**VOCATIONAL REHABILITATION – MN STATE SERVICES FOR THE BLIND 2024**

**Program-Specific Requirements for State Vocational Rehabilitation Services Program**

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

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

(select A or B):

[ ] (A) is an independent State commission.

[X] (B) has established a State Rehabilitation Council.

In accordance with Assurance 3(b), please provide information on the current composition of the Council by representative type, including the term number of the representative, as applicable, and any vacancies, as well as the beginning dates of each representative’s term.

|  |  |  |
| --- | --- | --- |
| **Council Representative** | **Current Term**  **Number/**  **Vacant** | **Beginning Date of Term**  **Mo./Yr.** |
| Statewide Independent Living Council (SILC) | 2 | 2/2022 |
| Parent Training and Information Center | Vacant | 6/2020 |
| Client Assistance Program | 1 | 2/2023 |
| Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency) | 1 | 2/2023 |
| Community Rehabilitation Program Service Provider | Vacant | 6/2020 |
| Business, Industry, and Labor | Vacant | 7/2019 |
| Business, Industry, and Labor | 1 | 2/2022 |
| Business, Industry, and Labor | 1 | 6/2021 |
| Business, Industry, and Labor | 2 | 2/2022 |
| Disability Advocacy Groups | 2 | 2/2022 |
| Disability Advocacy Groups | 2 | 6/2021 |
| Disability Advocacy Groups | 1 | 9/2021 |
| Current or Former Applicants for, or Recipients of, VR services | Vacant | 6/2020 |
| Section 121 Project Directors in the State (as applicable) | Vacant | 6/2020 |
| State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA) | Vacant | 2/2023 |
| State Workforce Development Board | 1 | 2/2022 |
| VR Agency Director (Ex Officio) | Ex Officio | Permanent |
| Advocate for Individuals who are Blind with Multiple Disabilities | 1 | 2/2023 |
| DeafBlind Community Representative | 1 | 2/2022 |

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

The Minnesota State Rehabilitation Council for the Blind (SRC-B) meets the first Thursday of every December, February, April, June, August, and October from 5:30 PM to 8:30 PM. Historically, SSB has had difficulty having council appointments approved by the Governor’s office due to changing administrations and frequently changing staff. SSB makes an effort to personally connect with the Boards and Commissions staff, to provide information and education on SSB in an effort to increase the speed of the approval process. We currently have several open positions due to completed terms, retirements, or individuals leaving the employment tied to their council position.

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

The SRC-B develops and follows a yearly workplan to ensure that it carries out all its duties in a timely fashion. The majority of workplan entries occur on an annual or semiannual basis; however, as new recommendations from the council are made, they can be added.

The SRC-B has a standing “Customer Satisfaction and Goals & Priorities Committee,” which exists to carry out specific duties contained in federal regulations for the Vocational Rehabilitation (VR) program. These include conducting a review and an analysis of the effectiveness of, and consumer satisfaction with:

* + The functions of the Department of Employment and Economic Development.
  + Vocational Rehabilitation services provided within the state (except adjustment to blindness and technology services).

and

* + Employment outcomes of persons served

In collaboration with SSB, the committee evaluates the extent to which SSB achieved its goals and priorities, strategies used, and factors that impeded success and performance on the federal Workforce Investment Opportunity Act (WIOA) Primary Indicators of Performance. Jointly with other committees of the Council, and in partnership with SSB, it develops and, as necessary, revises a statement of goals and priorities. The committee reports quarterly to the full SRC-B and annually presents the VR Effectiveness Report to the SRC-B for review and approval. The VR Effectiveness Report contains: Part I – State’s Performance Under the Performance Accountability Measures of Section 116 of WIOA, Part II – Customer Satisfaction Survey Review, and Part II – Review of Goals and Priorities. The committee includes the VR Effectiveness Report in the Annual SRC-B report. The PY23 VR Effectiveness Report and the Annual SRC-B Report were presented to the SRC-B at the December 7, 2023, meeting and is available at <https://mn.gov/deed/ssb/involve/srcb/reports/index.jsp>.

A Budget Task Force works annually in collaboration with SSB to propose the SRC-B’s budget for next federal fiscal year. SSB provides the task force with the budget expenditures so that determinations can be made. The council’s budget for FFY24 was presented by the Budget Task Force and approved at the August 3, 2023, meeting.

In an effort to increase diversity, equity, and inclusion, the SRC-B developed a Task Force on Guest Speakers or Professional Development with the purpose of: adding to knowledge of how the council can learn more about SSB; finding community members representing Hmong, Hispanic, Somali, and Native American cultures; and hearing from medical professionals regarding providing SSB information to individuals with vision loss. The task force reported to the council at the October 6, 2022, meeting and recommended that this group continue meeting regularly and be added to the annual work plan.

The Committee Structure Task Force works annually in collaboration with SSB to review the council committee charge and structure to determine if any changes are needed. At the June 2, 2023, meeting, the task force presented their report recommending the change in name of the Minority Outreach Committee to Diversity, Equity & Inclusion Committee. It was felt that the proposed name was more encompassing and positive. The SRC-B unanimously approved the change.

At the June 2, 2023, meeting, the SRC-B was presented a report by Jessica Burke, Consultant, Management Analysis & Development (MAD). SSB contracted with MAD as internal independent consultants to identify barriers that customers are facing and find ways to reduce or eliminate those barriers. The council expressed their concerns with the report, specifically with the lack of effort to reach survey participants, and lack of accessibility in communication. As result, at the August 3, 2023, meeting, the council unanimously voted to send the *Recommendations for Improving DEI Practices Within Minnesota State Services for the Blind,* presented by the Diversity, Equity, and Inclusion Committee, to Jessica Burke.

A brief public hearing was held at the August 3, 2023, meeting regarding the order of selection (OOS) process and SSB’s intent to end OOS. Unanimous support for the end of the order of selection process was given by the council.

Additionally, at the August meeting the council discussed the pros and cons of joining the National Coalition of State Rehabilitation Councils (NCSRC). The NCSRC had provided a report about membership and signing the resolution during the June 2, 2023, council meeting. Council members shared their concerns regarding NCSRC and the lack of accessibility. After the discussion, a motion to join NCSRC failed for the absence of a second. It was decided that the council would gather more information before reconsidering joining the coalition. The SSB SRC-B staff liaison and one council member attended the NCSRC 2023 fall conference in Savannah, Georgia, and they reported their observations during the December 7, 2023, council meeting. While the council recognized that it is important to be informed of new legislation and stay connected with the coalition, they remained reluctant to join and a vote was not called.

Sections pertaining to the proposed funding of establishment projects occurring at the 2200 University Avenue building were presented to the SRC-B on October 5, 2023, and were unanimously approved.

The Community Partners Outcomes and Measures Committee has conducted a review of the current ATB Customer Satisfaction Survey response rates. Their goal was to address low response rates and provide recommendations to enhance the effectiveness of post-training surveys. The committee developed three recommendations regarding data collection, survey delivery method, and survey timing and automation. The information was presented at the December 7, 2023, meeting.

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

[List each recommendation/input followed by the VR agency response]

**Recommendation/Input**

The PY22 VR Effectiveness Report and the Annual SRC-B Report were presented to the SRC-B and approved at the December 7, 2023, meeting.

**SSB Response:**

SSB has worked in collaboration with the SRC-B and the Customer Satisfaction and Goals & Priorities Committee to develop these reports.

**Recommendation/Input**

The council’s budget for FFY24 was presented by the Budget Task Force and approved at the August 3, 2023, meeting.

**SSB Response:**

SSB has worked in collaboration with the SRC-B to develop the FFY24 budget. The council’s budget has remained consistent for several years and is reasonable and appropriate.

**Recommendation/Input**

The task force on Guest Speakers or Professional Development reported to the council at the October 6, 2022, meeting and recommended that this group continue to meet regularly and be added to the annual work plan.

**SSB Response:**

SSB agrees with the task force and guest speakers or professional development activities have been added to the

SRC-B Work Plan.

**Recommendation/Input**

At the June 2, 2023, meeting, the Committee Structure Task Force presented their report recommending the change in name of the Minority Outreach Committee to Diversity, Equity & Inclusion Committee.

**SSB Response:**

SSB is in agreement with this change. It is in line with our state and agency goals and is more encompassing and positive.

**Recommendation/Input**

At the August 3, 2023, meeting, the council unanimously voted to send the *Recommendations for Improving DEI Practices Within Minnesota State Services for the Blind,* presented by the Diversity, Equity, and Inclusion Committee, to Jessica Burke.

**SSB Response:**

SSB felt the recommendations were impressive and encompasses some items that have been previously discussed internally. SSB suggested that these recommendations come from the council directly to Jessica and SSB, as they could carry more weight.

**Recommendation/Input**

Unanimous support for the end of the order-of-selection process was given by the council.

**SSB Response:**

We are in agreement with the SRC-B and it was announced that SSB would swiftly end the order of selection process. Order of selection ended on November 16, 2023.

**Recommendation/Input**

Council members shared their concerns regarding NCSRC and the lack of accessibility. After discussion, a motion to join NCSRC failed for the absence of a second. It was decided that the council would gather more information before reconsidering joining the coalition.

**SSB Response:**

SSB is available to answer questions and provide information to the SRC-B as requested and will leave this decision with the council.

**Recommendation/Input**

Sections pertaining to the proposed funding of establishment projects occurring at the 2200 University Avenue building were presented to the SRC-B on October 5, 2023, and were unanimously approved.

**SSB Response:**

SSB agrees with the SRC-B.

**Recommendation/Input**

The Community Partners Outcomes and Measures Committee has conducted a review of the current ATB Customer Satisfaction Survey to address low response rates and provide recommendations to enhance the effectiveness of post-training surveys. The committee developed three recommendations regarding data collection, survey delivery method, and survey timing and automation. The information was presented at the December 7, 2023, meeting.

**SSB Response:**

SSB is reviewing the committee’s recommendations in further detail. We acknowledge that the ATB Customer Satisfaction Survey is not providing the information it was intended to provide. There are multiple reasons for the low response rates, one of which is a low number of participants. SSB is working with the DEED Survey Coordinator, who oversees the administration of the current survey method, to investigate the possibilities of alternative survey delivery methods. Some ideas include returning to delivering surveys via phone and contracting with a third party to conduct focus groups. SSB will continue gathering information until it is able to make a determination.

**(b) Comprehensive Statewide Needs Assessment (CSNA).** Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

1. The VR services needs of individuals with disabilities residing within the State, including:
2. Individuals with the most significant disabilities and their need for Supported Employment;

Supported Employment services are provided to SSB customers as needed. In PY2022, there were 55 customers with Supported Employment (SE) plans, 27 of which received Pre-ETS. In PY2023, there were 53 customers with SE plans, 29 of which received Pre-ETS. With regards to youth, SSB is committed to providing all students work experiences with or without supported employment services.

SSB uses Title I funds to provide SE services and is declining to receive FFY2024 SE funds. SSB is declining supported employment dollars, as the requirements for using those dollars are too restrictive. These funds have youth matching requirements, and the funds can only be used once the individual enters employment. Youth with significant disabilities often require more in-depth and comprehensive training before they are able and ready to enter into employment; therefore, they are often over the age of 25 by the time this occurs. Should there be flexibility on when the funds can be used and a change to the supported youth matching requirements, SSB will revisit declining funds.

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

The Department of Administration, Minnesota State Demographic Center released [*The Economic Status of Minnesotans 2023,* A Chartbook with Data for Minnesota’s Largest Cultural Groups](https://mn.gov/admin/assets/Economic%20Status%20of%20Minnesotans%202023_tcm36-569572.pdf), in March 2023.   
The report presents newly tabulated data about the economic conditions and considerations of Minnesotans as a whole, as well as 17 more refined cultural groups, to help policymakers and the public understand and improve the economic conditions for Minnesota’s residents. The report is especially helpful in that it provides data on cultural groups specific to Minnesota that are more refined than the standard racial groups used by the Census Bureau which are too broad and may not be relevant to our state.

Although 78.2% of the population of Minnesota is white, there is a diversity of cultural groups. In reviewing Table: Minnesota’s Largest Cultural Groups in the report, the top 5 cultural groups, other than White, with the highest percentage of the MN population and people can be found in the table below.

The category of “Multiple Cultural Groups” includes people belonging to more than one of these 17 cultural groups; Dakota, Ojibwe, Asian Indian, Chinese, Filipino, Hmong, Korean, Lao, Vietnamese, African-American, Ethiopian, Liberian, Somali, Mexican, Puerto Rican, Russian, and White. Additionally, the “African-American” cultural group that was constructed consists of only U.S. born Black/African-American individuals and their children.

| **Racial or Ethnic Group** | **Cultural Group** | **Percent of MN Population** | **People** |
| --- | --- | --- | --- |
| Other/Multiple Groups | \*Multiple Cultural Groups | 3.9 | 216,300 |
| Hispanic or Latino | Mexican | 3.3 | 186,800 |
| Black or African-Americans | African-American | 3.2 | 179,800 |
| Asian | Hmong | 1.6 | 86,6000 |
| Black or African-American | Somali | 1.4 | 76,200 |

With the diversity in cultural groups in Minnesota, there are many languages spoken other than English. The top 5 languages, not including English, spoken in Minnesota are:

1. Spanish
2. Amharic, Somali, or other Afro-Asiatic Languages
3. Hmong
4. Chinese
5. Vietnamese

It is difficult to get an accurate picture of the incidence of blindness, low vision, and DeafBlindness in Minnesota as there are few sources of data collection and the most recently available is from 2019. The American Foundation for the Blind reported in their 2019 Prevalence Rates of Vision Difficulty, a total of 84,900 individuals. Of that total, 38,265 were male and 46,635 were female. The prevalence rates are broken down by age as follows:

|  |  |
| --- | --- |
| Under 5 | 1,425 |
| 5-17 | 6,209 |
| 18-34 | 10,466 |
| 35-64 | 29,378 |
| 65-74 | 12,923 |
| 75 and older | 24,499 |

2017 Minnesota Joint Disparity Study

The State of Minnesota conducted disparity studies in:

* + 1999 (Mason Tilman)
  + 2009 (MGT of America)
  + 2017 (Keen Independent Research)
  + <https://mn.gov/admin/disparity-study/>

The 2017 Minnesota Joint Disparity Study examines whether discrimination affects minority-owned and women-owned firms in the marketplace and ways to address that discrimination. Although this purpose does not address individuals with disabilities specifically, it can still provide useful information. The Legislature has approved money to conduct an updated study.

The SRC-B Customer Satisfaction Survey Committee, in coordination with the Department’s survey specialist, added a demographic profile to the customer satisfaction survey results. This profile gives us additional information on the customer satisfaction by age, gender, race, ethnicity, geographic area, etc. The MnCSI (Minnesota Customer Satisfaction Index) measures percentage of satisfaction, with a higher number being higher satisfaction. Satisfaction for the most recent 2023 survey was overall higher for individuals who are BIPOC or Hispanic/Latinx.

*2023 Customer Satisfaction Survey Demographic Profile*

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Gender** | **Total Population (663)** | **Valid Population (587)** | **Survey Respondents (186)** | **MnCSI (154)** |
| Female | 48% | 48% | 53% | 77.7 (82) |
| Male | 52% | 52% | 47% | 78.9 (71) |
| (Blank) | -- | -- | -- | -- |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Region** | **Total Population** | **Valid Population** | **Survey Respondents** | **MnCSI** |
| Greater MN | 39% | 38% | 39% | 75.9 (63) |
| Metro | 60% | 61% | 59% | 79.8 (88) |
| NULL | <1% | 1% | 2% | 81.4 (3) |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **SSB Status** | **Total Population** | **Valid Population** | **Survey Respondents** | **MnCSI** |
| Successful Closure | 7% | 7% | 8% | 83.6 (15) |
| Unsuccessful Closure | 3% | 2% | 1% | -- |
| In-progress | 88% | 89% | 90% | 77.5 (138) |
| (Blank) | 2% | 1% | 1% | -- |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Ethnicity** | **Total Population** | **Valid Population** | **Survey Respondents** | **MnCSI** |
| Hispanic/Latino | 7% | 7% | 5% | 81.4 (8) |
| Not Hispanic/Latino | 91% | 91% | 92% | 78.0 (143) |
| Did not self-identify | 2% | 2% | 2% | -- |
| (Blank) | <1% | <1% | 1% | -- |

|  |  |  |  |
| --- | --- | --- | --- |
| **Race** | **Total Population** | **Valid Population** | **Survey Respondents** |
| American Indian or Alaska Native | 1% | 1% | 1% |
| Asian | 5% | 5% | 6% |
| Black or African American | 20% | 19% | 12% |
| Hawaiian Native/Pacific Islander | -- | -- | -- |
| Two or more races | 1% | 1% | 1% |
| White | 71% | 71% | 77% |
| Did not self-identify | 2% | 2% | 2% |
| (Blank) | <1% | <1% | 1% |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **BIPOC** | **Total Population** | **Valid Population** | **Survey Respondents** | **MnCSI** |
| Yes | 33% | 33% | 25% | 82.7 (37) |
| No | 65% | 67% | 75% | 76.8 (117) |
| (Blank) | 2% | -- | -- | -- |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Primary Impairment** | **Total Population** | **Valid Population** | **Survey Respondents** | **MnCSI** |
| Blindness | 76% | 76% | 73% | 79.5 (110) |
| Deaf-Blindness | 7% | 7% | 9% | 81.4 (12) |
| Other visual | 17% | 17% | 18% | 72.6 (31) |
| Other physical | -- | -- | -- | -- |
| (Blank) | <1% | <1% | 1% | -- |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Veteran** | **Total Population** | **Valid Population** | **Survey Respondents** | **MnCSI** |
| Veteran | 1% | 1% | 1% | -- |
| Not a Veteran | 98% | 98% | 98% | 78.7 (151) |
| (Blank) | 1% | 1% | 1% | -- |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Age range** | **Total Population** | **Valid Population** | **Survey Respondents** | **MnCSI** |
| Less than 18 | 9% | 9% | 7% | 69.4 (4) |
| 18-24 | 25% | 26% | 26% | 84.3 (39) |
| 25-44 | 32% | 33% | 30% | 74.0 (48) |
| 45-54 | 16% | 16% | 19% | 81.2 (34) |
| 55-59 | 8% | 7% | 6% | 70.0 (11) |
| 60 and above | 11% | 10% | 11% | 77.5 (18) |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Education indicated** | **Total Population** | **Valid Population** | **Survey Respondents** | **MnCSI** |
| None | 1% | 1% | 1% | -- |
| Less than High School | 4% | 4% | 2% | -- |
| High School | 16% | 15% | 16% | 81.7 (17) |
| High School Diploma/GED | 35% | 35% | 31% | 75.0 (48) |
| Vocational School Diploma/Cert | 13% | 13% | 12% | 72.4 (20) |
| Associate’s Degree | 6% | 6% | 8% | 73.1 (12) |
| Bachelor’s Degree | 15% | 15% | 16% | 84.5 (25) |
| Grad School/Other PostSec License | 11% | 11% | 15% | 64.0 (27) |
| Did not identify | <1% | <1% | 1% | -- |

In an effort to understand where there are areas of racial disparities within the customers SSB serves, an analysis was conducted by our data analyst consultant, Michael Prideaux, in early October 2023. The analysis examines a series of T Tests to determine if the difference between groups is statistically significant. The factors examined were the percent exiting successfully, exiting unable to locate, and the wage at exit. The analysis included data on participants served in PY 2021 and 2022 for the following pairs:

1. Black-White
2. Asian-White
3. Hispanic/Latinx-White
4. Native American/Alaska Native-White
5. Asian/Pacific Islander-White
6. Multiracial-White
7. Black, Indigenous, People of Color (BIPOC)-White
8. Female-Male

The analysis’s main finding is a statistically significant disparity in the percentage of participants unable to be located between BIPOC participants at large and white participants. This disparity is likely driven by the disparities between black and Hispanic participants and their white counterparts. Wages had no statistically significant disparities, likely due to sample size and the slight difference in wages at exit. Further investigation will be needed to determine the causes of the disparity.

SSB is aware that services for new Americans is an area of continued need. We know that outcomes are not as positive for new Americans and there is a lack of service providers available to meet the needs. In line with the MN Department of Employment and Economic Development (DEED), SSB has an objective to focus on diversity, equity, inclusion, and accessibility, creating an agency that better meets the needs of the current and emerging workforce, including improving services to new Americans, underrepresented communities, and veterans. We’ve included this objective in our Goals, Priorities, and Strategies and this is in alignment with the WIOA combined State Plan Strategic Vision, Goals and Strategies for the entire state of Minnesota.

SSB serves a small number of veterans as most individuals receive services through the Veterans Administration. We currently have 10 customers identified as veterans and believe that services are adequate to meet their needs.

SSB currently serves 49 DeafBlind individuals with another 26 categorized as having a dual sensory loss.

In 2021, the Minnesota Commission of the Deaf, DeafBlind & Hard of Hearing (MNCDHH) partnered with Wilder Research to conduct a needs assessment and create a data-informed strategic plan, with the goal of better supporting DeafBlind children and youth in Minnesota. The key finding was Minnesota lacks a cohesive system for supporting Deafblind children and youth. Professionals identified a number of system and practice issues, with the most prominent being a lack of communication and coordination among professionals who serve DeafBlind children and youth including:

* A lack of communication among service providers
* A lack of DeafBlind-specific knowledge and skills among professionals who serve DeafBlind children and youth
* A lack of professional support and guidance for families and loved ones of DeafBlind children and youth

Professionals also reported a piecemeal “system” for serving Deafblind children and their families that is comprised of slightly coordinated institutions, organizations, and people. Several suggestions for better supporting DeafBlind children and youth in Minnesota were given including:

* Promoting coordinated services and the sharing of information among service providers
* Helping children with combined hearing and vision loss and their families coordinate

services

* Providing education about deafblindness to parents and providers
* Offering social connection and emotional support for DeafBlind children and youth and

their families

* Preparing DeafBlind youth for the transition to community-based services at age 21
* Contributing to legislative and policy-focused activities that could improve the lives of

DeafBlind children

SSB has worked to develop more options in service providers specializing in DeafBlindness. A contract has been established with Helen Keller National Center (HKNC) for ATB with the potential for additional services being investigated. Additionally, there has been discussion of growth by potentially hiring providers in the state of Minnesota for service provision and potentially establishing an in-state location for training. An HKNC employment services staff member is acquiring ACRE certified training to become a Customized Employment provider.

Despites these strides, there continues to be a lack of providers with the knowledge and skills to provide the specialized services needed by DeafBlind individuals and even less so, those that can communicate directly in their language.

SSB continues to see an enormous lack of the availability of Adult Basic Education centers (ABE) that provide ELL services with braille to blind and visually impaired individuals. For many new Americans, learning English is a first step before Adjustment To Blindness (ATB) training, higher education and/or employment, and self-sufficiency. Minnesota has a robust ABE program; however it is not equipped to serve individuals with visual disabilities. Minnesota’s ELL centers/programs are very limited, under-funded, and in need of resources to learn, set-up, and provide accommodation, needs, and services to Minnesota’s growing blind, visually impaired, and DeafBlind customers needing ELL programs that can provide them the disability accommodations they require to be successful. The unique dual needs of learning ATB skills (adaptive way to access print) while learning beginning level ELL skills is missing from 2 out of the 3 ATB centers offered in Minnesota. The need is great for students to continue learning adaptive daily skills while learning ELL skills. Minnesota should have more ABE centers that are able to provide ELL classes with braille for blind, visually impaired, and DeafBlind students to meet the growing needs.

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

Blind, visually impaired, and DeafBlind individuals are served in all components of the workforce development system, both as universal customers and in eligibility-based programs. In Minnesota, we call this system CareerForce, while other states refer to this as the American Job Centers. In Minnesota, universal customers are served by CareerForce partners, including the WIOA Title I and III programs in the local workforce development areas. There are close to 50 CareerForce locations throughout the state offering classes, workshops, pre-employment services, etc. SSB has a presence in 6 CareerForce locations with 10 SSB Workforce Development Unit (WDU) staff officed in CareerForce locations. A small percentage of the individuals who utilize the CareerForce locations are blind, visually impaired, or DeafBlind. A SSB recent analysis of referrals from CareerForce Centers from Program Year 2020 to 2022 revealed only 2 verified referrals.

Although CareerForce Centers are available and their use is encouraged, many individuals who are blind, visually impaired, or DeafBlind do not feel comfortable utilizing the CareerForce locations and choose to work with SSB directly. Staff at local CareerForce locations often do not have the training or skills to help with the accessible computer systems.  SSB staff are recognized as more knowledgeable in the areas of blindness and accessible technology. SSB’s service model is to work directly with individuals in their communities, at the location of their choosing, using the method they prefer (whether in-person or virtual). Rarely do individuals show up at a CareerForce location seeking SSB services. With transportation being a primary barrier for the vast majority of our customers, the “we come to you” approach is more customer centric.

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

An important and unique group of possible customers for State Services for the Blind are students and youth with disabilities. This category includes students ages fourteen up until their 22nd birthday eligible for pre-employment transition services, and youth through age twenty-four.

Minnesota Department of Education (MDE) has indicated in their “Unduplicated Child Count” report for fiscal year 2023 that there are approximately 248 students in secondary education who are blind, visually impaired, or DeafBlind. This number only includes those students whose primary disability is blindness or DeafBlindness.

*Table 1*

Table 1 includes data on the number of Pre-ETS students (Participant and Potentially Eligible) served by SSB in Program Years 2018 through 2022. SSB does not serve a large number of Pre-ETS potentially eligible customers. Overall, we saw a decrease in numbers between 2018 and 2021. Since then we have started to see a gradual increase from 2021 and are now back to our pre-pandemic levels of customers eligible per year and approaching our pre-pandemic numbers of customers served per year. It is worth noting that in PY2020, although the number served decreased, the number of Pre-ETS participants increased and that trend continues. We believe this is a testament to the adaptability and creativity of our staff who began offering a wide variety of virtual programming. Note that the data is a snapshot in time and actual numbers may vary plus or minus a few students.

|  | PY2018 | PY2019 | PY2020 | PY2021 | PY2022 |
| --- | --- | --- | --- | --- | --- |
| Number of Individuals Determined Eligible | 224 | 176 | 191 | 210 | 260 |
| Number of Total Participants With an IPE | 913 | 870 | 815 | 834 | 847 |
| \*\*Number of Pre-ETS Potentially Eligible Students with a Disability | 12 | 17 | 12 | 10 | 10 |
| Number of Students with a Disability With an IPE | TBD | TBD | TBD | TBD | TBD |
| Number of Youth with a Disability With an IPE | TBD | TBD | TBD | TBD | TBD |

\*\*Pre-ETS Potentially Eligible per year total includes any individual who was in the Pre-ETS referral status at any point during the year.

*Table 2*

The data in Table 2 provides the percentage of customers who were served in each Pre-ETS Category by Potentially Eligible and Participants (Pre-ETS only) in FFY23.

| Pre-ETS Service Category | Potentially Eligible | Participants  (Pre-ETS only) | Participants  (Pre-ETS + Potentially Eligible) |
| --- | --- | --- | --- |
| Instruction in Self-Advocacy | 25% | 44% | 43% |
| Job Exploration Counseling | 50% | 42% | 41% |
| Post Secondary Counseling | 50% | 42% | 41% |
| Work-Based Learning | 13% | 38% | 37% |
| Workplace Readiness Training | 38% | 49% | 48% |
| **Total All Students** | **63%** | **79%** | **78%** |

*Table 3*

From the data in Table 3, of the dollars spent in FFY2023 in each Pre-ETS category by potentially eligible and participants, participant expenditures for Work-Based Learning, and Workplace Readiness Training activities constitute the majority of our spending.

| Pre-ETS Service Category | Potentially Eligible | Participants | Totals |
| --- | --- | --- | --- |
| Instruction in Self-Advocacy | $0 | $4,599.8 | $4,599.8 |
| Job Exploration Counseling | $0 | $7,276.52 | $7,276.52 |
| Post Secondary Counseling | $0 | $516.83 | $516.83 |
| Work-Based Learning | $0 | $59,546.54 | $59,546.54 |
| Workplace Readiness Training | $1,632.58 | $219,321.86 | $220,954.44 |
| **Total All Students** | **$1,632.58** | **$286,661.75** | **$288,294.33** |

\*\*\*\*Table 3

*Assessments*

SSB developed a Pre-ETS student self-assessment which gives an opportunity for students to share their understanding of their preparedness for college, careers, and work in relation to the Pre-ETS categories.  With this student self-assessment, the results provide two key pieces of information:

1. The results indicate where the student believes their strengths and weaknesses are, and thus provide a sense of direction for staff to validate the student's strengths and work towards improving the weak areas.

2. The self-assessment can be used as a post-assessment when administered a second time. This allows students and team members to see the student’s growth as a result of having received Pre-ETS. The results will demonstrate if the if the methodologies were effective or if service delivery has room for improvement.

The self-assessment may be facilitated by SSB staff, teachers, providers, or completed independently by students with the results compiled by SSB. It can be provided to both potentially eligible and eligible students.

The self-assessment serves as a powerful tool to help guide both students and team members in which area or service to focus on, as well as track learning progress. This assessment is delivered on a case-by-case basis and used as appropriate. IEP team members, parents, and other supports can assist with the process when deemed appropriate by the team.

SSB staff are required to complete a comprehensive assessment before IPE development. This assessment reinforces the necessity for counselors to consider IEP goals within this assessment and address areas of need as best fit. Counselors are required to address all five core Pre-ETS areas within this assessment and note all of the services an eligible student requires to make progress toward an employment goal or projected goal.

For potentially eligible students, a similar assessment is completed to determine which of the five core Pre-ETS the student would require. Ongoing assessment and review is conducted to determine any additional Pre-ETS the student would need or which Pre-ETS have concluded.

Every high school student is eligible to engage in SSB’s in-house assessments for assistive technology, orientation and mobility, and independent living needs that are critical for success. These assessments are required for seniors in high school as they plan to transition into activities beyond secondary education. Training is then coordinated in relation to the needs displayed in the assessment with education officials and other team members as appropriate.

*Coordinating to determine needs*

When invited, SSB staff attend IEP and IEP 3-year evaluation meetings and collect these documents for review to coordinate with team members and provide services in collaboration with IDEA. SSB staff work with students and their families, IEP case managers, teachers of the blind and visually impaired, orientation and mobility specialists, and other IEP team members to supplement services provided by IDEA in order to assist with goal acquisition. SSB is able to provide additional activities outside of the classroom and school day through in-house service provision and community partners to strengthen and reinforce IEP goals needed for high school success and preparedness for the workplace. SSB staff consult with IEP members when providing additional activities that supplement IEP activities and align with IPE goals to ensure understanding of instruction from both agencies.

SSB’s Pre-ETS and Transition Coordinator attends Statewide Vision Network meetings hosted by the specialist for the blind/visually impaired (BVI) with the Department of Education to stay engaged and up to date on BVI instruction throughout the state. They sit on the BVI Advisory Committee to collaborate and develop additional opportunities for students in and out of the classroom. The Pre-ETS and Transition Coordinator and other SSB staff, as appropriate, also attend the annual Minnesota Division on Vision Impairments TBVI and COMS Conference in the fall every year to network and collaborate with teachers statewide.

*Identified needs and how they are being addressed*

SSB has identified three gaps that need to be filled; these gaps were identified in previous needs assessments and are still ongoing needs.

1. Students being unprepared for post-secondary training.
2. Spending the 15% set aside.
3. Services for students who have multiple challenges.

As is generally the case, identifying gaps does not imply that nothing is currently being done in these areas. Rather, the intent here is to indicate that the need for more attention is a priority. SSB has developed contracts with various community partners to help assess Pre-ETS and transition needs while providing innovative transition programming to address those needs. SSB’s Pre-ETS and transition staff has also expanded to ensure needs are assessed and addressed.

SSB has expanded its Pre-ETS and transition staff to ensure it continues to meet the needs of students throughout the state and make certain that our work is managed under consistent supervision. A Pre-ETS and Transition Program Manager was hired to manage the Pre-ETS budget, contracts, and policy, as well as supervise the Pre-ETS and transition direct service staff. A second Work Opportunities Navigator located in Greater Minnesota, and available to deliver the five core Pre-ETS to all students, was also added. SSB is in the process of hiring a Multiple Systems and Pathways Coordinator, who will be responsible for helping students with the most significant of disabilities and their families navigate the complex federal, state, and local services and resources to transition from school to work.

These 3 new staff comprise the complement of 1 Pre-ETS and Transition Manager, 1 Pre-ETS and Transition Coordinator, 2 Work Opportunities Navigators, 3 dedicated Pre-ETS and Transition counselors in the seven-county metro area, and 1 dedicated Pre-ETS Assistive Technology Specialist. All counselors outside of the metro area serve both students and adults.

In addition to the roles mentioned above, we have staffed positions for orientation and mobility training, job coaching, and rehabilitation teaching that are available to students. SSB has 1 employment specialist who specializes in working with DeafBlind Pre-ETS students.

SSB has a continued need for additional service providers and allows applications for contracts through the Request For Proposal (RFP) process, as SSB continues to seek out impactful opportunities for students to engage in local and national organizations.

The COVID-19 pandemic has brought about additional community partners to provide Pre-ETS virtually in ways that had not been options before. Virtual work-based learning experiences are offered through ReSOURCE/LEAP, a community partner out of Vermont. They provide opportunities for students to engage in hands-on work experiences where students actively engage in pre-employment transition skill building including career mentorship, communication, teamwork, problem-solving, professionalism, time management, goal setting, leadership, and more. They also offer workplace readiness training in various areas to help low vision, blind, and DeafBlind students build valuable skills needed for the workforce.

SSB has contracted with the local nonprofit Wilderness Inquiry. They have partnered with SSB to provide outdoor education and experiences while instructing on self-advocacy and workplace readiness training. As of the fall of 2023, two summer canoe trips have been coordinated, plus a winter activity for students to engage in self-advocacy instruction and peer mentoring opportunities are being discussed.

SSB has contracted with Envision Foundation for their all-virtual College Success Program (formerly offered through Learning Ally). The all-virtual College Success Program offers a holistic support system that utilizes the knowledge and experience of experts in the blindness field as well as blind or visually impaired college graduates to help guide students as they transition from high school to college and employment. This support system includes:

* Resources – robust, carefully crafted, and designed to address situations encountered by blind or visually impaired college students.
* Mentorship – mentors, who are recent college graduates and are blind or visually impaired themselves, help their mentees navigate college experiences including a job hunt that is unique to them, and provide them with as much or as little support as they’d like.
* Meetups – held virtually, these meetups are opportunities for students to connect with their peers to talk about issues, ask questions, network, make connections, and more.
* Audiobook Solution – College Success Program membership includes access to Learning Ally’s Audiobook Solution with over 80,000 human-read audiobooks.

Sky’s The Limit Communications through David DeNotaris is contracted with SSB. David and his partner Eileen Rivera Ley provided two days of instruction in self-advocacy and personal finance with SSB students in June of 2023 and more trainings are planned. This contract affords both virtual and in-person Pre-ETS in four of the five required areas. This flexibility allows SSB to bridge some of the gaps in delivering services in greater Minnesota through virtual programming, as students in rural areas frequently miss out on programming held in the Twin Cities.

SSB recently developed a contract with Perkins School for the Blind that will allow aspiring college students to engage in their College Success Compass Program to work on college preparedness and valuable workplace readiness skills. Vanward Consulting Services will also partner with SSB to offer students opportunities in job exploration counseling, workplace readiness training, and work-based learning opportunities.

SSB’s Pre-ETS and transition team is planning to create an ambassador program to enhance opportunities for self-advocacy instruction and peer mentoring opportunities. Staff realize how important mentorship opportunities are for students and how students connect and develop friendships across the state when events take place that bring students together. The objective of this program is to bring students together more frequently to increase opportunities for them to connect and learn from each other. Mentors will be supported through the SSB Pre-ETS and transition team, and these students will also help with recruiting efforts for programming. SSB recognizes that students are more likely to engage in programming when they know others who are attending or are invited by their peers versus counselors and other SSB staff.

The Summer Transition Program (STP), a joint collaboration between the Minnesota Department of Education, Local Education Agencies, and SSB, is a program for students who are entering their last or second to last year of high school and have extended school year services identified in their IEP. This is typically a two-week residential program held at the University of St. Thomas in St. Paul MN, where students engage in a variety of training that aligns with their IEP and IPE goals, hitting all five required Pre-ETS areas. STP returned to in-person the summer of 2022 after hiatus due to the COVID-19 pandemic. Skills are assessed by the IEP team (including vocational rehabilitation counselors), and this program is recommended for those with goals that align with this training opportunity. Students will participate in STP, work on their IEP goals, and engage in additional training important for success in the community. Students are offered to work with SSB’s Work Opportunities Navigators to participate in a work-based learning experience following the residential completion of STP.  For the summer of 2022, there were 17 students registered and 20 were registered for the summer of 2023.

To meet the identified needs for youth and students with disabilities, SSB plans to continue offering a wide variety of activities to help them prepare for competitive integrated employment. Some of these activities include:

* Sponsoring adjustment to blindness training or workplace readiness training offered in-house and through community partners.
* Hosting the annual College 101 event, where current and former low-vision, blind, and DeafBlind students form a panel and discuss their experiences in post-secondary with aspiring college students and parents.
* Resuming the SSB career fair previously held every other year. This will be a social event where low vision, blind, and DeafBlind individuals in the workforce come together and offer their experiences and mentorship to high school students with vision loss.
* Collaborating with the University of Minnesota to host a post-secondary assistive technology workshop in the spring of 2024. This will be for aspiring and current college students to learn about assistive technology skills needed for success in higher education.

Another challenge is spending the 15% set aside. SSB continues to identify, develop, and implement creative effective approaches to spending this money. Despite the development of some very innovative programs, it is a struggle to spend all the dollars due to the relatively small number of Pre-ETS students. While each year, we have successfully met (and somewhat exceeded) our 15% requirement both as an agency and a state, we know we have to continue to monitor our budget carefully to ensure we continue to meet the requirement.

To accurately outline and address solutions for the concerns highlighted above, SSB continues to develop a yearly Pre-ETS Blueprint using the framework put into place by WIOA. The Pre-ETS Blueprint outlines SSB’s plans to address the five required activities and nine authorized activities as mandated by WIOA. It outlines our set-aside forecasting formula, which allows for us to offer authorized activities in addition to those required.

The third gap in services relates to students who have multiple challenges. These students may not initially be referred to SSB since their primary disability may create more barriers than vision loss. Once they are connected with SSB, the programs might not fit their individual needs. Because our expertise is in blindness rather than other disabilities, we need to seek partners who can augment the programs with support for those students.

SSB is involved in the E1MN partnership that was launched on July 1st, 2021. E1MN is Minnesota’s state partnership dedicated to advancing employment-first outcomes for youth and adults with disabilities. This partnership evolved from Minnesota’s Employment First policy adopted by the Olmstead Subcabinet in 2014.  E1MN is led by the State of Minnesota Departments of Education (MDE) Career and Technical Education, and Special Education Unit, Employment and Economic Development (DEED) Vocational Rehabilitation Services (VRS) and State Services for the Blind (SSB) Divisions, and Human Services (DHS) Disability Services Division (DSD). SSB serves a very small number of customers through this partnership compared to VRS due to the low incidence of blindness, or blindness not being the primary disability.

DEED entered into a Memorandum of Understanding with DHS, DSD on July 1, 2021, and continues to be involved in interagency work for the E1MN partnership to ensure individuals receiving Medicaid waiver services and vocational rehabilitation services have seamless employment service delivery to achieve competitive integrated employment. MDE is also present for this work focusing on transition students to develop education and training, as well as resources for students and their families, vocational rehabilitation staff, schools and educators, and team members at DHS supporting students with disabilities preparing for and entering employment.

SSB’s new Multiple Systems and Pathways Navigator position will be dedicated to working with students with multiple and/or complex needs. This position will assist with the coordination of various agencies and systems these students can utilize to achieve their employment, independent living, and recreational and leisure goals. Work in this area will ensure SSB follows Minnesota’s Employment First policy and is grounded in person-centered principles. This policy is included in Minnesota’s Olmstead Plan and envisions a future where all people with disabilities can achieve competitive integrated employment.

In summary, there are three identified gaps related to students and youth with disabilities. They are:

* Students being unprepared for post-secondary training
* Dealing with the challenges of allocating and effectively spending 15% of federal dollars
* Better serving students with multiple challenges

Additionally, we face challenges from a lack of community partners to provide services, especially in greater Minnesota. Our state contracting requirements make it difficult to bring in programs that would contribute to spending our 15% set aside and promote new community providers who desire contracting with us, potentially outside the Twin Cities. Minnesota State Services for the Blind is already aware of these gaps and is working on addressing them. We are striving to gain a better understanding of these efforts in the next cycle of this process.

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

State Services for the Blind operates as the Designated State Unit in Minnesota, with the Department of Employment and Economic Development as the Designated State Agency. Due to circumstances within the State and consistent with the requirements of 34 CFR 361.29(a)(1)(ii), SSBhas determined it necessary to engage in activities to establish, develop, or improve facilities for community rehabilitation programs (CRPs) (hereinafter “establishment projects”) in the State for the purpose of providing vocational rehabilitation (VR) services to applicants and eligible individuals, as well as pre-employment transition services (Pre-ETS) to students with disabilities who are eligible or potentially eligible for the VR program.  In assessing the need for establishment projects in the State, SSBhas determined it may be necessary to incur capital expenditures to acquire equipment or improve the field offices of SSB, which satisfy the definition of a CRP at 34 CFR 361.5(c)(8). These expenditures will ensure the continuity of quality service delivery to individuals with disabilities seeking to receive services under the VR program.  The State assures it will submit requests for prior written approval to RSA for those costs that exceed the capital expenditure threshold applicable to the State, or for any capital improvements necessary to ready the space for its intended use under the VR program, consistent with requirements set forth in 2 CFR part 200.

The availability of community partners (the term used by Vocational Rehabilitation Services and State Services for the Blind in replace of “vendors”) varies by service and location within the state. There are currently over 30 total community partners that SSB contracts with that provide Adjustment To Blindness (ATB) and Employment-Related services. For twenty plus years, Minnesota has had three facilities that offer comprehensive ATB training with an optional residential component; for purposes of this document, we refer to them as “community rehabilitation programs”. In January 2024, one of those comprehensive ATB facilities closed its doors for an undetermined amount of time during a reorganization and another has discontinued their residential component.

State Rule allows SSB to utilize the master contracts Vocational Rehabilitation Services (VRS) have developed with community partners as well. This allows SSB customers more service providers to choose from, which is especially needed in greater Minnesota, where there are fewer choices. ATB community partners in rural Minnesota are becoming more difficult to access; providers have retired or otherwise left the industry, or they have limited flexibility with scheduling during non-business hours.

With the greater emphasis being placed on transition aged youth, the need for more transition programs has been identified. Contracts have been developed with seven community partners to provide Pre-ETS and transition programs to students. These services are meant to augment work done by school districts with activities on evenings, weekends, and summer breaks. Since October 2015, SSB has contracted with two Adjustment to Blindness training centers to provide transition programs to students. Since October 2019, a third center began offering a modified version of their full/part time comprehensive Adjustment to Blindness training program to better serve students. With our most recent contracting cycle, which began July 1, 2022, we increased our outreach and trainings efforts to encourage all current and new community partners to include Pre-ETS and transition-related services as appropriate. All contracted offerings are reviewed annually to ensure that they continue to meet the needs of the students and are adjusted accordingly.

SSB is experiencing a reduction in the amount of Orientation and Mobility instructors available. We have had a couple retire and one leave us for employment in another state. Although we have an incoming contract, there is not enough potential new community partners to meet our needs. SSB will need to recruit new qualified O&M instructors and will be looking at ways to offer incentives. SSB has also been working to increase service providers that can provide services to our DeafBlind customers. We have recently developed a contract with the Helen Keller National Center for ATB and Employment-Related services and are exploring the possibility of an in-state training center.

Due to an almost 25% decrease in adjustment to blindness service providers since COVID, Minnesota Blind SSB has been hiring their own in-house staff to provide some of those services. Specifically, we have hired two rehabilitation teachers, one for the VR program and one for the Older Blind program. Rehabilitation teachers provide training in all things related to independence in the home and community, including product identification, safe cooking, and cleaning techniques, etc.

While our rehabilitation teachers do go into people’s homes, there is also a need to have our own rehabilitation teaching space at SSB, which would allow for a safe, neutral location and conducting group lessons. This space could also be used by our service providers for the same purpose. In the past, we could use space offered by community centers, churches, libraries, etc. Since the advent of COVID-19, most places have become restrictive and limit the number of additional people in their buildings.

In addition, as a result of the pandemic, a large shift was made towards a hybrid service delivery model. This means offering services through a variety of methods, including virtual. Many of our meetings and trainings with customers, community partners, and council members are either virtual or a combination of virtual and in-person. Our current infrastructure at our 2200 University headquarters does not allow for accessible hybrid meetings, which means our customers and partners do not have as much flexibility in their ability to choose how they receive their services. This means we need to make improvements to our building to allow for flexibility in service delivery, including improving the technology in our conference rooms and making any further adjustments and improvements to the space. Our customer service survey results shows that customers are overwhelmingly satisfied with being able to receive hybrid and virtual services, as transportation is a huge barrier for them.

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

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

The SRC-B has a standing “Customer Satisfaction and Goals & Priorities Committee” which reviews and makes recommendations regarding customer satisfaction, goals and priorities, and VR effectiveness. The committee reports quarterly to the full SRC-B. In preparing the strategies for the goals and priorities, the SRC-B committees are asked to submit their recommendations to SSB. In 2023, there were no recommendations from the committees to review, and SSB and the Customer Satisfaction and Goals & Priorities Committee jointly developed goals and priorities for the program year 2024. They were presented to the SRC-B at the October 5, 2023, meeting and received a unanimous vote of approval.

and

1. Identify measurable goals and priorities in carrying out the VR and Supported Employment programs and the basis for selecting the goals and priorities (e.g., CSNA, performance accountability measures, SRC recommendations, monitoring, other information). As required in section 101(a)(15)(D), (18), and (23), describe under each goal or priority, the strategies or methods used to achieve the goal or priority, including as applicable, description of strategies or methods that—
2. Support innovation and expansion activities;
3. Overcome barriers to accessing VR and supported employment services;
4. Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post

secondary education, employment, and pre-employment transition services); and

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

[text box: List and number each goal/priority, noting the basis, and under each goal/priority list and number the strategies to achieve the goal/priority]

The following goals and priorities are established to guide our work in the listed areas. They mirror the overall State Plan vision, goals, and strategies. We recognize that measuring progress and outcomes are essential to knowing how we are doing and what to adjust along the way. Each area will have multiple staff and stakeholder participants who will determine what measures to apply, so ongoing final reports clearly show results.

1. **Improve Partnerships*.*** Increase interagency coordination with local and state workforce partners so individuals who are blind, low vision, and DeafBlind, and employers have a customer-centric, positive experience no matter which “door” they enter. The basis for this goal/priority is SSB’s Evolve: VR Initiative.

* Implement an outreach and training campaign that increases the relationships and engagement between Community Partners and SSB staff, so customers quickly receive needed services by:

1. Building a Community Partner Search Tool in WF1 so staff can quickly locate service providers.
2. Hosting regularly scheduled Community Partner and WDU staff training sessions that focus on a certain service type and inviting partners who provide that service to introduce themselves and their services.
3. Developing a schedule to regularly engage with Workforce partners to remind and educate them about how best to work with, and refer individuals to, SSB.

* Develop a universal application and process by:

1. Creating a digital, accessible referral process that quickly and easily connects customers to a WDU staff.
2. Designing an electronic application that is easy to complete and deliver to WDU staff.

1. **Increase the Workforce Participation Rate*.*** Build relationships with businesses that lead to career opportunities with family sustaining wages for individuals who are blind, low vision, and DeafBlind. It is recognized that services prior to job placement in the individuals plan may include internships and work opportunities that build a work foundation which leads to meaningful and career path employment. The basis for this goal/priority is SSB’s Evolve: VR Initiative.

* Redesign how we prepare job seekers and connect them with vacancies by implementing the Rapid Placement Model that places customers into their chosen field as quickly as possible by:

1. Reimagining WDU’s employment services model so the framework meets the needs of customers, businesses, and staff.

1. Establishing a system and process that connects customers to vacancies quickly and efficiently.
2. Better utilizing the WF1 Talent Pool page so job leads are easily shared with customers.
3. Engaging fully with E1MN to develop and use relationships with long-term support

providers to accelerate customers transition to those supports.

1. **Focus on Diversity, Equity, Inclusion, and Accessibility.** Create an agency that better meets the needs of the current and emerging workforce, including improving services to new Americans, underrepresented communities, and veterans. The basis for this goal/priority is SSB’s Evolve: VR Initiative.

* Develop new, and nurture existing, partnerships with entities that represent underserved groups, including:

* + Organizations that serve veterans
  + Communities of color
  + English Language Learners
  + Tribal communities
  + Individuals with severe and persistent mental illness
  + Justice involved
  + Individuals with complex and significant disabilities
  + Immigrants and refugees

1. **Marketing Work Ready Individuals to Employers*.*** Identify and implement innovative and evidence-based practices, and service-delivery approaches so that individuals with disabilities have the same opportunities in the labor market as everyone else. The basis for this goal/priority is SSB’s Evolve: VR Initiative.

* Utilize all available opportunities to encourage eligible employers to use the Employer Reasonable Accommodation Fund for potential and existing employees with disabilities.
* Develop and launch a public outreach and engagement campaign using multiple modes of communication to broadcast to employers that hiring blind, visually impaired, and DeafBlind people is essential to solving their workforce shortages.
* Create a Rapid and Continuous Engagement framework so customers can begin receiving services quickly and sustain their momentum while they are engaged in services. This framework may include:
  + Rapid Eligibility Model
  + Rapid Assessment Model
  + Continuous Engagement Model
  + Rapid Placement Model

SSBhas determined it necessary to engage in activities to establish, develop, or improve facilities for community rehabilitation programs (CRPs) (hereinafter “establishment projects) in the State for the purpose of providing vocational rehabilitation (VR) services to applicants and eligible individuals, as well as pre-employment transition services to students with disabilities who are eligible or potentially eligible for the VR program. These activities will be required to meet our above-described goals and priorities.

For example, due to an almost 25% decrease in adjustment to blindness service providers since COVID, which impacts achieving our goals and strategies, SSB has been hiring their own in-house staff to provide some of those services. Specifically, we have hired two rehabilitation teachers, one for the VR program, and one for the Older Blind program. For that reason, infrastructure improvements need to be completed, including a cafeteria remodel into a rehabilitation teaching space, which will provide better availability to serve customers. This flexibility will allow our customers to receive their services quickly and in a safe environment.

In addition, as a result of the pandemic, a large shift was made toward a hybrid service delivery model. This means offering services through a variety of methods, including virtual. Many of our meetings and trainings with customers, community partners, and council members are either virtual or a combination of virtual and in-person. Our current infrastructure at our 2200 University headquarters does not allow for accessible hybrid meetings, which means our customers and partners do not have as much flexibility in their ability to choose how they receive their services. This necessitates the need to make improvements to our building to provide better flexibility in service delivery.

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

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

[text box: List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies]

**2022 – 2023 Goals, Priorities, and Strategies**

1. **Priority: Competitive Integrated Employment**

Strategies:

1. Implement a model for coordinating employer services with DEED Workforce Innovation and Opportunity Act (WIOA) partners, including:
   * Title I- Adult/Dislocated Worker; Youth
   * Title III- Job Seeker Services
   * Title IV- Vocational Rehabilitation Services
   * SSB is working with DEED partners and stakeholders to develop a Client Relationship Management tool. Currently partners are determining the cost to use Minnesota IT for consulting and services and what funding they can commit. Once this is finalized, the planning process will begin by identifying partner business and customer needs and how to assemble these into a cohesive product.
   * Monitor the Employer One Stop online virtual hub representing all partners and available services and determine any modifications and adjustments needed to ensure its effectiveness.
   * Monitor the E1MN section of the Disability HUB website for DEED outreach and marketing and determine any modifications and adjustments needed to ensure its effectiveness.

Review:

We have made considerable progress on designing a model for better, more coordinated employer services across our department. For example, we now have regional meetings across DEED divisions related to serving businesses and connecting them with workforce services, including talent recruitment.

There has been, unfortunately, no progress on the Client Relationship Management (CRM) tool. We were also not able to create the Employer OneStop hub as we envisioned, since the Department resources were instead put towards improving the CareerForceMN.com platform. However, we have identified a new avenue to accomplishing both items, which includes leveraging the new labor exchange system that is being designed.

Several partners within DEED expressed interest in obtaining a CRM, such as SalesForce, to better track our contacts with businesses. A few divisions within DEED already had SalesForce, and other divisions did not see the benefit. While it has limits, it is a good tool for tracking the employer relationship side of our work. Instituting a new system across partners, including funding agreements and joint policies, is a large-scale effort that requires consensus. While we had Commissioner’s Office support, we did not have consensus across all partners. We are undergoing a digital transformation project, which includes a new labor exchange system, and there was fear a CRM would require dual entry. We are now determining if the new labor exchange, which will integrate with CareerForceMN.com, could meet our needs instead. We are confident that the digital transformation work within DEED will result in a system which will allow us to better engage with businesses and track those contacts. In addition, we believe that instead of creating a new system, modifications could be made to our existing CareerForceMN.com, and will act as the hub we envisioned. SSB is on the steering committee for this entire project, which allows us provide input and share feedback.

Under the E1MN initiative with the Departments of Education and Human Services, a process map was developed called the [Engage, Plan, Find, Keep](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdisabilityhubmn.org%2Fmedia%2Fsqsbrsac%2Fe1mn-efpk-framework.pdf&data=05%7C01%7Cjon.benson%40state.mn.us%7C7ccaece2090547091ee608dbe480a2ff%7Ceb14b04624c445198f26b89c2159828c%7C0%7C0%7C638355013361209436%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=uE8IriF5ec8XdCCTsbzHiGyyoxRV3p8k9raTxII8cjU%3D&reserved=0) framework, which clarifies roles and determines funding of services for those on Medicaid waivers. [E1MN Training](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdisabilityhubmn.org%2Ffor-professionals%2Fwork%2Fsupporting-people-on-waivers%2Fe1mn-training%2F&data=05%7C01%7Cjon.benson%40state.mn.us%7C7ccaece2090547091ee608dbe480a2ff%7Ceb14b04624c445198f26b89c2159828c%7C0%7C0%7C638355013361209436%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=z8QCjjgKOlcASffg3CarsaGK%2FxxGH8v0Qjbgp%2FJBd5I%3D&reserved=0) was launched in 2023 to support the E1MN referral and funding decisions for all roles. The Disability Hub Work Toolkit has a section on [Supporting People on Waivers](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdisabilityhubmn.org%2Ffor-professionals%2Fwork%2Fsupporting-people-on-waivers%2Fthe-engage-plan-find-keep-framework%2F&data=05%7C01%7Cjon.benson%40state.mn.us%7C7ccaece2090547091ee608dbe480a2ff%7Ceb14b04624c445198f26b89c2159828c%7C0%7C0%7C638355013361209436%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=WvWUFbT2gBB%2Bak8XKz6GJWvcrYhIt%2F5UXdGlYKgUK9w%3D&reserved=0) that provides tools and resources to support understanding on the Engage, Plan, Find, Keep framework. The Disability Hub is a premiere website site that is constantly being updated and refreshed. This specific strategy has been successfully completed.

1. Implement ongoing training, tracking, and oversight of Measurable Skills Gains (MSG) and credential attainment of students to reach negotiated targets.
   * Monitor staff tracking of their customers and input of appropriate documentation by in depth review of staff input of customers MSG’s and credentials between enrollment and disenrollment.
   * Ensure accuracy in reporting and validity of the MSGs and credentials claimed.
   * Train staff as needed regarding data fixes necessary for these measures.

Review:

While we have made considerable progress as it relates to reporting on, and tracking of, MSGs and credential attainment, we still have a long way to go. Based on recent data reports from RSA, SSB is below the mean when it comes to our performance rates for these two measures. We attribute this primarily to incomplete and inaccurate tracking by staff in our case management system.

We have employed several strategies to mitigate this. Our Quality Assurance Specialist conducts in depth reviews of the MSGs and credentials claimed after each semester, while also flagging staff of potential MSGs that have not yet been claimed. Additionally, multiple reminders are sent as MSG deadlines approach. These reminders include instruction on what needs to be collected as well as links to previous trainings. Throughout the year, additional training is provided to counselors on MSGs and credentials. Our case management system has several reports available to staff that assist in identifying potential MSGs and credentials. However, while these strategies have helped us double our MSG rate from the previous program year, they are not fully resolving the issues we have. This coming year, we will be looking at the following activities:

* Full system integration between our case management system and the National Student Clearinghouse (NSC). We already have access to the NSC data. However, it is a manual process and by integrating the data into Workforce One, we can make it automated.
* Hiring an administrative support specialist to assist the quality assurance specialist in case reviews, which will include fixing data entry errors in the system and tracking down supporting documentation. We will still be communicating those errors to counselors, but we know many of the errors are occurring because counselors are incredibly busy managing their caseloads. This is one small thing we can do to reduce administrative burden and increase our accuracy in reporting.

1. In coordination with the Advisory Task Force on State Employment and Retention of Employees with Disabilities, develop and implement methods for the hiring and retention of blind, visually impaired, and DeafBlind customers into state government including using Connect 700 and Supported Worker programs.
   * Monitor the recommendation document submitted by the Advisory Taskforce to the Legislative subcommittee. Recommendations included items and proposed statutory changes that will specifically support the hiring and retention of blind, visually impaired, and DeafBlind customers, including:
   * A requirement for all technology and digital content to be accessible and provided in a timely manner;
   * Job posting language to be nondiscriminatory (including not requiring a driver’s license when one is not actually needed);
   * Hiring managers are made aware of the state Accommodation Fund;
   * Reasonable accommodations are provided to allow full participation;
   * State Services for the Blind and Vocational Rehabilitation Services must be consulted when it comes to any updates or changes to the Connect 700 policy;
   * Training of staff on inclusive environments, digital accessibility standards, and the Americans with Disabilities Act.

State Services for the Blind will continue to work with Minnesota Management and Budget to ensure these recommendations are carried out.

Review:

All strategies in this area are considered complete. This past Legislative session put all the Advisory Taskforce recommendations into the applicable statutes, which includes:

* Strengthening state accessibility requirements
* Establishing nondiscriminatory job posting language, including changing the driver’s license requirements to instead say “reliable form of transportation” or equivalent (unless the position is a driving position)
* Providing better awareness of the Centralized Accommodation Fund
* Collaborating with VRS/SSB on changes to the C700 program prior to implementing them
* Requiring mandatory disability training for all levels of staff

The Advisory Taskforce will be reconvening at the start of 2024 to review progress made and conduct oversight on progress made on the above items.

1. **Priority: Internal Controls and Quality Assurance**

Strategies:

* 1. Enhance the case review process to allow for real time results that can be put in SharePoint and allow for trends and patterns that can shape training and accountability and policy process.
     + Case reviews will be conducted by the Quality Assurance specialist.

Review:

As of November 2023, our case review tool has been integrated into our case management system. This allows for a streamlined case review procedure, ability for reviews to be stored in a central location, the option for running reports, and more easily identifying trends that can shape future training or inform policy updates and program decisions. Case reviews are conducted monthly by the Quality Assurance specialist, as well as one supervisor on a rotating basis. This strategy is considered successfully completed.

* 1. Create a data dashboard to allow for real-time reporting of performance and demographics.
     + We will be continuing the work on developing the data dashboard by reviewing existing tools that may be available to meet this need compared to building our own. The expectation is to have completed this project well within the year.

Review:

While we have made some progress in this area, we are not as far along as we wanted to be. Our data analyst went on a one-year extended leave, so we have relied on other department data analysts to assist when they are available. We have, however, been able to work with DEED’s Performance and Technical Management division to begin building data dashboards in Power BI. We have one report fully completed, which is the post-pandemic application and successful closure trend report. We have a list of other reports we would like to have in a more comprehensive dashboard, once we have the staffing level to do so. We are in the process of hiring a second data analyst who will have a larger focus on the creation of data dashboards and tools.

1. **Priority: Under-Represented Populations**

Strategies:

* Increase minority applicants for vocational rehabilitation services who otherwise would not have applied because of statewide outreach with the minority communities. Use applicant data on race, ethnicity, gender, and religion to measure against closure rates to determine if there are trends in unsuccessful closures among a particular protected class.
* Once measurements are established, an action plan will be developed to identify what gaps exist and how to reduce them.

Review:

We have made considerable progress in our intentional and targeted outreach efforts toward underserved and underrepresented communities; however, there is still more to be done. The following activities highlight this progress:

* The State Rehabilitation Council for the Blind (SRC-B) revitalized and renamed the Minority Committee to the Diversity, Equity, and Inclusion Committee. This group is tasked with helping SSB reach and serve more individuals from BIPOC communities.
* We added a demographic profile to our customer satisfaction survey so we can track satisfaction by age, gender, race, and ethnicity; satisfaction results show **higher** satisfaction with our services if you are Hispanic/Latino, BIPOC, or DeafBlind.
* We are hiring a second outreach coordinator who will be able to devote time in connecting with those communities who are historically underserved; this includes our Tribal communities.
* We are serving more individuals from BIPOC communities according to our data, however, across the board, these communities have higher unsuccessful closures.
* We established a contract with a new orientation and mobility specialist contractor who is fluent in Somali.
* We have launched our Literacy for All campaign in our Communication Center; this means we are offering more accessible materials in languages other than English. We have been able to translate our brochures in multiple languages, both written and via audio. In addition, we are in the early stages of supporting the Language Revitalization efforts through the Minnesota Department of Education, which is an effort to revitalize the Dakota and Ojibwe languages.

A work group was created to investigate applicant and closure data and identify gaps and trends. This group spent a considerable amount of time reviewing historical data from the last 3 to 5 years. They even dug into case notes to determine what led to the unsuccessful closure. Through that considerable amount of research, they identified the biggest area of need had to do with serving new Americans and refugees. DEED is fortunate to have the Office of New Americans. The work group met with the Assistant Commissioner for that office to learn more about this population, including cultural components.

It was identified that many staff lack cultural awareness, especially when it comes to how we describe our services and the purposes of our program. We also have a significant lack of service providers who know how to bridge language and cultural barriers, especially when those barriers are partnered with vision loss or blindness. We are unsure what we can do to develop community partners with this skill set, but we are considering the creation of “community liaisons” who can serve as a cultural bridge between SSB staff and the communities.

SSB staff members are receiving ongoing training as it relates to diversity, equity, inclusion, and accessibility, but this training is geared more towards their employment through the State of Minnesota and less around how to engage with, and serve, customers. We are considering implementing the ABCs of Cultural Competence to staff, which is a training offered through UA Currents.

1. **Priority: Transition and Pre-Employment Transition Services (Pre-ETS)**

Strategies:

* 1. Develop a longitudinal study on all youth (ages 25 and younger) case closures. Identify factors that contribute to successful or unsuccessful outcomes.
     + The Transition Subcommittee of the SRC-B has requested the data on case closures specifically for student and youth 25 and under with successful and unsuccessful closures.
     + When the data is received, the Transition Subcommittee will evaluate to identify factors that contribute to successful or unsuccessful outcomes.
     + Based on these factors, we will begin to develop strategies to address how better to ensure successful outcomes.

Review:

These strategies were not implemented, and thus this has not been successfully completed. Due to SSB staffing changes and shifts in leadership of the committee, this work was unable to commence. The committee still plans to move forward with the study, once the second SSB data analyst has been hired.

1. **Priority: Staff Training and Development**

Strategies:

1. Provide a comprehensive and structured training curriculum for new employee onboarding and ongoing staff training by the designated trainer.
   * The designated trainer is developing the comprehensive and structured training curriculum for new employee onboarding and ongoing staff training. Expected outcomes are:

* On boarding and training packages specific to each role that make up the Workforce Development Unit (WDU)
* An annual training and development schedule for the WDU as a whole and for specific unit roles and functions
* Acquiring data about training effectiveness and adjusting as needed

Review:

SSB hired a dedicated staff development specialist, who oversees our annual training plan, as well as ad-hoc and on-demand training. Our trainer has improved the existing onboarding training, creating a robust and comprehensive onboarding for all new WDU staff. Counselor and VR-Tech training plans have been built along with plans geared more toward the other roles in WDU and other units that require a less comprehensive training.

The trainer has also constructed an annual training plan to ensure unit staff are receiving the training necessary to continue to do their work and develop in their roles. This includes monthly counselor only training sessions that focus on topics specific to counselors and provide counselors a venue to collaborate with one another regularly. At times, training topics may be relevant to other unit roles, and the staff in those roles are invited to attend those sessions.

Additionally, there is a training newsletter that goes out weekly and identifies training opportunities that may be valuable to unit staff.

We have been able to procure the YesLMS platform, which houses all of our training. YesLMS puts together content for us which we can modify to meet our needs, or upload our own. CEUs are available for many of them.

We have successfully completed this strategy.

* 1. Increase the level of awareness of the importance of timely communication with customers in response to customer comments on the Customer Satisfaction Survey (CSS)
     + The Customer Outcomes and Goals & Priorities Committee, together with SSB staff, will monitor the frequency of comments on subsequent surveys.
     + SSB staff will investigate other internal controls that could be useful in identifying any communication timeliness problems.

Review:

Each year when the results of the annual customer satisfaction survey are released, SSB leadership reviews every individual comment. While timeliness in communication continues to be a frequently referenced issue, it appears to be targeted toward only one or two specific staff and not the entire work unit. For that reason, we have been able to address those instances on a case-by-case basis. Overall, due to steps we have taken, and continue to take, to reduce administrative burden on staff, we see fewer complaints about communication responsiveness. Staff turnover was another major factor in communication timeliness. At one point, we were down several counselors and VR-Techs, and we had a turnover rate of more than 30%. At the time of this review of our goals and priorities, we are almost fully staffed and have less than 5% turnover. Caseloads are at an average of 45, and we have no counselor vacancies.

We also have a number of internal controls in place to monitor this data on an ongoing basis.

**Timely communication in internal controls via caseload reviews**

Internal control:

Every caseload review includes the date of the last live contact each customer had with SSB, as well as the date that the next live contact is due (the 90-day mark), if it’s within the next 30 days. The dates under ‘Next Live Contact’ might be highlighted (or noted for those with a visual impairment) yellow or red - yellow indicating the next live contact due date is coming up within the next month, or red indicating that the due date has passed, and we did not make live contact with the customer within 90 days of the last live contact. However, even if a due date is red, a counselor may have still made attempted contacts which is always noted for the counselor and supervisor to see. Any concerns that are identified, including a lot of past due dates *without* attempted contacts, are emailed to the supervisor who is asked to review the report with the counselor.

Trends:

We have not seen any overall trends or changes in this area. Counselors are primarily consistent in how much red or yellow they have on their individual caseload reviews, whether that’s a lot or none at all.

**Timely communication in internal controls via intensive case reviews**

Internal control:

Every intensive case review includes reviewing the items listed below:

* Correspondence with customer, vendors, and other SSB staff is professional and responses are sent in a timely manner.
* Counselor maintained contact with customer at least once every 90 days. Or, if customer did not respond to contact attempts, counselor continued to try to engage customer until contact could be made.

Trends:

Counselor review ratings on these items have not included any non-compliant; they are always mostly compliant and most often, compliant ratings.

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

|  |  |  |  |
| --- | --- | --- | --- |
| **Performance Indicators** | **PY22 Actual SSB** | **PY22 Actual Combined** | **PY22 Negotiated** |
| Employment (Second Quarter After Exit) | 39% | 58% | 51.5% |
| Employment (Fourth Quarter After Exit) | 35% | 58% | 49.6% |
| Median Earnings (Second Quarter After Exit) | $7,326.00 | $3,722.50 | $3,411.00 |
| Credential Attainment Rate | 34% | 44% | 31% |
| Measurable Skill Gains | 41% | 51% | 50.3% |

There were no discrepancies identified.

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

SSB uses funds reserved for innovation and expansion activities for its State Rehabilitation Council for the Blind (SRC-B). For FFY 2024, the SRC-B has budgeted $35,730, with the majority of its budgeted line items for interpreters, Court Reporting and Transcription, council member compensation and travel expenses for SRC-B meetings, and council member conference related expenses including registration and out of state travel expenses. SSB’s council is very active and interested in the state of VR at the local, state, and federal level; therefore, funding is budgeted to send at least one to two council members to the spring and fall CSAVR/NCSAB conferences.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **STATE REHABILITATION COUNCIL** | | | | |
| **FOR THE BLIND FFY 2024** | | | | |
|  |  |  |  |
|  | **FFY2024** | **FFY 2024** | **FFY2024** |
| **COUNCIL BUDGET** | **Budgeted** | **Spent** | **Balance** |
|  |  |  |  |
| 410706 Board/Council Member Comp | $ 6,000 | - | $ 6,000 |
| Conference Per Diem Per 2 Participants x 4 conferences |  |  |  |
| 411313 Court Reporter & Transcriber | $ 3,100 | - | $ 3,100 |
| 411319 Educational-Instruction Serv | $ 1,360 |  | $ 1,360 |
| 411601 Travel Expense - In-State (uber, mileage, food) | $ 1,000 | - | $ 1,000 |
| 411602 Living Expense - In-State (hotel only) | $ 400 |  | $ 400 |
| 411605 Private Auto Mileage In State | $ 700 | - | $ 700 |
| 411701 Travel Expense Out of State (Air, Uber, Mileage & Food) | $ 5,000 | - | $ 5,000 |
| 411702 Living Expense Out of State(hotel) | $ 4,500 | - | $ 4,500 |
| 411705-Private mileage (Out of State) | $ - | - | $ - |
| 413001- Awards/Supplies | $ 350 | - | $ 350 |
| 411803 Registration Fees-Conf-Sem Out StP | $ 4,000 | - | $ 4,000 |
| 413006 Food (Not Food Service) | $ 1,500 | - | $ 1,500 |
| 415001 Repair To Equip And Furniture | $ - |  | $ - |
| 430001 Other Purchased Services (Interpreters) including | $ 7,820 | - | $ 7,820 |
| Veritext - Close Captioning |  |  |  |
| 430007 Transportation Paid to Vendor | $ - |  |  |
|  |  |  |  |
| **TOTAL EXPENDITURES** | $ 35,730 | $ - | $ 35,730 |

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

1. Acceptance of title VI funds:
   1. [check box] VR agency requests to receive title VI funds.
   2. [ ü] VR agency does NOT elect to receive title VI funds and understands that supported employment services must still be provided under title I.
2. If the VR agency has elected to receive title VI funds, Section 606(b)(3) of the Rehabilitation Act requires VR agencies to include specific goals and priorities with respect to the distribution of title VI funds received under section 603 of the Rehabilitation Act for the provision of supported employment services. Describe the use of title VI funds and how they will be used in meeting the goals and priorities of the Supported Employment program.

Minnesota State Services for the Blind does not elect to receive title VI funds and understands that supported employment services must still be provided under title I.

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

Minnesota State Services for the Blind does not elect to receive title VI funds and understands that supported employment services must still be provided under title I.

Supported employment services promoting the integration of people with the most severe disabilities into employment in Minnesota have become increasingly available. The scope and quality of supported employment services have improved as more entities become aware of the benefits of ongoing employment supports for individuals with the most significant disabilities. The recent implementation of E1MN has provided a more seamless system between waiver and vocational rehabilitation. However, the demand for supported employment exceeds the capacity of systems in Minnesota to provide the necessary extended ongoing employment supports. In addition to the goals for Title VI Part B described in Section N, SSB will continue to engage in capacity building and technical assistance efforts with other state agencies and community service providers. For example, SSB is currently identifying solutions to increase the availability of job coaches, especially job coaches that are available to provide long-term supports. SSB implemented a payrate increase for providers. Additionally, SSB hired two in-house job coaches to help supplement the job coaching offered by our providers.

SSB provides up to 24 months of supported employment services, beginning after job placement, to allow youth to attain job stabilization prior to the transition to extended services. SSB may provide more than 24 months of supported employment services, if the need for additional time is identified in the IPE. SSB may act as the direct extended services provider to a youth with a most significant disability until the youth reaches age 25 or receives 4 years of extended services through the VR agency, whichever occurs first. SSB then arranges for another extended services provider to continue delivering extended services to youth. SSB does not fund or directly provide extended services to individuals who are not youth with most significant disabilities.

When vocational rehabilitation services are completed, a customer transitions to extended services. That transition occurs when the individual achieves the goals set out in their supported employment IPE, when they reach stability on the job, and when a service provider agrees to begin providing the needed ongoing employment supports. In most cases, the transition from vocational rehabilitation services to extended services occurs within three months. In Minnesota, the sources of ongoing support primarily include the counties, community rehabilitation programs, or other private non—profit organizations. SSB provides up to 24 months of supported employment services after job placement unless additional time is needed for the individual to achieve job stabilization and transition to extended services. SSB may directly provide extended services to youth with most significant disabilities for up to four years, or until the youth reaches age 25, whichever occurs first. SSB does not provide extended services to individuals who are not youth with disabilities.

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

361.5(c)(19)(v).

DEED-VRS/SSB entered into a Memorandum of Understanding (MOU) with the DHS Disability Services Division (DHS-DSD) as of September 23, 2019. The purpose of the MOU was to improve employment services, including the transition to extended services, for individuals with the most significant of disabilities. As highlighted in the MOU, DEED & DHS agreed to work together to align systems so that common customers who receive home and community-based service (HCBS) disability waivers and vocational rehabilitation services (VRS) from DEED-VRS or SSB get seamless and timely supports to make informed choices and meet competitive integrated employment goals.

From these efforts, a model was developed called E1MN (Employment First Minnesota). E1MN works to deliver a seamless and timely employment support system for youth and adults with disabilities so they understand their options and get what they need to achieve and maintain competitive integrated employment. E1MN is led by the State of Minnesota Departments of Education (Career and Technical Education and Special Education), Employment and Economic Development (Vocational Rehabilitation Services and State Services for the Blind) and Human Services (Disability Services Division). E1MN coordinates their work through steering committees for adults (out of school) and youth (in school).

A framework was developed as part of E1MN that describes the continuum of employment services called Engage-Plan-Find-Keep. This framework shows how waiver employment services and supports through Vocational Rehabilitation Services/State Services for the Blind support people at different stages of their path to employment. <https://disabilityhubmn.org/media/sqsbrsac/e1mn-efpk-framework.pdf>.

The overall strategies of E1MN include:

* Aligning our systems — policies, programs, funding, providers, and roles — to better coordinate services and Employment First approaches.
* Connecting partners to solve problems, remove barriers, and transform services.
* Using data and information to drive our work and seek continuous improvement.
* Building on existing strengths and great ideas while developing new resources to share.
* Engaging with our shared customers and stakeholders to communicate our work and incorporate their insights.
* Working with local and culturally specific partners to improve and assure access and equity.
* Building a unified voice through shared communications, training, and support to foster consistent practices and messages for all stakeholders.
* Supporting families in setting a positive trajectory for employment and independence for their child.
* Incorporating person-centered tools and practices to help create a common language and experience for our shared customers.

Minnesota State Services for the Blind has several professional/technical contracts with local providers that offer supported employment services, including customized employment and job coaching. There is a goal as part of E1MN to obtain as many providers as possible to have both a professional/technical contract with DEED-SSB/VRS and a 245(d) license through DHS. That way, the same provider can work with the individual through their entire continuum of employment services (job search, job placement, short-term supports, and long-term extended services). Unfortunately, many providers find the 245(d) license process to be lengthy, confusing, and expensive. In order for our goal to be successful, DHS has been looking at ways to streamline the process in the future.

In addition to what has been described above, Minnesota VRS has a unique state-only funding appropriation to providing ongoing employment supports to individuals with disabilities called the Extended Employment program. SSB eligible customers have been able to take advantage of this available funding if they do not otherwise qualify for waiver-based, long-term employment services (e.g. job coaching).

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

1. Estimates for next Federal fiscal year—
2. VR Program; and

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Priority Category (if applicable) | No. of Individuals Eligible for Services | No. of Eligible Individuals Expected to Receive Services under VR Program | Costs of Services using Title I Funds | No. of Eligible Individuals Not Receiving Services (if applicable) |
| N/A | 250 | 875 | $3,4000,000.00 | 0 |

1. Supported Employment Program.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Priority Category (if applicable) | No. of Individuals Eligible for Services | No. of Eligible Individuals Expected to Receive Services under Supported Employment Program | Costs of Services using Title I and Title VI Funds | No. of Eligible Individuals Not Receiving Services (if applicable) |
| N/A | 25 | 60 | $230,000.00 | 0 |

**(g) Order of Selection.**

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

Minnesota State Services for the Blind will not be implementing an order of selection.

[check box] The VR agency is implementing an order of selection with one or more categories closed.

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

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

1. For VR agencies that have defined priority categories describe—

1. The justification for the order;

Minnesota State Services for the Blind will not be implementing an order of selection.

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

Minnesota State Services for the Blind will not be implementing an order of selection.

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

Minnesota State Services for the Blind will not be implementing an order of selection.

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

[check box] Yes

[x] No

Minnesota State Services for the Blind will not be implementing an order of selection.

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

Not Applicable

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

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

1. The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;
2. The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and
3. Projections of the number of personnel, broken down by personnel category, who will be needed by the VR agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

|  |  |  |  |
| --- | --- | --- | --- |
| Personnel Category | No. of Personnel Employed | No. of Personnel Currently Needed | Projected No. of Personnel Needed in 5 Years |
| Director | 1 | 0 | 0 |
| Deputy Director | 1 | 0 | 1 |
| Supervisor | 5 | 0 | 0 |
| Pre-ETS Coordinator | 1 | 0 | 0 |
| Rehabilitation Counselor | 14 | 0 | 10 |
| Pre-ETS Rehabilitation Counselor | 3 | 0 | 1 |
| Vocational Rehabilitation Technician | 11 | 0 | 5 |
| Employment Specialist | 4 | 0 | 1 |
| Pre-ETS Work Opportunities Navigator | 2 | 1 | 1 |
| Job Coach | 2 | 0 | 1 |
| Rehabilitation Teacher | 1 | 0 | 1 |
| Orientation and Mobility Instructor | 2 | 0 | 1 |
| Assistive Technologist | 5 | 0 | 1 |
| Data Analyst | 1 | 1 | 1 |
| Quality Assurance Specialist | 1 | 0 | 1 |
| Training and Development Specialist | 1 | 0 | 1 |
| Payer | 2 | 0 | 1 |
| Fiscal Staff | 3 | 0 | 1 |
| Outreach Coordinator | 2 | 0 | 1 |
| Contracts Specialist | 2 | 0 | 0 |

1. Ratio of qualified VR counselors to clients: [1:39]
2. Projected number of individuals to be served in 5 years: [920]

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | PY2018 | PY2019 | PY2020 | PY2021 | PY2022 |
| Number Served | 913 | 870 | 815 | 834 | 847 |
| Number Determined Eligible | 224 | 176 | 191 | 210 | 260 |
| Pre-ETS Potentially Eligible | 12 | 17 | 12 | 10 | 10 |

The projected number of individuals to be served in the 5 years is 920 which would account for approximately a 10% – 20% increase each year, keeping consistent with the previous years. This would put SSB beyond the 913 that was seen in 2018 and is in line with the SSB Evolve: VR Initiate and outreach efforts. The current number of open cases at any given time ranges between 675-690. SSB saw a decrease in the numbers of customers determined eligible and served between 2018 and 2021 due to the COVID-19 Pandemic, then started to see a gradual increase beginning in 2021. SSB is now back to pre-pandemic levels of customers eligible per year and approaching pre-pandemic numbers of customers served per year. SSB does not serve a large number of Pre-ETS potentially eligible individuals per year with a current total of 4.

1. Data and information on personnel preparation and development, recruitment and retention, and staff development, including the following:
2. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program; the number of students enrolled at each of those institutions, broken down by type of program; and the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

|  |  |  |  |
| --- | --- | --- | --- |
| Institute of Higher Education | Type of Program | No. of Students Enrolled | No. of Prior Year Graduates |
| University of WI -Stout | Rehab Counseling | 15 | 15 |
| St. Cloud University | Rehab Counseling | 21 | 11 |

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

SSB’s recruitment and retention strategies include the following:

* Participating with the CSAVR Performance and Accountability committee to collectively review data, ideas, and best practices.
* Utilizing the findings from the Penn State study “Recruitment and Retention of State Vocational Rehabilitation Counselors: A Mixed Method Analysis” to inform our problem solving.
* Incorporating the strategies built into our Evolve VR project as it relates to personnel which is to:

1. Develop a job vacancy outreach plan including connections with long-term training grant recipients and higher education programs,
2. Implement hiring and referral bonuses,
3. Establish a formal rehabilitation counselor internship program,
4. Use our department Innovation Lab to work with counselors and their support staff to reimagine their roles,
5. Re-evaluate and redesign the organizational structure to ensure we have the right roles with the right responsibilities to meet the needs of customers and the program, and
6. Provide tuition reimbursement for staff interested in getting their bachelors/masters degrees in vocational rehabilitation.

The overarching intent with these strategies is to:

* Foster a program, environment, and culture that talented and qualified professionals seek out and want to work for,
* Design an organizational structure that meets the needs of the program and the people we serve, and
* Restore the vocational rehabilitation counselor role to be a counselor, not a case manager.

1. Description of staff development policies, procedures, and activities that ensure all personnel employed by the VR agency receive appropriate and adequate training and continuing education for professionals and paraprofessionals:
2. 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
3. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.

All WDU staff members new to SSB receive Introduction to Blindness, Visual Impairment, and DeafBlindness —Phase 1 and Phase 2 Training on the essential aspects of blindness and visual impairment within three months of hire. Minnesota statutory language requires all Rehabilitation Counselors to successfully complete a minimum of 6 weeks of intensive training under sleep shades from an adjustment to blindness center. The 6 weeks of training provides classes in all curriculum areas of the training centers. The curriculum includes training in:

* Communication Skills including Braille and Assistive Technology Instruction,
* Travel Training,
* Independent Living Skills, including techniques of daily living and adaptive leisure instruction,
* Facilitated Structured Group Discussion on topics centering on the impact of blindness on employment, independent living, and social interactions, and
* Other Optional Training Activities which include achieving a personal goal agreed upon by the participant, their SSB supervisor, and staff of the approved vendor.

An example of the specific curriculum includes:

1. **Communication Skills**
   1. Fully understanding the importance and use of uncontracted and contracted Unified English Braille.
   2. Exposure to the uncontracted Braille alphabet and numbers using a slate and stylus, and orientation to

the alphabet with the Perkins Brailler.

* 1. Exposure to using speech output and magnification computer programs and devices.
  2. Identify the positives and negatives of various technology packages, what each does, and the functions they carry out, including operating systems, screen readers, magnification, and mobile technology.
  3. Identifying and using the Radio Talking Book and National Library Service play back equipment.
  4. Exposure to alternative methods of communication for DeafBlind individuals.

1. **Travel Training**
   1. Understanding the importance and use of the long white cane.
   2. Traveling without assistance using the long white cane in familiar areas, including crossing controlled and uncontrolled intersections.
   3. Using public bus and train transit, if available in the community.
   4. DeafBlind traveling techniques.
2. **Independent Living Skills**
   1. Independently place telephone calls.
   2. Using measurement tools and hand and power tools to construct a simple wooden item.
   3. Cleaning techniques which can include sweeping, cleaning furniture, vacuuming, etc.
   4. Telling time using non-sighted techniques (e.g., Braille watch, talking watch).
   5. Identifying coins and bills and using a check writing guide.
   6. Techniques for maintenance of household items.
   7. Managing one's wardrobe including coordinating items, identifying and sorting clothing, maintenance and cleanliness.
   8. Organizing kitchen cupboards and drawers to safely find and identify various cooking ingredients, supplies, and utensils.
   9. Preparing meals using basic kitchen tools (e.g., microwave, electric mixer, etc.) and essential food preparation and cooking techniques.
   10. DeafBlind Independent Living Skills.
3. **Facilitated Structured Group Discussion**
   1. Participating in discussions with other students and staff on topics centering on blindness, visual impairment, and DeafBlindness and its impact on employment, independent living, and social interactions.
4. **Other Optional Training Activities**

1.  Achieving a personal goal agreed upon by the participant, their SSB supervisor, and staff of the approved vendor.

SSB and WDU specific staff also go through six weeks of onboarding after they come back from sleep shade training. Onboarding consists of 6 modules containing a multitude of reading, watching presentations, attending meetings, completing blindness and low-vision specific trainings online, competing activities, and passing quizzes. This includes meetings and completing activities with their assigned employment specialist and assistive technologist. They shadow assistive technology specialists to learn more about the work they do with customers. The new employee learns about not only vocational rehabilitation in terms of its history, but also SSB specific policies and procedures through activities, quizzes, and case study. The case study allows them to use their knowledge of the policies and procedures and implement that with a new system many are unfamiliar with called WorkForce One (WF1). This includes reviewing eye reports, uploading documents to the system, writing case notes, calculating Customer Financial Participation (CFP), completing vendor referrals, and more.

New Employee Onboarding Summary:

**Module 1:**

* Read policy chapters about General Requirements, Information & Referral, Informed Choice, Data Practices, Mandates Reporting and Case Documentation & Record of Service.
* Activities: Upload an accessible document to WF1, understand DRIVE Case Noting Framework, create case notes when given a scenario
* Quizzes: Is this Competitive and Integrated Employment?, Data Practices, Case Documentation

**Module 2:**

* Read policy chapters about referral, intake, and application, eligibility & OOS, Comprehensive Assessment & IPE Development, Comparable benefits, and Customer Financial Participation (CFP).
* Activities: Complete the “Frank Your Name Here” Case Study: Referral Intake & Application, Eligibility, Comprehensive Assessment & IPE Development, discuss comparable benefits for Frank, complete Frank’s CFP
  + Techs do not complete IPEs. A supervisor creates that within the user profile they’re working under.
* Staff Trainer begins scheduling meetings with colleagues around the office to build the new employee’s network.

**Module 3:**

* Read policy chapters about general service provision, other services such as interpretation, maintenance, personal assistance, transportation, vehicle modifications, etc.
* Activities: calculate the cost of school with the Staff Trainer, complete three authorizations in WF1 for ATB, college tuition, and Metro Mobility
* Quizzes: Everything Around Service Provision, CFP and Schooling Quiz
* Staff Trainer continues scheduling meetings with colleagues around the office to build the new employee’s network.

**Module 4:**

* Read policy chapters about Pre-ETS, Translation Services, Subminimum Wage, and Vendor Guidance.
* Activities: Completing a referral for Frank, and leaning more about Pre-ETS by reading the Marc Marcus Case Study and completing an ROI, Pre-ETS authorization, and grade uploading for Marc.
* Staff Trainer continues scheduling meetings with colleagues around the office to build the new employee’s network.

**Module 5:**

* More policy reading.

**Module 6:**

* Learning about other disabilities and resources, like our WF1 Connect Mobile App, autism, neurodivergence, traumatic brain injuries, etc.

New employees are also asked to meet with their team and read and analyze corresponding policy chapters for each individual on their team to understand how their team works, the responsibilities of each team member, and what individual customers may need from the team at any given time, for any customer. Additionally, a weekly newsletter highlighting upcoming opportunities for internal and external trainings and webinars that relates to vocational rehabilitation, accessibility, health and wellness, etc. is sent to current staff so they can keep up to date on skills, research, and also Certified Rehabilitation Counselor (CRC) continuing education units, if they so require. Staff may request, for development purposes, additional or more advanced training activities that will be considered on a case-by-case basis and reflect organizational needs and resources.

In collaboration with other offices of the Department of Employment and Economic Development (DEED), SSB utilizes a collaborative model when looking at employee performance and creates a dialogue between supervisor and staff. Together, they establish goals for the upcoming year and put plans into place that will help the individual reach those goals. A final component is completing a review of any essential professional and employment-related training that is either desired by the employee or required by the employer. Ongoing in-service training offerings give employees a wide variety of options for enhancing and improving skills. This new DEED department-wide initiative calls for employee led Individual Development Plans (IDP) that are organized into two main categories: Skills and Professional Development, and Inclusive Customer Service (for employees) or Inclusive Leadership (for people leaders).

WDU Annual Training Plans are developed and updated every year in August to share ideas and plan trainings for the next year. They include ideas for the WDU Quarterly Meetings, online accessible training platform YesLMS, and Counselor-Only Training Sessions (COTS). Future areas of focus for training include:

* Supported Decision Making
* Person-Centered Practices
* APH ConnectCenter
* HIPAA and Customer Confidentiality
* Readying an Eye Report (COTS)

The Counselor-Only Training Sessions (COTS) are held monthly with varying scheduled topics, speakers, or dedicated time for Counselors to connect and help each other, and share resources. The COTS are informal and an excellent team building opportunity. WDU Quarterly Meetings are held 3-4 times per year with varying topics including speakers, WDU updates, new employee introductions, etc. All WDU staff are expected to attend the meetings or review the recordings which are posted to the unit’s SharePoint site.

Additional DEED Human Resources requires mandatory annual trainings for all employees. Some employees may be asked to complete additional trainings based on their role or leadership authority. Most employees complete the following trainings:

* + Code of Ethics
  + Appropriate Use of Electronic Communications
  + Prohibition of Harassment and Discrimination
  + Security Awareness
  + Preventing Sexual Harassment
  + Workplace Violence
  + Acknowledgements:
    - Code of Ethics
    - Mobile Device Use Policy
    - Workplace Violence Prohibited Policy

In 2021, the WDU created a full-time staff training position to develop accessible online training curriculum to ensure staff understand and apply federal and state policies, agency expectations and standards, and strategic goals and initiatives.  The trainer modified existing curriculum to meet the needs for onboarding new staff, addressing ongoing training and development needs of staff requiring remedial or corrective training, and facilitation of unit wide training sessions on a regular basis.  The trainer is utilizing SharePoint and other electronic methods for sharing on-going information and opportunities for staff development through other available resources. SSB’s accessible electronic training platform, YesLMS, is an example of a resource available to staff where free optional or required training can be accessed. In addition, staff use the policy management system, DocTract, for reading policies during onboarding, for ongoing training, and whenever they need to reference policies and procedures. We expect this outcome will result in stronger foundational competencies for new staff and overall higher levels of consistency and application of program requirements and service provision.

SSB has begun collaborating with Vocational Rehabilitation Services (VRS) to provide training to staff and Community Partners to ensure staff are aware of best practices in the VR and blindness education fields. Agency combined trainings on the new E1MN initiate and E1PBA was an example of this new higher level of collaboration with VRS.

SSB collaborates with technology vendors who provide demonstrations to staff on new products and devices. SSB assistive technology specialists are encouraged to attend assistive technology conferences so they may stay current on the latest technology available in the field and share that knowledge with other SSB staff.  Additionally, SSB has a Technology Resource Lab that is kept up to date with current technology so customers and staff can have hands on experience with it.

SSB is also very fortunate to have a library within our Department of Employment of Economic Development (DEED). Specialized library services provide SSB and VRS with a weekly *DEED Library Alert* which is a service to inform staff of news, research, and developments of interest.

1. Description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency professional and paraprofessional personnel are adequately trained and prepared, including—
2. 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
3. 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.

Policies and procedures are in place relating to the establishment and maintenance of standards to ensure personnel needed by SSB are appropriately and adequately prepared and trained. Such policies and procedures, including negotiated labor agreements with exclusive bargaining representatives, also cover the selection, retention, development, and termination of staff employed by SSB, and includes requirements of State law concerning the classification of SSB positions by Minnesota Management and Budget.

The academic degree standard for a vocational rehabilitation counselor at SSB is the Master's degree in rehabilitation counseling or a closely related field, with graduate-level coursework in each of the following: theories and techniques of counseling; medical/psycho-social aspects of disability, assessment, and occupational information or job placement.

SSB works closely with its Human Resources to ensure only those individuals who have earned a Master's degree in rehabilitation counseling, or a closely related field, qualify for placement on eligible lists for rehabilitation counselor. Therefore, all counselors fully meet the position standard and SSB does not have any expenditures for staff training to obtain a graduate degree in rehabilitation counseling. SSB does not anticipate any factors that would adversely affect the ability to hire qualified staff.

SSB does not require Certified Rehabilitation Counselor (CRC) certification; however several staff have obtained and maintain this credential. Management recognizes the importance of professional affiliations and provides in-house and external opportunities for training with CRC continuing education units available.

New employees come to SSB with a variety of knowledge, skills, and abilities. Nearly all need SSB to provide them with additional information and training to ensure they have the tools and resources to do their job. Minnesotans expect SSB to be “experts” in the field of blindness, low vision, and DeafBlindness. We are the one public organization providing such services. Therefore, SSB has an obligation to train staff on the essential aspects of blindness, visual impairment, and DeafBlindness. To meet that expectation, SSB has a comprehensive training program consisting of:

• Introduction to Blindness, Visual Impairment, and DeafBlindness —PHASE I. Responsibilities of SSB staff do vary, but there are minimum requirements for all positions and are part of this course which is required of all new employees.

• Introduction to Blindness, Visual Impairment, and DeafBlindness —PHASE II. “Under the blindfold” and with simulators are training activities which will be required of some new staff as determined by SSB management.

• Continuing Education in Blindness, Visual Impairment, and DeafBlindness —PHASE III. Training consists of specialized and ongoing training related to blindness and vision loss and will be required of staff as determined by SSB management.

SSB ensures that personnel understand the evolving labor force. Minnesota’s Labor Market Information Office within the Department of Employment and Economic Development (DEED) collects employment, wage, and industry information from throughout the state, then analyzes it to provide information employers and others can use to make decisions and plan. SSB uses the Labor Market Information Office to provide labor market training to its personnel. Other opportunities exist for staff to participate in training such as: area or city specific Business Engagement Networks or other specialized trainings.

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

SSB assures that all materials are available to staff in their desired format. Print material is made available to staff in braille and other alternate formats such as print in native language, large print, and electronic. SSB is fortunate to have Braille and Audio services onsite and can produce high quality Braille and digital recordings in short timeframes. Minnesota is also fortunate to have several spoken and written language transcription services as well as American Sign Language and Tactile Sign Language interpreter services available who contract with the State for use with non-English speaking individuals and/or DeafBlind individuals. Communication Access Real-time Translation (CART) services is another available option through state contract to ensure communication access.

1. 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.

* SSB regularly provides optional and required in-house staff training in the areas of Pre-ETS and working with youth to ensure all staff receive appropriate and adequate training and continuing education including any additional guidance provided by RSA. Additional training opportunities outside of SSB are encouraged and supported.
* Counselors may be asked to make presentations at staff meetings in areas of their expertise which include DeafBlind best practices, person centered services, motivational interviewing, and transition best practices.
* SSB employment, assistive technology, and counseling staff work with other Minnesota state departments on the hiring and integration into their workplaces of blind, visually impaired, and DeafBlind individuals as part of achieving the Minnesota Governor’s executive order for increasing the number of employees with disabilities in the state government workforce.
* SSB staff provided training to educators on the Employment First Minnesota (E1MN) initiative, which activate interagency collaboration for student success.
* SSB staff participated in monthly trainings for educators through state-wide communities of practice, Minnesota Access Center Office Hours, (sponsored by Minnesota Department of Education), regional meetings hosted by regional low-incidence facilitators, and other state-wide professional conferences and workshops.
* SSB has a Pre-ETS resources toolkit for counselors state-wide. The toolkit lists specific resources in each of the five required Pre-ETS activities.
* SSB collaborates with Work-Based Learning Coordinators to better align the schools’ work planning and the vocational rehabilitation program.
* The Work Opportunity Navigators will train and consult with employers to provide guidance about adding student interns and workers who may be blind, visually impaired, and Deafblind to their workforce.

**COOPERATION, COLLABORATION, AND COORDINATION (Section 101(a)(11) of the Rehabilitation Act)**

**(j) Coordination with Education Officials.** In accordance with the requirements in section 101(a)(11)(D) of the Rehabilitation Act—

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

**Technical Assistance and Consultation** DEED's VRS and SSB and MDE's Special Education and Career and College Success staff will provide technical assistance and consultation regarding these five required pre-employment transition services made available to students with disabilities who need them in grade nine until the 22nd Birthday statewide:

* Job exploration counseling to assist students with disabilities in understanding their work-related strengths and interests and what career possibilities there are;
* Work-based learning experiences, which may include in-school or after school opportunities, or experience outside the traditional school setting (including internships), that is provided in an integrated environment in the community to the maximum extent possible.
* Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education.
* Workplace readiness training to develop social skills and independent living.
* Instruction in self-advocacy (including instruction in person-centered practices), which may include peer mentoring (including peer mentoring from individuals with disabilities working in competitive, integrated employment).

**Partnership with SECCSD** DEED's VRS and SSB and MDE's Special Education and Career and College Success Divisions agree to share responsibility for ensuring that schools are aware of, and how to use, the tools to support students with disabilities need to receive current information about their strengths, interests, and preferences in order to make informed choices about competitive integrated employment prior to leaving school. DEED's VRS and SSB and MDE's Special Education and Career and College Success Divisions agree to share responsibility for ensuring that schools which serve students with disabilities receive information about the benefits of providing career information.

**MSIC -** Coordinated services for youth in special education. Minnesota law mandates a coordinated system of services for youth from birth to the 22nd birthday, who are enrolled in special education programs. The Minnesota System for Interagency Collaboration (MnSIC) was formed to develop and implement this system. SSB staff participate on subcommittees that develop service strategies for students and recommendations for governance, and coordination of, state and local collaborative efforts.

**CTIC -** Approximately 70 local CTICs promote statewide interagency coordination to remove system barriers and expand community services. CTICs include parents, students, advocacy groups, local businesses, county government, postsecondary education, vocational education, community education, corrections, SSA health care, and other local service providers. SSB staff serve on CTICs, thereby helping to improve and expand vocational services that result in employment outcomes.

**Serving all public, private, and charter high schools in Minnesota -** SSB counselors are active participants on transition planning teams so that each eligible or potentially eligible student with a disability can access VR services. DEED's VRS and SSB counselors attend meetings for the development of Individualized Education Programs (IEPs), when invited. Counselors will use the IEPs with students to assist in developing the individualized plans for employment (IPE).

**Outreach -** Outreach efforts include working with school nurses, guidance counselors, case managers, principals, social workers, 504 personnel, community agencies, and work experience coordinators to identify students with disabilities who are not in special education programs. For SSB, connecting with students through teachers of the blind and visually impaired is a primary way to ensure that we are serving students. A referral of all potentially eligible students is sought as soon as possible to ensure employment services can begin well before the student leaves school.

**Assistive Technology** On an annual basis, the MDE Assistive Technology Steering Committee submits a request for technology to SSB for the MDE lending library. This lending library is located at the Minnesota State Academy for the Blind and is available for transition-aged students who are blind, low vision, or DeafBlind to use as part of their pre-employment transition services. In addition, when a student with a disability transitions into a work environment or postsecondary program, SSB may purchase any assistive technology device that the SSB’s former school district purchased on the child’s behalf.

1. Describe the current status and scope of the formal interagency agreement between the VR agency and the State educational agency. Consistent with the requirements of the formal interagency agreement pursuant to 34 CFR 361.22(b), provide, at a minimum, the following information about the agreement:
2. Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services;
3. Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under section 614(d) of the Individuals with Disabilities Education Act;
4. The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services;
5. Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals;
6. Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and
7. Assurance that, in accordance with 34 CFR 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.

Vocational Rehabilitation Services (VRS), State Services for the Blind (SSB), and Minnesota Department of Education (MDE) have a memorandum of understanding (MOU) to achieve better coordination between schools and VR services and to create a bridge from the school to VRS or SSB prior to school exit. The intent of the agreement is to:

* Provide consultation and technical assistance to Local Education Agencies (LEAs) in planning for the transition of students with disabilities from school to post-school activities including postsecondary education, training, competitive integrated employment, and independent living.
* Provide secondary transition planning by DEED personnel alongside secondary special education and career and college readiness staff through the delivery of pre-employment transition services and vocational rehabilitation services under the Rehabilitation Act and transition services under the IDEA.
* Define the roles and responsibilities, including financial responsibilities, of each agency, including provisions for pre-employment transition services, vocational rehabilitation services, and IDEA transition services.
* Designate procedures for outreach to, and identification of, students with disabilities who are in need of pre-employment transition services and/or vocational rehabilitation services. Outreach to students should occur as early as age 14.
* Outline services and documentation requirements set forth in section 511 of the Rehabilitation Act, as added by the Workforce Innovation and Opportunity Act (WIOA), regarding youth with disabilities who are seeking subminimum wage employment.
* Provide assurance that neither the SEA nor the LEA will enter an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a youth with a disability is engaged in work at a subminimum wage.

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

SSB works with employers to identify employment and career exploration opportunities in competitive and integrated settings. SSB has four employment specialists who work with employers to identify their needs in finding, attracting, and retaining an inclusive workforce. Employment specialists partner with employers to find qualified candidates, as well as provide education on creating a diverse workforce, worksite analysis, training on disability employment-related topics, identifying improvements to promote inclusive hiring practices, providing information and referrals to other title partners, and job retention services for employees with a vision loss.

SSB employment specialists routinely attend and develop networking events to promote disability awareness and inclusivity training, as well as provide resources and technical assistance to employers in Minnesota and nationwide. SSB staff presented to State of Minnesota agency senior leadership and national and regional company leaders on the advantages of hiring people who are blind, visually impaired, and DeafBlind. SSB provided business services to recruit, onboard, and retain individuals with disabilities to multinational, national, and local employers. Education to employers includes how to recruit, onboard, and retain qualified candidates by creating and maintaining an inclusive and disability-friendly workplace through services like worksite assessments, resources, and technical assistance such as on-site accessibility testing of employer computer systems and data bases, in addition to information accessibility support, at no charge. Providing these services to businesses helps support relationships with employers and enhance the exchange of labor market information to assist in the development of individual plans for employment and self-employment decision making.

SSB actively participates and provides leadership and guidance to local and national groups devoted to connecting employers to qualified individuals with disabilities in cooperation with other DEED entities and title partners related directly to services to businesses. This is done through the Council of State Administrators of Vocational Rehabilitation (CSAVR) and the CSAVR National Employment Team (NET), Statewide Business Engagement Networks (BENs), Chambers of Commerce, national self-employment networking and policy-making groups, and Disability: IN.  In return, the state provides advance communication of employment opportunities, improved communications about the State’s employment processes, assistance with practice interviews, and training to improve candidate performance in the hiring process. Various partners participate in career fairs, community outreach events, job information sessions, training sessions, resource sharing, and more. SSB staff routinely partner with other State of Minnesota agencies to provide training and modules for employers statewide. This includes partnering with the Department of Labor’s Apprenticeship Office, America’s Job Center, and other title partners. SSB staff participated in the development of online virtual learning modules available to all employers statewide on Minnesota’s America’s Job Center labor exchange website, titled Bite Sized Learning Modules. These modules are specific to employers and were developed following a period of input from Minnesota businesses.

The NET through CSAVR is comprised of one point of contact for each of the 78 rehabilitation programs nationwide. The sole purpose of this team is to connect with employers on a national level including private employers and federal partners. The NET enables SSB to connect with new employers monthly and receive correspondence and job leads from twelve or more employers each month. Each year, SSB has customers hired by employers through NET employer connections. SSB also frequently acts as the subject matter expert and resource for other state programs that connect directly to employers across Minnesota. SSB utilizes the relationships with these business partners to supplement the efficiency of contracted Community Rehabilitation Providers, giving more than six one-on-one presentations with employers last year.

The Pre-ETS and transition team at State Services for the Blind is comprised of a Pre-ETS and Transition Program Manager, VR counselors specializing in Pre-ETS and transition, a Pre-ETS and Transition Coordinator, Work Opportunities Navigators specifically serving students and youth, an assistive technologist, support staff, and additional specialists, including Orientation and Mobility instructors and job coaches (these specialists serve students and adults).

SSB has implemented a model for transition called BRIDGE to Success that is implemented with all eligible and potentially eligible transition students. BRIDGE encapsulates SSB’s philosophy upon which our youth services are built. BRIDGE stands for:

•Basic Skills

•Role Models

•Initiative

•Discovery

•Goal Setting

•Experiences

In particular, our team connects with employers to provide job exploration counseling and work-based learning experiences.

Job exploration counseling: SSB’s Work Opportunity Navigators reach out to community employers to identify job shadows and job tours to facilitate career exploration for students. SSB’s Pre-ETS and Transition Coordinator facilitates a Career Expo event, where blind, low vision, and DeafBlind employees from various sectors of the workforce come together and network with students about their journey to employment and working in the community. SSB staff connects with employers to gain an understanding of what occupation needs are open in their business and network to match students with employers for informational interviews. Work Opportunity Navigators bring students into businesses to talk with employers and to network with employers by learning about job openings and in demand community occupations, while coaching students on networking and professionalism skills needed when approaching potential employers.

Work-based learning experiences: Transition Navigators connect with employers to identify work opportunities that are available for students. SSB’s transition team connects students with regional work programs, such as Step Up for students in Minneapolis and BrookLynk for students in the northwest metro. Students work with internal SSB staff and community rehabilitation providers to engage in work experiences from volunteering, to obtaining internships. Work Opportunities Navigators, Pre-ETS and Transition Coordinator, and counselors compile a list of summer internship opportunities in the community and then conduct targeted outreach to students who qualify for various opportunities. SSB staff let students know about the opportunities, as well as assists with applications.

SSB Work Opportunity Navigators support students through orientation and training when work opportunities are developed. SSB staff members engage in the interactive process between students and employers to help address and problem-solve accessibility barriers that may present in the workplace to ensure students’ success and employers’ understanding of how to accommodate and work with the strengths of students.  For example, SSB has two in-house job coaches who connect with employers to provide workplace readiness training and job coaching when a need arises during a work-based learning experience. For students who need more frequent support, SSB works with community partners to authorize those services.  SSB staff connects with managerial staff to check in and follows up after work experiences are underway to ensure student success and development throughout work experiences.

SSB participates in Project SEARCH, which is a business-led collaboration that enables young adults with disabilities to gain and maintain employment through training and career exploration.

A 9-12 month program, Project SEARCH provides total immersion in a large community business. Students with disabilities are offered a workforce alternative for their last year of high school.

The Project SEARCH partnership includes a local host business, a school, VRS/SSB, a Community Service Provider, and a disability services agency. The business provides an on-site training classroom, business liaison, and rotational internships for on-the-job training. The school provides an instructor and job skills trainer(s).

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

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

The Minnesota STAR (System of Technology to Achieve Results) Program, a program within the Minnesota Department of Administration, is funded by the Department of Health and Human Services in accordance with the Assistive Technology Act of 1998, as amended. SSB often refers people to STAR for a device demonstration. This allows customers to compare benefits and features of a particular device, or category of devices. Once a decision on a device is made, the person can borrow the device for 30 days to make sure it meets their needs before SSB purchases the item. SSB and VRS has an executed Memorandum of Understanding (MOU) with STAR to provide assistive technology specialists with commonly used devices for use in doing assessments with customers. During this next Combined State Plan period, there is a plan to update and refresh the MOU, as it has been some time since the last version was drafted.

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

There currently is no formalized working relationship between the Department of Agriculture and State Services for the Blind. The Minnesota USDA Rural Development Office does use technical economic and forecasting information provided by DEED to develop and market its services.

1. Non-educational agencies serving out-of-school youth;

SSB does not have any cooperative agreements with agencies serving out-of-school youth.

1. State use contracting programs;

Since the mid-1990s, Minnesota state agencies have been legislatively encouraged to purchase goods and services from small businesses operated by individuals with disabilities. In 2007, the Legislature enacted a set-aside program, providing that 19 percent of the total value of all state janitorial contracts be awarded to community rehabilitation organizations approved by VRS as service providers under the VRS Extended Employment Program. During the 2010 legislative session, the set-aside program was expanded to include document imaging, document shredding, mailing, collating, and sorting services. Further, the amount of each contract awarded under this section may exceed the estimated fair market price for the same goods and services by up to 6 percent. SSB has utilized these contracting programs in the past when we transitioned to an entirely electronic system and required mass document scanning, collating, and shredding services.

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

The State Medicaid plan under Title XIX of the Social Security Act; Medical Assistance, the state’s Medicaid program, is administered by the DHS Disability Services Division (DHS-DSD). Vocational Rehabilitation Services (VRS) and State Services for the Blind (SSB) collaborate closely with DHS in the provision of services for individuals who are on home and community-based waivers. In September 2019, DHS-DSD, VRS, and SSB signed a Memorandum of Understanding. The terms of the MOU are specific to individuals on a Medicaid waiver who are interested in competitive, integrated employment. Employment First and Person-Centered principles form the basis of the shared vision for how DEED-VRS/SSB and the Medicaid agency agree to provide employment services for people with disabilities in a coordinated manner.

The purpose of the MOU and interagency cooperation is to align systems so that common customers – those who receive home and community-based service disability waivers and vocational rehabilitation services from VRS or SSB – can get seamless and timely supports to make informed choices and meet their competitive, integrated employment goals. Implementation of the MOU agreements began July 1, 2021. DEED-VRS/SSB and the Medicaid agency developed communication, stakeholder involvement, training, and resources prior to launch to ensure understanding of the responsibilities for each party supporting the person on a Medicaid waiver. Under the MOU, the following coordination of services occurs:

**Payment of Services** DEED-VRS/SSB is the primary payer for job-related services (services supporting job development, placement, and employment stability) for common customers. Once employment stability is established, DHS-DSD will continue to pay for long-term supports to maintain employment for customers of all ages. DHS-DSD will also pay for services that assist people in making informed choices and developing informed employment goals.

**Interagency Planning and Policy Development** DHS-DSD and VRS/SSB will use strategic planning, troubleshooting, consultation, and technical assistance to ensure successful implementation of this agreement. Key areas include goal setting, systems development, coordination of services, quality assurance, data collection, and stakeholder involvement. We will:

* Meet as an interagency steering committee to provide MOU oversight, set goals, review program services and financing options, identify promising practices, and resolve disputes.
* Support program liaisons from VRS/SSB and DHS-DSD to coordinate joint efforts in communication, quality assurance, training, and coordination of services, policies, and procedures.
* Create work groups as needed to provide advice and share expertise regarding practice enhancements.
* Hold periodic staff meetings across agencies to ensure coordinated communication and address policy issues.
* Establish an advisory committee that includes stakeholders from VRS/SSB, DHS-DSD, lead agency, and providers of both vocational rehabilitation services and waiver services to discuss progress and challenges with the MOU.
* Collaborate with stakeholders to collect feedback and identify areas for improvement.
* Understand employment outcomes in our respective programs and develop a shared understanding of outcome measures and reporting procedures.
* Promote the use of evidence-based practices and/or promising approaches to create a more closely aligned employment service system, increase quality, and gather shared data on employment outcomes.
* Identify common customers and practices that support positive employment outcomes.

**Eligibility, Referrals, and Customer Flow** DEED-VRS/SSB and DHS will continue to implement and refine the processes and practices developed under the Engage, Plan, Find, Keep framework. This includes promoting regional and local collaboration, E1MN training curriculum, and the tools and resources to support this work on the Disability HUB work toolkit.

**Service Provider Networks** DEED-VRS/SSB and DHS will continue to work together to increase our statewide, shared network of employment service providers to improve access, support seamless transitions, and expand individuals’ choices to high quality employment services. As part of this work, we agree to:

* Evaluate strategies for a common employment service provider pool. We will continue to explore options for creating a shared job search service provider pool to support seamless service delivery and prevent unnecessary interruptions as people move between supports funded by VRS/SSB and supports funded by DHS-DSD.
* Encourage dual enrollment of employment service providers. While DHS and DEED will continue to maintain separate employment service provider licensure/accreditation standards, we will make it easier for providers to understand our respective standards and develop strategies to provide ongoing communication and technical assistance to those interested in enrolling.
* Align and streamline processes and efforts. We will explore opportunities to better align and streamline each agency’s business processes and requirements to create consistency and efficiencies for dually enrolled employment service providers.
* Coordinate communications and training. We will coordinate service provider communications and training to maintain consistent messaging and increase understanding of each agency’s respective system and the shared customer flow outlined in this agreement.
* Measure and promote provider performance. We will explore methods to assess and provide information on service provider performance to people with disabilities and their families to support informed selection of service providers.
* Develop new providers. We will analyze data, set goals, and collaborate on the development of employment service providers in underserved populations and areas of the state.

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

The primary Minnesota agency responsible for services for individuals with developmental disabilities is the Department of Human Services (DHS).

In Minnesota, the Governor’s Council on Developmental Disabilities serves to advocate for all persons with developmental disabilities by carrying out activities in major areas of emphasis.

Minnesota’s Olmstead Plan supports freedom of choice and provides a framework and a series of key activities that must be achieved to ensure Minnesotans with disabilities have opportunities to live, learn, work, and enjoy life in the most integrated setting desired by the person. Former Governor Mark Dayton appointed an Olmstead Subcabinet to develop and implement this plan. The Subcabinet consists of representatives of the MnSIC agencies listed above, the Housing Finance Agency, the Department of Transportation, the ombudsman for mental health and developmental disabilities, and the executive director of the Governor’s Council on Developmental Disabilities.

1. State agency responsible for providing mental health services;

The Minnesota Department of Human Services (DHS) is responsible for coordinating mental health services for adults and youth. Minnesota’s Mental Health system is a state mandated, county operated system. The State Mental Health Authority is responsible for ensuring that Minnesota’s 87 counties, the local mental health authority, provide an array of community mental health services including: basic clinical services, community services and supports, hospitalization and residential treatment. Funding for Minnesota’s mental health system comes from health care insurance, including Medicaid, private insurance, and MinnesotaCare, as well as county and local tax levy funds, state mental health funds, and Federal Block grant funds. Minnesota’s Mental Health and Drug and Alcohol Divisions merged to provide a combined state administration for adult and children’s mental health and alcohol and drug abuse. The emphasis is on moving to integrated care approaches.

1. Other Federal, State, and local agencies and programs outside the workforce development system; and

Following is a discussion of State Services for the Blind’s collaborative arrangements with federal, state and local agencies and with private entities that are not formal components of the statewide workforce investment system.

**Olmstead Subcabinet -** The Department of Employment and Economic Development (DEED) is active on the Governor’s subcabinet to implement the Olmstead Plan that was approved by the U.S. District Court on September 29, 2015. The subcabinet "embraces the Olmstead decision as a key component of achieving a better Minnesota for all Minnesotans and strives to ensure Minnesotans with disabilities will have the opportunity, both now and in the future, to live close to their families and friends, to live more independently, to engage in productive employment and to participate in community life" (2013 vision statement). The employment section of the plan listed two population-level indicators: 1) Increase the employment rate of persons with disabilities so it is comparable to the employment rate of persons without disabilities and 2) Increase the employment earnings of persons with disabilities so they are comparable to the earnings of persons without disabilities.

**Disability Agency Forum -** SSB is an active member of the Disability Agency Forum, which is a group of small disability organizations throughout Minnesota. Representation includes Commission for Deaf/HOH/DB, Deaf and Hard of Hearing Services, Minnesota Council on Disability, Governor’s Council on Developmental Disabilities, STAR, Office of Accessible Technology, Olmstead Implementation Office, and SSB.

**Technically Accessibility Advisory Committee -** SSB provides representation on the TAAC, which is a group that assists with the accessibility of technology throughout the State of Minnesota.

**Minnesota Council on Disability -** SSB provides ex-officio membership to the Minnesota Council on Disability (MCD). MCD’s mission is to serve people with disabilities in Minnesota through development of effective policy, training, technical resources, and collaborations with public and private stakeholders. Their vision is “a barrier-free Minnesota where every person with a disability has full access to all aspects of life.”

**Statewide Independent Living Council -** SSB is an ex-officio member of the SILC. The Minnesota Statewide Independent Living Council (MNSILC) provides statewide planning and policies necessary to provide independent living services to people with disabilities.

**Cooperative agreements with the White Earth Nation Tribal VR program and the Red Lake Nation Tribal VR program** - VRS and SSB provide information, technical assistance, training opportunities, and support to the state’s two tribal VR programs. A formal process is in place for referral and transfer of cases in accordance with best practices ensuring choice. Although not a part of the formal written agreement, the Social Security Administration’s Area Work Incentive Coordinator plays a crucial role in providing technical assistance on benefits planning.

**Professional Vocational Rehabilitation Counseling Organizations -**  Active participation relating to ongoing professional development for staff and to counselor recruitment takes place through well-established working relationships with, and memberships on, the boards of the Minnesota Rehabilitation Association, including the Minnesota Rehabilitation Counseling Association chapter.

1. Other private nonprofit organizations.

SSB holds master contracts with three full-time Community Rehabilitation Providers (CRPs) that are considered private, nonprofit organizations. As of January 2024, one of those CRPs closed their doors for an undetermined time for program restructuring. These contracts focus on providing adjustment to blindness training and employment related services, as well as other services to blind, visually impaired, and DeafBlind customers. SSB discusses with providers during the development of master contracts the scope of services, programs, and rates.

As required by statute, SSB contracts with CRPs to provide the minimum of six weeks intensive training under sleep shades from an adjustment to blindness center for rehabilitation counselors. As of mid-2023, all three CRPs in the Minnesota are able to provide this training. Contracts have also been developed with CRPs to provide transition programs to students. Services are meant to augment work done by school districts with activities on evenings and weekends.

Additionally, SSB continues to implement our “Community Partner + SSB Staff Forums” four times per year as an opportunity to provide updates about agency happenings, discuss trends in findings from monitoring visits, and provide training on pertinent topics such as data practices, navigating the state system for job placement, and Customized Employment.

**VOCATIONAL REHABILITATION CERTIFICATIONS AND ASSURANCES**

**CERTIFICATIONS**

| **States must provide written and signed certifications that:** | |
| --- | --- |
| 1. | The Department of Employment and Economic Development is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by title IV of WIOA,[[1]](#footnote-2) and its State Plan supplement under title VI of the Rehabilitation Act; |
|  |  |
| 2. | In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency or the designated State unit when the designated State agency has a designated State unit)[[2]](#footnote-3) agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[[3]](#footnote-4), the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations[[4]](#footnote-5), policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; |
|  |  |
| 3. | As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency or the designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the administration of the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[[5]](#footnote-6), the Rehabilitation Act, and all applicable regulations[[6]](#footnote-7), 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 unit, or if not applicable, the designated State agency has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement, and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c); |
|  |  |
| 5. | The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. |
|  |  |
| 6. | All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. |
|  |  |
| 7. | The Director of Minnesota State Services for the Blind 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; |
|  |  |
| 8. | The Director of Minnesota State Services for the Blind has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; |
|  |  |
| 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. |

**ASSURANCES**

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

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

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Vocational Rehabilitation Program  Will be Completed in May 2024 after Negotiations of Performance Indicators with The Rehabilitation Services Administration (RSA) | | | |
| Program Year: | | Program Year: | |
| Expected Level | Negotiated Level | Expected Level | Negotiated Level |
| Employment  (Second Quarter after Exit) 22 |  |  |  |  |
| Employment  (Fourth Quarter after Exit) 22 |  |  |  |  |
| Median Earnings  (Second Quarter after Exit [[7]](#footnote-8) |  |  |  |  |
| Credential Attainment Rate |  |  |  |  |
| Measurable Skill Gains |  |  |  |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | All WIOA Core Programs | | | |
| Program Year: | | Program Year: | |
| Expected Level | Negotiated Level | Expected Level | Negotiated Level |
| Effectiveness in  Serving Employers |  |  |  |  |

|  |
| --- |
| Additional Indicators of Performance |
| 1. |
| 2. |
| 3. |
| 4. |

GEPA Requirements

GEPA 427 Form Instructions for Application Package - Vocational Rehabilitation

* + 1. Describe how your entity’s existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
  + 2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
  + 3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
  + 4. What is your timeline, including targeted milestones, for addressing these identified barriers?

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

At Minnesota State Services for the Blind (SSB) under the Department of Employment and Economic Development (DEED), we are committed to cultivating a culture that encourages collaboration, flexibility, and fairness to enable all individuals to contribute to their full potential. Our mission, philosophy, and values embody equitable access to, and participation in, the Vocational Rehabilitation Program. We have Accessibility Champions imbedded into our agency who are dedicated staff trained on accessibility. We celebrate diversity and strive for a staff complement that is reflective of our customer base. Our State Rehabilitation Council for the Blind (SRC-B) shares our commitment to diversity and has dedicated a committee to Diversity, Equity and Inclusion. DEED policies strictly prohibit any form of harassment or discrimination based on the following protected classes:

* Race
* Color
* Creed
* Religion
* National origin
* Sex\* (includes pregnancy, childbirth, and related medical conditions)
* Marital Status
* Familial Status
* Receipt of public assistance
* Membership or activity in a local human rights commission
* Disability
* Age
* Sexual orientation
* Gender identity
* Gender expression
* For employees, genetic information

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

* A lack of service providers is a significant barrier for assisting our customers and achieving successful outcomes. This is especially true for providers of:
  + ELL and Braille
  + Job Coaching
  + Orientation and Mobility Instruction
  + DeafBlind Services
  + Services in Greater Minnesota
* Racial and Cultural Disparities- Our data shows that there are more unsuccessful outcomes for individuals who are part of the BIPOC community, specifically new Americans and English Language Learners. Our customer satisfaction level is higher for individuals from BIPOC communities, showing that they are satisfied with the services they are getting, yet they are still not achieving employment outcomes.
* Students who have multiple challenges may have many barriers since their primary disability may not be vision loss. SSB specializes in blindness rather than other disabilities. Therefore, we need to seek partners who can augment the programs with support for those students.
* SSB uses Title I funds to provide SE services and is declining to receive FFY2024 Supported Employment (SE) funds. SSB has chosen to decline SE dollars because the requirements for using these funds are too restrictive. These funds have youth matching requirements, and the funds can only be used once the individual enters employment. Youth with significant disabilities often require more in-depth and comprehensive training before they are ready and able to enter into employment. Often, they are over the age of 25 by the time this occurs. Should there be flexibility on when the funds can be used and a change to the supported youth matching requirements, SSB will revisit this decision.
  + 1. Based on the barriers SSB has identified, there are many steps we are taking to address barriers:
* Continue working with DEED Human Resources Department to improve the hiring process by removing barriers and increasing equitable access such as removing driver’s license requirements.
* Seeking to have a staff complement that reflects our customers base. SSB has a high percentage of staff who are blind, visually impaired, or DeafBlind and over the last few years, we have had an increased LGBTQ+ and BIPOC presence.
* Continue to champion and educate other state departments on the C700 program with the goal of increasing the number of Minnesotans with disabilities who are employed by the State.
* Hire an ELL Instructor/Coordinator to help with basic English language skills for ELL customers.
* Develop and nurture old and new partnerships with entities that represent underserved groups, including;
  + organizations that serve veterans,
  + communities of color,
  + English language learners
  + Tribal communities,
  + individuals with severe and persistent mental illness,
  + justice involved,
  + individuals with complex and significant disabilities, and
  + immigrants and refugees, especially East African
* Audio and written translations of agency materials by native speakers who are members of the minority and immigrant communities.
* Work with Community Partners to ensure they are armed with the resources they need to serve these communities.
* Build up community liaisons that can help connect SSB with underserved Minnesotans.
* Hired a second outreach coordinator to increase capacity and successful outcomes with messaging, outreach, and communication activities.
* Continue working with DeafBlind ATB training centers by developing new contracts and expanding existing services to increase national DB training options and bring more DeafBlind training options to Minnesota.

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

* Throughout calendar year 2024, we will be addressing the ELL component as well as outreach to underserved communities. A second outreach coordinator has been hired, so we have more capacity for these outreach activities.
* Planning for audio and written translations of SSB materials will start in January 2024, with work anticipated to start in spring and completion by the end of summer.
* We are in the beginning stages of hiring an ELL Instructor/Coordinator. The position request has been sent to DEED HR and could take 2 – 3 months for review. The hiring process to post the position description, review submissions, make an offer, and complete onboarding and training is anticipated to take 6 – 8 months.
* Developing a new contract with a DeafBlind ATB Training Center located outside of Minnesota could potentially take up to 4 months, but is dependent on several factors. The evaluation of a correctly submitted application and proposal takes 2 – 3 weeks. However, the negotiation and contract development phase takes more time.

1. Public Law 113-128. [↑](#footnote-ref-2)
2. All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph. [↑](#footnote-ref-3)
3. No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act. [↑](#footnote-ref-4)
4. Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 CFR part 361. [↑](#footnote-ref-5)
5. No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act. [↑](#footnote-ref-6)
6. Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 CFR part 363. [↑](#footnote-ref-7)
7. [↑](#footnote-ref-8)