



TO: Roger Breed, Ed.D.
Commissioner of Education

FROM: Mark Schultz, Director, Nebraska VR

SUBJECT: Approve the revisions to the FY 2013 State Plan for Vocational Rehabilitation Services

Proposed Board Action:

It is recommended that the State Board of Education approve the revisions to the State Plan for Vocational Rehabilitation Services and State Plan Supplement for the State Supported Employment Services Program for Fiscal Year 2013.

Background Information:

A revised State Plan is required for Vocational Rehabilitation to continue to receive federal funds after October 1, 2012. The Board approved the current State Plan at its July, 2011 meeting.

Estimated Cost:

Approval of the revised State Plan will assure Nebraska continues to receive \$3.69 in federal matching funds for each \$1.00 of state funds expended on the program.

Supporting Documentation Included:

VR 2013 State Plan Public Hearing Comments
Preprint of FY 2013 State Plan for the State Vocational Rehabilitation Services Program and State Plan Supplement for the State Supported Employment Services Program
Attachment 4.2(c): Summary of Input and Recommendations of the State Rehabilitation Council; Responses of the Designated State Unit and Explanations for Rejection of Inputs or Recommendations
Attachment 4.8(b)(1): Cooperation with Agencies That Are Not in the Statewide Workforce Investment System and with Other Entities
Attachment 4.8(b)(2): Coordination with Education Officials
Attachment 4.8(b)(3): Cooperative Agreements with Private Nonprofit Nebraska VR Service Providers
Attachment 4.8(b)(4): Evidence of Collaboration Regarding Supported Employment Services and Extended Services
Attachment 4.10: Comprehensive System of Personnel Development
Attachment 4.11(a): Results of Comprehensive Statewide Assessment of the Rehabilitation Needs of Individual with Disabilities and Need to Establish, Develop, or Improve Community Rehabilitation Programs
Attachment 4.11(b): Annual Estimates of Individuals to be Served and Costs of Services
Attachment 4.11(c)(1): State's Goals and Priorities
Attachment 4.11(c)(4): Goals and Plans for Distribution of Title VI, Part B Funds
Attachment 4.11(d): State's Strategies and Use of Title I Funds for Innovation and Expansion Activities
Attachment 4.11(e)(2): Evaluation and Report of Progress in Achieving Identified Goals and Priorities and Use of Title I Funds for Innovation and Expansion Activities

For Additional Information on this item:

For additional information on this item: Call Mark Schultz, 402-471-1202, or e-mail mark.schultz@nebraska.gov.

**2013 STATE PLAN FOR VOCATIONAL REHABILITATION (VR) SERVICES PROGRAM AND
SUPPLEMENT FOR THE SUPPORTED EMPLOYMENT (SE) SERVICES PROGRAM PUBLIC HEARING**

**2:00 P.M. (CST), Wednesday, June 27, 2012
VOCATIONAL REHABILITATION SERVICES OFFICE
3901 N. 27th Street, Suite 6, Lincoln, NE**

Attend by videoconference at the following Vocational Rehabilitation Offices

**Columbus – 3100 23rd Street, Suite 5
Grand Island – 203 E. Stolley Park Road, Suite B
Kearney - 315 W. 60th Street, Suite 400
Norfolk - 1212 Benjamin Ave.
North Platte - 200 South Silber, Bldg, 2,
Omaha - 1313 Farnam on the Mall
Omaha - 12011 Q Street
Scottsbluff - 1517 Broadway, Suite 131**

The State Rehabilitation Council is conducting a public hearing on the Vocational Rehabilitation 2013 State Plan draft. The public hearing is an opportunity for members of the public, including individuals with disabilities to comment on the goals, strategies and policies of the VR agency.

The 2013 State Plan draft is available for review on the website for [Nebraska VR](#) and at each Vocational Rehabilitation Office. Interested parties are invited to attend and to make comment. If reasonable accommodations are needed for the public hearing at any of the sites, please contact Vocational Rehabilitation at 402-471-3649 at least five days before the public meeting date.

Interested parties may also submit written comments by e-mail to pat.bracken@nebraska.gov or by mail to:

Pat Bracken, Program Director
Nebraska VR
P.O. Box 94987
Lincoln, NE 68509-4987

Comments received by the close of the public hearing on Wednesday, June 27, 2012 will be made part of the hearing record.

VR 2013 State Plan Public Hearing
June 27, 2012
2:00 p.m. CST

The public hearing was held at the VR Lincoln Service Office, 3901 N. 27th Street, Suite 6 and included video conferencing sites in Scottsbluff, North Platte, Kearney, Grand Island, Columbus, Norfolk, Lincoln NSOB, and two sites in downtown and west Omaha.

Mark Schultz, NE VR Director, opened the public hearing at 2:00 p.m. A brief overview of the purpose of the annual VR state plan and the public hearing was provided. A call for public input was made with no respondents. The public hearing was concluded at 2:05.

Public in attendance:

Scottsbluff: None
North Platte: None
Kearney: None
Grand Island: Rebecca Koehler, Goodwill Industries of Nebraska
Columbus: None
Norfolk: None
Lincoln: Kara Magdanz, HOPE-Mental Health Association of Nebraska,
Victoria Rasmussen, Client Assistance Program & State Rehabilitation Council
Lincoln NSOB: Jason Kerkman, State Rehabilitation Council
Omaha: None
Omaha West: None

Written Comment: One written comment was received from Vicki Rasmussen, SRC Board Member. She recommended adding two other recommendations the SRC made to the agency during FY 2011 to attachment 4.2(c). This attachment is a summary of the input and recommendations of the State Rehabilitation Council to the VR agency. The recommendations addressed the use of two agency forms.

Response: The two recommendations were added to 4.2(c) as proposed. They are SRC Recommendation 9 and 10.

**STATE PLAN FOR THE
STATE VOCATIONAL REHABILITATION SERVICES PROGRAM AND
STATE PLAN SUPPLEMENT FOR THE
STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM**

State Plan for Fiscal Year 2013

SECTION 1: STATE CERTIFICATIONS

- 1.1 The (enter the name of designated state agency or designated state unit below)...
Nebraska Department of Education
... is authorized to submit this State Plan under Title I of the Rehabilitation Act of 1973, as amended ^[1] and its Supplement under Title VI, Part B, of the Rehabilitation Act ^[2].
- 1.2 As a condition for the receipt of federal funds under Title I, Part B, of the Rehabilitation Act for the provision of vocational rehabilitation services, the... (enter the name of the designated state agency below) ^[3]
Nebraska Department of Education
... agrees to operate and administer the state vocational rehabilitation services program in accordance with the provisions of this State Plan ^[4], the Rehabilitation Act, and all applicable regulations ^[5], policies and procedures established by the secretary. Funds made available under Section 111 of the Rehabilitation Act are used solely for the provision of vocational rehabilitation services under Title I of the Rehabilitation Act and the administration of the State Plan for the vocational rehabilitation services program.
- 1.3 As a condition for the receipt of federal funds under Title VI, Part B, of the Rehabilitation Act for supported employment services, the designated state agency agrees to operate and administer the State Supported Employment Services Program in accordance with the provisions of the Supplement to this State Plan ^[6], the Rehabilitation Act and all applicable regulations ^[7], policies and procedures established by the secretary. Funds made available under Title VI, Part B, are used solely for the provision of supported employment services and the administration of the Supplement to the Title I State Plan.
- 1.4 The designated state agency and/or the designated state unit has the authority under state law to perform the functions of the state regarding this State Plan and its Supplement.

* The signatory of the assurance with the authority to execute and submit the State Plan will maintain a signed copy of the assurance(s) with the signed State Plan.

SECTION 1 FOOTNOTES

- [1] Public Law 93 112, as amended by Public Laws 93 516, 95 602, 98 221, 99 506, 100-630, 102-569, 103-073, and 105-220.
- [2] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended.
- [3] All references in this plan to "designated state agency" or to "the state agency" relate to the agency identified in this paragraph.
- [4] No funds under Title I of the Rehabilitation Act may be awarded without an approved State Plan in accordance with Section 101(a) of the Rehabilitation Act and 34 CFR part 361.
- [5] Applicable regulations include the Education Department General Administrative Regulations (EDGAR) in 34 CFR Parts 74, 76, 77, 79, 80, 81, 82, 85 and 86 and the State Vocational Rehabilitation Services Program regulations in 34 CFR Part 361.
- [6] No funds under Title VI, Part B, of the Rehabilitation Act may be awarded without an approved Supplement to the Title I State Plan in accordance with Section 625(a) of the Rehabilitation Act.
- [7] Applicable regulations include the EDGAR citations in footnote 5, 34 CFR Part 361, and 34 CFR Part 363.

SECTION 2: PUBLIC COMMENT ON STATE PLAN POLICIES AND PROCEDURES

- 2.1 Public participation requirements. (Section 101(a)(16)(A) of the Rehabilitation Act; 34 CFR 361.10(d), 361.20(a), (b), (d); and 363.11(g)(9))
- (a) Conduct of public meetings.
The designated state agency, prior to the adoption of any substantive policies or procedures governing the provision of vocational rehabilitation services under the State Plan and supported employment services under the Supplement to the State Plan, including making any substantive amendments to the policies and procedures, conducts public meetings throughout the state to provide the public, including individuals with disabilities, an opportunity to comment on the policies or procedures.
 - (b) Notice requirements.
The designated state agency, prior to conducting the public meetings, provides appropriate and sufficient notice throughout the state of the meetings in accordance with state law governing public meetings or, in the absence of state law governing public meetings, procedures developed by the state agency in consultation with the State Rehabilitation Council, if the agency has a council.
 - (c) Special consultation requirements.
The state agency actively consults with the director of the Client Assistance Program, the State Rehabilitation Council, if the agency has a council and, as appropriate, Indian tribes, tribal organizations and native Hawaiian organizations on its policies and procedures governing the provision of vocational rehabilitation services under the State Plan and supported employment services under the Supplement to the State Plan.

SECTION 3: SUBMISSION OF THE STATE PLAN AND ITS SUPPLEMENT

- 3.1 Submission and revisions of the State Plan and its Supplement. (Sections 101(a)(1), (23) and 625(a)(1) of the Rehabilitation Act; Section 501 of the Workforce Investment Act; 34 CFR 76.140; 361.10(e), (f), and (g); and 363.10)
- (a) The state submits to the commissioner of the Rehabilitation Services Administration the State Plan and its Supplement on the same date that the state submits either a State Plan under Section 112 of the Workforce Investment Act of 1998 or a state unified plan under Section 501 of that Rehabilitation Act.
 - (b) The state submits only those policies, procedures or descriptions required under this State Plan and its Supplement that have not been previously submitted to and approved by the commissioner.
 - (c) The state submits to the commissioner, at such time and in such manner as the commissioner determines to be appropriate, reports containing annual updates of the information relating to the:
 - 1. comprehensive system of personnel development;
 - 2. assessments, estimates, goals and priorities, and reports of progress;
 - 3. innovation and expansion activities; and
 - 4. other updates of information required under Title I, Part B, or Title VI, Part B, of the Rehabilitation Act that are requested by the commissioner.
 - (d) The State Plan and its Supplement are in effect subject to the submission of modifications the state determines to be necessary or the commissioner requires based on a change in state policy, a change in federal law, including regulations, an interpretation of the Rehabilitation Act by a federal court or the highest court of the state, or a finding by the commissioner of state noncompliance with the requirements of the Rehabilitation Act, 34 CFR 361 or 34 CFR 363.
- 3.2 Supported Employment State Plan Supplement. (Sections 101(a)(22) and 625(a) of the Rehabilitation Act; 34 CFR 361.34 and 363.10)
- (a) The state has an acceptable plan for carrying out Part B, of Title VI of the Rehabilitation Act that provides for the use of funds under that part to supplement funds made available under Part B, of Title I of the Rehabilitation Act for the cost of services leading to supported employment.
 - (b) The Supported Employment State Plan, including any needed annual revisions, is submitted as a supplement to the State Plan.

SECTION 4: ADMINISTRATION OF THE STATE PLAN

- 4.1 Designated state agency and designated state unit. (Section 101(a)(2) of the Rehabilitation Act; 34 CFR 361.13(a) and (b))
- (a) Designated state agency.
 - (1) There is a state agency designated as the sole state agency to administer the State Plan or to supervise its administration in a political subdivision of the state by a sole local agency.
 - (2) The designated state agency is:

- (A) a state agency that is primarily concerned with vocational rehabilitation or vocational and other rehabilitation of individuals with disabilities; or
- (B)X a state agency that is not primarily concerned with vocational rehabilitation or vocational and other rehabilitation of individuals with disabilities and includes a vocational rehabilitation unit as provided in paragraph (b) of this section.

(3) In American Samoa, the designated state agency is the governor.

(b) Designated state unit.

- (1) If the designated state agency is not primarily concerned with vocational rehabilitation or vocational and other rehabilitation of individuals with disabilities, in accordance with subparagraph 4.1(a)(2)(B) of this section, the state agency includes a vocational rehabilitation bureau, division or unit that:
 - (A) is primarily concerned with vocational rehabilitation or vocational and other rehabilitation of individuals with disabilities and is responsible for the administration of the designated state agency's vocational rehabilitation program under the State Plan;
 - (B) has a full-time director;
 - (C) has a staff, at least 90 percent of whom are employed full-time on the rehabilitation work of the organizational unit; and
 - (D) is located at an organizational level and has an organizational status within the designated state agency comparable to that of other major organizational units of the designated state agency.

(2) The name of the designated state vocational rehabilitation unit is Nebraska VR

4.2 State independent commission or State Rehabilitation Council. (Sections 101(a)(21) and 105 of the Rehabilitation Act; 34 CFR 361.16 and 361.17)
The State Plan must contain one of the following assurances.

(a) The designated state agency is an independent state commission that:

- (1) is responsible under state law for operating or overseeing the operation of the vocational rehabilitation program in the state and is primarily concerned with the vocational rehabilitation or vocational and other rehabilitation of individuals with disabilities in accordance with subparagraph 4.1(a)(2)(A) of this section.
- (2) is consumer controlled by persons who:
 - (A) are individuals with physical or mental impairments that substantially limit major life activities; and
 - (B) represent individuals with a broad range of disabilities, unless the designated state unit under the direction of the commission is the state agency for individuals who are blind;

(3) includes family members, advocates or other representatives of individuals with mental impairments; and

- (4) undertakes the functions set forth in Section 105(c)(4) of the Rehabilitation Act and 34 CFR 361.17(h)(4).

or

- (b)X The state has established a State Rehabilitation Council that meets the criteria set forth in Section 105 of the Rehabilitation Act, 34 CFR 361.17 and the designated state unit:
 - (1) jointly with the State Rehabilitation Council develops, agrees to and reviews annually state goals and priorities and jointly submits to the commissioner annual reports of progress in accordance with the provisions of Section 101(a)(15) of the Rehabilitation Act, 34 CFR 361.29 and subsection 4.11 of this State Plan;
 - (2) regularly consults with the State Rehabilitation Council regarding the development, implementation and revision of state policies and procedures of general applicability pertaining to the provision of vocational rehabilitation services;
 - (3) includes in the State Plan and in any revision to the State Plan a summary of input provided by the State Rehabilitation Council, including recommendations from the annual report of the council described in Section 105(c)(5) of the Rehabilitation Act and 34 CFR 361.17(h)(5), the review and analysis of consumer satisfaction described in Section 105(c)(4) of the Rehabilitation Act and 34 CFR 361.17(h)(4), and other reports prepared by the council and the response of the designated state unit to the input and recommendations, including explanations for rejecting any input or recommendation; and
 - (4) transmits to the council:
 - (A) all plans, reports and other information required under 34 CFR 361 to be submitted to the commissioner;
 - (B) all policies and information on all practices and procedures of general applicability provided to or used by rehabilitation personnel in carrying out this State Plan and its Supplement; and
 - (C) copies of due process hearing decisions issued under 34 CFR 361.57, which are transmitted in such a manner as to ensure that the identity of the participants in the hearings is kept confidential.
- (c) If the designated state unit has a State Rehabilitation Council, Attachment 4.2(c) provides a summary of the input provided by the council consistent with the provisions identified in subparagraph (b)(3) of this section; the response of the designated state unit to the input and recommendations; and, explanations for the rejection of any input or any recommendation.

4.3 Consultations regarding the administration of the State Plan. (Section 101(a)(16)(B) of the Rehabilitation Act; 34 CFR 361.21)

The designated state agency takes into account, in connection with matters of general policy arising in the administration of the plan and its supplement, the views of:

- (a) individuals and groups of individuals who are recipients of vocational rehabilitation services or, as appropriate, the individuals' representatives;
- (b) personnel working in programs that provide vocational rehabilitation services to individuals with disabilities;
- (c) providers of vocational rehabilitation services to individuals with disabilities;
- (d) the director of the Client Assistance Program; and

(e) the State Rehabilitation Council, if the state has a council.

4.4 Nonfederal share. (Sections 7(14) and 101(a)(3) of the Rehabilitation Act; 34 CFR 80.24 and 361.60)

The nonfederal share of the cost of carrying out this State Plan is 21.3 percent and is provided through the financial participation by the state or, if the state elects, by the state and local agencies.

4.5 Local administration. (Sections 7(24) and 101(a)(2)(A) of the Rehabilitation Act; 34 CFR 361.5(b)(47) and 361.15)

The State Plan provides for the administration of the plan by a local agency.

No

If "Yes", the designated state agency:

- (a) ensures that each local agency is under the supervision of the designated state unit with the sole local agency, as that term is defined in Section 7(24) of the Rehabilitation Act and 34 CFR 361.5(b)(47), responsible for the administration of the vocational rehabilitation program within the political subdivision that it serves; and
- (b) develops methods that each local agency will use to administer the vocational rehabilitation program in accordance with the State Plan.

4.6 Shared funding and administration of joint programs. (Section 101(a)(2)(A)(ii) of the Rehabilitation Act; 34 CFR 361.27)

The State Plan provides for the state agency to share funding and administrative responsibility with another state agency or local public agency to carry out a joint program to provide services to individuals with disabilities.

No

If "Yes", the designated state agency submits to the commissioner for approval a plan that describes its shared funding and administrative arrangement. The plan must include:

- (a) a description of the nature and scope of the joint program;
- (b) the services to be provided under the joint program;
- (c) the respective roles of each participating agency in the administration and provision of services; and
- (d) the share of the costs to be assumed by each agency.

4.7 Statewide and waivers of statewide. (Section 101(a)(4) of the Rehabilitation Act; 34 CFR 361.25, 361.26, and 361.60(b)(3)(i) and (ii))

- (a) Services provided under the State Plan are available in all political subdivisions of the state.

- (b) The state unit may provide services in one or more political subdivisions of the state that increase services or expand the scope of services that are available statewide under this State Plan if the:
 - (1) nonfederal share of the cost of these services is met from funds provided by a local public agency, including funds contributed to a local public agency by a private agency, organization or individual;
 - (2) services are likely to promote the vocational rehabilitation of substantially larger numbers of individuals with disabilities or of individuals with disabilities with particular types of impairments; and
 - (3) state, for purposes other than the establishment of a community rehabilitation program or the construction of a particular facility for community rehabilitation program purposes, requests in Attachment 4.7(b)(3) a waiver of the statewideness requirement in accordance with the following requirements:
 - (A) identification of the types of services to be provided;
 - (B) written assurance from the local public agency that it will make available to the state unit the nonfederal share of funds;
 - (C) written assurance that state unit approval will be obtained for each proposed service before it is put into effect; and
 - (D) written assurance that all other State Plan requirements, including a state's order of selection, will apply to all services approved under the waiver.
- (c) Contributions, consistent with the requirements of 34 CFR 361.60(b)(3)(ii), by private entities of earmarked funds for particular geographic areas within the state may be used as part of the nonfederal share without the state requesting a waiver of the statewideness requirement provided that the state notifies the commissioner that it cannot provide the full nonfederal share without using the earmarked funds.

4.8 Cooperation, collaboration and coordination. (Sections 101(a)(11), (24)(B), and 625(b)(4) and (5) of the Rehabilitation Act; 34 CFR 361.22, 361.23, 361.24, and 361.31, and 363.11(e))

- (a) Cooperative agreements with other components of statewide work force investment system.
The designated state agency or the designated state unit has cooperative agreements with other entities that are components of the statewide work force investment system and replicates those agreements at the local level between individual offices of the designated state unit and local entities carrying out the One-Stop service delivery system or other activities through the statewide work force investment system.
- (b) Cooperation and coordination with other agencies and entities.
Attachment 4.8(b) (1)-(4) describes the designated state agency's:
 - (1) cooperation with and use of the services and facilities of the federal, state, and local agencies and programs, including programs carried out by the undersecretary for Rural Development of the United States Department of Agriculture and state use contracting programs, to the extent that those agencies and programs are not carrying out activities through the statewide work force investment system;
 - (2) coordination, in accordance with the requirements of paragraph 4.8(c) of this section, with education officials to facilitate the transition of students with disabilities from school to the receipt of vocational rehabilitation services;
 - (3) establishment of cooperative agreements with private nonprofit vocational rehabilitation service providers, in accordance with the requirements of paragraph 5.10(b) of the State Plan; and,

- (4) efforts to identify and make arrangements, including entering into cooperative agreements, with other state agencies and entities with respect to the provision of supported employment and extended services for individuals with the most significant disabilities, in accordance with the requirements of subsection 6.5 of the Supplement to this State Plan.

(c) Coordination with education officials.

- (1) Attachment 4.8(b)(2) describes the 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 who are individuals with disabilities from the receipt of educational services in school to the receipt of vocational rehabilitation services under the responsibility of the designated state agency.
- (2) The State Plan description must:
 - (A) provide for the development and approval of an individualized plan for employment in accordance with 34 CFR 361.45 as early as possible during the transition planning process but, at the latest, before each student determined to be eligible for vocational rehabilitation services leaves the school setting or if the designated state unit is operating on an order of selection before each eligible student able to be served under the order leaves the school setting; and
 - (B) include information on a formal interagency agreement with the state educational agency that, at a minimum, provides for:
 - (i) consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post school activities, including vocational rehabilitation services;
 - (ii) transition planning by personnel of the designated state agency and the educational agency for students with disabilities that facilitates the development and completion of their individualized education programs under Section 614(d) of the Individuals with Disabilities Education Act;
 - (iii) roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining state lead agencies and qualified personnel responsible for transition services; and
 - (iv) procedures for outreach to students with disabilities as early as possible during the transition planning process and identification of students with disabilities who need transition services.

(d) Coordination with statewide independent living council and independent living centers.

The designated state unit, the Statewide Independent Living Council established under Section 705 of the Rehabilitation Act and 34 CFR 364, and the independent living centers described in Part C of Title VII of the Rehabilitation Act and 34 CFR 366 have developed working relationships and coordinate their activities.

(e) Cooperative agreement with recipients of grants for services to American Indians.

- (1) There is in the state a recipient(s) of a grant under Part C of Title I of the Rehabilitation Act for the provision of vocational rehabilitation services for American Indians who are individuals with disabilities residing on or near federal and state reservations.

No
- (2) If "Yes", the designated state agency has entered into a formal cooperative agreement that meets the following requirements with each grant recipient in the state that receives funds under Part C of Title I of the Rehabilitation Act:

- (A) strategies for interagency referral and information sharing that will assist in eligibility determinations and the development of individualized plans for employment;
- (B) procedures for ensuring that American Indians who are individuals with disabilities and are living near a reservation or tribal service area are provided vocational rehabilitation services; and
- (C) provisions for sharing resources in cooperative studies and assessments, joint training activities, and other collaborative activities designed to improve the provision of services to American Indians who are individuals with disabilities.

4.9 Methods of administration. (Section 101(a)(6) of the Rehabilitation Act; 34 CFR 361.12, 361.19 and 361.51(a) and (b))

(a) In general.

The state agency employs methods of administration, including procedures to ensure accurate data collection and financial accountability, found by the commissioner to be necessary for the proper and efficient administration of the plan and for carrying out all the functions for which the state is responsible under the plan and 34 CFR 361.

(b) Employment of individuals with disabilities.

The designated state agency and entities carrying out community rehabilitation programs in the state, who are in receipt of assistance under Part B, of Title I of the Rehabilitation Act and this State Plan, take affirmative action to employ and advance in employment qualified individuals with disabilities covered under and on the same terms and conditions as set forth in Section 503 of the Rehabilitation Act.

(c) Facilities.

Any facility used in connection with the delivery of services assisted under this State Plan meets program accessibility requirements consistent with the provisions, as applicable, of the Architectural Barriers Rehabilitation Act of 1968, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act of 1990 and the regulations implementing these laws.

4.10 Comprehensive system of personnel development. (Section 101(a)(7) of the Rehabilitation Act; 34 CFR 361.18)

Attachment 4.10 describes the designated state agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified state rehabilitation professional and paraprofessional personnel for the designated state unit. The description includes the following:

(a) Data system on personnel and personnel development.

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

(1) Qualified personnel needs.

- (A) The number of personnel who are employed by the state agency in the provision of vocational rehabilitation services in relation to the number of individuals served, broken down by personnel category;

- (B) The number of personnel currently needed by the state agency to provide vocational rehabilitation services, broken down by personnel category; and
- (C) Projections of the number of personnel, broken down by personnel category, who will be needed by the state agency to provide vocational rehabilitation services in the state 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.

(2) Personnel development.

- (A) A list of the institutions of higher education in the state that are preparing vocational rehabilitation professionals, by type of program;
- (B) The number of students enrolled at each of those institutions, broken down by type of program; and
- (C) 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.

(b) Plan for recruitment, preparation and retention of qualified personnel.

Development, updating on an annual basis, and implementation of a plan to address the current and projected needs for qualified personnel based on the data collection and analysis system described in paragraph (a) of this subsection and that provides for the coordination and facilitation of efforts between the designated state unit and institutions of higher education and professional associations to recruit, prepare and retain personnel who are qualified in accordance with paragraph (c) of this subsection, including personnel from minority backgrounds and personnel who are individuals with disabilities.

(c) Personnel standards.

Policies and procedures for the establishment and maintenance of personnel standards to ensure that designated state unit professional and paraprofessional personnel are appropriately and adequately prepared and trained, including:

- (1) standards that are consistent with any national- or state-approved or recognized certification, licensing, registration, or, in the absence of these requirements, other comparable requirements (including state personnel requirements) that apply to the profession or discipline in which such personnel are providing vocational rehabilitation services.
- (2) To the extent that existing standards are not based on the highest requirements in the state applicable to a particular profession or discipline, the steps the state is currently taking and the steps the state plans to take in accordance with the written plan to retrain or hire personnel within the designated state unit to meet standards that are based on the highest requirements in the state, including measures to notify designated state unit personnel, the institutions of higher education identified in subparagraph (a)(2), and other public agencies of these steps and the time lines for taking each step.
- (3) The written plan required by subparagraph (c)(2) describes the following:
 - (A) specific strategies for retraining, recruiting and hiring personnel;
 - (B) the specific time period by which all state unit personnel will meet the standards required by subparagraph (c)(1);
 - (C) procedures for evaluating the designated state unit's progress in hiring or retraining personnel to meet applicable personnel standards within the established time period; and
 - (D) the identification of initial minimum qualifications that the designated state unit will require of newly hired personnel when the state unit is unable to hire new personnel who meet the established personnel standards and the identification of a plan for training such individuals to meet the applicable standards within the time period established for all state unit personnel to meet the established personnel standards.

- (d) Staff development.
Policies, procedures and activities to ensure that all personnel employed by the designated state unit receive appropriate and adequate training. The narrative describes the following:
 - (1) A system of staff development for professionals and paraprofessionals within the designated state unit, particularly with respect to assessment, vocational counseling, job placement and rehabilitation technology.
 - (2) Procedures for the acquisition and dissemination to designated state unit professionals and paraprofessionals significant knowledge from research and other sources.
- (e) Personnel to address individual communication needs.
Availability of personnel within the designated state unit or obtaining the services of other individuals who are able to communicate in the native language of applicants or eligible individuals who have limited English speaking ability or in appropriate modes of communication with applicants or eligible individuals.
- (f) Coordination of personnel development under the Individuals with Disabilities Education Act.
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.

4.11. Statewide assessment; annual estimates; annual state goals and priorities; strategies; and progress reports. (Sections 101(a)(15), 105(c)(2) and 625(b)(2) of the Rehabilitation Act; 34 CFR 361.17(h)(2), 361.29, and 363.11(b))

(a) Comprehensive statewide assessment.

- (1) Attachment 4.11(a) documents the results of a comprehensive, statewide assessment, jointly conducted every three years by the designated state unit and the State Rehabilitation Council (if the state has such a council). The assessment describes:
 - (A) the rehabilitation needs of individuals with disabilities residing within the state, particularly the vocational rehabilitation services needs of:
 - (i) individuals with the most significant disabilities, including their need for supported employment services;
 - (ii) individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program carried out under this State Plan; and
 - (iii) individuals with disabilities served through other components of the statewide work force investment system.
 - (B) The need to establish, develop or improve community rehabilitation programs within the state.
- (2) For any year in which the state updates the assessments, the designated state unit submits to the commissioner a report containing information regarding updates to the assessments.

(b) Annual estimates.

Attachment 4.11(b) identifies on an annual basis state estimates of the:

- (1) number of individuals in the state who are eligible for services under the plan;
- (2) number of eligible individuals who will receive services provided with funds provided under Part B of Title I of the Rehabilitation Act and under Part B of Title VI of the Rehabilitation Act, including, if the designated state agency uses an order of selection in accordance with subparagraph 5.3(b)(2) of this State Plan, estimates of the number of individuals to be served under each priority category within the order; and
- (3) costs of the services described in subparagraph (b)(1), including, if the designated state agency uses an order of selection, the service costs for each priority category within the order.

(c) Goals and priorities.

- (1) Attachment 4.11(c)(1) identifies the goals and priorities of the state that are jointly developed or revised, as applicable, with and agreed to by the State Rehabilitation Council, if the agency has a council, in carrying out the vocational rehabilitation and supported employment programs.
- (2) The designated state agency submits to the commissioner a report containing information regarding any revisions in the goals and priorities for any year the state revises the goals and priorities.
- (3) Order of selection.
If the state agency implements an order of selection, consistent with subparagraph 5.3(b)(2) of the State Plan, Attachment 4.11(c)(3):
 - (A) shows the order to be followed in selecting eligible individuals to be provided vocational rehabilitation services;
 - (B) provides a justification for the order; and
 - (C) identifies the service and outcome goals, and the time within which these goals may be achieved for individuals in each priority category within the order.
- (4) Goals and plans for distribution of Title VI, Part B, funds.
Attachment 4.11(c)(4) specifies, consistent with subsection 6.4 of the State Plan Supplement, the state's goals and priorities with respect to the distribution of funds received under Section 622 of the Rehabilitation Act for the provision of supported employment services.

(d) Strategies.

(1) Attachment 4.11(d) describes the strategies, including:

- (A) the methods to be used to expand and improve services to individuals with disabilities, including how a broad range of assistive technology services and assistive technology devices will be provided to those individuals at each stage of the rehabilitation process and how those services and devices will be provided to individuals with disabilities on a statewide basis;
- (B) outreach procedures to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities in accordance with subsection 6.6 of the State Plan supplement, and individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program;
- (C) as applicable, the plan of the state for establishing, developing or improving community rehabilitation programs;
- (D) strategies to improve the performance of the state with respect to the evaluation standards and performance indicators established pursuant to Section 106 of the Rehabilitation Act; and
- (E) strategies for assisting other components of the statewide work force investment system in assisting individuals with disabilities.

(2) Attachment 4.11 (d) describes how the designated state agency uses these strategies to:

- (A) address the needs identified in the assessment conducted under paragraph 4.11(a) and achieve the goals and priorities identified in the State Plan attachments under paragraph 4.11(c);
- (B) support the innovation and expansion activities identified in subparagraph 4.12(a)(1) and (2) of the plan; and
- (C) overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State Vocational Rehabilitation Services Program and State Supported Employment Services Program.

(e) Evaluation and reports of progress.

- (1) The designated state unit and the State Rehabilitation Council, if the state unit has a council, jointly submits to the commissioner an annual report on the results of an evaluation of the effectiveness of the vocational rehabilitation program and the progress made in improving the effectiveness of the program from the previous year.
- (2) Attachment 4.11(e)(2):
 - (A) provides an evaluation of the extent to which the goals identified in Attachment 4.11(c)(1) and, if applicable, Attachment 4.11(c)(3) were achieved;
 - (B) identifies the strategies that contributed to the achievement of the goals and priorities;
 - (C) describes the factors that impeded their achievement, to the extent they were not achieved;
 - (D) assesses the performance of the state on the standards and indicators established pursuant to Section 106 of the Rehabilitation Act; and
 - (E) provides a report consistent with paragraph 4.12(c) of the plan on how the funds reserved for innovation and expansion activities were utilized in the preceding year.

4.12 Innovation and expansion. (Section 101(a)(18) of the Rehabilitation Act; 34 CFR 361.35)

(a) The designated state agency reserves and uses a portion of the funds allotted to the state under Section 110 of the Rehabilitation Act for the:

- (1) development and implementation of innovative approaches to expand and improve the provision of vocational rehabilitation services to individuals with disabilities under this State Plan, particularly individuals with the most significant disabilities, consistent with the findings of the statewide assessment identified in Attachment 4.11(a) and goals and priorities of the state identified in Attachments 4.11(c)(1) and, if applicable, Attachment 4.11(c)(3); and
- (2) support of the funding for the State Rehabilitation Council, if the state has such a council, consistent with the resource plan prepared under Section 105(d)(1) of the Rehabilitation Act and 34 CFR 361.17(i), and the funding of the Statewide Independent Living Council, consistent with the resource plan prepared under Section 705(e)(1) of the Rehabilitation Act and 34 CFR 364.21(i).

(b) Attachment 4.11 (d) describes how the reserved funds identified in subparagraph 4.12(a)(1) and (2) will be utilized.

(c) Attachment 4.11(e)(2) describes how the reserved funds were utilized in the preceding year.

4.13 Reports. (Section 101(a)(10) of the Rehabilitation Act; 34 CFR 361.40)

- (a) The designated state unit submits reports in the form and level of detail and at the time required by the commissioner regarding applicants for and eligible individuals receiving services under the State Plan.
- (b) Information submitted in the reports provides a complete count, unless sampling techniques are used, of the applicants and eligible individuals in a manner that permits the greatest possible cross-classification of data and protects the confidentiality of the identity of each individual.

SECTION 5: ADMINISTRATION OF THE PROVISION OF VOCATIONAL REHABILITATION SERVICES

5.1 Information and referral services. (Sections 101(a)(5)(D) and (20) of the Rehabilitation Act; 34 CFR 361.37)

The designated state agency has implemented an information and referral system that is adequate to ensure that individuals with disabilities, including individuals who do not meet the agency's order of selection criteria for receiving vocational rehabilitation services if the agency is operating on an order of selection, are provided accurate vocational rehabilitation information and guidance, including counseling and referral for job placement, using appropriate modes of communication, to assist such individuals in preparing for, securing, retaining or regaining employment, and are referred to other appropriate federal and state programs, including other components of the statewide work force investment system in the state.

5.2 Residency. (Section 101(a)(12) of the Rehabilitation Act; 34 CFR 361.42(c)(1))

The designated state unit imposes no duration of residence requirement as part of determining an individual's eligibility for vocational rehabilitation services or that excludes from services under the plan any individual who is present in the state.

5.3 Ability to serve all eligible individuals; order of selection for services. (Sections 12(d) and 101(a)(5) of the Rehabilitation Act; 34 CFR 361.36)

- (a) The designated state unit is able to provide the full range of services listed in Section 103(a) of the Rehabilitation Act and 34 CFR 361.48, as appropriate, to all eligible individuals with disabilities in the state who apply for services.
No
- (b) If No:
 - (1) Individuals with the most significant disabilities, in accordance with criteria established by the state, are selected first for vocational rehabilitation services before other individuals with disabilities.
 - (2) Attachment 4.11(c)(3):
 - (A) shows the order to be followed in selecting eligible individuals to be provided vocational rehabilitation services;

- (B) provides a justification for the order of selection; and
 - (C) identifies the state's service and outcome goals and the time within which these goals may be achieved for individuals in each priority category within the order.
- (3) Eligible individuals who do not meet the order of selection criteria have access to the services provided through the designated state unit's information and referral system established under Section 101(a)(20) of the Rehabilitation Act, 34 CFR 361.37, and subsection 5.1 of this State Plan.

5.4 Availability of comparable services and benefits. (Sections 101(a)(8) and 103(a) of the Rehabilitation Act; 34 CFR 361.53)

- (a) Prior to providing any vocational rehabilitation services, except those services identified in paragraph (b), to an eligible individual or to members of the individual's family, the state unit determines whether comparable services and benefits exist under any other program and whether those services and benefits are available to the individual.
- (b) The following services are exempt from a determination of the availability of comparable services and benefits:
 - (1) assessment for determining eligibility and vocational rehabilitation needs by qualified personnel, including, if appropriate, an assessment by personnel skilled in rehabilitation technology;
 - (2) counseling and guidance, including information and support services to assist an individual in exercising informed choice consistent with the provisions of Section 102(d) of the Rehabilitation Act;
 - (3) referral and other services to secure needed services from other agencies, including other components of the statewide work force investment system, through agreements developed under Section 101(a)(11) of the Rehabilitation Act, if such services are not available under this State Plan;
 - (4) job-related services, including job search and placement assistance, job retention services, follow-up services, and follow-along services;
 - (5) rehabilitation technology, including telecommunications, sensory and other technological aids and devices; and
 - (6) post-employment services consisting of the services listed under subparagraphs (1) through (5) of this paragraph.
- (c) The requirements of paragraph (a) of this section do not apply if the determination of the availability of comparable services and benefits under any other program would interrupt or delay:
 - (1) progress of the individual toward achieving the employment outcome identified in the individualized plan for employment;
 - (2) an immediate job placement; or
 - (3) provision of vocational rehabilitation services to any individual who is determined to be at extreme medical risk, based on medical evidence provided by an appropriate qualified medical professional.
- (d) The governor in consultation with the designated state vocational rehabilitation agency and other appropriate agencies ensures that an interagency agreement or

interagency agreement or other mechanism for interagency coordination.

5.5 Individualized plan for employment. (Section 101(a)(9) of the Rehabilitation Act; 34 CFR 361.45 and 361.46)

- (a) An individualized plan for employment meeting the requirements of Section 102(b) of the Rehabilitation Act and 34 CFR 361.45 and .46 is developed and implemented in a timely manner for each individual determined to be eligible for vocational rehabilitation services, except if the state has implemented an order of selection, and is developed and implemented for each individual to whom the designated state unit is able to provide vocational rehabilitation services.
- (b) Services to an eligible individual are provided in accordance with the provisions of the individualized plan for employment.

5.6 Opportunity to make informed choices regarding the selection of services and providers. (Sections 101(a)(19) and 102(d) of the Rehabilitation Act; 34 CFR 361.52)

Applicants and eligible individuals or, as appropriate, their representatives are provided information and support services to assist in exercising informed choice throughout the rehabilitation process, consistent with the provisions of Section 102(d) of the Rehabilitation Act and 34 CFR 361.52.

5.7 Services to American Indians. (Section 101(a)(13) of the Rehabilitation Act; 34 CFR 361.30)

The designated state unit provides vocational rehabilitation services to American Indians who are individuals with disabilities residing in the state to the same extent as the designated state agency provides such services to other significant populations of individuals with disabilities residing in the state.

5.8 Annual review of individuals in extended employment or other employment under special certificate provisions of the fair labor standards act of 1938. (Section 101(a)(14) of the Rehabilitation Act; 34 CFR 361.55)

- (a) The designated state unit conducts an annual review and reevaluation of the status of each individual with a disability served under this State Plan:
 - (1) who has achieved an employment outcome in which the individual is compensated in accordance with Section 14(c) of the Fair Labor Standards Act (29 U.S.C. 214(c)); or
 - (2) whose record of services is closed while the individual is in extended employment on the basis that the individual is unable to achieve an employment outcome in an integrated setting or that the individual made an informed choice to remain in extended employment.
- (b) The designated state unit carries out the annual review and reevaluation for two years after the individual's record of services is closed (and thereafter if requested by the individual or, if appropriate, the individual's representative) to determine the interests, priorities and needs of the individual with respect to competitive employment or training for competitive employment.
- (c) The designated state unit makes maximum efforts, including the identification and provision of vocational rehabilitation services, reasonable accommodations and other necessary support services, to assist the individuals described in paragraph (a) in engaging in competitive employment.
- (d) The individual with a disability or, if appropriate, the individual's representative has input into the review and reevaluation and, through signed acknowledgement, attests that the review and reevaluation have been conducted.

- 5.9 Use of Title I funds for construction of facilities. (Sections 101(a)(17) and 103(b)(2)(A) of the Rehabilitation Act; 34 CFR 361.49(a)(1), 361.61 and 361.62(b))
If the state elects to construct, under special circumstances, facilities for community rehabilitation programs, the following requirements are met:
- (a) The federal share of the cost of construction for facilities for a fiscal year does not exceed an amount equal to 10 percent of the state's allotment under Section 110 of the Rehabilitation Act for that fiscal year.
 - (b) The provisions of Section 306 of the Rehabilitation Act that were in effect prior to the enactment of the Rehabilitation Act Amendments of 1998 apply to such construction.
 - (c) There is compliance with the requirements in 34 CFR 361.62(b) that ensure the use of the construction authority will not reduce the efforts of the designated state agency in providing other vocational rehabilitation services other than the establishment of facilities for community rehabilitation programs.
- 5.10 Contracts and cooperative agreements. (Section 101(a)(24) of the Rehabilitation Act; 34 CFR 361.31 and 361.32)
- (a) Contracts with for-profit organizations.
The designated state agency has the authority to enter into contracts with for-profit organizations for the purpose of providing, as vocational rehabilitation services, on-the-job training and related programs for individuals with disabilities under Part A of Title VI of the Rehabilitation Act, upon the determination by the designated state agency that for-profit organizations are better qualified to provide vocational rehabilitation services than nonprofit agencies and organizations.
 - (b) Cooperative agreements with private nonprofit organizations.
Attachment 4.8(b)(3) describes the manner in which the designated state agency establishes cooperative agreements with private nonprofit vocational rehabilitation service providers.

SECTION 6: PROGRAM ADMINISTRATION

- 6.1 Designated state agency. (Section 625(b)(1) of the Rehabilitation Act; 34 CFR 363.11(a))
The designated state agency for vocational rehabilitation services identified in paragraph 1.2 of the Title I State Plan is the state agency designated to administer the State Supported Employment Services Program authorized under Title VI, Part B, of the Rehabilitation Act.
- 6.2 Statewide assessment of supported employment services needs. (Section 625(b)(2) of the Rehabilitation Act; 34 CFR 363.11(b))

Attachment 4.11(a) describes the results of the comprehensive, statewide needs assessment conducted under Section 101(a)(15)(a)(1) of the Rehabilitation Act and subparagraph 4.11(a)(1) of the Title I State Plan with respect to the rehabilitation needs of individuals with most significant disabilities and their need for supported employment services, including needs related to coordination.

- 6.3 Quality, scope and extent of supported employment services. (Section 625(b)(3) of the Rehabilitation Act; 34 CFR 363.11(c) and 363.50(b)(2))
Attachment 6.3 describes the quality, scope and extent of supported employment services to be provided to individuals with the most significant disabilities who are eligible to receive supported employment services. The description also addresses the timing of the transition to extended services to be provided by relevant state agencies, private nonprofit organizations or other sources following the cessation of supported employment service provided by the designated state agency.
- 6.4 Goals and plans for distribution of Title VI, Part B, funds. (Section 625(b)(3) of the Rehabilitation Act; 34 CFR 363.11(d) and 363.20)
Attachment 4.11(c)(4) identifies the state's goals and plans with respect to the distribution of funds received under Section 622 of the Rehabilitation Act.
- 6.5 Evidence of collaboration with respect to supported employment services and extended services. (Sections 625(b)(4) and (5) of the Rehabilitation Act; 34 CFR 363.11(e))
Attachment 4.8(b)(4) describes the efforts of the designated state agency to identify and make arrangements, including entering into cooperative agreements, with other state agencies and other appropriate entities to assist in the provision of supported employment services and other public or nonprofit agencies or organizations within the state, employers, natural supports, and other entities with respect to the provision of extended services.
- 6.6 Minority outreach. (34 CFR 363.11(f))
Attachment 4.11(d) includes a description of the designated state agency's outreach procedures for identifying and serving individuals with the most significant disabilities who are minorities.
- 6.7 Reports. (Sections 625(b)(8) and 626 of the Rehabilitation Act; 34 CFR 363.11(h) and 363.52)
The designated state agency submits 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 Part B, of Title VI and individuals receiving supported employment services under Title I of the Rehabilitation Act.

SECTION 7: FINANCIAL ADMINISTRATION

- 7.1 Five percent limitation on administrative costs. (Section 625(b)(7) of the Rehabilitation Act; 34 CFR 363.11(g)(8))
The designated state agency expends no more than five percent of the state's allotment under Section 622 of the Rehabilitation Act for administrative costs in carrying out the State Supported Employment Services Program.
- 7.2 Use of funds in providing services. (Sections 623 and 625(b)(6)(A) and (D) of the Rehabilitation Act; 34 CFR 363.6(c)(2)(iv), 363.11(g)(1) and (4))
- (a) Funds made available under Title VI, Part B, of the Rehabilitation Act are used by the designated state agency only to provide supported employment services to individuals with the most significant disabilities who are eligible to receive such services.
 - (b) Funds provided under Title VI, Part B, are used only to supplement and not supplant the funds provided under Title I, Part B, of the Rehabilitation Act, in providing supported employment services specified in the individualized plan for employment.
 - (c) Funds provided under Part B of Title VI or Title I of the Rehabilitation Act are not used to provide extended services to individuals who are eligible under Part B of Title VI or Title I of the Rehabilitation Act.

SECTION 8: PROVISION OF SUPPORTED EMPLOYMENT SERVICES

- 8.1 Scope of supported employment services. (Sections 7(36) and 625(b)(6)(F) and (G) of the Rehabilitation Act; 34 CFR 361.5(b)(54), 363.11(g)(6) and (7))
- (a) Supported employment services are those services as defined in Section 7(36) of the Rehabilitation Act and 34 CFR 361.5(b)(54).
 - (b) To the extent job skills training is provided, the training is provided on-site.
 - (c) Supported employment services include placement in an integrated setting for the maximum number of hours possible based on the unique strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice of individuals with the most significant disabilities.
- 8.2 Comprehensive assessments of individuals with significant disabilities. (Sections 7(2)(B) and 625(b)(6)(B); 34 CFR 361.5(b)(6)(ii) and 363.11(g)(2))
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.
- 8.3 Individualized plan for employment. (Sections 102(b)(3)(F) and 625(b)(6)(C) and (E) of the Rehabilitation Act; 34 CFR 361.46(b) and 363.11(g)(3) and (5))
- (a) An individualized plan for employment that meets the requirements of Section 102(b) of the Rehabilitation Act and 34 CFR 361.45 and 361.46 is developed and updated using funds under Title I.
 - (b) The individualized plan for employment:

- (1) specifies the supported employment services to be provided;
 - (2) describes the expected extended services needed; and
 - (3) identifies the source of extended services, including natural supports, or, to the extent that it is not possible to identify the source of extended services at the time the individualized plan for employment plan is developed, a statement describing the basis for concluding that there is a reasonable expectation that sources will become available.
- (c) Services provided under an individualized plan for employment are coordinated with services provided under other individualized plans established under other federal or state programs.

**Attachment 4.2(c): Summary of Input and Recommendations of the State Rehabilitation Council;
Responses of the Designated State Unit and Explanations for Rejection of Inputs and
Recommendations**

The following summarizes the State Rehabilitation Council's (SRC) input, recommendations and collaborations with Nebraska VR. The agency agrees with all the recommendations and will take or has taken necessary action to implement.

SRC Input

- I. SRC members provided input on many issues including: educating the public about VR & other marketing ideas, VR purpose statement, staff dress, internal & external agency web sites, use of 503 compliance as tool to employ individuals with disabilities, post secondary training, restructuring meetings to get more employers involved, and outreach to minorities.

SRC Annual Events

1. Disability Awareness Month - October 2010: SRC members recommended that the local Nebraska VR offices across the state recognize local employers or conduct disability awareness activities. Activities conducted by the offices include:
Business Attire Clothing Drive
Consumer Appreciation Days
Open House and Informational Events
Employer Awards
Multiple radio and television interviews conducted with staff to raise awareness about Nebraska VR services.
2. The SRC hosted a State Legislative Luncheon in February 2011 that was well attended by State Senators and their staff. The SRC Chair provided an overview of Nebraska VR services. Information about Nebraska VR's self-employment program was provided by the Program Director of the Abilities Fund and a consumer who had successfully achieved self-employment.
3. Entrepreneur of the Year Awards: The Entrepreneur of the Year Awards was held in July 2011. Awards were given to 4 Nebraska VR clients who succeeded in their self-employment ventures. The Governor participated in the awards ceremony. Those honored were:
B&B Street Motive
Takeout Express
Quality Block & Basement Company
Van Horn Saddlery

SRC Recommendations

1. The SRC approved the revisions to the functional capacities criteria and ratings used in the Order of Selection process.
2. The SRC recommended specific suggestions for improving the Nebraska VR transition program by focusing more on work experience.
3. The SRC recommended discontinuing 3 of the 4 consumer satisfaction surveys being conducted by the agency. The Successful Employment Survey was retained and revised based on recommendations from the SRC.
4. The SRC recommended specific revisions to the IPE Booklet used with consumers in the planning process. The revisions were a result of the Consumer Input Committee's review that found the existing format to be too long and overwhelming. The IPE Booklet was to be broken into segments and used based on the individual needs of the consumer.
5. The SRC approved the list of hearing officers proposed by the Nebraska Department of Education.
6. The SRC recommended moving from a group orientation to individual consumer orientations immediately followed by the employment discussion to increase the likelihood the consumer will stay engaged throughout the front-end process.

7. The SRC recommended that Nebraska VR conduct a satisfaction survey for clients whose cases were closed unsuccessfully.
8. The SRC recommended that Nebraska VR case reviews in the upcoming year focus on job retention services.
9. The SRC recommended to Nebraska VR the Employment Discussion Form did not need to be printed in duplicate and the completed form would remain in the file. These suggestions were as a result of the Consumer Input Committee.
10. The SRC supported the name change of the Job Search Strategy, having consumers sign the agreement, and language to increase participation and success of a job search. These suggestions were as a result of the Consumer Input Committee.

**Attachment 4.8(b)(1): Cooperation with Agencies That Are Not in the Statewide Workforce Investment System
and with Other Entities**

Nebraska VR seeks to work cooperatively with numerous other state and local agencies and programs. Collaborative efforts are manifested through coordinated committees throughout the state with Nebraska VR state office and local staff actively participating. Examples of the committees Nebraska VR serves on includes, but are not limited to, Nebraska Planning on Developmental Disabilities Council, State Advisory Council on Mental Health Services, Ticket to Work Infrastructure Committee, TBI Advisory Council, Local Community Resource Committees, Deaf and Hard of Hearing Special Education Advisory Committee, Aging and Disability Resource Center, Madonna Community Advisory Council, ATP Advisory Council, Money Follows the Person Project Advisory Panel, Alternative Finance Loan Advisory Council, local Chambers of Commerce, etc.

Nebraska VR maintains interagency agreements with Nebraska Health and Human Services, Nebraska Commission for the Blind and Visually Impaired, and the Veterans Administration–Vocational Rehabilitation and Employment Program for purposes of providing an understood and coordinated effort to achieve employment goals for persons with disabilities.

Written agreements are maintained with Liberty Centre Services Employment Program, Cirrus House, Inc., Central Nebraska Goodwill, Community Alliance, Office of Juvenile Services, Mosaic, Douglas County Correctional Services, State Parole Office, PAKS Developmental Services, Developmental Disabilities of Nebraska, Vital Services, Mid-Nebraska Individual Services, South Central Developmental Services, Employment Works, Region V Services, Community Alternatives, Eastern Nebraska Community Office of Retardation, Career Solutions, Rainbow Center, Ability Building Services, Versatile Support Services, Assistive Technology Partnership, Easter Seals - Nebraska, Abilities Fund, North Star, Black Hills Workshop, Autism Center, Center for People in Need, Project Search, Walmart, Faith Regional Hospital, Norris Public Schools, Waverly Public Schools, Columbus Public Schools, Educational Service Unit #9, St. Francis Hospital, and Good Samaritan Hospital. These written agreements coordinate efforts and services to assist persons with disabilities to achieve employment success. These agencies represent various locations throughout the state and serve individuals experiencing a variety of disabilities such as severe and persistent mental illness, developmental disability, brain injury, learning disability, and those experiencing multiple disabilities.

To maximize limited resources and assist individuals to access other programs which can provide needed services essential to individuals achieving employment, Nebraska VR works cooperatively with and utilizes numerous services and facilities within the state. These services and facilities include Centers for Independent Living, the Parent Information and Training Center, Apprenticeship Program, schools, Housing and Homelessness Commission, Educational Service Units and employers.

Nebraska VR works cooperatively with and utilizes Rural Economic Area Partnerships, and other programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture, when these programs and resources are available to local communities for economic development, and to the extent such cooperation and utilization is permissible under §101(a)(4) of the Rehabilitation Act of 1973, as amended.

The State of Nebraska does not have a state use contracting program.

Attachment 4.8(b)(2): Coordination with Education Officials

Coordination with Nebraska Department of Education-Special Education, Nebraska Department of Education

Nebraska VR and the Nebraska Department of Education-Special Education co-funded a Transition Program Director, a Youth Leadership Facilitator, and a Youth Leadership Council.

The statewide Youth Leadership Council provides an opportunity for youth with disabilities to develop leadership skills and promote self-advocacy. The Council will work with youth and organizations across the state to promote the Council's goals and activities and the development of Regional Youth Leadership Councils.

In partnership with Special Education and the Department of Health and Human Services, a Youth Rehabilitation and Training Center Liaison assists youth with disabilities as they leave the state's juvenile correctional facilities and return to their home community. The Liaison assists youth as they re-enter high school, post-secondary training, or employment.

In addition, Special Education and Nebraska VR have an interagency agreement to facilitate the transition of students receiving special education services. Special Education is the educational agency responsible for providing a free appropriate public education. Nebraska VR is the adult service agency responsible for providing vocational rehabilitation services. This agreement provides for —

- Consultation and technical assistance to assist local educational agencies and Educational Service Units in planning for the transition of students with disabilities from school to post-school activities, including employment, post-secondary education, vocational rehabilitation services, or services from an appropriate adult service agency.
- Transition planning by personnel of Nebraska VR, local school districts and Educational Service Units to facilitate the development and completion of individualized educational programs providing for the transition of students with disabilities from school to post-school activities.
- Identification of local school districts roles and responsibilities for the provision of a free appropriate public education to students with disabilities to the point of exit from school, including the planning and provision of transition services, and Nebraska VR's roles and responsibilities for providing consultation and technical assistance to local school districts, upon request, and the provision of other assistance in planning for the transition of students with disabilities during their school years to the extent determined by cooperative agreements with local school districts.
- Identification of the local school district as the lead agency responsible for providing transition services and responsible qualified personnel to students with disabilities to the point of exit from school, and Nebraska VR as the lead agency responsible for providing services and qualified personnel after the point of exit to those students meeting Nebraska VR eligibility and order of selection requirements.
- Identification of the local school district as having the financial responsibility for providing transition services to students with disabilities to the point of exit from school, and Nebraska VR as having the financial responsibility for providing services and qualified personnel after the point of exit to those students meeting VR eligibility and order of selection requirements. Any student eligible for the VR program will have their Individualized Plan of Employment completed before exiting school. Other financial responsibilities, including joint responsibilities, may be specified in cooperative agreements between Nebraska VR and local school districts or Educational Service Units.
- Procedures for enhancing outreach to and identification of students with disabilities in need of transition services, including those students with disabilities who qualify for assistance under §504 of the Rehabilitation Act, but not a free appropriate public education under the Individuals with Disabilities Education Act.

Nebraska VR serves on the Nebraska Department of Education's Special Education Advisory Council's Deaf and Hard of Hearing Standing Committee. This committee meets twice a year to share information, identify issues, and coordinate secondary education and transition services for deaf and hard of hearing students.

Coordination with local school districts and Educational Service Units

As a result of Nebraska's strong tradition of local control, over 250 local school districts offer secondary education. Most districts are small, enrolling fewer than 100 secondary students, and having less than 10 students with disabilities.

Nebraska VR has a two prong directed outreach effort to secondary school districts —

- Outreach and identification efforts directed to special education, vocational education, guidance counseling, school nursing, and school personnel having knowledge of students with disabilities, including those not receiving special education services.

- Development of a Transition Partnership Planning process for schools, Educational Service Units, and VR at the local level. This process is used to promote a coordinated effort between the local school, ESU, and the local VR Office. The planning process identifies the nature and scope of services the local VR Office will provide in coordination with the efforts of the school and/or ESU. The process addresses the schedule of events and activities, expected outcomes, and a process to evaluate the effectiveness of the partnership.

Attachment 4.8(b)(3): Cooperative Agreements with Private Nonprofit Nebraska VR Service Providers

Nebraska VR has written procedures for establishing written agreements with service providers, including private nonprofit vocational rehabilitation service providers. These procedures emphasize the role of local VR offices in identifying needs for specific vocational rehabilitation services responsive to the needs of persons with significant disabilities in their areas. They also emphasize the role of local VR and community rehabilitation staff in monitoring the agreements, including usage and effectiveness of services.

Background screening is required for all individual providers with written agreements who provide job coaching, independent living skills exploration and training, supported employment, and self-employment consultation. Providers who employ individuals who will provide services requiring background screening must provide written assurances that persons employed by them to provide direct services have not been convicted of a felony or misdemeanor involving neglect and/or abuse of a child or vulnerable adult before the written agreement is approved.

Currently, Nebraska VR does not have any formal Cooperative Agreements that utilize state and local dollars for matching federal funds.

Attachment 4.8(b)(4): Evidence of Collaboration Regarding Supported Employment Services and Extended Services

On the state level, Nebraska VR works collaboratively with the Nebraska Department of Health and Human Services Divisions of Developmental Disabilities Services and Behavioral Health Services to coordinate the system of service delivery for supported employment services. While the funding models for supported employment services in these two systems are different, both models contain performance-based provisions.

The Health and Human Services Division of Developmental Disabilities has expanded and supported employment opportunities through its Community Supports Program (CSP). This allows consumers and their families to hire private individuals, not associated with any agency, to serve as a job coach to help the individual achieve a supported employment outcome. Nebraska VR is developing policies to support this effort and to financially participate in this innovative supported employment effort.

Following a successful demonstration project with the Autism Center of Nebraska to provide supported employment and job coaching for individuals with autism, Nebraska VR established a performance-based contract to provide these services.

At the local level, Nebraska VR enters into written agreements for the provision of supported employment services with financial assistance provided by Nebraska VR. These agreements are used with public or private non-profit community rehabilitation programs and private for-profit entities providing supported employment services. Nebraska VR maintains written procedures for entering into these agreements.

Each agreement describes the time-limited services that will be provided to eligible persons with the most significant disabilities using funds from Nebraska VR prior to the transition to extended services. These services may include any of those described in Attachment 6.3.

Cooperating organizations must assure the availability of the minimum extended services of (1) twice monthly monitoring at the work site of each individual to assess job stability and (2) based on that assessment, coordination or provision of specific services needed to maintain job stability. If off-site monitoring is determined to be appropriate, then each month, there must be two contacts with the employed person and, if the person has disclosed their impairment to their employer, one contact with the employer each month. These mandatory extended monitoring services apply to all agreements.

Attachment 4.10 Comprehensive System of Personnel Development

This attachment describes the comprehensive system of personnel development. The State Rehabilitation Council had an opportunity to review and comment on the development of plans, policies, and procedures necessary to meet the requirements of 34 CFR 361.18(b), (c), (d), and (f).

Data systems on personnel and personnel development

Nebraska VR maintains a system for collecting and analyzing data on qualified personnel needs which includes: the number of personnel currently employed by Nebraska VR, by personnel category; the number of positions currently available to Nebraska VR, by personnel category; and projections of the number of personnel who will be needed in 5 years, by personnel category. The table summarizes this information for direct service personnel as of April 14, 2012:

Direct Service Personnel Employed:

	Rehab Specialist	Service Specialist	Associates
Direct Service Personnel Employed	66	44.5	38.86
Personnel to Consumer Ratio	1:114	1:170	1:194
Projected Staffing Requirements	67	46.5	38.86
Current Vacancies	1	2	0
Projected Replacement Needs (5 year total)	34	25	11

Non-Direct Service Personnel Employed

	Senior Administrators	Program Directors, Specialists & Associates	Information Technology	Office Directors	Office Associates
Non-Direct Service Personnel Employed	1	17	6	14	1.13
Projected Staffing Requirements	1	17	5	14	1.13
Current Vacancies	1	0	0	0	0
Project Replacements (5 year total)		4	1	5	1

2. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:
 - a list of the institutions of higher education in the state that are preparing vocational rehabilitation 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.

There are no institutions of higher education in Nebraska receiving funds under Title III of the Rehabilitation Act to prepare vocational rehabilitation professionals in the disciplines designated in the Act (29 USC 771(b)(1)(B)). Consequently, there is no personnel development data system.

Plan for Recruitment, Preparation and Retention of Qualified Personnel

There is a projected need to replace an average of 14 - 18 VR service delivery staff annually due to resignations and retirements over the next 5 years. We anticipate no new hires through growth.

Recruitment

The ability of Nebraska VR to recruit qualified specialists is grossly impaired by the absence of

- (1) a federal traineeship support for a long-term rehabilitation training program in Nebraska,
- (2) the lack of an active state chapter of the National Rehabilitation Association or any of its divisions, and
- (3) the totally inadequate regional supply of qualified applicants with an obligation to the public vocational rehabilitation program.

In academic year 2011/12, the agency participated in the Fall and Spring Career Fair at the University of Nebraska– Lincoln (UNL). This career fair, while held at UNL, is attended by students from most of the colleges in Nebraska. In addition, the agency participated in the Small College Career Fair at Doane College.

Qualified rehabilitation and service specialists (i.e., those who meet academic degree standards) will be actively recruited from Nebraska higher education institutions listed below as well as rehabilitation education programs located primarily in the Midwest. The agency supplements the distribution of Rehabilitation and Service Specialists' vacancy postings by the state's Personnel Office by sending announcements directly to the following counseling programs.

In Nebraska, there are two programs accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP). They are the University of Nebraska at Kearney and the University of Nebraska at Omaha. Both programs offer an M.A. in Community Counseling.

University of Nebraska at Kearney – Community Counseling
University of Nebraska at Omaha – Community Counseling and School Counseling

There are 6 institutions of higher education, accredited by the Higher Learning Commission of the North Central Association of Colleges and Schools that offer an M.A. in Counseling, Clinical Counseling, or Community Counseling. Because these are generic counseling programs, the agency must conduct a transcript analysis to determine which applicants meet the Professional Counseling certification criteria.

University of Nebraska-Lincoln
Creighton University
Bellevue University
Chadron State College
Doane College
Wayne State College

These are the rehabilitation education programs in adjacent and surrounding states that the

agency sends specialist vacancy announcements.

Master's Rehabilitation Programs

Adler School of Professional Psychology
Drake University
East Central University
Emporia State University
Illinois Institute of Technology
Langston University
Maryville University of St. Louis
Minnesota State University, Mankato
St. Cloud State University
The University of Iowa
University of Northern Colorado

Undergraduate Rehabilitation Programs

East Central University
Emporia State University
Illinois Institute of Technology
Southern Illinois University - Carbondale
University of Illinois Urbana
University of North Dakota
University of Wisconsin – Stout

Recruitment of Personnel from Minority Backgrounds and Individuals with Disabilities

There will be active recruitment of qualified personnel with disabilities and those from racial and ethnic minority. Current employees from a minority background and employees with disabilities often recruit from their networks. Our vacancy postings are listed with the Commission on Latino-Americans, the Ponca Tribe of Nebraska, the Urban League of Nebraska, the State Independent Living Council, five Nebraska Centers for Independent Living and the CIL in Council Bluffs, Iowa. In addition, an increased salary differential is offered to individuals who are bilingual or fluent in Spanish and American Sign Language (ASL). The agency currently has 18 minority staff and while we do have a number of staff with a reported or observed disability, we do not officially collect this information.

Preparation

New Nebraska VR staff receive intensive structured training in basic vocational rehabilitation values, principles, and practices during their initial probationary period. Participation is funded in part through the In-Service Training Grant.

Retention

All staff will be afforded the opportunity for 15-20 contact hours annually of continuing education in vocational rehabilitation knowledge, skills, and abilities to enhance job performance and improve job retention. This conforms to the annual contact hour requirement for the state's highest applicable standard. Participation is funded in part through the In-Service Training Grant.

The Director conducts video conversations with new staff during their first month, fifth month, and seventh month on the job. The video conversations are an opportunity to:

- become acquainted with each new staff member and his/her background,

- provide an opportunity for a new staff member to ask questions and provide feedback,
- assess how a new staff member is progressing in his/her training,
- determine if a new staff member is finding his/her job to be what they expected consistent with how the job was presented, and
- demonstrate the agency's interest in his/her success.

The agency grants work time to staff to attend classes and earn up to 7 semester credit hours or 9 quarter credit hours per year. In addition, there are staff enrolled in evening and weekend programs to obtain either a BA or MA degree including the Drake University part-time weekend programs in Rehabilitation Counseling and Rehabilitation Administration.

The Director offers an opportunity to staff for face-to-face, one-on-one interviews. This is an opportunity for all staff to provide personal feedback on specific policies and procedures and to discuss their role on their team and in the agency. In addition, staff have an opportunity to anonymously post questions about policy, rumors, or any concern a staff member has to the Director on an internal website.

The Program Director for Nebraska VR HR conducts exit interviews with all staff leaving the agency. The goal of the interviews is to assess why people leave, look for trends, and to learn if there was anything the agency could have done to retain them.

Personnel standards

Nebraska VR employs staff in 14 self-directed teams throughout the state to provide direct services and supports (including financial assistance to help pay for the cost of services) that are responsive to the unique needs and circumstances of each person with significant disabilities served.

During FY 2003, Nebraska VR implemented the new "Service Specialist" personnel classification. This position was created as the result of a Nebraska Department of Education position classification study based on job analyses of current job incumbents. The study contractors found that the direct service work performed by Nebraska VR staff fell into 3 distinct classes of personnel, and recommended that VR create a third position, intermediate between associates and rehabilitation specialists and made of some duties currently performed by them.

Associate position

Associates provide direct support to teams serving persons with disabilities seeking employment. Their responsibilities include: monitoring persons with disabilities engaged in agreed on vocational rehabilitation plans; arranging and coordinating team activities; arranging and coordinating transportation; maintaining individual service records; and arranging financial assistance necessary to obtain agreed on goods and services from community providers.

Associate academic degree standards

There are no national or state approved or state-recognized standards applicable to the associate position. The highest entry-level academic degree required for comparable work in State personnel requirements is the high school diploma. All currently employed associates meet or exceed this standard.

Service specialist position

Service specialists provide direct support to persons with disabilities seeking employment. Much of their work involves providing services to groups of consumers. Their responsibilities include: conducting orientation to Social Security benefits and benefits analysis; providing personal management training, social skills training, job placement assistance, job seeking skills training and other instruction of persons with disabilities using standardized curricula and instructional

methods; and providing information about the purpose, nature, and scope of vocational rehabilitation services to persons with disabilities, service providers, and the general public.

Service specialist academic degree standards

There are no national or state approved or state-recognized standards applicable to the service specialist. The highest entry-level academic degree required for comparable work in State Personnel requirements is the baccalaureate degree. All currently employed service specialists meet this standard.

Rehabilitation specialist position

Rehabilitation specialists make determinations and provide specialized direct services to persons with disabilities pursuing employment goals. Their responsibilities include: eligibility, IPE and amendment approval, IPE progress, and employment outcome determinations; community assessment; career counseling, disability awareness counseling, personal adjustment counseling, rehabilitation engineering, independent living skill training, personal management training, social skills training, job placement assistance, and job retention assistance. These activities generally require independent complex decision-making and problem solving based on extensive knowledge of disability, human behavior, the world of work, and the community.

Rehabilitation specialist academic degree standards

The highest entry-level academic degree standard in Nebraska applicable to the discipline of rehabilitation counseling is a master's degree in counseling or a closely related field. This degree is required for certification as a Professional Counselor under Nebraska's Uniform Credentials Act (Neb. Rev. Stat. §38-2132). Other state agencies typically require the bachelor's degree for work comparable to that of specialists. In 1983, after 2 years of use as an informal standard, the agency formally incorporated the master's in counseling or a closely related field academic degree standard into the Nebraska Department of Education personnel system hiring requirements for rehabilitation specialists. Thus, Nebraska VR's hiring standard exceeds that of other state agencies and equals the highest standard in the state. For 28 years, all rehabilitation specialists hired at Nebraska VR have possessed the master's degree in counseling.

Need for retraining plan

Since the personnel standards have equaled or exceeded the highest applicable standards in Nebraska for 30 years, no steps are necessary to change hiring standards or retrain personnel to meet the existing standard.

Personnel development

Each team assesses the current knowledge, skill, and ability of the team and its members, and identifies the personnel development activities necessary to enable the team and its members to achieve their strategic and performance goals. These team level assessments are analyzed and integrated with statewide training needs identified by specialty area Program Directors, training needed to implement planned innovation and expansion activities, and needs indicated by objective program performance measures. The following summarizes significant staff development needs identified from these assessments.

Analysis of the assessments indicates the need for a long-term staff development strategy. In the absence of a long-term strategy, staff development is a series of one-time responses to immediate needs. The impact of this training on organizational functioning deteriorates over time as a result of turnover. For example, even though 100% of staff can be trained at one point in time, with normal turnover, only about 50% of the trained staff will remain 5 years later. Also, in the absence of a long-term strategy identifying the staff development needs of teams and types of specialized knowledge, staff development focuses on individuals and does not respond to the knowledge and performance needs of teams and the organization as a whole. As a result of

these problems, there are persistent gaps in critical staff knowledge and skill. A long term staff development strategy will be developed to ensure the ongoing renewal and updating of the entire organizational knowledge and skill base to ensure the organization, its teams, and its staff promptly incorporate into practice new knowledge or responses to emerging needs in the consumer population, service delivery processes, or specific team services. A Program Director has been designated with the responsibility to work with the VR Leadership Council in the development of a long term strategy.

For staff development purposes, the organizational knowledge and skill base is made up of the three major domains and sub-domains shown in Table 1. The Disabilities and Service Delivery Processes domains are critical organizational knowledge and skills, shared by all team members. To effectively communicate among themselves, team members must possess knowledge of consumer disabilities and the way in which these impact upon the consumer, employment, and the provision of services. Every team member must possess knowledge of the organization's service delivery processes and their role and responsibilities in connection with these processes. Consequently, Disabilities and Service Delivery Processes knowledge is team based, possessed by all members of each team. Finally, each team member must possess the knowledge and skill to provide the specific services for which they are responsible. This knowledge is position based, possessed by all staff responsible for providing each service.

Table 1. Organizational Knowledge and Skill Domains and Sub-domains

Disabilities (Team-based)

- Alcohol & Drug
- Musculoskeletal
- Central nervous system
- Spinal cord disorders
- Psychosis
- Anxiety & personality disorders
- Cognitive disabilities
- Endocrine & immune system disorders
- Circulatory & respiratory
- Autism Spectrum Disorders
- Amputations
- Hearing impairments
- Acquired Brain Injury
- Learning Disabilities
- Developmental Disabilities

Service Delivery Processes (Team-based)

- Front End Process
- Plan Development Overview
- QUEST and QE2 Training
- Job Planning Training
- Partnerships
- Communication/Customer Service
- Support processes
- World of Work
- Career Connections
- Working As A Team

Team Services

- Assessment

Benefits Orientation
Counseling
Placement
Rehabilitation technology
Independent living
Transition

Personnel development needs

1. New staff training. There is an anticipated need for Nebraska VR to replace an average of 14 - 18 staff annually due to resignations and retirements over the next 5 years. Until recently this turnover has primarily occurred among direct line staff. The agency is now experiencing significant turnover among administrative and management staff due mostly to retirements. New hires through growth are anticipated to be negligible.

Nebraska does not have a CORE accredited, RSA assisted, graduate level rehabilitation education program preparing persons for practice in a rehabilitation discipline of counseling, evaluation or administration. In migration of qualified personnel to fill vacant positions averages only about 1 per year. Consequently, newly hired specialists, as well as all associates, must be provided with intensive initial post-hire training to assure they possess critical performance related vocational rehabilitation knowledge and skills. This training is provided at the central office and can be completed within 12 months barring any need to reschedule a section of New Staff Training.

The State of Nebraska will have operational in FY 2013 "LINK" which is an online Human Capital Management program that will assist the state with Sourcing and Recruiting, Learning and Development, Employee Performance Management, On-Boarding & Benefits Enrollment, Succession Planning and Compensation Management. The component supporting Learning and Development will be the Employment Development Center (EDC). EDC is an employee's "one-stop shop" for learning, employee performance management, and employee and employer succession planning. Nebraska VR will be exploring ways to best utilize this system. Eventually, existing and future agency podcasts and streaming videos will be added to the training library. The comprehensive library of online learning opportunities can be launched from an employee's desktop and completed at an employee's convenience. Additionally, this system will manage all training registrations for each employee, track training and/or education on an employee "transcript", and allow a supervisor to view and report on any employee's training and development progress.

The agency is continuing to explore utilizing videoconferencing, podcasts, or streaming videos as a way to deliver timely training to new staff. The typical schedule of new staff training sessions can result in the staff member receiving training months after starting to perform duties in their position. Using media technology would allow the training to be accessed when most relevant to each new staff member.

2. Training in functional aspects of physical and mental impairments. There is a need for on-going training of teams in the functional aspects of physical and mental impairments. Past disability related training has been uneven in frequency and staff coverage, with the result that teams lack the consistent knowledge base necessary for the effective planning and delivery of services. The nature and scope of this training will be described in more detail in the following sections.

3. Training in service delivery processes. There is a need for on-going training of teams in our core service delivery processes. We continually refine many core processes to better achieve our standards & indicators. Teams require intensive training and continuing follow-up to implement these changed processes, methods, and procedures. Since service delivery processes are

influenced by federal monitoring, legislation and current research, service delivery process training incorporates relevant requirements of the 1998 Rehabilitation Act Amendments (including informed choice, use of rehabilitation technology, and servicing culturally diverse populations), as well as evidence-based processes and practices identified in current research, and relevant portions of the Workforce Investment Act of 1998.

4. Training in team services. There is a need for on-going training to enhance the ability of VR rehabilitation specialists, service specialists, and associates to provide direct services and supports. Specific types of team services provided directly by our staff include: community assessment; career counseling, disability awareness counseling, personal adjustment counseling, rehabilitation engineering (including assistive technology), independent living skill training, personal management training, social skills training, job placement assistance, and job retention assistance. Also included are: Social Security benefits orientation and analysis; job seeking skills training and other instruction of persons with disabilities; monitoring persons with disabilities engaged in agreed on rehabilitation plans; providing information; arranging, coordinating, and scheduling team activities; arranging, coordinating, scheduling, and providing transportation; developing, preparing, and maintaining individual service records; and arranging financial assistance to procure agreed on goods and services. Staff responsible for providing specific services and supports need continuing training to maintain their competence, and to acquire the knowledge and skill needed to implement new best practices and procedures. The agency will conduct training every other month, at a minimum, via a videoconference system on topics that are identified as high priority training needs by staff.

5. Individual training. Training needs assessments show a broad and diverse range of training needs related to individual development and performance improvement. These individual needs include leadership development and capacity building.

6. Technology Use Training. Training needs assessments show a broad and diverse range of training needs related to integrating technology into everyday service delivery in order to improve productivity, efficiency, and timeliness of services. Primary focus of the training has been on the use of iPads and associated applications. This training will be enhanced with the appropriate use of social media as an outreach strategy with consumers, businesses, and the public.

System of personnel development

1. New staff training to an estimated 14-18 new staff annually. This responds to the identified need to develop fundamental vocational rehabilitation knowledge and skill related to job performance in newly hired staff.

New employee training classes included the following.

- VR Process (3 days)
- QUEST/QE2– Case Management System (1 day)
- New Employee Orientation (2 days)
- Medical Aspects I (2 days)
- Medical Aspects II (2 days)
- Job Planning Training (3 days)
- Communication Training (1 day)
- World of Work-DOL (1 day)
- Career Connections (1 day)

2. Workshops, distance learning, podcasts, and continuing education activities for Nebraska VR teams and staff in the areas of functional aspects of disability, service delivery process, and team services. This responds to the identified needs for in-service training in these areas. It also provides opportunities for staff certified under Nebraska's Uniform Licensing Act to obtain continuing education contact hours for certification maintenance. (see Neb. Rev. Stat. §71-1,269).

Current videos and podcasts available for team and individual training include the following:

Madonna Rehabilitation Hospital Training

- Multiple Sclerosis and Employment Considerations
- Work Considerations for the Adult with Cerebral Palsy
- Vocational Considerations for the Client with an Amputation
- Vocational Rehabilitation and Spinal Cord Injury

Agency Statewide Training Conference (No statewide training was held in 2010 and 2011. There are plans to hold a statewide training in 2012.)

- An Overview of Substance Use, Disorders, Screening and Treatment
- Barriers to Prisoner Re-entry and What Can Be Done to Overcome Them
- Brain Injury: Vocational Strategies for Clients with High-Level Cognitive & Behavioral Challenges
- Drugs of Abuse
- Interpersonal Communication
- Making a Return on Investment Pay Off by Matching People and Personalities in the Workplace
- Mild Traumatic Brain Injury in Returning Combat Veterans and Accessing VA Benefits
- Nine Essential Skills of Love and Logic
- Prisoner Re-Entry in the Midwest
- The Milestones of Adjustment Post-Psychosis (MAPPS) Model
- Transition from School to Work: Planning for Students with Aspergers

Brain Book

- Scenarios
- Webinar

Change in FLSA Status: What Employees and Supervisors Need to Know

Cold Calling Clinic Training

Effective Use of an On-the-Job Training

Employment Specialist Training Video

Fair Labor Standards Act (FLSA) Overview

Helps TBI Screening Presentation

On-the-Job Evaluation Training Video

Transition

Transition: A Youth's Perspective

Agency Video Conferencing (Bi-monthly beginning 1/2012)

ATP ADA Review

ATP Vehicle Modification'

ATP Bathroom Modifications

Social Security: Personally Identifiable Information (PII)

Consumer Success Stories

3. The Employment Development Center (EDC) through LINK will be used to identify areas of individual development and performance improvement. The EDC responds to individual needs as well as organizational needs of succession planning, leadership development, and capacity building.

4. Acquisition and dissemination of significant knowledge from research and other sources. These activities ensure that staff have access to new knowledge and learning in the field of vocational rehabilitation. The system of staff development must provide for the on-going renewal and updating of the entire organizational knowledge and skill base, requiring a long range training plan.

Coordination with the in-service training grant

In-service training grant funds are used to support, in part, the costs of instructional materials, instructional equipment, training consultant expenses, and the lodging and per diem expenses of trainees.

Communication with diverse populations

Nebraska VR, to the maximum extent possible, recruits and hires qualified personnel who are able to communicate in the native languages of applicants and recipients with limited English speaking ability. An increased salary differential is offered to individuals who are bilingual or fluent in ASL. Interpreter services for persons with limited English speaking ability are obtained from agencies, vendors, ethnic organizations and advocacy groups, or individuals (family members, friends, coworkers, volunteers). The AT&T Language Line is used as a backup service for walk-ins or crisis situations where no interpreter is available and there is an immediate need to communicate with a person with limited English speaking ability. Nebraska VR employs staff with sign language skills in areas with significant concentrations of persons with hearing impairments who communicate in sign language, and obtains interpreter services for the hearing impaired from persons meeting the Nebraska Department of Education's written interpreter qualification standards and policies in other areas. These standards now require the department and agency to use interpreters licensed by the State of Nebraska.

Coordination of personnel development with personnel development under the Individuals with Disabilities Education Act

Nebraska VR coordinates with the Comprehensive System of Personnel Development under the Individuals with Disabilities Education Act (IDEA) by: (1) exchanging needs assessment findings in areas or topics of mutual concern, (2) exchanging schedules of training and personnel development activities, and (3) joint development of training programs of mutual concern and priority, and joint funding of trainer costs for conducting joint training, when appropriate.

Attachment 4.11(a): Results of Comprehensive Statewide Assessment of the Rehabilitation needs of Individual with Disabilities and Need to Establish, Develop, or Improve Community Rehabilitation Programs

Individuals with the most significant disabilities

Major service needs include —

- *Impact and challenge from changing demographics in serving individuals with the most significant disabilities.* With 74% of Nebraska counties experiencing declining population and the growing trend of population increase among the more urban cities and counties, the agency will be looking at how best to allocate staff resources throughout the state and how to adequately serve both population sets. The population shift that has occurred typically is accompanied by a similar shift in community resources and employment opportunities.
- *Challenge of locating, accessing and coordinating needed community services and supports.* Consistent with prior comprehensive assessment of rehabilitation needs, individuals with the most significant work disabilities continue to have complex needs, complicated by poverty. Social services and support networks, both governmental and non-profit, have not been able to maintain much less increase service levels to meet these needs. The loss of local community offices to area call centers has and will further challenge individuals with the most significant disabilities as they seek out, find and manage services and supports.
- *Access to supported employment extended supports for students with developmental disabilities desiring to exit high school at an age appropriate time.* Despite the collaborative efforts, extended supports are still not available for individuals with developmental disabilities under age 21 delaying their access to supported employment services.
- *Transition services for students with the most significant disabilities.* The Nebraska Department of Education Statewide Count of Special Education Students by Impairment shows the four largest impairment groups to be Specific Learning Disability, Mental Handicap, Other Health Impaired and Behavioral Disorders. While Nebraska has one of the highest high school graduation rates in the country (85.77%), there is still concern for the number of students who have dropped out of school or who graduate but do not make a successful transition to employment and independence and become involved within the Juvenile Justice system. As these individuals move into the adult system it presents additional issues as most employers are routinely conducting routine background checks via the internet. A further concern is the over representation of minorities in the juvenile justice systems.
- *Services targeted to individuals with brain injury and autism spectrum disorders.* Strides have been made in using specialized vocational assessments for Nebraska VR consumers with brain injury and other cognitive disorders to identify services and supports required to achieve employment. The identification and use of assistive technology options have also proven to be beneficial to individuals with a brain injury. However, there continues to be limited statewide programs, services and supports. This is also true for individuals with Autism Spectrum Disorders, a disability population that continues to grow nationally and in Nebraska.
- *Skill training services provided in integrated competitive employment and community settings.* Many individuals with cognitive disabilities struggle with traditional post secondary classroom and/or segregated training programs. While, collaborative skill training programs with employers, schools, and other community partners have proven to be an effective method of preparing individuals with the most significant disabilities into jobs, there are not enough established programs to meet the demand.
- *Rehabilitation technology services to accommodate functional limitations.* Rapid advances in technology require continual monitoring to be aware of and knowledgeable of their potential application through rehabilitation engineering to accommodate individuals within work and living environments. The identification of solutions through a technology transfer approach provides individuals with significant disabilities expanded opportunities for employment. In addition, greater attention by employers to issues such as ergonomics and the aging workforce has led to an increased demand for assistive devices to improve the functional capabilities of individuals and prevent secondary disabilities in the workplace.

- *Transportation for employment and independence.* Lack of transportation limits the opportunities for employment and independence among persons with significant work disabilities. Resources for addressing this need vary by community. Often these services are viewed by cities and counties as likely areas for budget cuts. Private and non-profit transportation resources also struggle with maintaining service levels essential to the elderly and persons with significant disabilities.

Rehabilitation Needs of Minorities

- The state's population growth has primarily been among minority racial and ethnic groups. The growth has occurred in the more populous Nebraska cities and counties. The Hispanic or Latino (of any race) population grew by 77% since the 2000 census and numbers 167,000, which is 9.2% of the state's population. The Asian, non-Hispanic, population grew by 47% and represents 1.8% of the state's population. The Black and African American population grew by 20.9% and represent 4.5% of the state's population. The White, non-Hispanic, population only increased by 0.4%. While Nebraska VR has met or exceeded the Standard/Indicator 2.1 five of the last six years, this has no relation to the number of minorities accessing services. There is a need for Nebraska VR to be more effective in its outreach and marketing to diverse populations to improve minority referrals. Another need throughout parts of the state is the need for foreign language interpreters. As is the case with sign language interpreters, the availability of this service is limited in 65 to 75% percent of the geographic area of the state.

Rehabilitation Needs of Unserved and Underserved Populations

SSDI and/or SSI recipients may be an underserved population by virtue of the fact that Nebraska VR's percentage of consumers receiving SSDI and/or SSI is below the national and agency mean. However, SSA data indicates that state's percentage of individual's age 18 – 64 on SSDI or SSI on the basis of a disability is below the national average.

As previously mentioned, youth with developmental disabilities who exit or would like to exit school at an age appropriate time are unserved until they reach the age of 21 and can then receive Developmental Disabilities services and supports.

Nebraska Department of Education Special Education Data by Impairment shows a three-year increase in the number of students identified as experiencing Autism. This identification is an educational diagnosis rather than a medically verified diagnosis. Regardless, individuals with Autism Spectrum Disorders experience difficulty in employment due to their social and communication skills and their repetitive and restricted behaviors and interests. Community resources and as well as Nebraska VR staff are challenged in learning and effectively using approaches and techniques for addressing this needs.

Needs of persons with disabilities served by other workforce investment system components

Nebraska VR has in the last two years experienced a decline in individuals with disabilities that substantially impede their employment being made aware of and referred to Nebraska VR. While Nebraska VR serves on the three regional workforce investment boards and has a significant itinerant presence at the One Stop Centers, the move to an online, virtual application system has resulted in significantly less individuals with a disability identifying themselves being informed about Nebraska VR and self referring.

Need to establish, develop, or improve community rehabilitation programs

The need is for evidence-based, flexible vocational skill training, behavior management, and rehabilitation technology services and supports to be provided in natural environments, including integrated competitive employment sites. There also is a need for expanded, predictable, and stable funding of extended services and supports adequate to maintain persons with the most significant disabilities in supported employment.

**Attachment 4.11(b): Annual Estimates of Individuals to Be Served
and Costs of Services**

1. Estimates of the number of individuals who are potentially eligible for services.

Estimates of number of Nebraskans ages, 16 – 74, with a disability range from 118,000 to 127,000. Approximately 28,827 to 31,045 are working full-time and approximately 43,006 to 44,323 are employed in some capacity. Considering that employed Nebraskans with a disability may need VR services to remain employed or to regain employment, best guesstimate of the potential number of Nebraskans who could be eligible for services range from 74,994 to 82,677. In reality, only 5.6 to 6.6% of the potential number of Nebraskans with disabilities will apply for VR services in 2013.

2. Estimates of the number of individuals who will receive services and their costs.

a. Title I, Part B

The estimate of eligible individuals who will receive services with funds provided by Title I, Part B during FY 2013 is between 6,019 and 6,519. The estimate of case service expenditures for FY 2013 is between \$1,923,010 and \$2,202,256. Total Title 1, Part B funds expenditures in FY 2013 are estimated to be between \$19,000,000 and 20,500,000.

b. Title VI, Part B

The Title VI, Part B funds are exclusively used to fund the Behavioral Health Supported Employment Programs. These six Supported Employment programs are expected to serve between 600 and 645 individuals. The total allotment of Title VI, Part B funds is \$270,000.

Attachment 4.11(c)(1): State's Goals and Priorities

Nebraska VR's Goals and Priorities established in conjunction with the State Rehabilitation Council include —

1. **Increase the Rehabilitation Rate (as a part of meeting or exceeding each of the Federal Standards)**

Each time a consumer receives services and is not successfully employed, the agency loses staff time, funds for purchased services and very likely the consumer's satisfaction with VR services. The agency's rehab rate for FY2011 was 59.97%. This is slightly lower than the previous year. While the number of successful placements has increased approximately 7% each of the last two years, the rehab rate has not significantly changed as more individuals are coming to the agency for assistance but dropping out prior to achieving a successful employment outcome.

Nebraska VR is committed to integrating motivational interviewing as a strategy to help consumers determine if they are ready to make decisions about the next steps to getting a job and as a strategy to keep consumers engaged in the process. This is a consumer-centered directive counseling approach to assist consumers to recognize and reduce barriers to change. Motivational interviewing has been shown to increase consumer motivation and promote more active participation in services. Relative to performance standards and indicators, other VR agencies who have utilized motivational interviewing have experienced increases in their rehab rates. Staff are participating in a series of trainings in motivational interviewing provided by the Region VII TACE in April, May and June 2012. Staff who participated in an earlier TACE motivational interviewing training have been employing the techniques and are reporting success in moving consumers to decisions and engagement.

Since not every consumer will find they are "ready" for VR services, teams are enhancing relationships with referral sources that can provide non-employment related supports and services to assist consumers in addressing their critical non-employment related needs. These needs often contribute to the ambivalence about employment, and once addressed, allow consumers to be fully engaged with in achieving their employment goals and increase the likelihood of successful employment outcomes.

Measures: Increase the rehabilitation rate to 65%.

2. **Increase the Quality and Timeliness of Services**

In Nebraska, employment services are provided by VR staff. The quality of direct services is often a result of the combination of agency policy, process, and practice, and staff skills, knowledge and experience.

To increase the quality of services, annual team case reviews, as well as periodic targeted case reviews by Program Directors, are conducted to identify quality planning and timeliness issues. Issues specific to the team are addressed with the team. Issues that appear to be statewide or indicative of trends or problems that need to be addressed more globally are brought to the State Office Program Team. The State Office Program Team will research the issue, obtain input from the appropriate committees or work groups, recommend potential strategies to address the problem, and develop a plan for implementation. Opportunities for staff to be involved in the development of policy and procedures have been established through a number of committees and work groups. These include a Counselor Committee, Employment Committee, Transition Committee, Evaluation Committee, and Leadership Council.

Training and support to improve staff skills and knowledge is enhanced by the use of a videoconference system connecting eleven field offices to provide ongoing bi-monthly training opportunities for staff. A training plan will be developed to identify the method of training for the areas of agency initiatives, role-specific skills, and individual staff personal development. Topics are identified through case reviews or by any of the Committees as well as information gathered from an annual team evaluation survey.

Timeliness of services will be greatly enhanced with the use of a web-based case management and fiscal reporting system called QE2 scheduled to "go live" August 6, 2012. Utilizing a web-based system will allow for significant improvement in the amount of time it takes staff to document task notes, enter consumer information, complete IEPs, etc., with the end result being more time available to spend working directly with consumers.

The timeliness of services will also be increased with the use of mobile technology, with a particular focus on iPad technology in the field. Approximately 130 iPads have been deployed to field staff and management across the state. With a wireless connection, staff use the iPad to access e-mail, calendar, on-line job applications, videos of success stories to promote VR services to businesses and consumers, and to demonstrate disability-related applications. Once QE2 goes live, staff will also use the iPads to access case management information. Staff have developed other ways to use the iPads to enhance services and the provision of information. User groups will be established to provide opportunities for staff to learn from each other.

Other opportunities will be explored that will allow consumers to access materials and information online in an effort to shorten the process from referral to outcome. In particular, the use of social media strategies will be explored as a way to enhance the quality and timeliness of services. An internal social media page will be developed, tentatively called "My VR" to allow for greater communication and transparency in services between VR staff and consumers. Consumers will be able to log into their "My VR" page to update contact information, work history, job search progress, access their IPE, and communicate electronically with staff.

In FY2011, management staff and the Development and Implementation Group (Program Directors and Office Directors) established "decision points" throughout the VR process. Work groups were established to develop checklists as a way to simplify the process and ensure a common understanding of the necessary steps to assure compliance or to establish a quality case. In FY2013, the checklists will be completed and integrated into QE2 as appropriate to establish electronic compliance and quality controls. The decision points and checklists will also be integrated into new staff training as a simplified process to enhance understanding of the VR process.

Measures:

- (1) Each team will conduct team case reviews annually. The team case review will be coordinated by a Program Director and a summary report of findings and recommendations will be completed at the end of the review.
- (2) At least one training will be made available to all staff, primarily through the use of the videoconference system, on a bi-monthly basis.
- (3) Measures will be developed around staff productivity and delivery time for most services and should reflect the impact of the use of mobile technology through decreases in service times and increases in caseload capacity per team. Due to a delay in implementation of the QE2 case management system, the baseline for each of the measures will be established in FY2013.
- (4) The decision points and checklists will be integrated into the QE2 case management system.

3. Improve consumer satisfaction and engagement

The consumer's satisfaction with VR services, their engagement in the VR program and their belief that they will be employed is perhaps the most important factors in their success. Therefore this important goal is critical to our success as a program. As a part of the Employment Warranty Program follow up contacts by Easter Seals of Nebraska, questions are asked of consumers in regards to their level of satisfaction with VR services. Satisfactory ratings have consistently been 98% or higher. The State Rehabilitation Council continues to look at alternative methods to obtain consumer satisfaction, especially for individuals not closed as a successful outcome. The SRC will continue to obtain regular input on consumer concerns via feedback from Ombudsman and CAP and their recommendations for policy changes.

The State Rehabilitation Council has established a Consumer Input Committee that provides for direct consumer input into program materials, processes and policy. The Committee will continue to provide a consumer perspective to VR to prevent unintentional barriers to services and to ensure that materials and processes effectively keep individuals engaged. The involvement of individuals with disabilities early on in the development of process and materials enhances the likelihood that the focus remains on consumers in a way that is relevant, meaningful, engaging, and satisfactory.

The focus on motivational interviewing as discussed in goal one will also have an impact on consumer satisfaction and engagement. As part of the goal setting process, VR staff have established a standard for contact with consumers at least once every thirty days. Each team will continue to explore alternatives to improve communication and access to staff members as a strategy to increase consumer engagement.

An outreach plan will be developed to identify targeted groups, especially those who are unserved and/or underserved. The plan will detail marketing strategies and materials to be used to increase awareness of VR

services in order to generate increased referrals from these populations. It is anticipated that the initial target groups will include latinos, individuals who are deaf or hard of hearing, and individuals with autism. This will be the primary focus of the VR Outreach and Marketing Specialist in FY2013.

As part of the agency's dual customer focus, the SRC will survey businesses that have not previously worked with VR to determine what issues or barriers need to be addressed. Feedback from the survey will be provided to the Employment Committee to develop recommendations for change and marketing efforts.

Measures:

- (1) A satisfactory rating of 98% or higher will be achieved on Consumer Satisfaction Surveys as a part of the Employment Warranty Program follow up contacts.
- (2) The SRC Consumer Input Committee will review at least four areas of policy, process or materials in the next year, and make recommendations for revisions or alternative strategies.
- (3) Staff will have at least one contact with each consumer every 30 days, in person, by phone, e-mail, texting or other electronic means, and document the contact in QE2.
- (4) An outreach plan will be developed to identify targeted groups and specific marketing strategies and result in an increase in referrals as measured by the number of individuals in each of the targeted groups applying for services.
- (5) Completion of the survey of businesses to determine what issues or barriers need to be addressed.

4. Develop Effective Community Partnerships to Increase Long Term and Independent Living Supports

Partnerships provide additional supports that are needed for a consumer to be successful and generally occur in the program areas of transition, traumatic brain injury, autism, behavioral health, juvenile justice and corrections. A partnership is a collaboration with another entity that can play an important role in providing needed supports and services for consumers. It may or may not involve an exchange of funds. It is characterized by VR staff involvement, shared responsibility within the team, and a focus on long-term relationships that involves multiple consumers. It is not the same as a referral source that refers consumers to VR for services, but there is no further collaboration. Focusing on the development of partnerships that provide for long term and independent living support will be critical to address issues, such as those that are related to poverty, that impact on consumer job readiness and the ability to keep a job.

Partnerships with schools, community colleges, community businesses, and other agencies will continue with the Project Search and Community College Certificate Programs. These partnerships have proven to be successful in meeting the training needs of individuals with disabilities (especially transition-age youth) and the workforce needs of local community businesses. In FY2013, the focus will be on the enhancement of soft skills training to increase the number of students who achieve a successful employment outcome.

In past years, the agency has been in a position to expand the number of partnerships through the provision of financial support. In FY 2011, the agency began incorporating criteria to define "effective" community partnerships into agreements in which the agency invests financial support. In the renewal of agreements for FY2012, the criteria was incorporated to establish a baseline for evaluating performance, ensuring that funds are achieving intended purposes, and to establish the level of return on investment of VR resources. In FY 2013, the criteria will be used to prioritize funding for community partnerships based on the ability to maximize services and supports to the benefit of VR consumers in subsequent years.

The use of performance criteria for community partnerships will be revised as needed to incorporate the recent compliance findings from the RSA Monitoring Review. The corrective action plan will likely require revisions to the existing payment structure moving to a milestone payment process. In order to allow community partners the opportunity to transition into the new milestone payment process, Nebraska VR will meet with providers to develop the benchmarks and seek technical assistance as necessary to establish milestones that are accountable without impacting on the availability of services.

Measures:

- (1) The agency will incorporate program review criteria into all community partnership agreements.

- (2) The agency will use the community partnership performance data to establish a ranking of community partnerships based on the ability to maximize services and supports to the benefit of VR consumers.
- (3) Continued support of existing Project Search and Community College Certificate programs and enhanced focus on the development of soft skills will lead to an increase in the rehab rate of consumers involved in these programs.
- (4) The agency will establish a milestone payment process for community partnerships involving supported employment agreements.

Attachment 4.11(c)(4): Goals and Plans for Distribution of Title VI, Part B Funds

Goal

To maintain or increase the number of persons with a most significant mental health disability served through a mental health partnership using an evidenced based model supported employment services.

Number served in FY 2011 — 684

To meet or increase the number of persons with a most significant mental health disability who achieve a competitive successful employment outcome through a mental health partnership using an evidenced based model supported employment services.

Number of successful employment outcomes in FY 2011 — 218

Plans For Distribution Of Title VI-B Funds

The funds received under Title VI, Part B will be distributed in the form of contractual payments for the costs of supported employment services provided to eligible persons with the most significant behavioral health disabilities. Nebraska VR has a written agreement with the state's Division of Behavioral Health Services that promotes evidence-based supported employment services to individuals with behavioral health disabilities. Written contracts have been established with a qualified provider in each of the state's six regions. These contracts identify the need for supported employment, the specific evidence-based supported employment services available from the provider leading to competitive employment in a supported employment setting which may include Transitional Employment, and their negotiated projected outcomes. The Division of Behavioral Health Services also provides funds for supported employment and extended services.

The projected cost of the contracts exceeds the VI-B Funds allocation and is supplemented with Section 110 Funds.

Attachment 4.11(d): State Strategies

and

Use of Title I Funds for Innovation and Expansion Activities

Nebraska VR's Strategies and Use of Title I Funds for Innovation and Expansion Activities in FY 2013 flow out of the areas of need identified as a result of the current and past comprehensive statewide assessments. While the agency has had significant success in meeting Standards and Indicators and other performance goals, there continues to be a need for the agency to improve services and address challenges due to an ever changing environment.

In collaboration with the State Rehabilitation Council, detailed strategies and activities were developed for each of the following priority areas —

Transition Nebraska VR will undertake major changes in FY 2012 and FY 2013 to bring transition services into compliance with recent RSA monitoring findings.

- (1) Nebraska VR will eliminate the Consent Agreement and replace with the Application for Services.
- (2) Deconstruct the Transition IPE Booklet to develop an individualized on-line set of tools to engage students in career exploration, career planning, career activities and career decisions.
- (3) Disseminate publications and information to transition students and their families.
- (4) Maintain the statewide and 3 regional Youth Leadership Councils to provide students with opportunities to develop leadership skills. Develop an additional regional council in western Nebraska.
- (5) Develop a discharge planning protocol for use by juvenile justice facilities for releasing students to their home school districts and to enhance communication with the YRTC liaison.
- (6) Coordinate with the Nebraska Department of Education and the Department of Labor-Workforce Development to continue the use of Nebraska Career Connections that is available to all schools.
- (7) Design within QE2 a better method for collecting and recording transition data in order to provide necessary reports to staff and schools.
- (8) Continue to partner with Assistive Technology Partnership (ATP) to increase the use of assistive technology in secondary schools by increasing the awareness through Youth AT Conferences across the state and through the partial support of Transition AT Specialists.
- (9) Continue to use Project Search and Certificate Programs to facilitate transition of high school youth to work.

Employment Services The benefits of employer/vocational rehabilitation partnerships are well documented in recent rehabilitation research. Employers benefit from 1) a diverse workforce, 2) access to a wider range of qualified candidates, 3) reduced turnover and improved attendance of workers and 4) learning how to meet workers' accommodations needs. Rehabilitation benefits from 1) improved knowledge of business culture and needs, 2) increased employment opportunities for people with disabilities, 3) realistic skills training and 4) enhanced consumer satisfaction. Therefore, Nebraska VR will either continue or initiate the following:

- (1) Target employers and industries based on labor market information, future occupational trends and quality jobs.
- (2) Employers will be a part of Nebraska VR's outreach and marketing plan to provide input in the development of effective strategies and materials.
- (3) Utilize the National Employment Network, The NET, to connect local labor demands with regional and national opportunities.
- (4) Develop and implement additional Project Search partnerships, a training and employment program targeting hospitals and other businesses, to increase employment opportunities within the healthcare and other industries.
- (5) Develop and utilize success story videos and other materials to market the program to employers.
- (6) Develop employer internship opportunities for consumers pursuing post-secondary degrees.

- (7) Continue to provide training and technical assistance on Section 503 Compliance to businesses that are federal contractors.
- (8) Conduct a survey of businesses who have not worked with Nebraska VR in the past to determine what might be an effective strategy to understand the benefit of our services.

Consumer Satisfaction Nebraska VR has used various methods over the years of gathering consumer satisfaction. These efforts have yielded limited response and limited value in the information received. In order to improve our program and insure that the program is meeting the needs of our consumers, Nebraska VR must develop effective methods of gathering meaningful consumer satisfaction information. Therefore, Nebraska VR will either continue or initiate the following:

- (1) Continue to develop and refine consumer satisfaction surveys to gather timely and meaningful feedback.
- (2) Utilize the survey services of the State Rehabilitation Council including the Consumer Input Committee.
- (3) Contract with outsourced Employment Warranty® monitors to conduct consumer satisfaction survey by phone with consumers after successful outcome.
- (4) Utilize reports from the Client Assistance Program and the Agency Ombudsman to identify areas for improvement.
- (5) Explore use of social media to provide a forum to gather additional consumer satisfaction information.

Employment Outcomes Nebraska VR continues to see ways to improve the rehabilitation rate of the program. Therefore, Nebraska VR will either continue or initiate the following:

- (1) Conduct case reviews to determine factors that contribute to improving our rehabilitation rate.
- (2) Engage consumers in their program of services by incorporating motivational techniques throughout the VR process with the intent of increasing the frequency and quality of contacts and follow-up with consumers.
- (3) Continue to utilize the placement standards and evaluate performance.

Employment Warranty® This program helps consumers regain, maintain and advance in employment. Monitoring with consumers at 90 days, 180 days and 1-year following their employment outcome, promotes greater job stability for those with significant disabilities who have the least community supports available to them.

- (1) Identify data elements for collection and measurement to evaluate the long-term employment outcomes of consumers.
- (2) Program QE2 to support Employment Warranty® monitoring and data collection.
- (3) Continue contracting with Easter Seals of Nebraska for Employment Warranty® monitoring to conduct the monitoring with consumers for up to one year after their employment outcome.

Innovation and Expansion I&E funds will be used to support these areas and related activities —

State Rehabilitation Council — I&E funds will be used for full support of the activities of the State Rehabilitation Council.

Contracts and Grants Specialist — I&E funds will be used to pay the salary of this position.

Transition Program and the Youth Leadership Council — I&E funds will be used for 90% of the salary for the Transition Program Director and 50% of the salary of the Youth Leadership Council Coordinator in conjunction with Special Education.

Assistive Technology The agency contracts with the Nebraska Assistive Technology Partnership (ATP) to provide rehabilitation engineering and assistive technology services to agency consumers at all stages of the rehabilitation process. Consumers are referred to ATP by Nebraska VR staff for all assistive technology assessments, funding coordination and assistive technology solutions. ATP offices are located throughout the state and in some cities are co-located with the VR office. Based on referral data available at the writing of this plan, the VR agency is expected to make over 500 referrals to ATP.

Individuals with Disabilities who are Minorities The agency continues its commitment to the hiring of bilingual staff. At present, the agency has 8 bilingual staff members. In an attempt to increase the hiring of bilingual staff, we offer a salary differential incentive. Program materials are offered in Spanish.

There are 3 Indian Reservations in Nebraska. Nebraska VR has one representative on the Nebraska Department of Education Native American Education Advisory Council.

Individuals who have been Unserved or Underserved The Client Assistance Program (CAP) each year assesses the VR agency's outreach to unserved and underserved individuals with disabilities and will provide comment to the agency if CAP found the agency to be remiss in this area.

Some examples of the agency's efforts on behalf of individuals who are unserved or underserved are as follows:

Nebraska VR serves on the TBI Council which is funded through a HRSA grant. The Council is focused on supporting the statewide Brain Injury Association in Nebraska and promoting state legislation and funding for services to individuals with TBI in Nebraska. The Brain Injury Screening Tool is now being administered statewide to all applicants for VR services to aid in the identification of previously undiagnosed brain injuries and residual impediments to employment. Information about Nebraska VR services is being sent to all individuals identified through the Nebraska Traumatic Brain Injury Registry.

Nebraska VR will maintain services to the Criminal Justice population with staff assigned to the Adult Drug Court and Specialized Substance Abuse Services.

A supported employment pilot targeting individuals with autism, originally developed using ARRA funds, has proven to be successful and has continued on a fee for service basis. Nebraska VR has developed a Service Agreement with Williamsburg Behavioral Psychology for psychological evaluations and individual supported employment.

The Transportation Network developed in partnership with the Omaha Tribe of Nebraska through ARRA funds will continue to be utilized to increase access to available employment opportunities for Native Americans in rural Nebraska.

Youth with developmental disabilities who exit or would like to exit school at an age appropriate time cannot receive developmental disability services until age 21. Nebraska VR worked in partnership with the Alliance for Full Participation and the DD Planning Council to again develop and submit a grant proposal for funding to address this issue.

Plan for Establishing Community Rehabilitation Programs Since Nebraska VR provides direct services in the areas of vocational evaluation, independent living, and job placement, the agency has no plans for establishing any additional community rehabilitation programs. The agency does contract with those community rehabilitation programs that provide evidence-based supported employment services to individuals with behavioral health impairments, autism, and acquired brain injury.

Assisting Components of the Workforce Investment System in Assisting Individuals with Disabilities Nebraska VR continues to have representation on all the local WIA boards, serve on the local One Stop Career Center management council at some of the centers, have VR staff at each local One Stop Career Center on an itinerant basis.

Presentations are made to Center staff on Nebraska VR services and other topics related to serving individuals with disabilities. One Stop staff have standing invitations to attend Nebraska VR's Medical Aspects training programs.

Nebraska VR continues to address concerns with a decrease of referrals from the One Stop Career Centers due to an on-line application process as a result of the implementation of an electronic One Stop model. This has also resulted in a decrease in the number of community-based One Stop Centers across the state.

Attachment 4.11(e)(2): Evaluation and Report of Progress in Achieving Identified Goals and Priorities and Use Of Title I Funds for Innovation and Expansion Activities

The following represents Nebraska VR's evaluation and report of progress on the agency's FY 2011 State Goals and Priorities.

1. Strategies to Address Needs Identified in the Comprehensive Assessment and to Achieve Identified Goals and Priorities

Increase the Rehabilitation Rate

In FY 2011, we:

- (1) Conducted quarterly reviews with management staff to review progress on Standards & Indicators including the rehabilitation rate.
- (2) Conducted reviews of all placement files to ensure placement standards were followed and maintained.
- (3) Continued Project Search in 2 hospitals and 1 Walmart Warehouse Distribution Center in Nebraska and established Project Search sites in 4 additional hospitals.
- (4) Represented Nebraska as point of contact on The National Employment Team (NET). Pursued developing partnerships with employers identified through The NET.
- (5) Continued to contract with the Abilities Fund to provide all necessary services for consumers with a self-employment goal.
- (6) Continued use of job retention video with adults and students.
- (7) Continued supported employment services for individuals with most severe disabilities.
- (8) Utilized ARRA funds to expand supported employment services to underserved populations (Acquired Brain Injury, mental health, autism).

The rehab rate for 2011 was 59.97%.

Increase the quality and timeliness of services

In FY 2011, we:

- (1) Provided training about the Project Search Model to foster interest in developing partnerships with Nebraska VR, businesses, and schools in the local community.
- (2) Continued a state-imposed standard of 55 days for job search and placement.
- (3) Continued to monitor the standards that have been developed for the placement area.
- (4) Continued to have placement staff marketing with employers to identify specific job openings.
- (5) Provided labor market information specifically addressing each team's local labor market.
- (6) Provided training to all placement staff in the areas of: Schedule A Hiring, Work Opportunity Tax Credit/Bonding, Effective Interviewing, How to Place People with Criminal Backgrounds, Computer Mobile Applications to Make Our Job Easier.
- (7) Developed an employer outreach flyer describing placements by areas of the state, existing business partnerships, and promoting the return on investment of VR services.
- (8) Distributed 15 iPads, 1 to each team, to pilot the application of mobile technology to enhance VR service delivery.
- (9) Average consumer wage was \$10.26 in FY 2011, a slight decrease from FY 2009's Average Consumer Wage of \$10.29.
- (10) The amount of time that a consumer was in employment services increased to 67.5 days in FY 2011 from an average of 56.1 days per job in FY 2009.
- (11) Work groups were established to develop compliance and quality case review tools.

Improve consumer satisfaction and engagement

In FY 2011, we:

- (1) Implemented the recommendations of the State Rehabilitation Council to focus on 1 survey with successful employment outcomes conducted at the time of the 90-day employment warranty monitoring follow-up.
 - (2) Piloted at the recommendation of the SRC, satisfaction survey of consumers with unsuccessful outcomes.
 - (3) Reported survey results are tabulated by the Client Assistance Program and provided to the State Rehabilitation Council at each of the meetings throughout the year.
 - (4) Provided management staff the ability to review the results of consumer satisfaction surveys in order to address any team issues in a timely fashion.
 - (5) Requested quarterly reports from the Client Assistance Program on the type of client concerns and CAP's recommendations to Nebraska VR leadership.
 - (6) Expanded the Consumer Input Committee as a part of the SRC to provide for direct consumer input on program materials, processes, and policies. The Review Committee reviewed the Discover The Job That Works For You Planning Workbook and recommended that we utilize a more individualized approach when we implement QE2.
 - (7) Initiated quarterly ombudsman reports to SRC.
 - (8) Began piloting social media strategies such as LinkedIn and Facebook to enhance consumer engagement.
 - (9) Began exploring the use of motivational interviewing to improve consumer satisfaction and engagement.
- Consumer satisfaction has been found to be extremely high, typically ranging from 95-99%.

Develop effective community partnerships

In FY 2011, we:

- (1) Continued to collaborate and provide funding for Nebraska Career Connections through the Nebraska Department of Education, Department of Labor, Nebraska Public Power District, and Partnerships for Innovation.
- (2) Continued the partnership with Grand Island Public Schools and St. Francis Hospital to provide a training program based on the Project Search Model to prepare transition students for employment in the health care industry. Developed additional partnerships with Walmart and North Platte Public Schools; Kearney Public Schools and Good Samaritan Hospital; St. Elizabeth Hospital and Norris Public Schools, Waverly Public Schools, Columbus Public Schools and Columbus Community Hospital, Norfolk Public Schools and Faith Regional Services, Hastings Public Schools and Mary Lanning Medical Services. Explored and promoted partnership opportunities with other community hospitals and schools.
- (3) Continued the partnership with Central Nebraska Goodwill Industries to enhance the existing behavior health employment program with the addition of benefits analysis and extended follow-up after successful employment. The intent is to increase the likelihood of achieving nine (9) consecutive months of substantial gainful activity (SGA).
- (4) Utilized ARRA funds to expand the capacity of six (6) community-based mental health providers in providing supported employment services.
- (5) Continued the supported employment program for individuals with acquired brain injury through the use of ARRA funds. Nebraska VR revised the payment structure to a milestone payment process.
- (6) Continued a supported employment program for individuals with autism through the use of ARRA funds. Nebraska VR revised the payment structure to a milestone payment process.
- (7) Continued to explore the development of a Bridges Out of Poverty program with other community partners in Columbus.
- (8) Established Certificate Programs in Grand Island and Columbus. This initiative is a collaboration with community colleges in partnership with employers in the community targeting manufacturing jobs and electricians.
- (9) Continued job training programs through partnerships with the Association of Builders and Contractors Inc. for forklift operator training and Southeast Community College for food preparation training.
- (10) Developed and initiated a 503 Compliance Marketing Plan. Identified contractors in the state who were recipients of federal contracts and selected 100 businesses for a pilot introductory letter marketing campaign. In addition, follow-up phone calls were made to each of the pilot businesses. Subsequent to the review of the pilot by the SRC, the strategy was revised to focus on human resource associations and their required training activities as a way to educate covered entities on 503 compliance.

2. Strategies to Carry Out Outreach Activities to Identify and Serve Individuals with the Most Significant Disabilities Who are Minorities

Each team develops an outreach plan. As part of the planning, consideration is given on how to best serve minority populations. In addition to minority outreach through the teams, our transition strategy assists in reaching all racial and ethnic minority groups as they occur naturally in schools.

In FY 2011, we:

- (1) Continued our involvement with the Nebraska Department of Education Native American Initiative and working with the reservations.
- (2) Increased transportation options to expand employment opportunities for individuals who reside on the reservations.
- (3) Provided employer development services to Hispanic employers with bilingual staff where available.
- (4) Continued the priority of hiring bilingual staff. Increased pay is available for staff who are bilingual or have ASL skills.
- (5) Identified and have developed job openings with Hispanic employers who are seeking Spanish speaking employees.
- (6) Updated agency brochures and forms translated in other languages.

Our best indicator of the effectiveness of these strategies in FY 2011 is the Minority Access ratio of .89. In 2011, 19.8% of the cases served were minority. Nebraska's 2010 minority population was 17.9%.

3. Strategies to Overcome Identified Barriers Relating to Equitable Access to and Participation of Individuals with Disabilities in the State Vocational Rehabilitation Services Program and the State Supported Employment Services Program

Identified barriers affecting access to and participation in vocational rehabilitation services include:

- (1) **Systemic barriers.** Potential applicants with low incomes or in poverty survive on an intricate array of multiple income maintenance and human service supports. The rules, regulations, and requirements underlying these supports interact in unpredictable or unintended ways when participation in vocational rehabilitation services requires significant time or temporary employment for work trial or training purposes, threatening survival and creating substantial disincentives to vocational rehabilitation.
- (2) **Individual barriers.** Potential applicants have multiple specific individual and family life circumstances and problems, which interact with each other to interfere with program participation and employment. While the nature of many of these problems is well known (e.g., transportation, child care, housing, etc.), their multiplicity and interactions, in and of themselves, create barriers to program participation and employment. We have developed an evidence-based employment assessment to identify home, community, and on the job issues that interfere with program participation and employment. This assessment is incorporated in the *Discover the Job That Works for You* booklet.
- (3) **Programmatic barriers.** Other public programs working with low income and poverty populations encounter the same systemic and individual barriers. Programmatic barriers arise when disability is a complicating factor, and a different approach is required. While some programmatic barriers tie to program policies and practices, others result from staff ignorance of the functional impact of disability on work and independence, or from the cost impact of new approaches.
 - (1) Maintained supported employment partnerships for mental health in all six (6) regions of the state.
 - (2) Continued pilot programs for supported employment in the area of acquired brain injury and autism.
 - (3) Continued an evidence-based supported employment outcome model of service delivery.
 - (4) Continued to publicize the housing.ne.gov website to assist people with disabilities to get affordable housing near their worksite. Staff utilize this resource regularly.
 - (5) Continued to support and assist consumers in the use of the Alternative Financing and Telework loan programs.
 - (6) Continued to use the AT4All.com website which coordinates all available assistive technology for the state. This includes equipment available for loan, for sale, for demonstration and for give away.
 - (7) Established a Service Agreement with Deaf Services Unlimited of DesMoines, IA to provide video remote interpreting services to all Nebraska VR offices. This addresses the shortage of sign language interpreters for the deaf in the rural areas of the state.

- (8) Participated in 2 Nebraska Association for the Deaf Employment Forums and received input on consumer issues and concerns regarding employment services and employer receptivity to hiring employees who are deaf. Met with the Nebraska Commission for the Deaf and Hard of Hearing to develop strategies to address these concerns.
- (9) Utilized Title I funds to supplement Title VI, Part B funds to adequately address the supported employment services in the state of Nebraska.

In comparing FY 2009 and FY 2010 program indicators with FY 2011 program indicators, the program experienced an increase in consumers served and in successful employment outcome. Our conclusion would be that the strategies were effective with respect to access and participation in services.

Applied for Services

FY2009 — 5,013
 FY2010 — 5,069
 FY2011 — 4,812

Eligible for Services

FY2009 — 4,429
 FY2010 — 4,513
 FY2011 — 4,237

Started Services

FY2009 — 2,710
 FY2010 — 2,955
 FY2011 — 2,877

Received Services

FY2009 — 6,018
 FY2010 — 6,397
 FY2011 — 6,519

Successfully Employed

FY2009 — 1,568
 FY2010 — 1,677
 FY2011 — 1,799

Supported Employment Outcomes

FY2009 — 201
 FY2010 — 212
 FY2011 — 270

SE Mental Health Partnership Outcomes*

FY2009 — 179
 FY2010 — 173
 FY2011 — 218

**SE Mental Health Partnership Outcomes are a subset of the Supported Employment Outcomes*

4. Performance Accountability and Continuous Improvement

Performance accountability and continuous improvement is central to all strategies for meeting the vocational rehabilitation needs of individuals with significant and most significant disabilities in Nebraska. QUEST is our comprehensive information management system with the capacity to continuously capture and report data on critical processes and outcomes.

In FY 2011, we:

- (1) Continued the development of an on-line case management system to improve our efficiency and effectiveness.
- (2) Provided standardized processes through a web-based information portal to enhance efficiency in documentation.
- (3) Provided reports to local management staff to support performance reporting and analysis.
- (4) Began the use of mobile technology including videoconferencing, iPads, and iPhones as a strategy to expedite service delivery.

- (5) Continued case reviews, in which all team members participated, to provide information on how to improve accountability, documentation, and strategies for service provision.

5. Standards and Indicators

The agency met all of the performance standards in FY 2011. Through the strategies and activities identified in this state plan, the agency expects in FY 2013 to increase the margins by which it exceeds the federal standards.

6. Innovation and Expansion

I & E funding totaling \$339,566.52 was used to support the following:

- (1) State Rehabilitation Council (\$10,213.90)
- (2) State Transition Program Director and a portion of Transition related activities (\$115,760.82) (represents 90% of the funding)
- (3) Transition Juvenile Justice Program (\$32,277.05) (represents 26% of the funding)
- (4) Corrections Program Director (\$21,516.28)
- (5) Youth Leadership Council Coordinator and State Youth Leadership activities in a 50/50 partnership with Special Education (\$46,686.13)
- (6) Grants & Contracts Management (\$79,992.99)
- (7) Juvenile Justice Program/Omaha (\$33,119.35)

Attachment 6.3: Quality, Scope, and Extent of Supported Employment Services

Quality of supported employment services

All services provided will be of high quality, as judged by prevailing professional standards and such legal standards as may apply. Persons licensed, certified, or registered in accordance with the laws of the State of Nebraska to perform the services will render these services or, if the service is not regulated by the State, by persons who are able to demonstrate they are qualified by reason of education, training, and experience to perform the services.

Scope of supported employment services

The services made available by Nebraska VR using Title VI-B and Title I, Part B funds is limited to those initial services resulting in stable job performance in an integrated competitive work setting. These may include, as appropriate to individual needs:

1. An assessment of the need for supported employment services which is supplementary to and provided after an assessment of eligibility and rehabilitation need has determined that a person is eligible for services and is a person with a most significant disability.
2. Development and placement in integrated competitive employment for the maximum number of hours possible consistent with the person's unique strengths, resources, priorities, concerns, abilities, and capabilities.
3. Intensive on-the-job skills training and other training provided by skilled job trainers, co-workers, and other qualified persons. This training is based on a systematic analysis of the work to be performed, and a systematic analysis of the employer's performance expectations and requirements. It is conducted in accordance with a written plan identifying the methods of teaching, instruction, and behavior management necessary to enable the individual to acquire skills and master the work to be performed, to regulate behavior in accordance with the employer's requirements and expectations, and achieve stable job performance. The training provides for a systematic reduction of intensive teaching, instruction, and behavior management methods to the lowest intervention level necessary to maintain stable job performance.
4. Other vocational rehabilitation services that are needed to achieve and maintain job stability including, but not limited to —
 - a. Interpreter services for individuals with hearing impairments to permit communication between the individual and the skilled job trainer.
 - b. Occupational licenses and permits required by federal, state, and local law to perform an occupation.
 - c. Occupational tools and equipment required by the employer but not routinely provided to new employees.
 - d. Rehabilitation technology services including adaptations and modifications of the workplace.
 - e. Work clothing and uniforms required by the employer but not routinely provided to new employees, and safety shoes and other articles of clothing necessary to permit safe performance on the job.
 - f. Transportation from place of residence to the work site and return until the person can pay for the cost from earnings.
5. Follow-up services, including regular contact with the employer, the individual with a most significant disability, the individual's parents, guardian or other representative, in order to reinforce and stabilize the job placement.
6. On-going monitoring services from the time of job placement until the transition to extended services from one or more extended services providers. These services include, at a minimum, the assessment of employment stability and, based on that assessment, the coordination or provision of specific services needed to maintain employment stability.

Extent of supported employment services

1. Assessment of rehabilitation need for supported employment services are made available to the extent necessary to determine the nature and scope of services to be provided under an individualized written rehabilitation program to achieve supported employment.
2. Job development and placement services are provided to the extent necessary to place the individual into integrated competitive employment consistent with his or her informed choice, or to determine on the basis of clear evidence that an employment outcome cannot be achieved.

3. Intensive on-the-job and other training services are provided to the person to the extent necessary to achieve stable job performance, or to determine on the basis of clear evidence this cannot be achieved. Services are provided for a maximum of 18 cumulative months, beginning on the day the person starts the job, unless a longer period is provided in the individualized written rehabilitation program of the person.
4. Other services are made available to the extent necessary to support the individual in an individualized written rehabilitation program to achieve supported employment.
5. Follow-up services are provided to the individual to the extent necessary to assure that job stability has occurred, or to determine on the basis of clear evidence that job stability cannot be achieved.
6. On-going monitoring services are provided, at a minimum, twice monthly at the work site to assess employment stability and, based on that assessment, to coordinate or provide specific services needed to maintain employment stability. If off-site monitoring is determined to be appropriate, and is included in the person's individualized written rehabilitation program, it must, at a minimum, include two meetings with the person and one contact with the employer each month.

Transition to extended services

Nebraska VR transitions the person to extended services provided by other public agencies, nonprofit agencies or organizations, employers, natural supports, or other entities no later than 18 cumulative months after placement in supported employment (unless a longer period is established in the individualized written rehabilitation program), provided that—

- the person has made substantial progress toward meeting any hours per week work goal in the individualized written rehabilitation program,
- the individual is stabilized on the job, and
- extended services are available and can be provided without a hiatus in services.