**Idaho Commission for the Blind and Visually Impaired**

**PY 2020-2023 State Plan**

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

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

\_\_\_\_\_\_\_\_\_\_

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

#### a. Input of State Rehabilitation Council

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

##### 1. Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council’s functions;

The Idaho Commission for the Blind and Visually Impaired (ICBVI) falls under a Commission of 5 Board Members (ICBVI Board) who are appointed by the Governor of Idaho. The ICBVI Board holds four meetings a year that are open to the public and a designated consumer input time is always on the agenda. The ICBVI Board reviews and approves all policy regarding the Vocational Rehabilitation Program at ICBVI. Any recommendations by the ICBVI Board are discussed at the public meetings.

##### 2. The designated State unit's response to the Council’s input and recommendations; and

 Does not apply (see a(1))

##### 3. The designated State unit’s explanations for rejecting any of the Council’s input or recommendations.

 Does not apply (see a.(1)).

#### b. Request for Waiver of Statewideness

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

##### 1. A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;

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

##### 2. The designated State unit will approve each proposed service before it is put into effect; and

The state unit may provide services in one or more political subdivisions of the state that increase services or expand the scope of services that are available statewide under this State Plan if the:

a. non-federal share of the cost of these services is met from funds provided by a local public agency, including funds contributed to a local public agency by a private agency, organization or individual;

b. services are likely to promote the vocational rehabilitation of substantially larger numbers of individuals with disabilities or of individuals with disabilities with particular types of impairments; and

c. state, for purposes other than the establishment of a community rehabilitation program or the construction of a particular facility for community rehabilitation program purposes, requests in attachment 4.7(b)(3) a waiver of the state wideness requirement in accordance with the following requirements:

* identification of the types of services to be provided;
* written assurance from the local public agency that it will make available to the state unit the nonfederal share of funds;
* written assurance that state unit approval will be obtained for each proposed service before it is put into effect; and
* written assurance that all other State Plan requirements, including a state’s order of selection, will apply to all services approved under the waiver.

##### 3. Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Contributions, consistent with the requirements of 34 CFR 361.60(b)(3)(ii), by private entities of earmarked funds for particular geographic areas within the state may be used as part of the nonfederal share without the state requesting a waiver of the state wideness requirement provided that the state notifies the commissioner that it cannot provide the full nonfederal share without using the earmarked funds.

#### c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System

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

##### 1. Federal, State, and local agencies and programs;

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.

**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.

##### 2. State programs carried out under section 4 of the Assistive Technology Act of 1998;

ICBVI does not engage in any cooperative agreements carried out under section 4 of this Act. ICBVI does not maintain any contracts or vendor agreements in order to provide assistive technology (AT) to clients.

##### 3. 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.

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

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.

##### 5. State use contracting programs.

ICBVI does not engage in any state use contracting programs.

#### d. Coordination with Education Officials

Describe:

##### 1. The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students

In collaboration with the Transition Coordinator, 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:

Idaho State Department of Education - July 2018

Idaho Educational Services for the Deaf and Blind - November 2019

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.

ICBVI’s Project Coordinator for Transition Services is working with all state-wide LEA’s to educate and inform them of Pre-ETS activities. This individual is also communicating 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.

*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. Information on the formal interagency agreement with the State educational agency with respect to:

###### A. Consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;

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.

###### B. Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

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 facilitate the development and implementation of Individualized Education Programs (IEP). The agencies agree to cooperate in the development of transitioning students’ IEP and any relevant Individual Plan for Employment (IPEs). Development of the IEP is vested with the IEP team, including the student and his/her parent or guardian. Approval of the IPE is vested with the IDVR or ICBVI, the student and his/her parent or guardian.

Idaho Interagency Council on Secondary Transition:

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. IDVR 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 students 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. Members include the Idaho State Department of Education, Idaho Division of Vocational Rehabilitation, Idaho Commission for the Blind and Visually Impaired, Idaho Educational Services for the Deaf and Blind, Idaho Parents Unlimited, Council on Developmental Disabilities, Department of Labor, Boise State University, Idaho State University, The Assistive Technology Project (administered by the University of Idaho), Idaho Health and Welfare, Juvenile Corrections, Department of Correction, and LEAs.

###### C. Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

Idaho State Department of Education (SDE) - Secondary Transition: Idaho Commission for Blind and Visually Impaired (ICBVI), Idaho Division of Vocational Rehabilitation (IDVR), and the State Department of Education (SDE) currently have a formal cooperative agreement. This agreement ensures a coordinated, comprehensive system focusing on students with disabilities as they transition from secondary school to post-school activities, promoting post-secondary education, vocational training, competitive integrated employment (including supported employment), continuing and adult education, adult services, independent living, and community participation emphasizing a team approach to facilitate the transition of students with disabilities from public education into employment.

This agreement addresses the following:

* Roles and responsibilities of each agency
* Financial responsibilities of each agency, including the purchase of Assistive Technology
* Outreach and technical assistance
* Transition planning
* Referral process for students with disabilities to the appropriate VR program
* Data release and data sharing
* Planning to include timeframes for development of the IPE
* Service delivery
* Dispute resolution
* Coordination and documentation requirements under section 511
* Prohibition on entering into an arrangement with an entity holding a 14(c)-special wage certificate for the purpose of operating a program where people with disabilities are engaged in work at subminimum wage.

The current agreement establishes the following roles and responsibilities for the involved parties.

The Idaho State Department of Education (SDE) agrees:

* To assume the role of lead agency in facilitating interagency planning with LEAs and implementation of educational programs and transitional services for youth with disabilities in transition from high school to post-high school services.
* To support LEAs in their efforts to write IEPs using an outcome-oriented focus and to coordinate transition activities for each eligible student, beginning no later than the IEP before the student turns age 16 years (earlier if appropriate), and to address future student needs in the areas of employment, post-secondary education, vocational training; and adult living and community participation, including assistive technology.
* To invite ICBVI and /or IDVR to provide information regarding their services, including their role as an IEP team member, to school district personnel, students and their families.
* To invite ICBVI and /or IDVR counselors, with prior consent from adult students or parents or legal guardians, as appropriate, to participate as members of IEP teams for students who have been referred of ICBVI and/or IDVR for rehabilitation services.
* To work with ICBVI and IDVR Vocational Rehabilitation (VR) counselors to identify a process for such counselors to provide input and participate in the development of a student’s IEP, including pre-employment transition services, when appropriate.
* To identify appropriate school personnel who, with prior consent from adult students or parents or legal guardians, as appropriate, will initiate the referral process of students receiving special education services, and students who have a 504 Plan (Rehabilitation Act of 1973), or students with disabilities (e.g., physical, medical, or visual, etc.) who are not eligible for special education services, to IDVR and/or ICBVI for pre-employment transition services and/or vocational rehabilitation services.

Idaho Commission for the Blind and Visually Impaired (ICBVI), and the Idaho Division of Vocational Rehabilitation (IDVR) agree:

* To encourage staff to work closely with school district personnel to ensure coordination between education services and vocational rehabilitation services.
* That ICBVI and IDVR counselors will provide training to school district personnel, students and families on all aspects of vocational rehabilitation services, including their roles as IEP team members.
* That ICBVI and IDVR counselors are available to consult with educators concerning vocational rehabilitation services for transitioning students to assist them toward employment.
* That ICBVI and IDVR counselors will collaborate with the school districts in their service areas to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.
* That ICBVI and IDVR counselors will consult with educators concerning referral of students to ICBVI and/or IDVR for rehabilitation 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 providing rehabilitation services
* That ICBVI and IDVR counselors will accept referrals, when it is appropriate based on the individual needs of the student, to determine eligibility and will work collaboratively, with input from the student’s IEP team, to develop IPEs. 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 move the student to their employment goal.
* That 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. The ICBVI and/or IDVR counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
* All state plan requirements, including a state’s order of selection, will apply to all services provided under this cooperative agreement.

The Idaho Commission for the Blind and Visually Impaired (ICBVI) agrees:

* To continue serving school districts across the state. All Idaho school districts are served through each regional office. ICBVI does not maintain any cooperative agreements with school districts specific to the funding of school to work transition counselors.

###### D. Procedures for outreach to and identification of students with disabilities who need transition services.

ICBVI, IDVR, and the State Department of Education (SDE) currently have a formal cooperative agreement.

The agreement stipulates that ICBVI will initiate outreach and work with the LEAs to identify potential students with disabilities who need pre-employment transition services and VR transition services for students aged 14-21. This involves informing the student, or when appropriate their parent or legal guardian, as early as possible about the vocational rehabilitation program, its purpose, eligibility criteria, application procedures, and the scope of available VR services, to include pre-employment transition services.

The Commission also engaged key stakeholders in the state through the following activities:

* Collaboration at regional special educator meetings.
* Presenting at statewide administrator meetings.
* Presenting at the Tools for Life Conference to parents, students, and educators.
* Outreach to Idaho Parents Unlimited.
* Participation in the Idaho Interagency Council on Secondary Transition.
* Ongoing collaboration with the Idaho State Department of Education.
* Ongoing collaboration with the Idaho Educational Services for the Deaf and Blind.

Outreach strategies to identify students who need transition services include:

* Counselors and Rehabilitation Teachers are assigned to the school districts in their regions. Staff participate in district transition councils, meetings, and trainings.
* The ICBVI Transition Coordinator participates in district In-Service trainings across the state.
* The MOU with IESDB emphasizes regional collaboration, data sharing, and identifying secondary school students in Idaho who are blind or visually impaired.

The Commission currently working on developing specific goals to improve outreach, which include:

* Creating training and materials that will increase students’ understanding about the VR process and services.
* Create opportunities and materials to use with families to increase their understanding VR Services.
* Increasing outreach activities to rural communities in Idaho.

Since the implimentation of WIOA in 2016, most students are still currently being served in the VR program. While the relationship between outreach strategies and employment outcomes is unknown at this time, ICBVI does recognize the need for program evaluation methodologies that include measures such as these.

#### e. Cooperative Agreements with Private Nonprofit Organizations

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

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 11 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

#### f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

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

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.

#### g. Coordination with Employers

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

##### 1. VR Services; and

Through coordinated engagement, ICBVI and its workforce development partners will contribute to a more prosperous Idaho, providing businesses with talented job seekers to fill skill gaps and Idahoans living with blindness or visual impairments with the rehabilitation, training, and employment services needed to thrive in Idaho workplaces and communities. Employers may request an Assistive Technology (AT) assessment in order to hire a person with a visual impairment or who is blind. ICBVI will provide this service at no expense to the employer. This assessment may include website and network software accessibility as well as job site accommodations. ICBVI has an AT Technologist that assists all of the  VR counselors in life skills assessments  job site accommodations. Additionally, in 2019, ICBVI appointed the Statewide AT Technologist to coordinate business engagement activities in the state. ICBVI will work collaborative with the Idaho Department of Labor and the IDVR Business Engagement Team in achieving WIOA business outreach activities.

In early 2020, ICBVI staff will attend an IDVR strategic planning session with their Business Engagement Team (BET). The outcome of this training will be to facilitate a vision and plan for ICBVI services to businesses. Another natural outcome of participating in this planning session will be to develop a collaborative approach to business engagement activities for the VR programs.

ICBVI will continue to work with employers to provide general and customized technical assistance and support services to businesses and industries including input from employers in the 2020 Comprehensive State-wide Needs Assessment (CSNA):

* Through collaboration with employers to increase internship, mentoring, and training opportunities for ICBVI participants;
* By providing training in blindness and visual impairments to employers;
* By increasing visibility to employers in Idaho through marketing and outreach to businesses; and
* Through collaboration with One-Stop partners in the coordination of services to businesses (emphasis on collaboration with IDVR).

ICBVI will also focus on areas of need identified in the 2020 CSNA in respect to recommendations on how to improve business partnerships to engage employers in recruiting and hiring individuals who are blind or low vision:

* Greater community awareness and education of individuals who are blind or visually impaired, especially in rural communities;
* Increase visibility and engagement in rural communities;
* Provide quality training and job placement services; and
* Provide outreach and education to communities and employers on ICBVI services.

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

Pre-Employment Transition Services -

In addition to regional activities that are put on throughout the year, ICBVI host three main summer programs:

Work Readiness Camp – This one-week program is a collaborative effort between ICBVI, IESDB, and IDOL. This program focuses on job readiness skills, and helps to prepare students for summer employment experiences, or participation in our SWEP program.

College Days – This one-week program is for students who plan to pursue higher education after high school. This program is a collaborative effort between ICBVI, IDOL, and Boise State University.

Summer Work Experience Program - Every summer, ICBVI hosts transition aged students with disabilities (SWD) for a 7-week Summer Work Experience Program (SWEP) in Boise. Students eligible for Pre-ETS from across the state participate in the SWEP program. Throughout the program, all of the five required Pre-Employment Transition Services, as identified under WIOA, are delivered. ICBVI staff work with community employers to host our students for a work experience program. Students are paired with employers based upon interest and ability.

In addition, ICBVI’s Project Coordinator for Transition Services, in collaboration with regional staff, will develop and implement Pre-ETS activities and programs in every region of the state.

In 2018, ICBVI launched a innovation program entitled the Visually Impaired Students Transitioning in to Adulthood (VISTA) Leadership Program. This program is specifically for transition aged students who are eligible for Pre-Employment Transition Services (Pre-ETS).

The definition of leadership, for the purposes of this program, is more contemporary from a theoretical perspective, with a student-informed emphasis to program design. This contemporary, strength-based approach; which leverages the student's contextual resources (e.g., healthy relationships, engagement and access to community) is consistent with the theories of positive youth development.

There are 3 elements that make up the foundation of the VISTA Leadership Program:

* Social Emotional Learning
* Service Learning
* Mentoring (both peer and adult)

The formal program is one-year in length, and graduates of the VISTA Leadership Program mentor and support the incoming cohort and will continue to be supported up to their 22nd birthday, or in the event they are no longer eligible for Pre-ETS.

#### h. Interagency Cooperation

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

##### 1. The State Medicaid plan under title XIX of the Social Security Act;

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.

##### 2. The State agency responsible for providing services for individuals with developmental disabilities; and

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.

##### 3. The State agency responsible for providing mental health services.

Under cooperative agreement, ICBVI leverages the relationship between IDVR and H&W-Behavioral Health via their agreement (updated annually) for the purpose of better serving Idahoans experiencing severe and persistent mental illness. As part of their agreement, the Department of Health and Welfare provides certifiable non-federal monies for IDVR services; explained in their interagency cooperative agreement.

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. A designated IDVR counselor and staff member are assigned to an H&W Behavioral Health Region to better serve customers.The ICBVI counselor is a critical part of the treatment team with these shared cases.

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.

#### i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development

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

##### 1. System on Personnel and Personnel Development

###### A. Qualified Personnel Needs

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

i. The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

In PY 2019, 420 participants were served in the VR program through 37.5 ICBVI staff. Personnel categories are broken down in the next section (ii).

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

ICBVI currently employs a total of 37.5 staff necessary to provide VR services. The breakdown of personnel is as follows:

Professional Staff:

* 1 Administrator
* 1 Rehabilitation Services Chief
* 4 Program Managers
* 6 Senior VR Counselors for the Blind\*
* 13.5 Instructors for the Blind (includes the State Wide Assistive Technologist / Business Services Coordinator)
* 1 Project Coordinator for Transition Services.

Administrative staff:

* 1 IT Technology Senior
* 2 Fiscal Technician
* 5 Vocational Rehabilitation Assistants
* 1 Management Assistant
* 1 BEP specialist
* 1 Receptionist

  \* Requirements for Senior VR Counselor for the Blind are consistent with the national standard of CRC. Individuals who do not meet those standards are designated Counselor for the Blind. All counselors currently employed at ICBVI are designated Senior Counselor of the Blind.

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

ICBVI anticipates its current number of staff (37.5) will be required to provide VR services, based upon projections.

Additionally, ICBVI projects 4 staff retiring in the next 5 years:

Professional- Administrative Services Manager (1), Vocational Rehabilitation Counselor (1), Instructor of the Blind (1).

Administrative - Financial Technician (1).

###### B. Personnel Development

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

i. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

The University of Idaho is currently the only institution of higher education in the State that offers a VR program in Idaho.  However, in 2020 the University will be sunsetting this program.

Idaho State University is considering and exploring the possibility of a new Master’s in Counseling program which will include a track for Rehabilitation Counseling.  This program is likely to move forward in 2020 and is anticipated to be offered in two Idaho locations and will accommodate 25 students. They also offer a category “R” education program for individuals who have related master’s degrees and need up to six additional courses to be eligible to sit for the CRC exam. The 'Category R' program is intended to bridge the gap between traditional counseling programs and the specific requirements of rehabilitation counseling by outlining coursework and employment requirements to attain a CRC including Counseling Theory, Foundations of Rehabilitation Counseling, Assessment, Occupational Information/Job Placement, Medical and Psychosocial Aspects of Disability, and Case Management and Rehabilitation Services.  Completion of this program allows for an expedited path to a CRC for field staff with degrees in allied disciplines.

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

The University of Idaho is expecting 19 graduates in 2020 and no further students will graduate as the program is ending.

iii. The number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

The University of Idaho  Rehabilitation Counseling Program did not have any graduates this past academic year since they accept applications for students every other year and the current cohort started Summer 2018.   One student from the 2016 cohort changed to part-time and is on track to graduate with the current cohort. U of I received a record number of applications for the current cohort of students and expect to have 19 graduates Spring of 2020. All students are registered to take the Certified Rehabilitation Counselor Exam the Spring of 2020.

##### 2. Plan for Recruitment, Preparation and Retention of Qualified Personnel

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

ICBVI plans for recruitment will be to continue to recruit qualified staff from the University of Idaho 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, we employ 16 individuals with a disability, eleven of whom are blind or visually impaired and 2 individuals are from a minority background. With a total staff of 40, this amounts to 40% of ICBVI’s staff.

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.

##### 3. Personnel Standards

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

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

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 145 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. 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.

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 order for staff to have a 21st century understanding of the evolving labor force and needs of individuals with disabilities, ICBVI is committed to providing training and support in the following:

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

##### 4. Staff Development

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

###### A. A system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

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.

###### B. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

Succession planning and leadership development are discussed and emphasized to assist staff to enhance current skills or to build their skills for future opportunities for advancement within the agency. ICBVI has a policy to promote from within, which gives opportunities for current employees to advance and remain with the agency.

ICBVI continues to look for opportunities to collaborate on training and staff development with the Department of Education and the schools. ICBVl coordinates its CSPD activities with those provided under IDEA. ICBVI currently participates in:

* The Idaho Interagency Council on Secondary Transition;
* The Transition Institute;
* Tools for Life Conference;
* Independent Living Conference;
* Training and conferences provided by the Association for the Education and Rehabilitation for the Blind and Visually Impaired (AER);and
* Collaborative training with the Idaho Educational Services for the Deaf and Blind.

ICBVI will continue to work closely with the Idaho Educational Services for the Deaf and Blind addressing the needs of the transition population of the blind or visually impaired.

Throughout the year, training requests are approved for individual and group training in areas of interest or need. A variety of platforms are utilized for dissemination, including face-to-face training, conferences, and online webinars.

##### 5. Personnel to Address Individual Communication Needs

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

ICBVI employees that are fluent in Spanish are recruited to serve the needs of the Hispanic communities located throughout the state.

ICBVI has chosen to purchase 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.

##### 6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act

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

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. Additional training and education will be identified for staff regarding new services, new coordination and best practices in serving students with disabilities. VR counselors throughout the state will serve on regional Special Education and Transition Boards and Councils.

#### j. Statewide Assessment

##### 1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:

###### A. With the most significant disabilities, including their need for supported employment services;

ICBVI completed a Comprehensive Statewide Needs Assessment (CSNA) in FFY 2020 in accordance with the requirements of Section 101.15 of the Rehabilitation Act as amended. Three separate surveys were developed to thoroughly assess the needs of Idahoans who are blind or visually impaired. The survey participants included a sample of VR clients (*n* = ICBVI clients served within the time frame October 1, 2018 through September 30, 2019), all ICBVI staff, and a sample of employers and other key informants.

According to 2017 ACS estimates, 2.9% of the population reported a visual disability in Idaho, which is a higher than the percentage reported in the U.S (2.3%). It should be noted that the population reporting a visual disability in Idaho increased from 2.3% in 2015 to 2.9% in 2017. The percentage of individuals living in Idaho with a visual disability ages 18-34 (1.31%) is slightly higher than the US population (1.13%)

According to the results of the 2020 CSNA, the most common themes that emerged in the area of rehabilitation needs of blind and visually impaired individuals in the state were:

* Lack of transportation was identified as the major barrier to employment for individuals who are blind or low vision in Idaho.
* Societal attitudes, family attitudes, and employer attitudes regarding individuals who are blind or low vision continues to be a major barrier in Idaho.
* Independent living and mobility skills are seen as a major need of ICBVI clients.
* Access to career services, education and employment training programs.

###### B. Who are minorities;

According to the results of the 2020 CSNA, individuals who are blind or low vision and also Hispanic or Native American may be underserved by ICBVI. The existing data indicated a low percent of Hispanic cases served by ICBVI in relation to the percent of the population with any disability in the Hispanic category.

The prevalence by race/ethnicity and vision disability in Idaho and the U.S. are based on 2017 ACS estimates. The prevalence of vision disability for Idahoans is higher than the U.S. in two categories, white and other. The prevalence of vision disability for White Idahoans (2.9%) is higher than in the U.S. (2.4%). The prevalence of vision disability for Idahoans who identify as Other (4.0%) is higher than in the U.S (1.5%).  The percentage of Idahoans who identify as Hispanics with vision disability is the same (2.1%) than the percentage of Hispanics with a vision disability in the US.

Idaho’s population is expected to grow by 15.3% between 2015 to 2025, while the growth rate for Hispanics the state’s largest minority, is expected to be 14.9%. ICBVI is cognizant of this change and will continue and expand outreach efforts to match this growth.

###### C. Who have been unserved or underserved by the VR program;

According to the results of the 2020 CSNA, almost all participants surveyed commented on the rural nature of Idaho and the difficulty in providing services with limited financial and staff resources. Along this theme the lack of information in rural areas about ICBVI was also noted.

The WIOA Advisory Group has clearly identified rural areas as a traditionally underserved population. ICBVI regional counselors and rehabilitation teachers have always served rural communities; often times in the manner of home visits. ICBVI will continue to provide services (and expand as funding allows) more rural communities.

###### D. Who have been served through other components of the statewide workforce development system; and

ICBVI recognizes the need to increase partnerships with the statewide workforce system to develop innovative programs to serve co-enrolled individuals. ICBVI staff and counselors are committed to providing ongoing training of One Stop Center staff on issues related to blindness and visual impairments. Other strategies include continuing to expand partnerships and encourage coordination of services, developing of new ways to provide for job creation or to provide incentives to employers, and to work cooperatively to remove barriers and stigmas in the workplace.

###### E. Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

According to the 2020 CSNA, the most common themes that emerged in this area are:

* Collaboration with Local Education Agencies (LEA) / school districts needs to increase.
* Transition-age youth need more engagement in the workforce.
* Increase collaboration with WIOA partners to develop internships and other work based learning activities.
* There is lack of information regarding ICBVI services and opportunities.

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

According to the 2020 CSNA, there is a need to improve the collaboration with CRP’s in job training and placement services in the state for ICBVI clients.

To accomplish this, ICBVI will:

* Commit to annually reviewing CRP cooperative agreements and collaboratively identify areas for service improvement;
* Commit to providing training and support  with  CRP’s to help them increase their capacity to provide all employment services, including Pre-Employment Transition Services (Pre-ETS).
* Continue to provide CRP’s training in blind skills, and how to work with individuals who are blind or visually impaired. This has been a huge success, and ICBVI is committed to continue doing this in all of the regions across the state as a part of this state plan.

##### 3. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act

Current (2020) data from the Idaho Educational School for the Deaf and Blind (IESDB) reveals that there are 111 students identified in Idaho who are blind or visually impaired (this number does not account for home schooled youth).

According to the 2020 CSNA, the most common themes that emerged in the needs of students include:

* Improve access to assistive technology and training.
* Supports for transition from high school to college.
* Independent living skills training.
* More work-based learning experiences.

Recommendations to improve Transition Services include:

* Provide multiple and a broad variety of work-based learning experiences.
* Increased cross-training and collaboration between agencies and organizations.
* Improve marketing efforts of ICBVI transition services.
* Engage students at a younger age.

To address these needs, the ICBVI Project Coordinator for Transition Services is collaborating with  Local Education Agencies (LEAs) in all five administrative regions. This collaboration  includes an assessment to determine what transition services were currently being provided by the LEA, and to determine the need for additional pre-employment transition services. The Transition Project Coordinator  also provides technical assistance regarding service changes as a result of WIOA.

Using information provided by the LEAs and Regional ICBVI staff, the Project Coordinator for Transition Services will continue to develop statewide programs founded on the evidence-based practices that are aligned to the five authorized Pre-ETS categories. The Transition Project  Coordinator also collaborates with LEAs, institutions of higher education, state and federal programs serving students, and employers to enhance pre-employment transition services provided around the state.

The Project Coordinator for Transition Services is also employing marketing strategies and developing materials to reach students and youth in transition and school district personnel to inform parents, educators, administrators, and others about the ICBVI Vocational Rehabilitation program.

ICBVI / IDVR and the SDE have developed a comprehensive formal interagency agreement which addresses collaborative service provision. In addition, ICBVI participates in the planning and coordination of an annual Transition Institute for VR program staff and educators across the state.

The current CSNA clearly articulates the need for both the required and authorized Pre-ETS activities. In responses to this, ICBVI has completed its fiscal forecasting for Pre-ETS, and it is included in the 2020 CSNA. ICVBI will review this forecasting on an annual basis.

#### k. Annual Estimates

Describe:

##### 1. The number of individuals in the State who are eligible for services

following are derived from Table S1811 at American Community Survey (ACS):

In FFY 2020, the number of individuals with disability in Idaho (16 and older), and who are eligible for participation in the workforce is 67087.

In FFY 2021, the number of individuals with disability in Idaho, and who are eligible for participation in the workforce is 68893.

Data in the 2020 CSNA suggests that 2.2% of the disability population in Idaho have a visual disability. Therefore, we can estimate the number of individuals in the state to be eligible for services to be:

FFY2020 – 1476 individuals

FFY 2021 – 1516 individuals

##### 2. The number of eligible individuals who will receive services under:

###### A. The VR Program;

The number of clients served by ICBVI is diminishing. Historic rates of low unemployment across Idaho and new mandates created by WIOA are likely factors in this recent downturn.

The following are from the ICBVI 2020-2023 Strategic Plan:

In FFY 2020, Title I, Part B the number of eligible individuals is estimated to be 350.

In FFY 2021, Title I, Part B the number of eligible individuals is estimated to be 360.

###### B. The Supported Employment Program; and

The Supported Employment (SE) is managed by the Idaho Division of Vocational Rehabilitation. ICBVI no longer receives Title VI funds for the SE program. However, ICBVI does continue to serve all eligible SE clients, including students with disabilities, utilizing Title I funds.

In FFY 2018 and FFY 2019, ICBVI provided supported employment services to a total of 4 participants (3 youth with the most significant disabilities and  1 adult with the most significant disabilities). As required under state agreement, these participants were co-enrolled with the Idaho Division of Vocational Rehabilitation (IDVR).

ICVBI anticipates providing supported employment services to the following over the next 2 years:

FFY 2020

* 2 adults with the most significant disabilities
* 2 youth with the most significant disabilities (including extended services).

FFY 2021

* 2 adults with the most significant disabilities
* 2 youth with the most significant disabilities (including extended services).

The SE projections are included in the section k2A and k4 projections.

###### C. Each priority category, if under an order of selection.

ICBVI is not operating under an Order of Selection. The Commission will continue to monitor fiscal conditions as impacted by WIOA to determine whether or not an Order should be established and/or implemented. ICBVI currently operates a three-tier significance of disability (MSD, SD, D).

##### 3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

ICBVI is not operating under an Order of Selection.

##### 4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

• Title I Part B $655,000

• Title VI Part B $0

Estimated costs of services, per individual:

FFY 2020 – ICBVI projects serving 350 individuals with an estimated cost of $1871 per individual.

FFY 2021 – ICBVI projects serving 360 individuals with an estimated cost of $1819 per individual.

ICBVI has seen service volumes diminish while service costs per customer continue to increase. This increase in cost, coupled with the redistribution of funds for Pre-ETS could accelerate the need to implement an Order of Selection in Idaho.

ICBVI believes it will be difficult to determine the long-term impact of WIOA on number served without baseline data. While the Commission is committed to extending services to all eligible individuals, the emphasis and spending requirements associated with Pre-ETS requirements will both; (1) diminish overall funds available to individuals categorized as ‘eligible’ and, (2) fundamentally shifts the way ICBVI spends 15% of program funds.

#### l. State Goals and Priorities

The designated State unit must:

##### 1. Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions

ICBVI management team, along with the Board of Commissioners revised/modified the goals and priorities based on the recently completed Comprehensive Statewide Needs Assessment (CSNA). New program goals and priorities reflect and align with program changes resulting from WIOA, the results from the latest CSNA, and the goals and strategies of the combined state plan.

ICBVI, in collaboration with the Board of Commissioners, will continue to develop specific strategies that are in alignment with these goals and priorities.

Specific goals and priorities for the VR and SE programs are discussed in l.3.

##### 2. Identify the goals and priorities in carrying out the VR and Supported Employment programs

The Commission’s goals and priorities were informed via the 2020 CSNA conducted by the University of Washington. The goals and priorities were developed through discussions with the ICBVI Board of Commissioners and through collaboration among WIOA core partner programs. As well, program goals and priorities are identified  through the Commission’s  Strategic Plan (2020-2023).

The 2020 CSNA solicited input from a diverse body of stakeholders, including client’s (both current and exited), ICBVI staff, ICBVI Board of Commissioners, employers, CRP’s, education officials, consumer groups, and other key stakeholders.

The goals and priorities for PY2020-2023 are described in section l.3.A.

##### 3. Ensure that the goals and priorities are based on an analysis of the following areas:

###### A. The most recent comprehensive statewide assessment, including any updates;

The following goals are based on the recommendations from the Statewide Comprehensive Needs Assessment completed in 2020 with priorities developed for PY 2020—2023 period; based upon input from a broad spectrum of stakeholders including clients, ICBVI staff and other key informants.

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

* Priority 1: Provide quality independent living skills training;
* Priority 2: Improve access to job training and placement services;
* Priority 3: Provide outreach training to all community partners; and
* Priority 4: Improve services to business across the state.

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

* Priority 1: Continued education and training to employers, educators, and community partners;
* Priority 2: Continue to address transportation issues that face ICBVI clients through our efforts in the One-Stop system;
* Priority 3: Continue to address accessibility issues within the One-Stop system;
* Priority 4: Increase/improve access to assistive technology and training; and
* Priority 5: Increase outreach activities to rural communities.

Goal 3: Improve transition services for students

* Priority 1: Increase work-based learning experiences for students prior to exiting high school;
* Priority 2: Engage work force partners in the development and provision of Pre-Employment Transition Services; and
* Priority 3: Continue emphasizing training and education of key stakeholders on ICBVI programs and services, with emphasis on Pre-ETS.

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

* Priority 1:Revise ICBVI’s program satisfaction survey(s) to identify areas for program improvement;
* Priority 2: Continue to improve the internal case review process to align with WIOA requirements and inform the continuous quality improvement cycle; and
* Priority 3: Continue to develop policies, procedures, and internal controls to ensure accuracy and validity of program performance reporting.

###### B. The State’s performance under the performance accountability measures of section 116 of WIOA; and

Title IV Vocational Rehabilitation programs are using a phased-in approach to set levels of performance for all primary performance indicators under this Combined State Plan. RSA-TAC-18-01 released January 18, 2018 provides guidance on the requirements for these indicators. The Division is still collecting baseline information on most of these indicators. As a result, performance levels are being reported for only Measurable Skill Gains at this time.  During this plan, the implementation schedule for the Common Performance Measures is as follows:

* Employment in the 2nd quarter (baseline)
* Employment in the 4th quarter (baseline)
* Median earnings (baseline)
* Credential attainment (baseline)
* Measurable skill gains (begin reporting PY20)
* Effectiveness in serving employers (not yet established)

The Commission has updated our data sharing agreement, including signing the State Wage Interchange System (SWIS) Agreement. While, ICBVI has requested access to Idaho’s Data Management Council to gain access to Idaho’s Statewide Longitudinal Data System, the current data exchange environment does not allow for this information to be exchanged in time for reporting purposes.  The Commission is working closely with other core WIOA partners on a Workforce Development Quality Initiative (WDQI) grant which seeks to remove barriers through automation and reduce the time required to access this data.

The Commission continues to improve our data validation by implementing strategies which provide strong automatic internal control and quarterly data checks to detect anomalies and errors.

The Commission will continue to collect and analyze data to inform initial baseline thresholds to establish levels of performance to use for future negotiations with RSA.

###### C. Other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

The Commission has worked closely with RSA on their data dashboard information and utilizes the dashboard to identify and fix inaccuracies in the data collection process and for performance improvement.

ICBVI’s last monitoring report was conducted in 2010. The issues identified in this report were addressed and bear no relationship to the goals and priorities identified in this plan outside of the Commission continuing to expand its continuous improvement activities.

#### m. Order of Selection

Describe:

##### 1. Whether the designated State unit will implement and order of selection. If so, describe:

###### A. The order to be followed in selecting eligible individuals to be provided VR services

ICBVI is currently not operating under an Order of Selection. However, the impact of WIOA and the 15% reserve requirement on the ability to serve all client’s remains unknown for the future.

###### B. The justification for the order

n/a

###### C. The service and outcome goals

n/a

###### D. Time within which these goals may be achieved for individuals in each priority category within the order; and

n/a

###### E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities

n/a

##### 2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment

ICBVI currently is able to serve all eligible clients.

#### n. Goals and Plans for Distribution of title VI Funds

##### 1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services

In PY2018, under agreement with the Idaho Division of Vocational Rehabilitation (IDVR), ICBVI no longer receives any Title VI funds, as IDVR has agreed to manage the SE program for the state. Formerly, these funds were distributed in case service allotments to ICBVI regional offices to fund supported employment services under individualized plans for employment (IPE’s). ICBVI focused Title VI, Part B funds on SE services including extended services for youth.

As needed, the Commission will continue to provide SE services under general Title I funds.

In PY 2018 and PY 2019, ICBVI provided supported employment services to a total of 4 participants (3 youth with the most significant disabilities and  1 adult with the most significant disabilities). As required under state agreement, these participants were co-enrolled with the Idaho Division of Vocational Rehabilitation (IDVR).

ICVBI anticipates providing supported employment services to the following over the next 2 years:

PY 2020

* 2 adults with the most significant disabilities
* 2 youth with the most significant disabilities (including extended services).

PY 2021

* 2 adults with the most significant disabilities
* 2 youth with the most significant disabilities (including extended services).

##### 2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:

###### A. The provision of extended services for a period not to exceed 4 years; and

The Idaho Division of Vocational Rehabilitation (IDVR) manages the supported employment program for the state.

ICBVI has collaborated with IDVR on policies and procedures to ensure that extended services are available for youth with the most significant disabilities for up to 4 years, or until the individual turns 25 and no longer meets the definition "youth with a disability." Extended services can be provided following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. ICBVI will support extended services with Title I funds, as needed, and will continue to leverage other sources of extended services.

###### B. How the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

Under a cooperative agreement, ICBVI shares supported employment cases with IDVR. In addition, ICBVI has and will continue to support clients that require supported employment services through the basic support grant during program participation, and work with community partners, families, and other organizations to develop long term support or natural supports whenever feasible.

#### o. State's Strategies

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

##### 1. The methods to be used to expand and improve services to individuals with disabilities

The following strategies will be utilized to address the rehabilitation needs of blind and visually impaired in the state, as identified in the 2020 CSNA:

* Lack of transportation – Due to the rural nature of Idaho, transportation always emerges as a major barrier for individuals. To address this, ICBVI counselors and rehabilitation teachers will increase outreach activities to rural communities. As well, the Assessment and Training Center staff will continue their project of “mobile workshops” in regions across the state. ICBVI regional staff will continue to serve on public transportation boards and commissions that address transportation issues and projects.
* Societal attitudes – Outreach and education will include the “mobile workshops” conducted by our Assessment and Training staff. CRP’s, employers, educators, families are all invited to these regional workshops. ICBVI recently appointed the statewide AT Specialist also serve as a statewide business engagement specialist. A strategy of this individual to increase outreach and training to employers.
* Independent Living Skills-To address the continuing need of independent living skills training, ICBVI will ensure that rehabilitation teachers are provided opportunities for blind skills training. The VR program recently increased assessment activities for all eligible individuals to ensure all training needs are identified and provided in the IPE.

Access to career services and training programs – To address this, ICBVI has been working with all WIOA core programs to continue the development of the One-Stop System. As part of One-Stop strategy, ICBVI will also be emphasizing staff participation in all comprehensive and affiliate centers. Participation will include training of One Stop center staff and developing opportunities for co-locating. Additionally, ss part of our personal development strategies, staff trainings on Career Pathways, Labor Market Index, and Career Index Plus are all geared to ensuring staff have a 21st century understanding of the labor force and training programs.

##### 2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis

ICBVI will continue to:

* Conduct assessments of blindness skills on all VR clients to determine their level of competence with the alternative skills of blindness;
* Continue implementing training curricula and timelines for clients to learn how to best utilize their Assistive Technology devices;
* Utilize loaner system and increase the number of models of adaptive technology for clients to try out before we purchase items;
* Maintain comprehensive Assistive Technology supports and training through our Assessment and Training Center, Statewide Assistive Technologist and regional Rehabilitation Teachers.

##### 3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program

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. This agreement will facilitate ICBVI’s engagement with the Native American Indian Tribes that reside within the State to identify methods to better communicate the mission, goals, purpose and programs of ICBVI, and to identify processes to better facilitate referrals into ICBVI programs as well as implementation and completion of programs for employment outcomes.

ICBVI will work collaboratively with Department of Labor and the Idaho Commission on Hispanic Affairs to identify methods to better communicate the mission, goals, purpose and programs of ICBVI, and to identify processes to better facilitate referrals into ICBVI programs as well as implementation and completion of programs for employment outcomes. ICBVI will continue to collaborate with Department of Education to ensure that transition age students are made aware of ICBVI services and how to access them. This is occurring at a State level with ICBVI’s involvement in the Interagency Transition Council as well as regional level where the VR counselors are in direct communication with individual school staff. ICBVI will continue to strengthen its collaborative work with Idaho Educational Services for the Blind and Visually Impaired (IESDB).

##### 4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services)

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 Commission’s Project Coordinator for Transition Services will continue to  improve and expand Pre-ETS across the state.

ICBVI is committed to working collaboratively with the IESDB, IDVR, and all regional school districts to identify all eligible (or potentially eligible) secondary students in the state of Idaho. Furthermore, ICBVI is committed to reaching out to rural communities in this effort. ICBVI currently has two summer programs that are targeted towards high school students: 1) Summer Work Experience Program (SWEP) and, 2) College Days. Curriculum in both of these programs is being reviewed, expanded and modified, as appropriate, to ensure they meet all of the criteria of Pre-ETS.

As previously mentioned in this plan, the state VR program (ICBVI and IDVR) have agreed to lower the minimum age for the receipt of Pre-ETS to 14 years old. This will increase the number of students who will be eligible for Pre-ETS in the state.

##### 5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State

ICBVI is committed to working with Idaho’s CRP community. ICBVI has implemented training for CRPs who are interested in working with the blind and visually impaired. ICVBI is bringing this training to every region in the state. In 2018, ICBVI developed a cooperative agreement with all CRP’s, which is reviewed on an annual basis with all CRP’s who provide services to ICBVI clients; with emphasis on the provision of Pre-Employment Transition Services.

##### 6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA

Vocational Rehabilitation programs are using a phased-in approach to set levels of performance for all primary performance indicators under this Combined State Plan. RSA-TAC-18-01 released January 18, 2018 provides guidance on the requirements for these indicators.  No new guidance has been received to date; however the Commission does have baseline data for the Measurable Skill Gains (MSG) rate indicator and will enter into negotiations with RSA for PYs 2020 and 2021. Once an understanding of baselines emerge, ICBVI will be well positioned to develop strategies to improve upon these baseline figures for all performance indicators.

The Department of Labor is a recipient of a Workforce Data Quality Initiative (WDQI) grant and is working with the core programs to develop policy and methods to automate data sharing to help all programs for performance reporting purposes.

While ICBVI has an agreement to access Idaho’s Statewide Longitudinal Data System (SLDS) in order to pull education related data elements that will allow ICBVI to better understand what factors promote quality sustained competitive integrated employment, unfortunately, the SLDS education data received to this point is not current enough to use for MSG performance.

The Commission has used the RSA Data Dashboards as an interim tool to better reporting under Section 116.  The Commission will continue to collect and analyze data to inform initial baseline thresholds to establish levels of performance to use for future negotiations with RSA.  We expect to have more complete baseline data by the next plan submission and will then be able to articulate strategies for performance improvement based upon emerging trends and data.

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

The WIOA Advisory Group, in conjunction with the Idaho Division of Vocational Rehabilitation has agreed that both ICBVI and IDVR will be lead agencies in addressing the continuing education and technical assistance needs of external workforce partners in best serving individuals with disabilities. ICBVI and IDVR will jointly sponsor a yearly needs assessment of workforce partners regarding employment and disability. This collaboration will include the establishment of stand-alone informational products, tailored face-to-face trainings and informal consultation as needed. ICBVI will coordinate activities with mandatory One-Stop partners by sharing program contact information, eligibility criteria, and training on program services and mission. The Commission will maximize services to individuals with disabilities through increased collaboration and integrated service delivery with various partners in One-Stop centers. Comprehensive information and training will be provided to outside organizations such as, the Department of Mental Health and Welfare’s Division of Behavioral Health, School to Work Transition, American Indian Vocational Rehabilitation Services, and Centers for Independent Living. Participants will be encouraged to co-enroll in applicable services at the local One-Stop to ensure participants can benefit from the full range of services available to them.

The Commission has partnered with Live Better Idaho (LBI) (https://www.livebetteridaho.org/), a virtual portal which “connects service providers with Idahoans seeking those services.” This website, exclusively funded by the Idaho Department of Health and Welfare, is an ‘agency agnostic’ service which is offered to public and private providers of services and connects Idahoans in need to relevant services by matching individuals with programs they may qualify for. The tool is localized and customized, connecting users to services that are relevant and available in their local areas.

ICBVI has created a presence on LBI to connect potential customers to Vocational Rehabilitation and other ICBVI services and programs. The tool can help connect rural Idahoans to locally available resources, including VR, and expands the range of options youth can use to find appropriate employment programs.

##### 8. How the agency's strategies will be used to:

###### A. Achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

The following goals are based on the recommendations from the Statewide Comprehensive Needs Assessment completed in 2020 with priorities developed for PY 2020—2021 period; based upon input from a broad spectrum of stakeholders including clients, ICBVI staff and other key informants.

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

* Priority 1: Provide quality independent living skills training.
* Priority 2: Improve access to job training and placement services.
* Priority 3: Provide outreach training to all community partners.
* Priority 4: Improve services to business across the state.

Strategies for Goal 1 include:

* Monitor program outcomes through client surveys. ICBVI is updating the VR participant survey for PY 2020.
* Expand statewide business engagement activities through ICBVI initiatives or other activities with WIOA partners.
* ICBVI will improve the strategies utilized to monitor outreach and training for regional offices.
* ICBVI will provide training services through regional instructors and the Assessment and Training Center (ATC).
* Develop new and innovate strategies for the delivery of VR services throughout the state.

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

* Priority 1: Continued education and training to employers, educators, and community partners.
* Priority 2: Continue to address transportation issues that face ICBVI clients through our efforts in the One-Stop system.
* Priority 3: Continue to address accessibility issues within the One-Stop system.
* Priority 4: Increase/improve access to assistive technology and training.
* Priority 5: Increase outreach activities to rural communities.

Strategies for Goal 2:

* Develop new and/or innovative approaches to outreach and education to our community partners.
* Continued participation in the development of the One-Stop system, with emphasis on service delivery to rural communities.
* Consultation and accessibility training to One-Stop partners to address barriers to individuals who are blind or visually impaired.
* Develop new and innovative strategies for providing rehabilitation technology and disability related skills training.

Goal 3: Improve transition services for students

* Priority 1: Increase work-based learning experiences for students prior to exiting high school.
* Priority 2: Engage work force partners in the development and provision of Pre-Employment Transition Services.
* Priority 3: Continue emphasizing training and education of key stakeholders on ICBVI programs and services, with emphasis on Pre-employment Transition Services.

Strategies for Goal 3:

* ICBVI will revise current policies around work-based learning experiences to reflect a more curriculum-based approach to these activities. ICBVI will also begin developing outcome measure for all Pre-Employment Transition Services.
* Collaborate with regional CRP’s in the development and provision of work-based learning experiences for students with disabilities. ICBVI will update the current MOU to reflect policy changes in Pre-Employment Transition Services.
* ICBVI will engage LEA’s and other key education (Idaho State Board of Education, State Department of Education) stakeholders in the provision of transition services. ICBVI will continue its collaborative efforts with the Idaho Division of Vocational Rehabilitation in the coordination, monitoring, and evaluation of Pre-employment Transition Services in the state.
* Develop new and innovative strategies for providing Pre-Employment Transition Services.

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

* Priority 1:Evaluate VR program services and delivery
* Priority 2: Monitor program service records to ensure compliance to state and federal laws and regulations.
* Priority 3: Continue to develop policies, procedures, and internal controls to ensure accuracy and validity of program performance reporting.

Strategies for Goal 4:

* Revise ICBVI’s program satisfaction survey(s) to help identify areas for program improvement.
* Continue to improve the internal case review process to align with WIOA requirements and inform the continuous quality improvement cycle.
* Revise and improve policies, procedures, and internal controls relating to the RSA-911 data collection and reporting.
* Revise and improve policies, procedures, and internal controls relating to  Pre-Employment Transition Services.
* Continued participation in the Workforce Data Quality Initiative (WDQI) with WIOA core partners.

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

The Commission’s strategies to support innovation and expansion activities have been outlined above in section (o)(1). A substantial support of ICBVI activities are:

* the appointment of a business engagement specialist, and
* a substantial increase of the Rehabilitation Teachers role in all aspects of VR service delivery.

All of these strategies are included and supported in ICBVI’s strategic and operational plans and are approved and supported by the Board of Commissioners.

Innovation and expansion funds will not be utilized to support the Board of Commissioners or the State Independent Living Council during PY 2020 or PY 20121.

###### C. Overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

Sections (o)(3) and (o) (4) of the Commission’s program specific strategies (contained above) further elaborate on how the ICBVI will address equitable access and participation as it relates to this section.

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

Describe:

##### 1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:

###### A. Identify the strategies that contributed to the achievement of the goals

The following program goals were identified in 2018 Combined State Plan Update:

**Goal 1 - Increase Independence and Employment Outcomes through Quality Rehabilitation Services.**

* ICBVI conducted periodic program surveys from participants to identify program strengths, and to facilitate continuous improvement of program curriculum;
* Services were provided statewide, with emphasis on rural and remote communities. ICBVI regional rehabilitation teachers provided individualized training to promote independent living, and community inclusion:
  + Orientation and Mobility Training
  + Activities of daily living
  + Assistive Technology
  + Accessing transportation and the One Stop System.
* ICBVI, in collaboration with IESDB, identified students in all regions of the state who were eligible for Pre-ETS.
* ICBVI began evaluating 911 data via the dashboard reports provided by RSA to help make informed decisions to improve program performance and reporting.
* In order to improve program performance and quality outcomes, ICBVI provided staff training via in-service training, TAC Webinar training, local and regional workshops and conferences, and national conferences (CSAVR, NCSAB, Summit Group (PEQA)).
* ICBVI provided clinical services for clients via the Boise Low Vision Clinic. The Low Vision Clinic traveled to all regions in the state in 2019.

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

PY 2018

Number of client's who achieved competitive integrated employment- 32

There were no participants who exited the VR program with a supported employment outcome.

Measurable Skills Gains: 14

Pre-Employment Transition Services provided – 324

Average hourly wage at program exit – $18.40

**Goal 2 - Increase public and client awareness of the mission, purpose, goals, function and services of the agency.**

* ICBVI continued to reach out to consumers and employers throughout the state in 2019.
* To enhance visibility and services to businesses, ICBVI appointment a staff member (AT Technologist) to serve as a statewide business engagement specialist.
* ICBVI staff, under the direction of the Chief of Rehabilitation Services and the Transition Project Coordinator, collaborated with key stakeholders to increase student participation in Pre-ETS.
* ICBVI continued their outreach to the fours Native American Tribes in Idaho (facilitated by the MOU between ICBVI / IDVR and the Tribes. ICBVI provided outreach to Hispanic communities, and supported a counselor dedicated to translation services across the state when needed.
* ICBVI continued their commitment to the partnership with the Idaho Chapter of the National Federation of the Blind with the BELL (Braille Enrichment for Literacy and Learning) for children who are blind or visually impaired.

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

PY 2018

Total number of referrals to the VR program: 153

* One individual was referred from the tribal VR program.
* No individuals were referred from the One Stop system.

Total number of applications: 129

Total number of individuals found eligible for services: 129

Total number of individuals with an approved IPE: 106

Total number of Hispanic individuals served: 30

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

Number of contacts to CRP's: 23

Number of contacts to LEA's: 56

Number of contacts to employers: 29

**Goal 3 - Increase training availability, effectiveness and access for clients.**

* ICBVI increased training and access for clients via the regional rehabilitation teachers and the state-wide assistive technologist.
* ICBVI continued to be a core partner in the development and implementation of the Idaho One-Stop System;
* ICBVI has been committed and involved in the continuous improvement of programmatic and physical accessibility in the One-Stop System;
* In 2019, ICBVI continue a project of sending Assessment and Training Center (ATC) instructors to all regions in order to provide blind skills training to parents, employers, CRP’s, LEA personnel, and other interested community stakeholders.

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

PY 2018

Total number of client's who received rehabilitation technology services: 141

Total number of regional on-site office visits by the statewide Assistive Technologist: 10

Total number of state-wide training seminars conducted by our ATC: 6

**Summary:**

Consistent with the mission of the VR program, ICBVI can conclude that the goals and priorities set forth in the 2018 State Plan were achieved. Since benchmarks were not established in 2018, it is difficult discuss the achievement of such metrics. ICBVI recognizes that through improvements in it's case management system and reporting capabilities that ICBVI will be able to make better data-informed decisions when identifying and evaluating future goals and priorities.

###### B. Describe the factors that impeded the achievement of the goals and priorities

n/a

##### 2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:

###### A. Identify the strategies that contributed to the achievement of the goals

ICBVI has collaborated with the general agency to serve clients with SE needs, and will continue that practice. Since ICBVI only served 6 individuals in the SE program in FFY2019, the Commission collaborates with IDVR in setting goals and priorities for the program. A strategy that has been implement the current FFY is the requirement of co-enrollment with IDVR for all eligible individuals. This has benefitted ICBVI clients in terms of comprehensive IPE development and case coordination. The two state units have implemented a procedure for tracking co-enrollment, and this is monitored on a quarterly basis.

###### B. Describe the factors that impeded the achievement of the goals and priorities

The ongoing challenge for the state’s Supported Employment program to maintain the current level of funding for long term supports from the legislature.

##### 3. The VR program’s performance on the performance accountability indicators under section 116 of WIOA

ICBVI is continuing to gather baseline data from which to determine whether performance is degrading, maintaining or improving per section 116 standards. Once an understanding of these baselines emerge, ICVBI will be well positioned to develop strategies to improve upon these baseline figures.  ICBVI currently has is Measurable Skill Gains with a rate of 23.7%.

The Commission is hesitant to rely strongly on the current MSG rate as recent file reviews have illustrated there is more work to be done before relying on this rate as a baseline.

The Commission continues working with core partner agencies to establish the open exchange of information which surround these performance measures and will be positioned to predict and establish baselines for negotiation with RSA based upon this data. However, since the core group of people continues to fundamentally shift as we operationalize WIOA requirements, the error introduced into these predictions is unknown, but is diminishing over time.

This plan is filed at a transitional period for standards and indicators in vocational rehabilitation.

Section 116 of WIOA establishes six new performance indicators to align these measures across numerous programs in the state. ICBVI has not traditionally reported these measures as defined. This in concert with fundamental changes in Pre-ETS service provision further confound the Commission’s ability to accurately forecast targets for negotiated performance. Furthermore, many of these data elements remain undefined. That said, ICBVI has made progress toward establishing baseline targets for a number of these indicators.

##### 4. How the funds reserved for innovation and expansion (I&E) activities were utilized

Innovation and Expansion activities in PY 2018 were the services of a statewide assistive technologist. Expenditures were $71,364.28, which included salary, benefit and operating expenses.

ICBVI’s specific Innovation and Expansion (I&E) strategy for PY 2020 is to develop  the project of a Statewide Business Engagement Coordinator.

#### q. Quality, Scope, and Extent of Supported Employment Services

Include the following:

##### 1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities

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.

##### 2. The timing of transition to extended services

WIOA extended the SE time period from 18 to 24 months. The Commission has created protocols for and has made extended services for youth available when needed as required by WIOA.

Extended services may be provided to youth with MSD for a period not to exceed four years, or until the individual reaches the age of 25 and no longer meets the definition of a "youth with a disability" (whichever comes first) with the funds reserved under §363.22. SE services for adults will not exceed 24 months, unless an exception is granted. The Commission requires a third-party commitment to designate a long-term support provider. Since 2004, the Extended Employment Services (EES) program has been housed under IDVR and along with Medicaid are the two providers of long-term funding for extended services in Idaho. A supported employment participant may only be transitioned to long term support based on an assessment of rehabilitation goal achievement and job stability. Periodic monitoring occurs to ensure that each client receiving SE services is making satisfactory progress.

#### 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 WIOA[14], and its supplement under title VI of the Rehabilitation Act[15];

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

Idaho Commission for the Blind and Visually Impaired

##### 2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency)[16] agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[17] , the Rehabilitation Act, and all applicable regulations[18] , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;

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

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 agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[19] , the Rehabilitation Act, and all applicable regulations[20] , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;

##### 4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;

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

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

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

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

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

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.

##### Footnotes

 [14] Public Law 113-128.  
 [15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.  
 [16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.  
 [17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.  
 [18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR   
part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.   
 [19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined  State Plan in accordance with section 606(a) of the Rehabilitation Act.  
[20] Applicable regulations, in part, include the citations in footnote 6.

##### Certification Signature

| Signatory information | Enter Signatory information in this column |
| --- | --- |
| Name of Signatory | Beth Cunningham |
| Title of Signatory | Administrator |
| Date Signed | 03/05/20 |

#### Assurances

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

| The State Plan must include | Include |
| --- | --- |
| 1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act. |  |
| 2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140. |  |
| 3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:Administration of the VR services portion of the Unified or Combined State Plan: |  |
| 3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act |  |
| 3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected): |  |
| 3.b.(A) “is an independent State commission” (Yes/No) | Yes |
| 3.b.(B) “has established a State Rehabilitation Council” (Yes/No) | No |
| 3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act |  |
| 3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3) |  |
| 3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No) | No |
| 3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No) | No |
| 3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan | No |
| 3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act |  |
| 3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act |  |
| 3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act |  |
| 3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act |  |
| 3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities |  |
| 3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act |  |
| 4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will: |  |
| 4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act |  |
| 4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act |  |
| 4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No) | Yes |
| 4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act |  |
| 4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act |  |
| 4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act |  |
| 4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act |  |
| 4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14)of the Rehabilitation Act |  |
| 4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the​​​​​​​ Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs |  |
| 4.j. With respect to students with disabilities, the State, |  |
| 4.j.i. Has developed and will implement, |  |
| 4.j.i.I. Strategies to address the needs identified in the assessments; and |  |
| 4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and |  |
| 4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)) |  |
| 5. Program Administration for the Supported Employment Title VI Supplement: |  |
| 5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act |  |
| 5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act |  |
| 5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act |  |
| 6. Financial Administration of the Supported Employment Program: |  |
| 6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act |  |
| 6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act |  |
| 7. Provision of Supported Employment Services: | Yes |
| 7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act |  |
| 7.b. The designated State agency assures that: |  |
| 7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act |  |
| 7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act |  |

#### Vocational Rehabilitation Program Performance Indicators

**Performance Goals for the Core Programs**

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

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

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

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

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

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

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

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

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

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

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

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

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

| Performance Indicators | PY 2020 Expected Level | PY 2020 Negotiated Level | PY 2021 Expected Level | PY 2021 Negotiated Level |
| --- | --- | --- | --- | --- |
| Employment (Second Quarter After Exit) | baseline | baseline | baseline | baseline |
| Employment (Fourth Quarter After Exit) | baseline | baseline | baseline | baseline |
| Median Earnings (Second Quarter After Exit) | baseline | baseline | baseline | baseline |
| Credential Attainment Rate | baseline | baseline | baseline | baseline |
| Measurable Skill Gains | 37.8 | 38.5 | 40.3 | 41.0 |
| Effectiveness in Serving Employers | Not Yet Determined | Not Yet Determined | Not Yet Determined | Not Yet Determined |

*“Effectiveness in Serving Employers” is still being piloted.*