

**Section 427 of the General Education Provisions Act (GEPA)** ([20 U.S.C. 1228a](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

**GEPA Section 427 Form Instructions for State Applicants**

**State applicants must respond to the following four questions:**

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

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

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

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

• Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.

• Applicants use the associated text box to respond to each question.  However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans.  In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.

• Applicants are not required to have mission statements or policies that align with equity to apply.

• Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.

• Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to [GEPA 427 - Form Instructions for Application Package](https://wioaplans.ed.gov/node/584561)

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

***Section 427 of the General Education Provisions Act (GEPA)****(*[*20 U.S.C. 1228a*](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)*) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

[*GEPA 427 - Form Instructions for Application Package*](https://wioaplans.ed.gov/node/584561)

***State applicants must respond to four questions.***

***The first of four questions is:***

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

Idaho Commission for the Blind and Visually Impaired Mission Statement:

"The mission is to empower people who are blind or visually impaired by providing vocational rehabilitation, skills training, and educational opportunities to achieve self-fulfillment through quality employment and independent living. "

ICBVI's mission is fulfilled through the provision of vocational rehabilitation programs and services. ICBVI ensures equitable access to all services and activities by its commitment to customize all service plans individually to each participant.  Below is a list of services and how we ensure that all of our clients have access to them.

1.           **Pre-Employment Transitions Services for youth ages 14-21.**  ICBVI provides a variety of transition services to meet the needs of clients from all over the state.  Although ICBVI offers an in-person summer work experience program in Boise, it also offers virtual programs and local programs in the regions, which are customized to the individual for students who do not wish to leave home for a period of time during the summer.

2.           **To prepare individuals for competitive integrated employment in high demand occupations and careers.**ICBVI collaborates with WIOA core partners to identify up-to-date information on high demand careers to inform our practices around the provision of pre-employment transition services and vocational guidance and counseling services.

3.           **Skills training that enables individuals to be independent in their homes and be engaged in their communities.**  Our rehabilitation teachers provide these independent living skills to individuals in their homes.  To prepare for employment, an orientation and mobility instructor may provide specific mobility training from the participants home to the their place of employment.

4.           **Vocational guidance and counseling, career and training services, and job placement supports and services.**  ICBVI’s vocational rehabilitation counselors work with their clients in their homes, communities or in our office to ensure all clients are able to participate.  Each counselor tailors the services provided to the individual based on their interests and career goals.

5.           **Counseling to address adjustment issues related to vision loss and blindness.  One of the benefits of ICBVI’s Assessment and Training Center is its discussion class.**  This is a class that is held weekly that brings up a topic that relates to the adjustment to blindness.  After listening to a chosen experience, staff and students share their own experiences and this helps to provide both bonding and support as each participant navigates their own adjustment experience.  The fact that ICBVI employees teachers who are blind and visually impaired and who have also been through the experience of losing their vision is another way that ICBVI’s services provide inspiration and mentorship to clients.  At this time, 25% of the ICBVI staff are blind or visually impaired.

**6.  Resources for employers who hire or retain employees who are blind or visually impaired.**  ICBVI prides itself on being a resource to the community and to the employers who hire its clients.  Staff are willing and able to provide training on blindness etiquette, ADA accommodations and assistive technology that might be utilized by blind employees.  In addition to being a resource for employers, ICBVI also works with its clients in these areas to ensure client access to any needed technology to participate in its services and in employment.

**7.  Training in adaptive skills for reading, computer use, transportation, job seeking and other skills that promote independence and increase work readiness.** ICBVI’s Assessment and Training Center (ATC) works with each client starting at their level to provide skills in Braille, non-visual computers, orientation and mobility, vocational guidance and exploration, activities of daily living and industrial arts.  Some students who need more skills building than others will attend the ATC training program several times until they acquire the skills they need to be independent.  This is very individualized.

**8.  Supported and customized employment programs for individuals with the most significant disabilities.**ICBVI provided supported and customized employment services to ensure all eligible individuals with the most significant disabilities have equal access to competitive integrated employment.

**9. Engaging employers, parents, local education agencies, businesses, and other key stakeholders in training and education regarding the abilities and potential of people who are blind or visually impaired**.  This is another way that ICBVI reaches out to ensure access to services.  By listening to the needs of all of these stakeholders, ICBVI can adapt services to meet the needs of the community.

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

***Section 427 of the General Education Provisions Act (GEPA)****(*[*20 U.S.C. 1228a*](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)*) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

[GEPA 427 - Form Instructions for Application Package](https://wioaplans.ed.gov/node/584561)

***State applicants must respond to four questions.***

***The second of four questions is:***

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

1. Transportation is undoubtedly one of the most significant barriers faced by the blind and visually impaired.
2. Linguistic barriers  - Although most of the EL population in Idaho are Spanish speakers, we also serve individual's  and families from a variety of  cultures and linguistic backgrounds.  Resources for parents and families are routinely provided in English and Spanish, but few resources are available in other languages.
3. Rural and low socioeconomic status (SES) - Idaho is primarily a rural state.
4. Access to Wi-Fi or other technologies.

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

***Section 427 of the General Education Provisions Act (GEPA)****(*[*20 U.S.C. 1228a*](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)*) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

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***State applicants must respond to four questions.***

***The third of four questions is:***

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

1. Transportation - Steps we are going to take can be found in the Goals and Priorities section of this plan.
2. Linguistic barriers - ICBVI has a staff member who can provide Spanish translation when needed. ICBVI will continue to provided written materials in Spanish, and will also provide translation services via Language Link.
3. Rural and low socioeconomic status (SES) - ICBVI will continue it's outreach efforts to rural communities and individuals with low SES. Outreach is address in the Goals and Priorities of this plan.
4. Access to Wi-Fi or other technologies -  Ensure all technology needs are addressed by the counselors in the individuals comprehensive assessment. ICBVI can support client's through rehabilitation technology services, as well as any start-up costs needed for Wi-Fi or related service. Counselors can also refer client's to any state or federal resources that may be available.

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

***Section 427 of the General Education Provisions Act (GEPA)****(*[*20 U.S.C. 1228a*](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)*) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

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***State applicants must respond to four questions.***

***The final of four questions is:***

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

1. Transportation

* Continue to address transportation needs of clients in the comprehensive assessment.
* Ensure all regions have ICBVI representation in their regional transportation council (one year).
* Develop a resource list for each of the regional offices (one year)

1. Linguistic barriers

* Continue to provide translation services and materials in Spanish (on-going).
* Continue to utilize Language Link for translation services (on-going).

1. Rural and low socioeconomic status (SES)
   1. Continue outreach efforts to rural communities and agencies who serve individuals and families of low SES (on-going).
2. Access to Wi-Fi or other technologies
   1. Continue to address all technology needs of individuals in the comprehensive assessment (on-going).
   2. Develop / provide a resource list for each regional office (one year).

#### GEPA 427 Form Instructions for Application Package - Supported Employment

**EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES**

OMB Control Number 1894-0005 Expiration 02/28/2026

**Section 427 of the General Education Provisions Act (GEPA)** ([20 U.S.C. 1228a](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

**GEPA Section 427 Form Instructions for State Applicants**

**State applicants must respond to the following four questions:**

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

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

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

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

• Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.

• Applicants use the associated text box to respond to each question.  However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans.  In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.

• Applicants are not required to have mission statements or policies that align with equity to apply.

• Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.

• Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to [GEPA 427 - Form Instructions for Application Package](https://wioaplans.ed.gov/node/584561)

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

***Section 427 of the General Education Provisions Act (GEPA)****(*[*20 U.S.C. 1228a*](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)*) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

[*GEPA 427 - Form Instructions for Application Package*](https://wioaplans.ed.gov/node/584561)

***State applicants must respond to four questions.***

***The first of four questions is:***

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

ICBVI does not receive Supported Employment funds (Title VI).

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

***Section 427 of the General Education Provisions Act (GEPA)****(*[*20 U.S.C. 1228a*](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)*) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

[GEPA 427 - Form Instructions for Application Package](https://wioaplans.ed.gov/node/584561)

***State applicants must respond to four questions.***

***The second of four questions is:***

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

ICBVI does not receive Supported Employment funds (Title VI).

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

***Section 427 of the General Education Provisions Act (GEPA)****(*[*20 U.S.C. 1228a*](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)*) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

[*GEPA 427 - Form Instructions for Application Package*](https://wioaplans.ed.gov/node/584561)

***State applicants must respond to four questions.***

***The third of four questions is:***

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

ICBVI does not receive Supported Employment funds (Title VI).

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

***Section 427 of the General Education Provisions Act (GEPA)****(*[*20 U.S.C. 1228a*](https://www.govinfo.gov/content/pkg/USCODE-2020-title20/html/USCODE-2020-title20-chap31-subchapII-part2-sec1228a.htm)*) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education.  The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

[*GEPA 427 - Form Instructions for Application Package*](https://wioaplans.ed.gov/node/584561)

***State applicants must respond to four questions.***

***The final of four questions is:***

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

ICBVI does not receive Supported Employment funds (Title VI).