

Oregon Vocational Rehabilitation State Plan for 2024 - 2028

July 1, 2024

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Vocational Rehabilitation State Plan Overview

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each state must submit a Unified or Combined State Plan to the Secretary of the U.S. Department of Labor that outlines a four-year strategy for the state’s workforce development system. The publicly funded workforce development system is a national network of federal, state, regional, and local agencies and organizations that provide a range of employment, education, training, and related services and supports to help all job-seekers secure good jobs while providing businesses with the skilled workers they need to compete in the global economy. States must have approved Unified or Combined State Plans in place to receive funding for core programs. WIOA reforms planning requirements, previously governed by the Workforce Investment Act of 1998 (WIA), to foster better alignment of federal investments in job training, to integrate service delivery across programs and improve efficiency in service delivery, and to ensure that the workforce system is job-driven and matches employers with skilled individuals. One of WIOA’s principal areas of reform is to require states to plan across core programs and include this planning process in the Unified or Combined State Plans. This reform promotes a shared understanding of the

workforce needs within each state and fosters development of more comprehensive and integrated approaches, such as career pathways and sector strategies, for addressing the needs of businesses and workers. Successful implementation of many of these approaches called for within WIOA requires robust relationships across programs. WIOA requires states and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified or Combined State Plans.

The Vocational Rehabilitation (VR) services portion of the 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.

Vocational Rehabilitation State Plan Subsections

Input of the State Rehabilitation Council (SRC)

WIOA state requirement:

All VR agencies, except for those that have an independent consumer-controlled commission, must have a State Rehabilitation Council (SRC) that meets the criteria in section 105 of the Rehabilitation Act.

Agency response:

The designated State agency has established a State Rehabilitation Council.

WIOA state requirement:

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.

Agency response:

Council Representative	Current Term Number/ Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC), Brooke Wilson	1	10/22
Parent Training and Information Center, Christy Reese	2	12/22
Client Assistance Program, Corinne Schram	1	03/23
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency), Rose Pabon	1	03/22
Community Rehabilitation Program Service Provider, Jennifer Cassidy	1	03/23
Business, Industry, and Labor, Ed Cortez (waiting for second term appointment)	1	01/21
Business, Industry, and Labor, Bridget Dazey	2	10/23
Business, Industry, and Labor, Brian Sacre	1	03/22
Business, Industry, and Labor, Nicholas Kaasa	1	03/22

Council Representative	Current Term Number/ Vacant	Beginning Date of Term Mo./Yr.
Disability Advocacy Groups, Emily Purry	2	10/22
Current or Former Applicants for, or Recipients of, VR services, Melinda Boley	Pending	Pending
Section 121 Project Directors in the State (as applicable), Susie Calhoun	4	12/22
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA), Shava Feinstein	1	03/22
State Workforce Development Board	vacant/chronic	
VR Agency Director (Ex Officio), Keith Ozols	1	02/24
Developmental Disability Services Partner (state), Brad Collins finishing Allison Enriquez term	1	10/25/2022
Community Rehabilitation Program (CRP) education partner, Chien-Chun Lin	1	3/23/2023

WIOA state requirement:

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.

Agency response:

The SRC coordinator is actively working to recruit a former or current VR customer because the last one termed off in October. This has been an ongoing effort with special attention to age, type of disability and other diversity needs of the council. At the May 2024 quarterly SRC meeting the council voted on and elected a VR customer to the council. The appointment has been referred to the governor's office to complete official appointment. Recruiting for current and former VR customers will continue for representation in southern Oregon and within the age group of under 30 years old. The Workforce Talent Development Board (WTDB) position has been vacant because the terms for that board don't coincide with the terms for the SRC. The SRC does currently have a member who was a past member of the WTDB and who is a current Local Workforce Development Board Director. Her term on the WTDB ended but they are still a member of the SRC. The VR Director is actively meeting with several of the WTDB members as well to educate them about VR and to invite them to join the council. The SRC coordinator has been in contact with the staff and members of that board, as well as the Oregon Governor's Office, in the case that she may need to appoint someone directly, as according to the policy, to return to compliance.

WIOA state requirement:

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

Agency response:

SRC input 1:

The SRC recommends that the State Plan strategies to address the goals and priorities are written in a way that is Specific, Measurable, Achievable, Relevant and Time-bound (SMART). When reviewing the last State Plan, this committee felt that there were many goals that were not definable, measurable or trackable. The SRC would like to have a formal mechanism for tracking the goals, know who is assigned to monitor these goals, and receive reports as they are available but no less than annually on how the goals are being implemented and if they are successful and what are the barriers and possible solutions if they are not.

Agency response:

The VR program agrees that having Specific, Measurable, Achievable, Relevant and Time-bound (SMART) goals is a valuable mechanism to evaluate effectiveness in project implementation and programmatic change. The program started working with the Rehabilitation Services Administration (RSA) on our Corrective Action Plan from our recent monitoring visit, and the program committed to utilizing a SMART approach to addressing each of the areas of that plan. Those SMART goals are posted on VR's intranet site so all staff have access to the SMART goals and their progress. The VR program agrees to use this same approach with the goals, and specifically with the strategies that will be set to accomplish the larger goals of the State Plan. Additionally, the program will provide the SRC with updates no less than annually. Because this State Plan will cover the next four years, and because the program is currently working on the Corrective Action Plan with RSA, it would not be prudent to include within this plan some elements of the SMART process. For example, establishing beginning dates for each goal will need to be timed and sequenced when appropriate and

when sufficient resources and staff capacity is available for a successful implementation of the strategies.

SRC input 2:

Consistent practices across the state. This means that each branch is functioning similarly. Staff, customers and contracted providers would have the same experience regardless of which VR branch they are working in or accessing services from.

SRC recommendations:

- Consistent staff training on updated VR policy manual, at least annually.
- Updated staff training on customer service that include person-centered practices.
- Ensure consistent evaluation of meaningful customer contact according to VR policy.
- Standardized file review practices that are adopted statewide and trained to in each VR branch.
- Data collection will become more consistent with a standardized file review process that records and gathers data.
- Standard training for all staff based on information gathered from the file and service review.
- Standardized training for new staff.
- Create, fund and implement a service quality review process as part of the Consumer Satisfaction Survey conducted by the SRC. This survey should go out automatically to customers and contracted providers at certain points in the process to make sure the customer is being served well before exiting or closing their case.

- **Manager review standardization:** The RSA report indicates there is an expectation that branch managers review cases. It was stated that each office has its own process and tools for doing file reviews and onboarding. There is an expectation that branch managers also conduct reviews. However, each office has its own process and tools for conducting service record reviews and onboarding new staff.

Agency response:

The VR Program agrees to establish consistencies in practices across the state. To accomplish this, the program will standardize training for VR staff and establish statewide procedures to align service delivery across the state.

Additionally, the program will formalize statewide comprehensive quality assurance and file review processes to ensure adherence to policy. Reviews will be conducted at the local branch level and at a statewide level. The quality assurance team and other appropriate VR staff will work with the SRC's Evaluation and Recommendations Subcommittee to review the Consumer Satisfaction Survey and other data to develop recommendations based on customers' experience. We have submitted review questions and policies to RSA as a response to our monitoring findings. We are in process of developing communication and training plans.

As themes are discovered, the quality assurance team will work with the training and leadership teams to develop appropriate interventions and trainings to address any non-compliance issues. The quality assurance team will also review and share with agency and direct service leadership, training staff and policy staff to ensure findings are addressed.

Addressing the findings will be a combined effort between the Policy, Training and Direct Service units to ensure that there is consistent statewide service

delivery. Initially, the Policy and Training units will work together to develop new policies and supporting processes that will address identified issues. The development of these new policies and supporting processes will be completed with input from advisory workgroups made up of direct service staff that will be directly impacted by these changes. The next step will be for the Training unit and the Direct Services unit to develop the trainings with a similar advisory workgroup made up of direct service staff.

Once the new policies and supporting trainings are completed then the Training unit will first train all the local Branch Managers who supervise all the Direct Service staff. This will be an opportunity for all VR Leadership to be trained at the same time, to resolve any confusion and to make any final revisions to the policy or training. Once this step is completed the Training unit will roll out a statewide training plan to ensure that all appropriate staff receive the updated training for the consistent application of the new policies, processes, and service delivery.

The VR program recognizes the need for consistent practices leading to consistent experiences throughout the state; however, there may be some variation due to local branch realities. One example might be the use of specialized caseloads in some areas.

SRC input 3:

Increase communication that is representative of a customer-centered approach that includes communications that are disability-specific and culturally and linguistically appropriate.

- Communication between counselor and customer should be trauma-informed, non-violent, empowerment-based and using motivational interviewing techniques.

- Customer engagement: Create possible plan for VR to contact customer more frequently. For example, contact could be every 30 days using multiple modalities. Supervisors or management should review all cases before closure.
- Customers have expressed a mix of responses about satisfaction with virtual appointments. Steps should be taken to use the customers' preferred method and frequency of contact and learn what works best for them and why. Virtual appointments should be at the request of the customer and/or members of their team, not for the convenience of the program staff.

Agency response:

The VR program agrees with the SRC. RSA's recently released TAC 24-01 reinforces this approach and states that the best way to engage and build trust with customers is to maintain meaningful and sustained engagement with them throughout the VR process. The VR program will develop policies and practices to set clear guidelines for staff on how to engage with customers and respond to customer's needs in a timely manner.

SRC input 4:

The SRC recommends that VR develops a defined menu of some of the individual services that could help customers overcome their functional limitations. The list would help customers and contractors determine what services can be requested, required or supported. Additionally, VR should update definitions of "supported employment" to include Individual Placement Support (IPS) services, customized employment and supported employment services, in order to align with regulatory definitions. Supported Employment Services are "on-going support services that begin at intake, continue with engagement,

Individualized Plan for Employment (IPE), Job Search/Job Development and Follow-Along services, which may include job coaching.”

SRC recommendation: Update policies, procedures and provide all-staff training on these updated supported employment policies.

Agency response:

VR has recently updated its website with “Examples of services you can get” in the [“What Kinds of Services Can I Get”](#) section. Because each IPE is individualized, and the potential list of services needed to address an individual’s barriers to employment is vast, it would be difficult to create a comprehensive list of potential services. The agency agrees that staff could benefit from training on informed choice to be able to truly be a partner in developing each IPE with appropriate services. The program is finalizing the informed choice policy and will develop training for staff.

SRC input 5:

The SRC recommends VR provide a more robust post-secondary education plan to youth and adults that supports their areas of interest and follows VR customers’ journey towards high wage jobs and self-employment opportunities.

- Continue to prioritize and track the completion rate of secondary education opportunities for youth and adults through the Inclusive Career Advancement Program (ICAP) and other training opportunities such as internships, work-based learning, apprenticeships, trade school and certifications.
- Introduce students of all ages with disabilities to assistive technology and other accommodations earlier in their school/career experience.

- Encourage VR staff to attend Individualized Education Plan (IEP) meetings and explore career development with students, families and support people.

Agency response:

The VR program agrees that there are opportunities to create more robust supports for customers and potentially eligible individuals who are seeking post-secondary education and training. The program also agrees that assistive technology can be a vital support to assist access and completion of post-secondary training programs.

Currently VR is developing new contracts for the delivery of Pre-Employment Transition Services (Pre-ETS). These contracts will provide clarity around delivering post-secondary exploration for those potentially eligible students and eligible VR customers who can receive Pre-ETS. Secondly, VR has recently updated the Post-Secondary Education Policy to streamline the process and to provide more authority to counselors to approve plans that include post-secondary education and training services.

The VR program is committed to deepening the relationship with programs that provide assistive technology and will provide tools and guidance for staff about how to access and use these tools. The VR program is encouraged by the early results from the Inclusive Career Advancement Program. the Disability Innovation Grant-funded program that partners VR with community colleges across the state to create career pathways for VR customers. VR commits to continue investing in all of these efforts and seek other best practices in supporting people with disabilities in post-secondary education.

SRC input 6:

The SRC recommends VR expands services with the Centers for Independent Living, etc. around benefits planning.

Agency response:

The VR program agrees that additional resources would benefit the Centers for Independent Living and the Work Incentive Network of benefit planners in Oregon. The VR program will continue to seek additional funding through the Oregon Legislative process. Additionally, the program will seek to identify other resources with other governmental and non-governmental programs that could co-fund these services. The VR program also will commit to partnering with the Centers for Independent Living to identify other funding streams that the centers could pursue to diversify their funding streams for a more sustainable budget.

SRC input 7:

To better partner with VR in a timely and effective manner, the SRC requests that the VR program work with the SRC to create engagement processes such as timelines and communication strategies for projects that the two entities are required to collaboratively complete. These projects include, but are not limited to, the State Plan, the Comprehensive Statewide Needs Assessment and the Consumer Satisfaction Survey. Council members request timely notifications of project activities to create sufficient subcommittee workplans that allow for thoughtful feedback by SRC members. This will translate to improved project outcomes, regardless of who is managing these projects.

Agency response:

The VR program agrees to collaborate with the SRC on shared projects like the State Plan, Comprehensive Statewide Needs Assessment and Consumer Satisfaction Survey. The program will assign VR staff to participate in each of the

SRC's subcommittees to ensure good communication and resources to accomplish shared goals. Additionally, the program proposes that members of the SRC and VR leadership convene a workgroup to develop a long-range timeline of upcoming projects to establish transparent beginning and end dates for upcoming projects.

SRC input 8:

Support increasing the response rate to the Consumer Satisfaction Survey by partnering with other organizations that serve culturally diverse VR customers.

SRC recommendation: To assist with disseminating the Consumer Satisfaction Survey in rural areas and among diverse racial and ethnic groups in Oregon, the SRC recommends VR partner with providers who speak languages other than English and provide culturally specific services.

Agency response:

The VR program is supportive of the goal to increase the response rate of culturally diverse populations. While the Customer Satisfaction Survey is one of the primary responsibilities of the SRC, the program commits to partnering with the SRC in this effort.

One forum for this activity would be the existing Evaluation and Recommendations Subcommittee, although there will be other opportunities for the program to support the SRC.

SRC input 9:

Contracted service providers have expressed technical difficulties and long wait times using the OregonBuys system. Further, Workday poses its own barriers to contractor success.

SRC recommendation: Make sure that a VR support liaison is available to assist contractors' use with both of these systems. This can ensure smooth application processes, decreased wait times and Workday system efficiencies.

Agency response:

The VR Program agrees that the OregonBuys and Workday systems can be a barrier for some providers. These systems are not under the authority and administration of the VR program; therefore, the program is limited in what change can be made. With that understanding, VR is committed to advocating for greater supports provided by OregonBuys and Workday to current and potential providers trying to navigate those systems. Additionally, the VR Administration and Contracts teams will continue to assist current and potential providers to the greatest ability within our authorized role as a program using the OregonBuys and Workday systems.

SRC input 10:

Increased capacity and diversity for services in rural areas. VR partners have said there is a scarcity of program-supported ways to ensure customers have the full range of program provisions enjoyed by customers in more urban areas. Partners articulate creativity in developing relationships and opportunities for customer success and would like more support from VR in consider outside-the-box alternatives.

Agency response:

The VR program agrees that there is a need in some areas across the state for additional service providers and for multilingual and culturally-responsive service providers. The program is committed to increasing services providers and investing in cultural competency training for VR staff to help the program meet

the needs of diverse populations and rural communities across the state. This will be explored through traditional and new and innovative “out-of-the-box” methods.

Some of the resources the program is investing in to meet these goals is to partner with the ODHS Office of Equity and Multicultural Services and its community engagement team to seek out culturally diverse community-based organizations that could provide VR services. Additionally, VR’s Youth Team is developing contracts and opportunities for culturally diverse community-based organizations to provide those earliest interventions in a culturally responsive manner to best serve individuals seeking VR services.

Comprehensive Statewide Needs Assessment (CSNA)

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of the VR services needs of individuals with disabilities residing within the State.

WIOA state requirement:

Provide an assessment of the VR services needs of individuals with the most significant disabilities and their need for Supported Employment.

Agency response:

Oregon VR conducted a Comprehensive Statewide Needs Assessment (CSNA) in FFY 24. This CSNA was contracted with San Diego State University (SDSU – Interworks). This CSNA was conducted in partnership with the State Rehabilitation Council and included surveys, in-person forums, and individual interviews. Oregon VR has begun coordinating program changes with the Oregon Commission for the Blind (OCB), including around services for businesses. OCB and Oregon VR are on the same cycle for when the CSNA is due and will partner with OCB on production of some parts of the CSNA.

These are the executive summary findings from SDSU:

- VR is encouraged to continue to explore ways to increase and improve transportation options for individuals with disabilities in Oregon. VR can explore the creation of transportation task forces in rural counties/communities or use transportation network companies to identify options available and solutions for developing additional transportation resources.
- VR may consider identifying opportunities for key state-level and local partners to meet to strategize the expansion of individualized placement and support and fidelity-based, customized employment programs in Oregon.
- VR is encouraged to investigate the National Supported Employment Community of Practice facilitated by the Center for Innovative Training in VR at George Washington University. Representatives from VR systems nationwide learn together and benefit from shared problem-solving opportunities.
- VR may consider providing Supported Employment training for all staff and contracted providers to increase the use of this model where appropriate. This training should include the essential elements noted by nationally recognized groups like the Association of People Supporting Employment First (APSE) and Association of Community Educators (ACRE).
- VR may consider exploring new SE vendors in rural areas through pilots on unique reimbursement models to start building a network of qualified VR providers for these services.
- VR can explore options to ensure that all staff have access to and knowledge of affordable housing resources for their customers, including the 211 searchable database, affordable housing lists published by Oregon

Housing and Community Services, supportive housing under section 811 for people with disabilities and community action agencies. VR should collaborate with other state agencies to develop a cross-agency task force to formulate targeted plans to address these gaps.

WIOA state requirement:

Provide an assessment of the VR services needs of individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program.

Agency response:

In 2024 Oregon Vocational Rehabilitation conducted a Comprehensive Statewide Needs Assessment. Below are the executive summary findings related to serving minorities and individuals who have been unserved or underserved by the VR program.

While not statistically vastly different from the majority population, there are potential service delivery gaps based on population data discrepancies. However, a statistical analysis comparing ACS population statistics to VR enrollment demonstrates ODHS VR is serving a higher proportion of Native/American Indian, Black/African American, and Pacific Islander and lower proportions of White, Asian, and Hispanic/Latino populations.

- VR is encouraged to enhance the environment and culture of inclusion in the offices across the state.
- VR is encouraged to review the feasibility of creating disability or process-specific VR counselors to focus on outreach and increased services for the unserved and underserved population groups identified in the needs assessment process.

- VR may want to collaborate with state-level and local services and resources for aging Oregonians and potentially develop a working group to address this unique population.
- VR may want to expand staff training in Cultural Brokering and Disabilities and Culture to identify gaps and design solutions to develop culturally inclusive and proficient practices within VR based on state and region-specific needs.
- VR may consider the points recommended by the WIOA related to individuals living in rural areas as an unserved population and develop a specific workgroup to establish an improvement plan. The workgroup would include rural residents, rural business leaders, Tribal VR representatives and contracted providers.
- ODHS may consider establishing new partnerships and building on current partnerships with community organizations not typically engaged with VR but embedded in communities, such as cultural centers, places of worship, foster care agencies, homeless shelters, food banks, and community centers. These efforts could increase awareness of their services and build trust within these underserved communities.
- VR is encouraged to continue to recruit and hire additional bilingual staff to increase their ability to communicate with minority populations.
- VR is encouraged to provide training on trauma-informed care for all staff. Motivational interviewing, intersectionality, and cultural responsiveness, and how these elements impact individuals with disabilities.

WIOA state requirement:

Provide an assessment of the VR services needs of individuals with disabilities served through other components of the workforce development system.

Agency response:

Oregon VR conducted a Comprehensive Statewide Needs Assessment (CSNA) in 2024 through a contract with San Diego State University (SDSU) - Interworks. A portion of the CSNA focused on serving individuals with disabilities through components of the workforce development system. Some items of note:

- Oregon workforce system include collaboration of VR staff serving on each of the nine workforce boards
- VR partners with local leadership teams that serve on business sector workgroups and work to meet business needs in communities across the state.
- VR engages with programs and partnering agencies in education and resource for individuals with disabilities in the workplace.

VR partnerships with other components of the Oregon workforce system has provided access for individuals with disabilities through shared workforce resources that include joint trainings, outreach to community and inclusive hiring events.

Additionally, SDSU provided the following points as part of the Executive Summary of the CSNA:

- VR is encouraged to reach out to the Oregon WorkSource across the state and to identify opportunities for training center staff on effectively working with individuals with disabilities.
- VR is encouraged to develop a plan for creating and facilitating disability awareness training for Oregon WorkSource staff. VR and WorkSource should explore cross-training opportunities where staff in both systems can

learn from each other. Mutually attended events will contribute to networking, rapport-building and resource sharing.

- VR is encouraged to explore co-locating VR and WorkSource offices, or assigning designated staff at each WorkSource office — and vice-versa — whenever possible.
- VR should seek to broaden collaborative practices highlighted by the Center for Advancing Policy on Employment for Youth and other national centers. An essential resource on advancing partnerships with WIOA Title I programs includes [Unlocking the Potential of Title I](#).
- VR is encouraged to co-create a resource guide and training for Oregon Workforce Partners and VR to provide to businesses about hiring, training, accommodating and retaining employees with disabilities.
- In partnership with the Oregon WorkSource, VR should seek to implement Integrated Resource Teams for customers served by the more extensive Workforce Development System. This team approach has proven to assist with leveraging resources and increasing positive outcomes through shared planning and service delivery. More information can be found at [Workforce GPS](#).

WIOA state requirement:

Provide an assessment of the VR services needs of 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.

Agency response:

In 2024 Oregon VR contracted with San Diego State University (SDSU) – Interworks to conduct a Comprehensive Statewide Needs Assessment. Some education related aspects of the CSNA and how we serve youth are:

- VR engages in significant outreach to youth and students with disabilities and their family and support systems in a variety of ways. First, VR staff does outreach about Pre-ETS and the full continuum of VR Transition Services to statewide audiences at the following events: VR Inservice, Council for School Administrators annual Special Education Conference, Oregon Statewide Transition Conference, FACT Parent and Training annual parent transition planning institute. VR also provides outreach to schools locally through attendance at professional development events in schools, parent nights and career fairs.
- Our approach is simple: communicate regularly and honestly, be an accessible partner in through necessary changes. While VR has been in a time of transition with our school partners as we modernize our youth services delivery systems and contracts, our teaming and collaboration with the SEA and LEAs has yielded interest in and application for Pre-ETS contracts at a stable rate; 59 contracts in over 200 schools across Oregon.
- Our MOU with OCB, ODE and ODDS explicitly outlines increased efforts to share cross agency information in a variety of settings, including at school trainings around collaborative transition planning. Regional cross agency teams are building local implementation plans to address increase outreach.
- There are, always. We are currently investigating ways in which we can provide outreach to our incarcerated students and their families, as well as houseless students and their families in non-school environments such as through community resource centers.

- Our cross-agency transition plan, facilitated by the National Technical Assistance Network on Transition (NTACT) has a goal to increase family engagement, and will first be listening and learning about the interest in families across Oregon to engage in mentorship before we'd initiate such a project.
- VR is intentionally moving toward Pre-ETS as a service available to the widest number of students possible instead of concentrated programming for a select few. This coming year will be our baseline year from which we will determine approaches which may be scaled out.
- VR has a strong partnership with FACT, Oregon. FACT's mission is to Empower Oregon families experiencing disability in their pursuit of a whole life by expanding awareness, growing community, and equipping families. Every employee of FACT is a peer, meaning they are a direct familial support for an individual who experiences disability. FACT has been the State of Oregon's contracted parent and training organization since 2012. A representative from FACT serves on our NTACT statewide cross agency transition team and contributes to our goals and state plan. VR will continue to develop and strengthen our partnership with FACT in the pursuit of identifying families, resources and events which can support and mentor families as they progress through the continuum of VR services.

Below is the executive summary from the CSNA related to serving youth:

- VR is encouraged to engage in significant outreach to youth and students with disabilities throughout the state to effectively mitigate the challenges cited related to accessing the Youth Transition Program, Summer Youth Employment Program, and the transition to adult VR services. These challenges occurred following RSA's monitoring of Oregon VR where RSA

required Oregon VR to discontinue the above programs and reconstitute how youth are served.

- VR would benefit from re-establishing and nurturing relationships with the local school districts in Oregon.
- VR is encouraged to explore the opportunity to contract with additional vendors to provide Pre-Employment Transition Services.
- VR is encouraged to create outreach tools and make resources accessible to navigate for families.
- VR is encouraged to formulate an outreach plan to transition staff and families to ensure all students with disabilities have access to information about VR services.
- VR is encouraged to identify “mentor families” who could provide peer support to new families.
- In partnership with Oregon Department of Education, VR is encouraged to establish Model Transition Program sites where transition and Pre-ETS thrive. These MTPs could serve as a demonstration or mentor school for lower-performing schools. Schools in rural locations should receive technical assistance to demonstrate the same practices adapted to their setting.
- VR is encouraged to promote post-secondary education training for youth in transition. There is room for growth in the number of individuals supported by the agency in higher education programs, and youth in transition are an important focus in this area. The existence of the Individual Career Advancement Program (ICAP) funded by RSA can be further leveraged to advance this work and expand beyond the state's community college system.
- VR is encouraged to continue to provide self-advocacy skills instruction for students with disabilities. This area of strength for the agency can be

enhanced by developing and implementing a peer mentoring program in Oregon. One possibility is an online peer mentoring program available through [PolicyWorks](#). A vital component of this mentoring program is the development of self-advocacy skills in youth and students with disabilities.

WIOA state requirement:

Identify the need to establish, develop or improve community rehabilitation programs in Oregon.

Agency response:

In 2024 Oregon VR contracted with San Diego State University (SDSU) – Interworks to conduct a Comprehensive Statewide Needs Assessment. Some service gaps were identified around: customized employment, youth/transition services, Job Placement Service Contract Overview, and benefits planning. As part of this process Oregon VR has begun identifying joint trainings to provide with community rehabilitation programs (CRPs) and VR staff to improve services.

Below is the executive summary from SDSU related to community rehabilitation programs:

- VR is encouraged to partner with CRP groups and organizations like APSE (Association of People Supporting Employment First), OSECE (Oregon Supported Employment Center for Excellence/IPS (Individual Placement and Support), and others, to assess gaps and needs in the field and co-develop a strategic plan for attracting professionals to the state's CRP and VR positions.
- VR is encouraged to engage in cross-training opportunities with contracted providers using person-centered models, motivational interviewing, trauma-informed practices, and culturally responsive approaches.

- VR may consider expanding the Job Development Orientation Training series in alignment with nationally recognized groups, with evidence-based practice models, with standards related to providing high-quality employment services.
- VR is encouraged to develop Supported Employment and Competitive Employment providers for their consumers who need these services in areas with limited access to these services or other Community Rehabilitation Programs.

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.

WIOA state requirement:

VR agencies must describe how the SRC and the VR agency jointly developed and agreed to the goals and priorities and any revisions.

Agency and SRC response:

The SRC and VR agency worked in close partnership to prepare for and develop the goals and priorities for this combined state plan. VR partnered with the SRC in 2023 to help plan and prepare for a Comprehensive Statewide Needs Assessment (CSNA) and three forums: one for VR leadership, one for the SRC,

and a public forum for partners, customers and staff. Both parties worked diligently to create in-person and virtual opportunities for customers, partners, and staff to share their experiences, insights, and ideas for improvement within the VR program. The SRC and VR promoted the public forum in Spanish and provided interpreters. Additionally, an electronic survey, available in English and Spanish, was used to gather input from those who could not attend or were not comfortable speaking up in a public forum. The CSNA was completed on January 10, 2024. The results of the CSNA, forums, and survey were compiled and reviewed for consistent themes that were used to inform the goals and priorities of this plan. Themes identified were consistent across all findings. Some of the themes identified in the CSNA that informed the goals established in this plan are related to helping customers explore education and training programs. Some other comparable benefits, services and consumer needs identified in the CSNA were affordable housing resources, services for aging Oregonians and ways to address a paucity of rural transportation. The SRC and VR are committed to developing a list of resources that can be housed and updated on the internal “Staff Tools” website to address these needs. Continuous efforts will be made by VR and the SRC to partner in the accomplishment and tracking of these goals and priorities.

We agree with the SRC that prioritizing post-secondary education is important so that our customers will be able to focus on careers. That is why we have a strategy on how to increase customer participation in post-secondary education. Additionally, Oregon VR has already incorporated a new program, ICAP (Inclusive Career Advancement Program), that helps facilitate customers into career focused post-secondary services.

WIOA state requirement:

Identify measurable goals and priorities in carrying out the VR and Supported Employment programs and the basis for selecting the goals and priorities (such as the CSNA, performance accountability measures, SRC recommendations, monitoring and 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:

- Support innovation and expansion activities;
- Overcome barriers to accessing VR and Supported Employment services;
- 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
- Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.

Agency response:

Goals, Priorities, and Strategies

Goal 1: Do a great job assisting customers.

VR will reach this goal through the following strategies:

1. Create processes to hear directly from customers about how VR could improve.

- a. Support the SRC in completing the Consumer Satisfaction Survey and use the data to develop new strategies to reach diverse groups.
 - b. Develop a process for customers to give immediate feedback on VR services, including youth services.
2. Do a better job explaining VR services and processes to current and new customers.
 - a. Create an updated video that explains VR services for people who don't know about VR.
 - b. Create materials to help explain VR process and activities.
 - c. Work with partners that have trusted relationships with the disability community, including youth, to share information about VR services.
 - d. Train VR staff to use assistive technology and devices to communicate with customers.
3. Communicate with customers in their preferred language, format and style.
 - a. Make sure all written communication materials for customers are in plain language.
 - b. Create outreach materials and methods in a format that works best for the audience.
 - c. Translate client documents into their language.
 - d. Make standard VR forms available in different languages and formats.

4. Make outreach materials available in different languages and formats.
 - a. Speed up the process of getting services.
 - b. Once a person applies, speed up the time it takes for them to become eligible.
 - c. Once someone is eligible, speed up the time it takes to start meeting with their VR Counselor to create an Individualized Plan for Employment.
 - d. Give decision-making power to the right people so decisions can be made faster. Review and update policies to re-assign decision authority where needed.
5. Help customers explore education and training programs.
 - a. Review and update policies to remove barriers.
 - b. Look to the Inclusive Career Advancement Program (ICAP) team for ways the program could further support customers in accessing training for high-demand fields.
 - c. Increase the number of students getting Pre-Employment Transition Services (Pre-ETS) throughout the state.

Goal 2: Make and improve partnerships

VR will reach this goal through the following strategies:

1. Strengthen partnerships with Workforce Partners to serve more people.
 - a. Look for opportunities for Workforce Partners to provide employment services to customers.
 - b. Share data with Workforce Partners to track outcomes and avoid duplicating efforts.

- c. Collaborate with Workforce Partners on opportunities to share information about VR in community settings.
2. Identify organizations that have relationships in rural areas and with underserved communities — Black communities, people of color, Indigenous communities and other culturally specific communities.
 - a. Partner with ODHS Communications and the Office of Equity and Multicultural Services to identify new organizations, create communication materials and identify outreach opportunities to share information about VR.
3. Develop a process for customers to share feedback about their experience working with VR's contracted service providers.
4. Make sure customers and partners are included in creating policies that help VR to be effective.
 - a. Conduct regular reviews of the VR Policy Manual and Oregon Administrative Rules (OAR) with program partners and contractors to make sure policies are current and that they eliminate barriers to effective service delivery.
 - b. Ask for input on policy changes from the SRC, which represents the needs and concerns of VR customers. This review will take place every two weeks when the SRC Policy Committee meets.
 - c. Ask for input on rule changes from the Rules Advisory Committee, which advises VR on how its rules affect people with disabilities.

5. Continue to invest in training for contracted providers in order to provide professional, consistent services throughout the state. Topics will include:
 - a. Contract trainings specific to job placement services providers.
 - b. Building new skills to help customers.
 - c. Meeting national standards and following best practices.
 - d. Psychosocial communication accommodations — communication techniques assist in engaging with people with mental health conditions. Example techniques include motivational interviewing, trauma-informed care, nonviolent communication, de-escalation techniques, collaborative problem solving, and addressing microaggressions.
6. Build and maintain relationships with businesses.
 - a. Provide training and consultation to business on hiring, supporting, retaining and promoting people with disabilities.
 - b. Participate in business events to raise awareness about VR services to businesses.
 - c. Inform businesses about incentives for hiring people with disabilities.
 - d. Share resources to support businesses in employing, supporting, retaining and promoting people with disabilities.
7. Work with the National Employment Team to have a unified approach to working with business customers.
8. Coordinate with the Oregon Employment Department's Business Services Team to share information about VR with businesses.

9. Partner with the local workforce development boards to coordinate services and share resources.
10. Bring on more contractors to provide services to youth with disabilities.
 - a. Create a fee-for-service contract for Pre-Employment Transition Services for youth and phase out current contract.
 - b. Bring on more contractors who can fill gaps in services. This includes contractors who can serve rural areas, who can work outside of school hours, and who have the language and cultural skills to work with diverse populations.
 - c. Bring on more contractors who can provide opportunities for students to get work experience year-round.
11. Build relationships with schools, families and programs to serve more youth with disabilities.
 - a. Connect with families and students with disabilities about VR youth services to increase awareness.
 - b. Work with partners that have trusted relationships with families to share information about VR services.
 - c. Develop policy that specifically addresses youth-related topics and requirements.
 - d. Develop and implement training for staff and partners.

Goal 3: Hire and keep diverse, well-trained staff.

VR will reach this goal through the following strategies:

1. Make VR offices across the state more welcoming to employees of diverse backgrounds.

- a. Partner with the ODHS Office of Multicultural Services and the VR Service Equity Committee to put into action the ODHS Diversity, Equity, Inclusion and Belonging Plan.
 - b. Share information with new staff about how they can get involved with ODHS affinity groups, called Employee Resources Groups.
2. Continue to recruit racially diverse and bilingual staff who reflect the demographics of Oregon to be effective in serving customers with various languages and cultures.
 - a. Conduct targeted outreach to colleges with diverse student bodies to encourage students to either apply for an internship or employment with Oregon VR.
 - b. Expand and refine recruitment and hiring practices to reach more applicants. Use ODHS resources that support and invest in a diverse workforce.
3. Train VR staff to provide services in a way that is respectful of different cultures and disabilities.
 - a. Expand staff training in cultural brokering, a practice that helps people from different cultures understand each other.
 - b. Provide trainings for VR staff in psychosocial communication accommodations — communication techniques assist in engaging with people with mental health conditions. Example techniques include motivational interviewing, trauma-informed care, nonviolent communication, de-escalation techniques, collaborative problem solving, and addressing microaggressions.
 - c. Identify areas where further training is needed.

4. Provide training and professional development opportunities for staff in all positions to provide professional and consistent practices across the state.
 - a. Train all staff on new and updated policies.
 - b. Train new staff, including new managers, on all policies and procedures.
 - c. Use data and case file reviews to develop training plans.
 - d. Train staff on expectations for how and how often they communicate with customers.
 - e. Train staff on how to move customers quickly through the VR eligibility process.
 - f. Create training on how to use the program's case management system that keeps track of all VR customers and their progress.
 - g. Create training on fiscal management to help staff quickly authorize contracted services and approve invoices, and to make sure they are including the right supporting documents.
5. Continue to develop and support Vocational Rehabilitation Specialists, who are experts in specific disabilities or program areas.
 - a. Create a supportive system for interns by expanding support for supervisory staff.
 - b. Start a formal mentoring program for direct service, program and non-management staff.
6. Start a mentoring program for new staff to help them understand their role. Ideally this will improve performance and their job satisfaction.

- a. Develop a mentoring program for staff with several years of experience to develop new skills or explore different areas of the program.

Goal 4: Make sure our processes work well and we can effectively assist customers.

VR will reach this goal through the following strategies:

1. Create and put into action a thorough system of good internal controls, policies and procedures to make sure we follow federal rules and document requirements correctly.
 - a. Review and update required forms to make them easier and less time consuming for staff.
 - b. Conduct a review of existing policies and procedures to revise decision-making authorities where necessary in order to provide authority to appropriate levels and expedite service delivery.
 - c. Update the intake and application process to make accessing services simpler for customers.
2. Move towards rapid engagement to reduce the number of customers who drop out prior to plan development.
 - a. Reduce the overall count of days from application to eligibility and eligibility to plan development.
3. Provide ways for staff to provide input on the vision, goals and future direction of the program.
 - a. Establish advisory groups that will have rotating membership to give opportunity for more participation. Examples include groups

to advise on policy, Youth Services, and the case management system.

4. Set up strong internal control for the federal grant award to make sure the program is managing the grant money properly, following all federal laws and meeting the terms of the grant.
 - a. Review internal controls annually. When authority updates occur, identify if we need to update, develop or discontinue any controls.
 - b. Develop appropriate training for new and updated internal controls.
 - c. Implement new internal controls and related procedures.
5. Draft and implement a monitoring plan with a risk management component that evaluates financial, legal, security and brand risk in accordance with federal and state requirements. The plan will monitor expenses and case files to make sure we are following federal and state requirements.
 - a. Make sure there are appropriate internal controls to support this monitoring plan.
 - b. Communicate with staff on all aspects of the monitoring process and how it will be implemented.
6. Draft policies, procedures and internal controls over contract monitoring that include monitoring policies and procedures; a monitoring schedule; and a risk management component that is compliant with the federal and state requirements.
 - a. Write applicable policies and internal controls.
 - b. Develop training for staff and contractors.

- c. Update contracts as needed.
- 7. Develop policies and procedures for how we collect and verify our data.
 - a. Regularly update VR's case management system to keep it secure from bad actors and incorporate the latest features and improvements.
 - b. Streamline data gathering procedures to improve staff efficiency and reduce administrative burden.
 - c. Develop policies and procedures for how VR tracks customers who earn a credential for completing a training or education program.
- 8. Conduct regular reviews of the VR Policy Manual to make sure policies are current and streamlined to eliminate barriers to effective service.
 - a. The Policy Advisory Committee will meet quarterly to review current policy and ensure artificial barriers to service are eliminated.
 - b. The Policy and Compliance team manager will host an "open office hour" monthly for staff to interact, ask questions or provide feedback and suggestions.
- 9. Improve consistency of case practices by implementing a case review process to reduce findings and improve customer satisfaction.
 - a. Conduct quarterly, annual, and as-needed quality assurance case reviews to evaluate the quality of services provided.
 - b. A model for multi-office case service record reviews will be developed and implemented by the QA team to ensure accuracy

- of local level review data and to inform policy clarifications and training needs of the program.
- c. Branch managers will conduct local level case reviews to assist with case-specific decision making, ensure compliance, and determine if adequate progress is being made for the customer.
 - d. Conduct an annual statewide survey with VR customers to determine levels of satisfaction with services provided.
10. Provide customers with more support in becoming self-employed.
- a. Work with the policy team to simplify and clarify policy and processes for customers interested in pursuing self-employment, including supported self-employment.
 - b. Provide ongoing training to VR staff on self-employment policy and processes.
11. Create process for VR Workforce and Businesses team to better collaborate with VR counselors in matching customers to jobs that fit their goals and meet the needs of businesses.
- a. Create a process for VR staff to request case consultation or direct support from the team.
 - b. Share information with VR counselors and contracted providers about opportunities for career seekers.
 - c. Provide VR staff, customers and partners with training and support on employment readiness skills that are industry-specific.
 - d. Connect contracted employment service providers with businesses when an employment opportunity aligns with the customer's employment goal.

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.

WIOA state requirement:

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe progress in achieving the goals and priorities identified for the VR and Supported Employment programs.

Agency response:

The VR program goals and priorities established in the 2020-2023 Combined State Plan were as follows:

Goal 1: Increase quality employment outcomes for all Oregonians with disabilities

- Support and accelerate the customer experience to be empowering, effective, and efficient.

VR has worked to improve the customer experience by reducing redundancy and shortening the applicant service questionnaire by multiple pages. In addition, the program also adopted electronic signatures by contracting with DocuSign and our case management system, Aware Sign. This provided opportunities to have virtual intakes and meetings with clients and community partners. Over the past year, VR has had over 2,450e-signature documents and anticipates an increase in electronic signature options as we continue to move towards electronic case records. VR expanded its virtual service delivery options to include career

exploration, one of the required Pre-Employment Transition Services (Pre-ETS). This allowed for some of our service providers to engage with customers who live in rural areas who may have not had the opportunity to engage in career exploration or group Pre-ETS classes. VR has created and implemented 207 virtual training workshops and events since January 1, 2022.

- Continue implementation of inclusive and dynamic statewide student and youth programs that meet the community needs.

VR was awarded the Disability Innovation Fund (DIF) grant in the fall of 2021. This model demonstration grant provided the program an opportunity to expand access to existing career pathways in the state for residents of Oregon with disabilities. The grant, the Inclusive Career Advancement Program (ICAP), was designed to leverage Oregon's current statewide success with career pathways for other populations, including integrated education and wraparound support, to advance educational and economic equity for people with disabilities including those from marginalized populations. ICAP will braid the supports and services of all 17 Community Colleges, located in urban, suburban, and rural settings, with the VR program and the state's Self-Sufficiency Programs in addition to local collaboration with employers and other WIOA workforce partners.

Year 2 ended with successful completion of the first two critical objectives of the grant: completing implementation preparation and the hiring of 10 career coaches at our 10 pilot sites and we are reviewing effectiveness of this implementation for process improvements. Two additional community colleges have added and onboarded career coaches this summer and one additional school is completing the hiring process to begin serving students in Year 3. As of this report, ICAP has enrolled 159 students thus far, adding additional students regularly. As we continue to identify enrollment successes and gaps around the state, analyzing service delivery needs, VR timelines and obstacles, and

addressing granular issues effecting student enrollment and outcomes, we are also investing resources to ensure students receiving this training segway into aligned careers as we build capacity and skills for job acquisition within the Career Coaching model and build relationships with employers. ICAP is embedded within the larger Oregon VR program, and as a result, the benefits of this grant to our larger state VR program continue enhance change not otherwise prioritized without DIF implementation. Most significantly in Year 2, the larger VR program modified its post-secondary education policy. Substantial progress has been achieved in aligning the grant goals with the larger Oregon VR programs attitudes, culture, and framing of post-secondary education for VR eligible participants in Oregon through this policy change and subsequent training. This new policy allows for timely service delivery, the ruling-in instead of ruling-out of potential students in post-secondary education and removed unnecessary approval processes that delayed services to clients. This is consistent with WIOA goals surrounding credential attainment and measurable skill gains. Oregon VR leadership support of ICAP goals along with action-based supports driving critical decision making, process simplification and strategic planning are now at the forefront for other areas of Oregon VR to directly support ICAP students and all Oregon VR clients seeking training services.

In 2021, VR put forward a Policy Option Package to obtain legislative authority for four full time positions to expand the workforce team. These positions have enhanced business services strategies as directed under the Workforce Innovation and Opportunity Act (WIOA). These positions have helped the program with business engagement, outreach and client engagement with potential employers.

- Work with state and local partners to increase access to employment including Supported Employment services for individuals.

VR, in collaboration with Office of Developmental Disabilities Services (ODDS), Oregon Department of Education (ODE) and Oregon Commission for the Blind (OCB), have maintained the Memorandum of Understanding to describe the outlines of each party and agreements of funding and partnership.

In addition, during this programming year, all parties have developed a Project SEARCH steering committee. The intent of this committee is to develop a review of all sites across the state for consistency, review potential new sites for expansion across the state, and look for opportunities for innovation and collaboration with our education partners and community rehabilitation providers. Currently Oregon has 4 project SEARCH sites. Oregon lost 4 sites during the pandemic, however, anticipates that there will be 2 new sites starting in the Fall of 2024.

During the pandemic, VR increased virtual service options to increase access. One example is the addition of virtual career exploration classes for people with intellectual and developmental disabilities. This gave access to people in rural areas that typically lack provider capacity. This provider expanded their ability to serve individuals across the state and this offered an opportunity for our rural communities to participate in a career exploration class that was not previously available. This class continues post-pandemic due to the success.

- Increase programmatic consistencies to ensure quality employment outcomes.

VR hired a Quality Assurance manager to help restructure and design a Quality Assurance unit to improve overall program consistency and review employment outcomes. The program has conducted a complete statewide review of closed VR files. Through this review we were able to reduce the number of forms required for the application process. Training was developed to support the new streamlined process. This new process has reduced redundancy and improved

counselor efficiently. We continue to work with our consumers and direct service staff to determine better methods of service delivery.

- Increase the knowledge about and usage of assistive technology (AT).
- We have made marginal improvements in this area. VR has partnered with ATI to increase access to a full range of high- and low-tech assistive technology for VR participants. These events and avenues have included information sessions about availability and process to access assistive technology to our Transition Technical Assistance Network- a group of subject matter experts from VR, Department of Education and Developmental Disabilities who provide technical assistance and training across the state. Also, annual presentations at the Oregon Statewide Transition Conference, and our Vocational Rehabilitation Inservice. In addition, the update to our transition focused Oregon Administrative Rules include updated definitions and requirements around access to auxiliary aides and services in accessing Pre-ETS which align with the Notice of Interpretation [85 FR 11848](#). Finally, our new Pre-ETS contract includes provision and procedure for accessing auxiliary aides and services for student who require those in order to access Pre-ETS.
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- Increase the knowledge about and usage of assistive technology (AT).

The VR program developed policy and guidance regarding assistive technology and access for youth who are requesting or accessing Pre-Employment Transition Services (Pre-ETS). This guidance was sent to VR direct service staff and training was developed to support the policy and guidance.

In 2022, VR had an opportunity to engage in an onsite assessment to give an opportunity for both staff and customers to learn more about the use of assistive tech in office experiences and for employment in the community.

Goal 2: Increase capacity and resources to provide enhanced levels of service to Oregonians with Disabilities.

- Assist the workforce development system with increasing its capacity and capability to serve Oregonians with disabilities.

VR, in collaboration with each of the WIOA core programs, created a statewide steering committee called the Work System Executive Team with the goal of increasing collaboration across the public workforce development system. VR was able to collaborate with the other WIOA core members on exploring ways to build capacity and resources to provide enhanced levels of service across the public workforce system. VR also created five new positions titled Workforce and Business Coordinators who partner with Local Workforce Development Boards, community colleges, employers, and others to leverage existing comparable benefits that could support VR clients and other people with disabilities seeking competitive integrated employment. VR local area managers also sit on all nine Local Workforce Development Boards to assist in coordinating services across all 36 counties in Oregon.

- Restructure the VR service delivery model to comply with state contracting requirements and be outcome driven.

During the COVID-19 pandemic VR had to make substantial changes to its service delivery model. VR was able to incorporate remote service delivery for every stage of the VR process. VR Counselors were able to provide intake appointments and all subsequent meetings with clients virtually or in-person depending on client choice. Additionally, VR was able to work with contracted providers to ensure in-person, virtual and hybrid services were available. During the early years of the pandemic there was a significant downturn in demand for VR services and this negatively impacted VR's broader network of contracted providers.

VR supported contracted providers by updating the Job Placement Services Contract Training (JPSCT). VR also started providing targeted trainings to

address disability specific skills. In support of requests from our employment providers, this training moved from a required 3-day training to a that was tiered based on the employment provider's role in the agency. For example, training specifically geared towards administrator and billing, training specific to job placement, coaching and reporting.

Since the new contract has been executed, the program has provided 87 trainings. These trainings we offered virtually so vendors across the state could participate. VR also added a position to the contracting unit to help the program comply with state contracting requirements. VR is currently working with the Vocational Rehabilitation Technical Assistance Center for Quality Management on strengthening the program's oversight and evaluation of all contracts to further improve qualitative and quantitative outcomes.

- Expand the availability of Vendor and Partner services that meet the needs of Oregonians with disabilities, including those requiring supported employment services.

VR updated contract requirements for contractors that provide employment services to individuals with the most significant disabilities. These updated requirements ensure that providers have the appropriate qualifications and experience to meet clients' employment and supported employment needs. The updated Job Placement Services Contract Training for contracted providers and the Job Placement Services Contract Overview for VR staff was initiated to enhance the collaborative nature in which program staff and providers throughout the state provide services to VR clients.

As stated above, VR partnered with employment providers to develop a monthly learning community of practice that provided training to vendors and partners to support training needs on relevant topics. Many of the topics and learning objectives were tied to emerging training needs. Examples of some of the new

and post-pandemic needs were virtual service delivery and delivering employment related supports for VR clients working in remote settings.

Goal 3: Improve the performance of the VR program with respect to the performance accountability measures under section 116 of WIOA.

- Increase staff knowledge of the labor market.

VR introduced several online tools to research emerging local and regional employment trends and current labor market information. The Oregon Employment Department's Workforce and Economic Research Division runs the [QualityInfo](#) website that provides dynamic and real-time local and regional labor market information. Additionally, VR has partnered with the [Oregon Career Information System](#) that specializes in labor market information for students and youth in Oregon. VR also uses national information such as [The Career Index Plus](#) to research labor market information on a national scale.

VR also engaged with all 17 community colleges and nine Local Workforce Development Boards to explore emerging employment trends and other sector strategies. The goal was to align local employer needs with education programs that provide credentialing and training.

- Expand opportunities for skill gain and credentialing.

VR has expanded opportunities for skill gain and credentialing for clients through the Disability Innovation Fund grant that is focused on creating access to career pathways for people with disabilities. Initial results are positive and VR clients, through the supports provided by this program, are successfully accomplishing measurable skills gains and earning credentials in their desired field of employment.

In the spring of 2023, VR provided targeted trainings for staff on measurable skills gains and credential attainment. VR recognized that the program's case

management system had several deficits in reporting and capturing measurable skills gains and credential attainment outcomes for clients. To address this issue VR has been working extensively with the Vocational Rehabilitation Technical Assistance Center for Quality Management on improved reporting on measurable skills gains and credential attainment. This work includes updating the education screens of the case management system to accurately record and report measurable skills gains and credential attainment for clients.

- Expand opportunities for clients to learn about and enter higher wage, high demand jobs.

VR has expanded opportunities for clients to learn about and enter higher wage, high demand jobs through the Disability Innovation Fund (DIF) grant that is focused on creating access to career pathways for people with disabilities. The partnership with local VR offices and the local community colleges has provided greater awareness of local sector strategies that identify high demand employment opportunities. This new partnership creates a formalized relationship between VR and the college to create greater access to these programs. This includes campus visits for clients to shadow and observe course offerings. The DIF grant funded career counselors and VRCs work with the clients at every step of their experience to ensure they have a supported educational experience that assists the client in overcoming disability related barriers. VR's workforce and business team are now partnering with local employers that are seeking qualified employees graduating from the career pathway programs. This "warm introduction" is an emerging way that VR can provide a continuum of services that lead to clients entering high wage and high demand jobs.

- Create an employer engagement model that creates opportunities for work-based learning opportunities.

VR's youth team is at the initial stages of creating a year-round Work-Based Learning Experiences (WBLE) program for students with disabilities to learn about the region's top industries. Work experiences can be paid and short-term while fostering self- and career-exploration. These opportunities will include assessments to identify skills, interest, and support needs at the worksite. They will also provide long-term benefits to employers by building a pool of local skilled workers who have gained employability skills through the program.

These work experiences are seen as a viable option for VR to engage and develop meaningful, "win-win" relationships with employers. These employers could host student "interns" at their earliest stage of career exploration. And VR's VRCs and workforce and business team can continue to strengthen the talent pool pipeline of VR clients graduating from the career pathway programs with support from the Inclusive Career Advancement Program.

- Expand the use of Benefits Planning to assist Oregonians with Disabilities.

VR continues to be dedicated to the goal of expanding the access and use of benefits planning to assist Oregonians with disabilities in entering competitive integrated employment. The Work Incentives Network (WIN) is administered by VR. WIN is one of two Oregon programs that offer free benefits counseling to Oregonians with disabilities who are interested in working. Certified benefits counselors help people with Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI) benefits understand how working may affect their benefits and how work incentives can help them meet their job goals.

The WIN team contracts with Work Incentives Coordinators who provide direct client services in Centers for Independent Living (CILs) across Oregon. The WIN team provides technical assistance and support to community partners, VR staff and WIN contractors.

VR had two unsuccessful requests for additional funding from the Oregon legislature to expand these benefits counseling services in the state. VR plans to submit another request in the upcoming legislative long session for additional general funds to expand the network. Concurrent with the past and upcoming requests, VR is working with partner agencies to identify other funding sources that could support and expand benefits counseling throughout the state. Notably the Office of Development Disability Services was able to include benefits planning as a billable service on their medical waiver. A continuing challenge for the state is related to the limited capacity of certified benefit counselors.

WIOA state requirement:

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe 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.

Agency response:

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 22 Actual
Employment (Second Quarter After Exit)	50.0%	51.0%	59.9%
Employment (Fourth Quarter After Exit)	40.0%	43.0%	55.1%

Median Earnings (Second Quarter After Exit)	\$3514.20	\$3,700.00	\$4,034.65
Credential Attainment Rate	34.0%	35.0%	46.0%
Measurable Skill Gains	25.0	32.0%	33.1%
Effectiveness in Serving Employers	Not Applicable	Not Applicable	

For program year 2022 Oregon VR exceeded all of the Negotiated Levels of Performance.

WIOA state requirement:

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe 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).

Agency response:

VR uses a portion of our funds every year to provide innovative activities that allows us to expand our services in partnership with the SRC and State Independent Living Council.

Over the reporting period, the SRC partnered with the VR program in several ways, to uplift the voice of consumers of the program.

- The Consumer Satisfaction Survey was reimplemented. This started with an “in-house” attempt that led to council members realizing that more meaningful results would be received if it was done thorough a third party that could disseminate the survey and provide an analysis of the results. The SRC and VR contracted with Western Oregon University to establish a baseline understanding of how VR customers were feeling about services.

The results of this survey provided evaluations and inputs for the State Plan and matched other results from other tools around areas of success and areas that needed improvements.

- One of the SRC subcommittees developed and distributed a one-time vendor survey to learn about the needs and challenges of contracted providers and challenges so that VR could increase and retain contractors.
- The SRC and VR conducted many outreach efforts to add membership and representation of diverse populations on the council. Outreach efforts included inviting more people to SRC meetings, attending related conferences and meetings and spending time building relationships among communities served in VR.
- During the pandemic, the SRC held virtual meetings. The council was able to resume in-person quarterly meetings in May 2023 while continuing to offer a virtual attendance option. SRC members attended the VR in-service conference and combined the third quarterly meeting at the same time to save travel time and dollars, allowing council members to attend and present at the in-service as well as to network with staff and other community partners.
- Innovation: The SRC's Evaluation and Recommendation Subcommittee spent countless hours reviewing and analyzing relevant data from the program and results of the surveys to provide recommendations to increase and improve customer services.
- The legislative workgroup collaborated with other ODHS programs to hold events for National Disability Employment Awareness Month in October. The SRC invited Oregon Legislators to learn about how ODHS programs support people with disabilities around employment and to hear success stories.

During the reporting period, the State Independent Living Council (SILC) was provided \$295,587 in federal Innovation and Expansion funds, which were matched with \$80,000 in state general funds to support the SILC, consistent with the Act. The council collaborated with the VR program on various efforts, supporting distribution of VR program information to the disability community. The SILC's Executive Director also served on the SRC and some of its subcommittees.

The SILC also collaborated with VR to improve the partnership, with special focus on transition services for youth — a core service of the SILC's Independent Living Program. The State Education Agency and VR also explored opportunities for a [Disability Innovation Fund - Pathways to Partnerships](#) grant, though neither had capacity to administer the grant. The SILC worked with the Administration for Community Living to assist in communicating with the RSA regarding possible other eligible grantees. Centers for Independent Living continue to consider other grant opportunities to support the project.

Funding of the SILC also supported two goals of the State Plan for Independent Living.

- Development of a statewide initiative to aid in youth leadership and training. This goal is still in progress. The SILC explored approaches used in other states for youth initiatives, expanded outreach to contacts able to help make connections with youth across the state and planned for hiring of SILC staff to lead a youth initiative within the Independent Living Program to prepare for implementation.
- Providing a statewide training conference for Oregon's Independent Living network. This was completed, with plans underway for a future conference. This was a highly valued opportunity by participants including the

Independent Living Program service providers and the SILC. The conference included:

- Sharing in small groups with those in similar jobs (Work Incentive Counselors, Independent Living Specialists, administrators, board members, etc.)
- Training regarding:
- Innovative services
- Consistent data collection practices
- History of the Independent Living movement and the ADA
- Behavior health policy systems change
- Methods for collaboration with community colleges to foster students with disabilities as advocates
- Innovative ways to serve youth with disabilities and build community

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

WIOA state requirement:

Acceptance of Title VI supported employment funds.

Agency response:

The VR agency requests to receive Title VI supported employment funds.

WIOA state requirement:

If the VR agency has elected to receive Title VI funds, Section 606(b)(3) of the Rehabilitation Act, which 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.

Agency response:

Oregon VR's Title VI, Supported Employment Funds are \$506,400 for the biennium. At a cost per case of approximately \$4,990, we will be able provide services to approximately 101.48 Supported Employment customers using these funds. The number of individuals receiving Supported Employment services is much larger than this number; approximately 3,161.52 participants will receive supported employment services funded with Title I funds.

WIOA state requirement:

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.

Agency response:

Extended services are ongoing support services and other appropriate services identified, needed and agreed upon in the IPE. Extended services are provided once the participant is stable on the job and no longer needs VR services to maintain employment.

- An extended service provider is the entity that provides extended services when VR services are no longer needed for job performance.

- An example of extended services would be job coaching services paid for by Medicaid waiver services through County Developmental Disability Programs, brokerages or mental health agency funding.

Note: This was previously termed “long-term support services” through VR.

Resources for extended services could include, but are not limited to:

- County developmental disability services
- Mental health agency funding
- Social Security work incentives
- Co-worker natural support systems
- Family members, friends
- Oregon income cap trust fund

Extended services may only be funded by VR for youth with the most significant disabilities for up to four years, or until the individual turns 25 and no longer meets the definition of a youth with a most significant disability, whichever comes first.

- For example, a youth with a most significant disability who requires extended services but is not eligible for Medicaid waiver services is not eligible for extended services when they are age 25.
- The counselor must identify another source of extended services for the youth to ensure there is no interruption of services.

Note: VR may not provide extended services to an individual who is not a youth with a most significant disability.

The VR counselor coordinates with the appropriate case management entity to transition the customer to extended supports.

Any youth considering the possibility of seeking employment in a sub-minimum wage setting must receive documented counseling in accordance with all provisions outlined in [Section 511 of the Rehabilitation Act](#).

VR works closely with other state agencies whose populations benefit from VR Supported Employment services. VR, the Department of Education, and the Office of Developmental Disability Services work together with the state's Employment First program to ensure that individuals who experience Intellectual and/or Developmental Disabilities receive coordinated and sequenced services that meet their employment needs.

This multi-agency collaboration operates under the guidance of Executive Order 15-01 and the Lane v. Brown Settlement, actively working to ensure that policies and services are aligned in a way that makes sense for transition-age students as well as adults seeking services. The VR/Office of Developmental Disabilities Services (ODDS) Collaborative Agreement was updated in September 2018 and continues to guide the close relationship of the two agencies.

VR has a close relationship with Oregon Health Authority's Behavioral Health programs to ensure that individuals accessing VR's services who are also working with mental health programs across the state get access to quality Individualized Placement and Support (IPS) services.

VR continues our collaboration with the Oregon Supported Employment Center for Excellence (OSECE) that oversees the fidelity of the 37 programs that currently offer IPS services in the state. VR continues to work with OSECE to expand the availability of these services across Oregon.

In 2022, VR amended the 2018 Job Placement Services contract. Joint certification and coordinated training continue to make it easier for VR-funded providers of Job Placement and Support Services to continue to provide

employment support services to customers when handoffs occur between agencies. VR currently has more than 140 providers under contract through our amended Job Placement Services Contract.

VR continues to systematically identify areas of the state where capacity issues exist to assure that training is available in those areas. Recruitment of providers in these areas continues to be a priority.

VR also participates in an ODHS rural stakeholders group designed to explore opportunities to expand service delivery in rural Oregon as well as in the ODHS Native American Policy Workgroup to increase service delivery and cooperation with the Nine Tribes of Oregon.

VR has also established a higher service categorization tier for those VR customers identified as having the most significant disabilities. This tier includes paying providers an increased rate for providing job development services as well as other incentives for serving this population. VR and ODDS, in cooperation with the Oregon Home Care Commission, continue to develop job coach capacity through the use of Personal Care Attendants.

WIOA state requirement:

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 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).

Agency response:

VR works closely with other state agencies whose populations benefit from VR Supported Employment (SE) Services. VR, the Oregon Department of Education, and the Office of Developmental Disabilities Services work together with the Employment First program to ensure that individuals who experience Intellectual and/or Developmental Disabilities receive coordinated and sequenced services that meet their employment needs. This multi-agency collaboration operates under the guidance of Executive Order 15-01, actively working to ensure that policies and services are aligned in a way that makes sense for transition-age students as well as adults seeking services. The VR/ODDS Collaborative Agreement continues to guide this relationship.

VR also has a close relationship with OHA Behavioral Health programs to ensure individuals who access VR's services, who are also working with mental health programs, get access to quality Individualized Placement and Support (IPS) Services when appropriate.

VR continues our collaboration with the Oregon Supported Employment Center for Excellence (OSECE) that oversees the fidelity of mental health programs that offer IPS services in Oregon. VR continues to work with OSECE to expand the availability of these services.

In addition to aligning policies and service sequences, VR is working with OHA Behavioral Health and ODDS to ensure that our certification requirements for service providers are in alignment. Joint certification and coordinated training continue to make it easier for VR-funded providers of Job Placement and Support Services to continue to provide employment support services to customers when hand-offs occur between agencies. VR currently has more than 140 providers under contract through our Job Placement Services Contract.

VR continues to systematically identify areas of the state where capacity issues exist to ensure training is available. Recruitment of providers continues to be a priority.

Additionally, VR is working with several community colleges to explore the possibility of a career pathway program that will train future service providers in a curriculum jointly developed with these community colleges.

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.

WIOA state requirement:

In accordance with 34 CFR § 361.29(b), annual estimates must include estimates for next Federal fiscal year for the VR program (October 1, 2024, to September 30, 2025).

Agency response:

Priority Category (if applicable)	Number of Individuals Eligible for Services	Number of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	Number of Eligible Individuals Not Receiving Services (if applicable)
Priority 3 – Not Significantly Disabled	1,354	1,354	\$3,888,052.04	0

Priority Category (if applicable)	Number of Individuals Eligible for Services	Number of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	Number of Eligible Individuals Not Receiving Services (if applicable)
Priority 2 – Significantly Disabled	1,755	1,755	\$4,825,767.82	0
Priority 1 – Most Significantly Disabled	6,741	6,741	\$25,274,403.02	0

WIOA state requirement:

In accordance with 34 CFR § 361.29(b), annual estimates must include estimates for next federal fiscal year for the Supported Employment Program (October 1, 2024, to September 30, 2025).

Agency response:

Priority Category (if applicable)	Number of Individuals Eligible for Services	Number of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	Number of Eligible Individuals Not Receiving Services (if applicable)
Priority 1 – Most	3,263	3,263	\$506,400	0

Priority Category (if applicable)	Number of Individuals Eligible for Services	Number of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	Number of Eligible Individuals Not Receiving Services (if applicable)
Significantly Disabled				

Order of Selection

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

Waiver of Statewideness

WIOA state requirement:

The State Plan shall be in effect in all political subdivisions of the state; however, the Commissioner of the Rehabilitation Services Administration 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.”

Agency response:

Not applicable.

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.

WIOA state requirement:

Analysis of current personnel and projected personnel needs including:

- 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 customers;
- The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and
- Projections of the number of personnel, broken down by personnel category, who will be needed by the VR agency to provide VR services in five 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.

Agency response:

Personnel Category	Number of Personnel Employed	Number of Personnel Currently Needed	Projected Number of Personnel Needed in 5 Years
VR Program Total Positions	275	295	295
VR Counselors	129	142	147
VR Specialists	16	21	21
Pre-ETS Coordinators/Transition Service Coordinators/ Youth Contract Coordinator	10	11	12
Human Services Assistants/Office Assistants	68	77	82
Workforce and Business Staff	13	14	16
Administrative Managers (Program and Direct Service)	10	10	10
Central Administration Staff	25	28	34

WIOA state requirement:

Ratio of qualified VR counselors to clients.

Agency response:

The total 129 budgeted VR counselors and 16 budgeted VR Specialists (145 total) provided necessary service delivery to clients during the following state fiscal years (SFY):

SFY 2020: 14,984 customers were served

- Staffing ratio: 1 VR Counselor and VR Counselor Specialist per 103 customers

SFY 2021: 12,240 customers were served

- Staffing ratio: 1 VR Counselor and VR Counselor Specialist per 84 customers

SFY 2022: 11,695 customers were served

- Staffing ratio: 1 VR Counselor and VR Counselor Specialist per 87 customers

SFY 2023: 12,657 customers served (Projected)

- Staffing ratio: 1 VR Counselor and VR Counselor Specialist per 87 customers

WIOA state requirement:

Projected number of individuals to be served in five years.

Agency response:

The total VR caseload forecast projects 14,750 customers will be served in PY 2028.

WIOA state requirement:

Data and information on personnel preparation and development, recruitment and retention, and staff development, including 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.

Agency response:

Institute of Higher Education	Type of Program	Number of Students Enrolled	Number of Prior Year Graduates
Idaho State University	MS in Clinical Rehabilitation Counseling	20	5
Portland State University	MS in Clinical Rehabilitation Counseling	36	10
Portland State University	Graduate Certificate in Orientation and Mobility	29	19
Western Oregon University	MS in Rehabilitation Counseling	47	12
Western Washington University	MA in Rehabilitation Counseling	36	14

WIOA state requirement:

Data and information on personnel preparation and development, recruitment and retention, and staff development, including 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.

Agency response:

Oregon VR continues to work closely with the graduate rehabilitation counseling programs at Western Oregon University and Portland State University as well as

other graduate rehabilitation counseling programs nationwide to attract a diverse, highly qualified applicant pool to work for our program.

These recruitment efforts include reaching out to interested graduate programs to provide practicum and internship sites for students working their way through the program. In the current 2023-24 academic year, VR received 17 applications for internships from students representing nine graduate academic programs; 13 were offered positions as interns, which resulted in nine students being placed in direct services offices working as Vocational Rehabilitation Counselor interns.

We have begun accepting applications for the 2024-25 academic year and have already received 13 applications from three graduate academic programs. So far, we have extended 10 offers for internships with eight students responding in agreement to intern with us next academic year. We anticipate receiving more applications and placements.

The VR Director's Stipend Program was discontinued in 2023 and has been replaced by paid temporary Vocational Rehabilitation Counselor Intern positions. This was done to benefit the students to grant them an employment relationship directly with our program, which removed a lengthy contracts process between our program and two in-state universities.

This has been positively received by our university partners and students. By creating temporary positions, we have been able to extend the opportunity to offer paid internship positions to students from any university. Previously the VR Director's Stipend Program was only available to students in our two in-state Rehabilitation Counseling programs.

Current universities we are working in collaborative partnership with include:

- Idaho State University
- Pacific University

- Portland State University (PSU)
- San Diego State University (SDSU)
- Southern Oregon University
- State University of New York at Buffalo
- Texas Tech University Health Science Center (TTUSHC)
- University of Alabama
- University of Massachusetts at Boston (UMB)
- Western Oregon University (WOU)
- Western Washington University (WWU)

Our program is designed to attract and support interns, as well as develop a rich and diverse pool of applicants for Vocational Rehabilitation Counselor positions. During this reporting period, VR was able to provide the VR Director's Stipend to five graduate interns during the 2022-23 academic year, with a total expenditure of \$72,000. This included three WOU students at a cost of \$43,200 and two PSU students at a cost of \$28,800.

Additionally, three interns did not receive the stipend because they were able to obtain full-time permanent VRC employment prior to starting internship and one who was a student from a graduate program without the VR Director's Stipend. Of these nine interns, 50 percent reported being a part of a BIPOC community and 62.5 percent disclosed experiencing disability.

Cooperative Agreements between VR and public universities (referred to as Interagency Agreements in Oregon) offering graduate degrees in Rehabilitation Counseling are developed and implemented prior to disbursement of stipend funds, which include a portion of the overhead costs for university staff who administer the funds.

During the current 2023-24 academic year, we have committed to spending \$85,680, which works out to be \$10,710 for each of the eight students at an average of \$17.85 per hour. Oregon's pay equity law allows students with additional training and work experience to receive a higher wage. The students represent the following schools: three from PSU, two from WOU and one student each from SDSU, TTUSHC, and UB. Of these eight, 50 percent reported being a part of a BIPOC community and 75 percent disclosed experiencing disability.

VR staff members continue to serve on Rehabilitation Counselor Education Advisory Councils for programs in the region at WWU, PSU, and WOU. Additionally, several program managers and VR Counselors participate in graduate level coursework and in mock interviews conducted with students. The VR Internship Coordinator, VR managers and several VR Counselors have also been involved in the selection process for incoming students at WOU and PSU for the past two years.

During the next 2024-25 academic year, we have committed \$149,940 for 14 students with the same cost per student, hourly rate and pay equity process as the 2023-24 academic year. The eight students from PSU and WOU who have secured internships for 2024-25 will be receiving these funds, with six remaining slots for additional interns. Of these eight future interns, half reported being a part of a BIPOC community and six disclosed experiencing disability.

WIOA state requirement:

Data and information on personnel preparation and development, recruitment and retention, and staff development, including a 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:

- 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
- 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.

Agency response:

VR ensures employees are provided with the supervision and training necessary to deliver quality VR services. VR follows a formal training process for staff, partners, and providers. VR provides an annual in-service training that informs staff of state and federal updates to policy, procedures, and program internal controls. VR provides an evaluation component to ensure that the training meets the staff's training needs and to ensure that there is knowledge gain. All trainings are listed in the VR Procedure Implementation Toolkit to connect, policy, procedure, and be an overall resource to our staff.

To increase training capacity and provide a more robust comprehensive training curriculum, the program has entered into training contracts with Cornell University and Western Washington University's Center for Continuing Education in Rehabilitation to provide ongoing clinical, foundational and developmental training to ensure staff remain current on best practices and the latest developments in rehabilitation counseling.

VR has also entered into Intensive Technical Assistance training agreements with all three Vocational Rehabilitation Technical Assistance Centers (VRTAC-QM Vocational Rehabilitation Technical Assistance – Quality Management, VRTAC-QE Vocational Rehabilitation Technical Assistance Center – Quality Employment, and NTACTION: National Technical Assistance Center on Transition). These agreements were completed to ensure compliance with all required training and staff development policies and procedures, and to offer increased opportunities for staff growth and advancement.

WIOA state requirement:

Data and information on personnel preparation and development, recruitment and retention, and staff development, including a 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:

- 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.

Agency response:

VR uses an established set of standards to evaluate and select Vocational Rehabilitation Counselors (VRCs). These standards are based on a modified version of standards used by the State Workers' Compensation Division (WCD). The state's VRC classification is shared by WCD, the Oregon State Hospital, the Oregon Commission for the Blind and VR.

The Oregon VRC classification requires that VRCs possess at a minimum:

- A Master's Degree in Rehabilitation Counseling; or
- Certification from either the Commission on Rehabilitation Counselor Certification as a Certified Rehabilitation Counselor (CRC), or a Certification of Disability Management Specialists Commission as a Certified Disability Management Specialist D (CDMS), and six months full-time work experience providing vocational rehabilitation-related services; or
- A Master's Degree in Psychology, Counseling, or a field related to Vocational Rehabilitation, such as one that promotes the physical, psychosocial, or vocational wellbeing of individuals with disabilities, and 12 months full-time work experience providing vocational rehabilitation-related services, or
- A bachelor's degree in a related field, such as one that promotes the physical, psychosocial, or vocational wellbeing of individuals with disabilities, and three years of full-time work experience providing vocational rehabilitation-related services to individuals with disabilities. There is no direct work experience substitute for the bachelor's degree requirement.

VR continues to have a goal that all employees classified as VRCs will hold a Master's Degree in Rehabilitation Counseling or a closely related field. VR will continue to seek counseling staff with master's degrees, but VRC candidates with an appropriate bachelor's degree and related work experience may be hired.

WIOA state requirement:

Data and information on personnel preparation and development, recruitment and retention, and staff development, including a 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:

- 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.

Agency response:

VR continues to support staff who have attained the Certified Rehabilitation Counselor (CRC) credential through not only ensuring that all eligible training sessions are pre-approved for Continuing Education Units (CEUs), but by also paying for renewal fees and online training courses through the Commission on Rehabilitation Counselor Certification.

Additionally, for staff who are eligible to apply to take the CRC examination, VR covers the cost of the testing fees, preparation materials and the University of Wisconsin-Stout CRC Preparation Course. Currently, 67 VR staff have CRC credentials; 50 of these are practicing VR Counselors, nine are branch or regional managers stationed in the field and the remaining eight are former VR Counselors who are now working in the Administration Unit.

The program expects that all staff members will participate in appropriate professional development activities and continuing education opportunities. This expectation includes keeping up with the most recent advances and best practices when working with individuals with specific disabilities; staying up to

date with best practices overall; and maintaining an updated understanding of the evolving labor market in their area.

Relationships have been developed with the regional economists and workforce analysts employed by the Oregon Employment Department's Research Department to ensure that staff have the information and training they need to understand the labor markets in their area. VR is establishing robust relationships with Labor Workforce Development Boards so that VR staff have an increased understanding of their local sector strategies.

WIOA state requirement:

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

Agency response:

Hiring and retaining staff: VR focuses on hiring and retaining staff proficient in languages other than English to meet the communication needs of applicants and eligible individuals. In January 2024, VR had 21 staff who have passed mandatory language proficiency testing in American Sign Language, Amharic, Bosnian, Persian, Serbian-Croatian and Spanish. In specific geographic areas and for specific caseloads, VR engages in targeted recruiting for job applicants with specific language skills. Staff who took proficiency testing, but did not pass the first attempt, may study and receive supports to improve skills for a second attempt after at least six months of study and practice.

Contracted services: VR staff who are not fluent in the preferred language of a participant have access to, and training in, the use of approved contractors

approved for onsite, remote and telephonic services. Contracted language access services include spoken language interpreting, ASL interpreting and real-time captioning services.

Document translation: To further support the communicate needs of participants, VR translated all customer-facing forms and outreach materials in five common languages: Arabic, Russian, Simplified Chinese, Spanish and Vietnamese. Content of program materials are written at an eighth grade reading level in plain language. We are working to implement rapid customer-specific translations for documents such as Individualized Plans for Employment and Notice of Proposed Action letters. All documents are available in alternate formats and languages upon request. Customer-facing forms, outreach materials and written messages include this boilerplate accessibility language with a call to action for making a request: "You can get this document in other languages, large print, braille or a format you prefer free of charge."

Accessible meetings: VR led the agency throughout the COVID-19 pandemic in advocacy and testing of language access services for virtual meetings. VR, other programs in Oregon Department of Human Services, Oregon Health Authority, and the Office of Information Systems engaged with the Microsoft Accessibility Team to ensure the software platform is accessible for individuals who use ASL interpreters and Communication Access Real-time Translation (CART) services. VR staff have access to Zoom for Government to meet the needs of Deaf and Hard of Hearing participants and other Oregonians with disabilities who require ASL or text-based accommodations until accessibility in Microsoft has been achieved.

Community of practice: Spanish-speaking VR counselors began meeting in 2023 to improve communications, services and outreach to Spanish-speaking

communities. This group is modeled on VR's long-standing Rehabilitation Counseling with Deaf and Hard of Hearing community of practice.

WIOA state requirement:

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.

Agency response:

VR coordinates personnel development with the Oregon Department of Education (ODE) as outlined in our combined Cooperative Agreement among the Office of Developmental Disabilities (ODDS), Oregon Commission for the Blind (OCB), and Oregon Department of education (ODE). This agreement is current through June 30, 2028, and is publicly available on each agency's website. It is used as the foundation of shared goals outlined in Oregon's NTACT State Team's annual plan. The NTACT State Team is made up of members from VR, ODE, ODDS, OCB, Career Technical Education, and FACT (Oregon's parent training organization). Annually, each May, this team creates shared transition-related goals to which each organization contributes. The work of the Transition Collaborative is carried out by subject matter experts within each organization or through contract services. Our statewide team of SMEs meets quarterly, and regional teams meet monthly to carry out objectives of our statewide transition plan.

Coordination with Education Officials

WIOA state requirement:

In accordance with the requirements in section 101(a)(11)(D) of the Rehabilitation Act 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.

Agency response:

Plans: The Oregon Transition Collaborative is a statewide group made up of representatives from VR, ODE, OCB, ODDS, Career Technical Education, and FACT (parent training organization) that creates and implements an annual plan. This plan addresses shared transition topics intended to facilitate a more streamlined and accessible process of moving youth and families from school-aged services to adult services.

Policies: Both Oregon Administrative Rule Division 150 – Transition Services, and VR’s policies explicitly address the need for coordination between agencies to ensure access to transition services without duplication or reduction of responsibility from any one agency.

The OARs address:

- 582-150-0002 Purpose
- 582-150-0005 Definitions
- 582-150-0015 General Provisions for Students and Youth with Disabilities in Transition
- 582-150-0030 Pre-employment transition services
- 582-150-0040 Program application and eligibility for students and youth for individualized transition services

- 582-150-0045 Individualized plan for employment (IPE) for student or youth
- 582-150-0050 Group Transition Services
- 582-150-0065 Required program service records for students receiving Pre-Employment Transition Services or transition coordination
- 582-150-0070 Customer Assistance Program information
- 582-150-0070 Use of funds reserved for Pre-Employment Transition Services (Pre-ETS)
- 582-150-0075 Limitations
- 582-150-0080 Restrictions
- 582-150-0100 Reservation for Pre-ETS
- OAR 582-150-0200 Pre-ETS rate setting

VR's Youth Services Policy addresses:

- Definitions specific to student and youth with disabilities
- Pre-ETS
- Pre-ETS required activities
- Who can receive Pre-ETS
- Pre-ETS coordination
- Frequency of contact with students receiving Pre-ETS
- Transition services
- Youth with disabilities no longer in school
- Contracted services for youth in transition
- Individualized Plan for Employment (IPE) for students or youth with disabilities
- Employment outcome within the IPE

Procedures: VR coordinates personnel development with the Oregon Department of Education (ODE) as outlined in our combined Cooperative Agreement among the Office of Developmental Disabilities (ODDS), Oregon Commission for the Blind (OCB), and ODE. This agreement is used as the foundation of shared goals outlined in Oregon's Transition Collaborative's annual plan. The Transition Collaborative is made up of members from VR, ODE, ODDS, OCB, Career Technical Education, and FACT (Oregon's parent training organization). This team creates shared transition-related goals to which each organization contributes. The work of the Transition Collaborative is carried out by subject matter experts within our organizations or through contract services through a series of conferences, training events, regional collaborative meetings and side-by-side technical assistance.

WIOA state requirement:

In accordance with the requirements in section 101(a)(11)(D) of the Rehabilitation Act 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:

- 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;

- 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;
- 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;
- 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;
- 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
- 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.

Agency response:

The current formal Cooperative Agreement among VR, the Oregon Department of Education (ODE), the Office of Developmental Disabilities Services (ODDS),

and Oregon Commission for the Blind (OCB) is active until June 30, 2028. Within this agreement, all parties mutually agree to the following:

- To meet regularly to address systems, policy, practice and funding issues that facilitate or negatively impact the transition of youth with disabilities from school to work or post-secondary education.
- To foster innovation in transition program design and service delivery strategies between VR, OCB, ODDS and school districts (Local Education Agencies, or LEAs).
- To use a consistent message when sharing information with local VR, OCB, ODDS offices and school districts.
- To post this agreement on their respective websites or in a location readily available to agency staff.
- To align policy and practice at the state and local level, in order to facilitate the seamless transition of youth with disabilities from school to work or postsecondary education; minimize redundant services; and maximize resources in both systems.
- To develop and provide common trainings and professional development opportunities to improve transition and employment results.
- To provide or post a copy of this agreement to the agency websites as a public document.
- To mutually develop and distribute notices, memorandums, and other information regarding transition to agency and community partners.
- To give timely notice to agency and community partners of all proposed changes to rule or policy that relate to youth transition.
- To collaborate toward meeting the unique needs of school districts and VR, OCB, and ODDS offices, and facilitate seamless transition for students

with disabilities from a free and appropriate public education to the provision of vocational rehabilitation services.

- To assign qualified staff positions to facilitate and support linkages among transition activities and outcomes provided by school districts, VR, ODDS, and OCB.
- To identify criteria for determining and assigning the financial and programmatic roles and responsibilities of each agency for the provision of Pre-Employment Transition Services and transition services to students with disabilities. The criteria may include:
 - Purpose of the service
 - Customary service
 - Eligibility for services

It is the goal that VR staff attend or provide information to students and families at IEP meetings, or other transition planning meetings. At the same time, in order to maximize the capacity of our statewide network, and using the communication channels of Oregon's Transition Collaborative, each partner agency informs one another of updates to policies, procedures, new initiatives and priorities, and most critically the initial points of access. Partner agencies plan and participate in collective shared learning events twice each year so that each agency has accurate and current information to share with students, families, community partners and respective agency staff across our multiple settings. Collectively, we commit to making clear the points of contact who are available so that we are all able to share the basic information and route our consumers to each agency with specific questions.

Vocational Rehabilitation collaborates and coordinates with our educational partners in many ways. VR provides information on Pre-ETS to the Oregon Department of Education and local education entities to distribute to students,

family members, guardians or their representatives. VR staff attend meetings for the development of an Individualized Education Plan (IEP) when given timely notice of invitation, with appropriate consent and as resources allow. As part of our partnership, education staff provide information and referrals regarding VR and ODDS services. It is a shared goal that each of our agencies develop respective plans (Individual Plans for Employment, Individual Education Plans, Individual Service Plans) that strategically align to maximize services without duplication for our shared youth customers.

Following is a summary Oregon's coordinated transition services:

VR Pre-Employment Transition Services are the earliest set of services available for students with disabilities who are eligible or potentially eligible for VR services. These services are short-term, based on the student's needs, and help students identify their career interests. Designed to be an early start at job exploration for students with disabilities, services include Job Exploration Counseling, Work- Based Learning Experiences, Counseling on Post-Secondary Opportunities, Workplace Readiness Training and Instruction in Self Advocacy.

- Population served: young people ages 14-21 who are enrolled in school and eligible or potentially eligible for VR.
- Funding source: 15 percent reserved from annual VR program's federal allotment.

VR Transition Services are outcome-oriented services that promote movement from school to post-school activities, including post-secondary education, vocational training and an employment outcome in competitive integrated employment or Supported Employment, including customized employment. These services provide for further development and pursuit of career interests with post-secondary education, vocational training, job search, job placement, job

retention, job follow-up and job follow-along services. Services may include job development, job coaching, clothing, course fees, license fees, follow-up and follow along services. Pre-ETS can be a transition service when students have an active Individual Plan for Employment with VR.

- Population served: Young people ages 14-24 who are in plan with VR. This can include youth who do not qualify for Pre-ETS because they are not in school.
- Funding source: VR client service dollars; state agencies cannot charge against the 15 percent reserve unless the transition service is provided as a Pre-ETS.

VR holds the financial responsibility for both of these services and are provided by VR staff, or through VR authorized contracts.

- VR staff include Pre-ETS Coordinator, Youth Service Coordinators and VR Counselors.
- Contracted staff include Youth Transition Coordinators and Pre-ETS Support Specialists.

Individuals with Disabilities Education Act (IDEA) Transition Services are the financial responsibility of ODE and local districts. They represent a coordinated set of activities designed to be a results-oriented process for improving the academic and functional achievement for youth as they move from school to post-school activities, including postsecondary education, vocational education, integrated employment and independent living. The purposes of IDEA include ensuring that all children with disabilities have available to them a free appropriate public education that emphasizes special education and related services designed to meet their unique needs and prepare them for further

education, employment and independent living. Transition services under IDEA refers to a coordinated set of activities for a child with a disability and is based on instruction, related services, community experiences, development of employment, and other post-school, adult living activities. Funding for special education in Oregon is provided through state and federal funding sources.

Oregon Developmental Disabilities Services (ODDS) long-term services:

ODDS hold the financial responsibility to provide the following long-term services: job coaching, benefits counseling, employment path services, small group, day support activities, on the job attendant care, career development planning, transportation and professional behavior services. In addition, services to youth may include pre-employment support for long-term job coaching. In certain circumstances, ODDS may provide other services as needed to complement services from other funding streams such as transportation, professional behavior services and attendant care or personal assistance.

- Population served: people with Intellectual and Developmental Disabilities.
- Funding source: Medicaid and ODDS-funded Home and Community-Based Long Term Care Services.

Procedures for outreach to and identification of students with disabilities who need transition services and Pre-Employment Transition Services include the following:

- We promote outreach to and identification of students with disabilities who are in need of transition services or transition planning (including Pre-ETS) beginning as early as 14 years old. Outreach to these students includes a description of the purpose of the VR program, eligibility requirements, application procedures and scope of services that may be provided to potentially eligible and eligible individuals. Outreach methods can include

sharing brochures, posting to social media channels, and attending events such as back-to-school nights, group orientations and transition events. Agencies will obtain, when necessary, a release of information from parent or guardian to assist in coordinating services.

- VR informs ODE of policies or procedural changes that may impact the eligibility of students with disabilities for VR and OCB services and the provision of services, so that ODE can disseminate such material to school districts and the state's directors of Special Education.
- VR and OCB inform and refer students to Tribal VR in the identified service delivery area to receive culturally relevant services so the student can make an informed choice about the services that they are eligible for and can receive. VR and OCB inform eligible students that they have the choice to work with VR, Tribal VR, or OCB separately or collectively.
- Upon request from the district or ODE, VR provides technical assistance on how VR identifies potentially eligible students for services from VR or OCB and how to work with VR or OCB in the provision of transition services including Pre-Employment Transition Services.
- VR determines eligibility for VR or OCB services and provides VR services to eligible school-aged students with disabilities when referred by the district.
- Upon request, VR works with ODE, ODDS and other agencies through a variety of training activities to identify and plan transition strategies for students with disabilities requiring long-term support after a young person completes VR or OCB time-limited services.
- VR inform district, students and their parents of the availability of the Customer Assistance Program, a dispute resolution program available to VR and OCB customers and participants in rehabilitation programs receiving federal funding.

- VR provides training to all VR Counselors and qualified staff on their role in providing outreach activities to students with disabilities to include those served in special education, served under Section 504, and those served in general education.
- VR provides consultation and technical assistance — using alternate means for participation when necessary, such as video or conference calls — to the schools to prepare students with disabilities for career opportunities.
- Upon request, VR participates in transition planning with schools to facilitate the development of IEPs for students with disabilities.
- VR assure that IPEs are developed for students within 90 days of being determined eligible for VR services.
- VR and OCB office staff are encouraged to collaborate in local community planning and implementation efforts that are focused on the transition of students with disabilities from school to postsecondary outcomes.
- VR and OCB provide one assigned VR counselor to serve as point of contact for each district.
- Upon request, VR provides information to the ODE State Advisory Council on Special Education to assist in the development of the council's annual report to the Superintendent of Public Instruction.

As of July 1, 2023, Oregon prohibits the use of subminimum wage employment. VR has developed collaborative agreements with the Office of Developmental Disabilities Services to monitor all subminimum wage employers. This partnership identifies all statewide entities authorized to pay subminimum wages under a Section 14C certificate. As part of this agreement, any entity paying subminimum wages must allow the VR program opportunities to provide annual

counseling and training to any employee making subminimum wage, as well as providing space on site for this counseling to occur.

The VR program has contracted with a statewide vendor to perform all required counseling for each person earning subminimum wages, on at least an annual basis, about opportunities to earn minimum wage. The vendor also facilitates an appointment at the closest available state VR office should the individual desire additional information.

Transition services and Pre-Employment Transition Services will not occur in settings where subminimum wages are paid under a 14c certificate (Rehabilitation Act, Oregon Revised Statutes 653.033).

Oregon Revised Statute 653.033 eliminated all subminimum wage options effective June 30th, 2023.

After June 30, 2023, an employer who may have been authorized to employ individuals with disabilities at subminimum wage pursuant to a special certificate issued under 29 U.S.C. 2 14(c) or in accordance with rules under ORS 653.030 or through the Oregon Department of Human Services, may not employ or agree to employ individuals with disabilities at a rate lower than the hourly rate as established under ORS 653.025 (minimum wage rate).

This legislative mandate effectively removed the option for subminimum wage employment statewide after June 30, 2023. Prior to this law going into effect, a phaseout of subminimum wage employment statewide had been put into effect as part of the Lane v. Brown Settlement agreement, with all employees earning subminimum wage being monitored by both the VR Program and the Oregon Office of Developmental Disabilities (ODDS).

The Oregon Department of Education was an active participant in the Lane v. Brown Settlement and was fully engaged in partnership with VR and ODDS to

identify, reduce and to provide education for students and youth participating in subminimum wage employment prior the elimination of subminimum wage statewide on June 30, 2023.

Coordination with Employers

WIOA state requirement:

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.

Agency response:

VR Services

Given the needs of our customers and business community, a robust employer engagement model is required to be successful. VR Counselors, along with a dedicated VR workforce and business team, provide education and resources to employers to assist in meeting their individual employment demands through hiring qualified individuals with disabilities. In addition, VR contracts with qualified job placement service providers to identify individual employment, assessment and training opportunities for those who require these customized services to become gainfully employed.

VR is fully integrated into the Oregon workforce development system. By leveraging opportunities with other workforce partners, VR increases competitive integrated employment opportunities for Oregonians with disabilities.

VR will:

- Engage the workforce development system and the business community through intentional, targeted outreach, relationship and partnership building.
- Coordinate with Oregon Commission for the Blind (OCB) for services and training to businesses.
- Engage with the National Employment Team (NET) for a unified approach to working with business customers.
- Collaborate with the Employment Department's Business Services Team members around the state on joint services to business.
- Partner with the local workforce development boards (LWDB) to coordinate services and leverage resources.
- Research and communicate opportunities for customers including on-the-job training, paid work experiences, internships and apprenticeships with businesses.
- Participate in and coordinate local employer recruitment events and career fairs.
- Contract with providers to facilitate employment events and activities for individuals with disabilities.
- Provide training to contracted job placement and partner providers.
- Leverage Memorandums of Understanding with local agencies regarding employment and career exploration opportunities.
- Provide training and consultation to business on disability awareness and accommodations in the workplace.

- Identify and engage external organizations that may not currently be a workforce partner.
- Participate in local area business events to increase disability awareness and knowledge of VR services.
- Engage businesses by promoting local area internships for individuals with disabilities.
- Be a resource on non-degree credentials, including certificates, industry certifications, apprenticeship certificates, and occupational licenses with CTE, workforce, and businesses to build an inclusive and skilled future workforce.
- Use labor market information in designing strategy for employer and industry engagement.
- Inform business partners on hiring incentives and resources to support businesses employing, supporting, retaining and promoting qualified talent with disabilities.
- Use data collection methods to track and guide business engagement and services to business.

All employer coordinated activities include youth with disabilities.

VR will work to ensure that coordination with employers continue to include opportunities for youth with disabilities. These opportunities will include expanding Work Based Learning Experiences and Career Exploration with businesses.

VR has direct service youth and workforce teams that provide services to youth. VR staff are informed about these services through frequent contact in local VR offices, in VR office meetings, events shared in VR communications,

through invitation with partner collaboration meetings, in ongoing youth and workforce presentations and training and in joining community outreach, business tours and inclusive hiring events with employers.

Services to Business include but are not limited to:

- Connection to skilled talent to address workforce needs,
- Tips, tools, information, and resources to promote disability inclusion in the workplace.
- Training on a variety of topics related to disability in the workplace.
- Partnering on all-ability hiring events.
- Empowering businesses through professional networking and educational opportunities.
- Visit VR's [Services to Business](#) page for additional information.

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.

WIOA state requirement:

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

Agency response:

Access Technologies, Inc. (ATI) serves as the Implementing Entity for the Oregon Statewide AT Program; providing all state level and state leadership activities as mandated by the Assistive Technology Act of 1998, as amended. ATI has entered into an administrative agreement with Oregon's lead agency (the Oregon Department of Human Services [ODHS]). This administrative agreement sets forth the 10 activities that must be conducted by ATI on behalf of ODHS and the system of oversight to be provided by ATI's Board of Directors. ODHS has assigned a project officer to oversee the administrative agreement, and who will meet with the president of ATI quarterly to discuss activities and the implementation of this state plan.

WIOA state requirement:

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

Agency response:

VR has not entered into agreements with programs carried out by the Under Secretary for Rural Development of the U.S. Department of Agriculture.

WIOA state requirement:

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

Agency response:

In Oregon the Oregon Employment Department (OED) partners with nine Local Workforce Development Boards to engage and provide substantial services to out-of-school youth throughout the state. Oregon VR works closely with each of the local boards and OED to ensure that there are statewide and local partnerships with VR to support this population. To accomplish this VR has

assigned a branch manager to be a member of each of the nine Local Workforce Development Boards (LWIB). Additionally, VR has managers and staff that are members of the board's Local Leadership Teams (LLTs). Oregon's workforce boards LLTs drive workforce innovation, enhance training programs, and align workforce development with regional economic goals. While VR managers serve as board members, they can strategically plan for services to address local needs for out-of-school youth and the LLTs operationalize programs and activities that the board has established.

While each of the nine regions covered by the LWIBs are responding to local economic opportunities and challenges they support locally driven decisions and programs. OED, LWIBs and VR partner on services for out-of-school youth to meet those local needs at the integrated one-stop service centers co-operated by OED and the LWIBs and through the contracted services for out-of-school youth administered by the LWIBs. This high level of coordination at the strategic and operational level provides VR the opportunity to coordinate services for VR youth with disabilities who are also out-of-school and who could benefit from these services.

WIOA state requirement:

State use contracting programs.

Agency response:

VR uses the Statewide Office of Contracts and Procurement to memorialize service delivery arrangements using cooperative agreements and contracts with entities outside of the statewide workforce development system.

VR is part of the Oregon Department of Human Services, which has established a “buy decision” matrix requiring that state use vendors be evaluated on a priority basis for providing offered services to all state agency programs.

Additionally, the VR program has in place a policy and procedure for working with vendors that are part of the State Use Program as well as for evaluating their worksites for potential customer placement purposes.

All employers operating under an “Oregon Forward” contract (the established Oregon State Use program name), will be evaluated on a case-by-case basis to determine the suitability of VR customer placement, and assist the vendor if the location is deemed to not meet the criteria for job placement under the guidelines for Community Integrated Employment.

WIOA state requirement:

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

Agency response:

In Oregon, the Oregon Health Authority (OHA) is the agency that administers the State Medicaid Program. Through a series of Inter–Governmental Agreements and Memorandums of Understandings the Oregon Department of Human Services is established as the agency that operates the Medicaid programs and waivers. VR has not entered into separate agreements with OHA outside of our parent agencies agreements. VR does collaborate with the individual programs that administer the waivers.

Medicaid has many programs that aid in the development and ongoing support of competitive and integrated employment. These programs and services include:

- IPS (Individual Placement and Support) services assist individuals with severe and persistent mental health in their employment goals.
- EASA (Early Assessment and Support Alliance) serves youth who have early symptoms of psychosis by providing outreach, treatment, education and employment services.
- EPD (Employed Persons with Disabilities) program provides or continues to provide medical coverage and long-term services to people with disabilities, who may qualify, who are working or want to work.
- In Oregon, Office of Developmental Disabilities Services provides benefits information and referral services under the Medicaid waiver.

WIOA state requirement:

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

Agency response:

VR and the ODHS Office of Developmental Disabilities Services (ODDS) have focused their work since the 2016 State Plan submission and 2018 updates to achieve the outcomes set forth in Executive order 13–04, which was updated in Executive Order 15–01. These Executive Orders emphasize with more clarity the state’s Employment First policy. Additionally, the State of Oregon has recently settled a lawsuit that calls for increased integrated employment opportunities for individuals with intellectual and developmental disabilities (I/DD). VR, ODDS, Oregon Department of Education (ODE) and the I/DD service delivery system have a working relationship that shares information, leverages and braids funding and encourages joint case management of joint customers. VR will continue to collaborate with ODDS, ODE, and I/DD service delivery system to maximize

funding, streamline processes, and meet the competitive and integrated employment goals of individuals with intellectual and developmental disabilities.

VR, ODE and ODDS:

- Collaborate on trainings for consistency and quality in curricula used for VR, ODDS and ODE staff throughout Oregon. This is accomplished through agency conferences such as the VR In-Service, ODDS Case Management Conference, and ODE's Regional Transition Conferences. Interdisciplinary staff from all partnering agencies are invited and cross trained on techniques to further collaborate on shared goals.
- Have ongoing and regularly scheduled Employment First steering committee meetings that lead to collaborative actions by VR, ODDS, and ODE.
- Coordinate policy and innovation meetings that are co-led by VR, ODDS, and ODE staff to facilitate these collaborative actions. The three programs review and discuss all new or newly revised policy to assure alignment across agencies.
- Conduct education and transition meetings to discuss pertinent issues for students who have transition plans.

OVR works closely with our partner, the Oregon Developmental Disability Services (ODDS), to provide comprehensive services to Oregonians with Most significant Disabilities to ensure employment opportunities within competitive integrated settings (CIE). We do this through several cooperative efforts; these include weekly meetings between OVR and ODDS leadership to discuss ongoing collaborative strategies and to staff difficult cases if needed.

Additionally, OVR has several counselors that are assigned primarily I/DD caseloads. These individuals work closely with the ODDS regional employment

specialists, as well as partnering with the County Developmental Disability Services Case Managers, and our brokerage personal agents to help ensure that the individuals DD plan and goals are in alignment with the services being provided by OVR and that employment occurs in settings that meet the requirements for CIE.

OVR works closely with ODDS to evaluate employment in settings that may not meet the requirements for competitive integrated employment. If a client with most significant disabilities is dually enrolled in both OVR and ODDS, a team from both programs will visit a worksite if questions arise about the competitive nature of the employment opportunity. OVR works closely with the Oregon Resource Association (ORA), the non-profit support group for our providers, to help address issues that may make a worksite incompatible with CIE. Through these efforts, OVR has a robust system in place to help ensure all Oregonians with most significant disabilities are provided with substantial opportunities to gain employment in truly integrated settings.

Oregon also has a strong statewide Employment First network. VR is active in both the statewide and local Employment First groups and uses these forums to partner with providers and support groups dedicated to working with individuals with most significant disabilities, as well as connecting with client advocacy organizations and other local/regional services.

Lastly, Oregon has a very strong Project Search program dually managed by OVR and ODDS. These Worksites enable clients with most significant disabilities to experience employment opportunities in several different settings and with strong supports to enable them to develop skills that lead to greater independence, competitive wages, and employability.

WIOA state requirement:

State agency responsible for providing mental health services.

Agency response:

A primary effort of VR and Oregon Health Authority (OHA) Behavioral Health programs has been in the development and expansion of evidence-based Supported Employment services by increasing the number of county mental health organizations providing such services and meeting fidelity standards. VR continues to partner with and use the Oregon Supported Employment Center for Excellence (OSECE) in developing and refining evidence-based Supported Employment services. With the inclusion into Oregon Administrative Rules, evidence-based Supported Employment services continue to expand in Oregon. Additionally, VR collaborates and supports the Early Assessment and Support Alliance (EASA) which is an evidence-based practice effective in reducing the early onset of and the symptoms of severe mental illness. VR works with EASA in assisting young people with early onset psychiatric disabilities by helping them get and keep employment.

VR has a dedicated Vocational Rehabilitation Counselor Specialist position. This dedicated staff works directly with Oregon Supported Employment Center for Excellence (OSECE) to coordinate outreach and training to enhance services between the VR program and the Mental Health programs. By strengthening understanding, access and support between partners, will increase outcomes that are in integrated settings at competitive wages for Oregonians who are most significantly disabled.

WIOA state requirement:

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

Agency response:

American Indian Vocational Rehabilitation Services programs in Oregon: There are nine federally recognized tribes in Oregon. Currently five of those tribes have a federally funded American Indian Vocational Rehabilitation Services (AIVRS) programs. VR has MOUs with each of these tribes to ensure a coordinated set of services and activities to support tribal members. In addition to these five AIVRS programs, the VR Director meets with all nine of the tribal leaders council quarterly to discuss ways that VR can help support tribes with AIVRS programs and tribes that do not have these programs.

WIOA state requirement:

Other private nonprofit organizations.

Agency response:

VR works in partnership with multiple non-profit agencies. These include:

Job Placement Contractors: VR works with many community-based programs, commonly known as Community Rehabilitation Programs or CRPs, to provide an array of employment services for VR clients. These job placement and retention services are vital to successful outcomes for VR clients. VR counselors work directly with clients and these Job Placement Contractors to deliver person centered services that will, ideally, lead our clients to the optimal level of employment described in their Individualized Plan for Employment. Oregon VR also partners and collaborates with Oregon Resource Association (ORA) that is a professional membership association that supports Job Placement Contractors statewide. VR attends quarterly meetings with ORA to provide program updates and to problem solve with their membership to ensure a high level of collaboration. Oregon VR also attends ORA's annual conference and VR invites

ORA members and all Job Placement Contractors to VR's annual In-Service for cross-training opportunities.

Other Community Based Organizations: VR also partners with other Community Based Organizations that are not traditionally considered CRPs because they provide employment services to a larger population that just individuals that experience disabilities. As Oregon VR is intentionally trying to expand its network of employment service providers the program has broadened its outreach efforts to recruit more non-profits and other service providers to start providing Pre-Employment Transition Services during the summer months that are focused on Work-Based Learning Experiences.

ATI (Access Technology Inc.): Program staff from ATI work with consumers, service providers, state agencies like VR, private industry, legislators, and other interested individuals to facilitate the development of a statewide system to provide AT services. This includes an AT Device Loan Library, Training and Technical Assistance, and Financing Resource for AT. Centers for Independent Living: Each of the five core Independent Living Services are provided by the seven Centers for Independent Living (CILs) in various locations throughout Oregon. CILs are private, non-profit organizations run by people with disabilities. Services are provided through a peer mentoring model. The five core services that VR commonly refer clients to receive at the CILs are: information and referral; independent living skills training; peer counseling; individual and systems advocacy; and life transition assistance (related to youth leaving secondary education, or individuals transitioning to or remaining in the least restrictive living environment).

Northwest ADA Center: VR has partnered with the NW ADA Center on developing trainings for VR staff. The ADA Center offers resources and support that can be crucial for employment and accessibility for VR clients.

Easterseals Oregon: This organization offers culturally responsive and linguistically diverse programs and services for VR clients including employment services, training, and support.

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:

- **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.
- **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.

- **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:
 - The establishment of the designated State agency and designated state unit, as required by section 101(a)(2) of the Rehabilitation Act.
 - Either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.
 - 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. 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).
 - 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.
 - As applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
 - Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. The requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.
 - All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.
 - The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
 - 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.

- 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).
- The submission of reports as required by section 101(a)(10) of the Rehabilitation Act.
- **Administration of the Provision of VR Services:** The designated State agency, or designated State unit, as appropriate, assures that it will:
 - Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.
 - 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.
 - 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.
 - Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.
 - Comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.

- 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.
- Provide vocational rehabilitation services to Native Americans who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.
- 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.
- 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. With respect to students with disabilities, the state has developed and will implement strategies to address the needs identified in the assessments and strategies to achieve the goals and priorities by the state to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
- Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25), and 113).
- 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.
- Program Administration for the Supported Employment Title VI Supplement to the State plan:

- 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.
- 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.
- Financial Administration of the Supported Employment Program (Title VI):
- 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.
- 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.

- Provision of Supported Employment Services:
- The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.
- 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.

Certifications

States must provide written and signed certifications that:

- Oregon Vocational Rehabilitation, 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, and its State Plan supplement under title VI of the Rehabilitation Act;
- 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, Oregon Vocational Rehabilitation 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, the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations, 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;

- 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, the Rehabilitation Act, and all applicable regulations, 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;
- 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);
- The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

- All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.
- The Oregon Vocational Rehabilitation Director 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;
- The Oregon Vocational Rehabilitation Director has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;
- 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.

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