

VOCATIONAL REHABILITATION

Program-Specific Requirements for State Vocational Rehabilitation Services Program

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

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

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

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

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	Vacant	NA
Parent Training and Information Center	1 st Term	10-21-2021
Client Assistance Program	Ongoing	4-17-2023
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	1 st Term	1-1-2022
Community Rehabilitation Program Service Provider	1 st Term	9-14-2022
Business, Industry, and Labor	1 st Term	9-14-2022
Business, Industry, and Labor	1 st Term	1-1-2022
Business, Industry, and Labor	1 st Term	9-14-2022
Business, Industry, and Labor	Vacant	NA
Disability Advocacy Groups	1 st Term	1-1-2022
Current or Former Applicants for, or Recipients of, VR services	1 st Term	8-14-2023
Current or Former Applicants for, or Recipients of, VR services	1 st Term	10-21-2021
Current or Former Applicants for, or Recipients of, VR services	1 st Term	4/17/2023
Current or Former Applicants for, or Recipients of, VR services	1 st Term	4/17/2023
Current or Former Applicants for, or Recipients of, VR services	1 st Term	1-1-2023

Section 121 Project Directors in the State (as applicable)	1 st Term	9-14-2022
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	1 st Term	10-20-2021
State Workforce Development Board	Vacant	NA
VR Agency Director (Ex Officio)	3 rd Term	

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

The SRC continues to meet quarterly.

In 2023, meeting dates for the SRC were:

- **February 9, 2023 – virtual meeting**
- **May 10 & 11, 2023 - in Helena, MT**
- **August 10 & 11, 2023 – in Anaconda, MT**
- **November 8 & 9, 2023 – in Butte, MT**

In 2024, meeting dates for the SRC will be:

- **February 8 & 9, 2024 – in Red Lodge, MT**
- **April 17 & 18, 2024 – in Missoula, MT**
- **August 15 & 16, 2024 – in Dillon, MT**
- **November 14 & 15, 2024 – in Bozeman, MT**

The previous SILC representative on the SRC resigned their position prior to the 3rd quarterly meeting in 2023. A new SILC representative for the SRC has been identified and she has applied for Governor appointment.

The previous SWIB representative on the SRC was Montana's SWIB director. He resigned his position effective November 17, 2023. A new SWIB Director was appointed and started January 8, 2024 and plans to attend the first quarterly SRC meeting of 2024. She will need to complete the application to be formally appointed to the SRC.

The VR Agency Director is currently in the re-application process with the Governor’s office for re-appointment.

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

SRC input on the services and operations of the VRBS program, and the State Plan is regularly collected during quarterly meetings. Consumer satisfaction survey results, strategic plan updates, and state plan progress are standing agenda items for SRC and are usually addressed at the first, second, and third quarterly meetings of the year respectively. Typically, the topics are presented on by VRBS staff by reminding the SRC of the purpose and process associated with each activity and then current data and progress updates shared. Throughout the presentations, SRC members are welcome to ask questions and/or provide comments and feedback. After the VRBS staff presentation, further time for questions, discussion, and feedback is offered. The SRC is welcome to make formal motions related to topics and tasks they would like us to pursue further.

Of particular interest to the SRC members over the last couple of years due to extremely low response rates (ex. 4 total responses were collected despite over 1400 surveys being sent out in 2023), has been the Consumer Satisfaction Survey. Montana's SRC has a sub-committee assigned to overseeing the dissemination of the consumer satisfaction surveys and the data collected from VRBS participants. This sub-committee has worked closely with VRBS staff in recent years to generate and implement ideas to improve response rates. Those ideas have included re-writing and re-formatting the survey, utilizing a data collection platform, emailing the survey as opposed to mailing out paper surveys, and providing QR codes to access the survey instead of links among others. Despite best efforts, this has not proved overly successful. During the summer 2023 meeting of the SRC following a sub-committee report to the full council on Consumer Satisfaction Survey, a motion was made by an SRC member to pursue utilizing appropriate Montana procurement practices to secure a contractor to manage this process and function in hopes of receiving statistically significant response rates. This motion was unanimously passed and the sub-committee has been actively engaged with VRBS staff to acquire a contractor through Sole Source procurement. It is possible the procurement method could change, but at this time, VRBS has identified a potential contractor that is believed to be uniquely qualified to perform this task.

In the 2023 SRC Annual Report, the following recommendations to VRBS were given:

- 1. Maintain VRBS Technician positions within the program to assist with expediting the VRBS process from application to plan.**
- 2. Develop advancement opportunities for VRBS Technicians to VRBS Counselor positions through mentorship, state agency support and private partnership opportunities.**
- 3. Maximize VRBS Counselor retention by monitoring caseloads, paying attention to feedback, creating a flexible policy model, promoting communication and collaboration, and monitoring job satisfaction ratings and employee engagement.**
- 4. Improve communication between VRBS staff, client, parents, case manager, instructors and other key partners when case transfers occur to ensure client's engagement in the program is maintained.**
- 5. Increase recruitment of qualified candidates to fill vacancies throughout the agency by establishing a recruitment strategy to help identify, hire, and retain employees and expand talent networks.**

6. **Increase referral and transition services among WIOA partners and other community programs to improve client services and program performance outcomes.**
7. **Improve focus on community partnerships to ensure that the diverse needs of the individual clients are met through wraparound coordinated services.**
8. **Consistently provide region/area specific resources to clients throughout all phases of the program from intake through exit.**
9. **Monitor Community Rehabilitation Providers' activities with VRBS clients and provide needed tools to increase the number of client successful closures annually.**

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

1. Maintain VRBS Technician positions within the program to assist with expediting the VRBS process from application to plan.
 - **VRBS Response: The 2023 Montana legislative body appropriated 4 FTE to support maintaining rehabilitation technician positions. VRBS is currently working with the department to fund 6 additional rehabilitation technicians through modified positions.**
2. Develop advancement opportunities for VRBS Technicians to VRBS Counselor positions through mentorship, state agency support and private partnership opportunities.
 - **VRBS Response: VRBS leadership is exploring the possibility of offering graduate level training for rehabilitation technicians to support advancement in the agency if interested. Additionally, a mentorship program for staff is being explored.**
3. Maximize VRBS Counselor retention by monitoring caseloads, paying attention to feedback, creating a flexible policy model, promoting communication and collaboration, and monitoring job satisfaction ratings and employee engagement.
 - **VRBS Response: These activities are currently underway within VRBS.**
4. Improve communication between VRBS staff, client, parents, case manager, instructors and other key players when case transfers occur to ensure client's engagement in the program is maintained.
 - **VRBS Response: The case transfer procedure is currently being updated. The updated version will be totally paperless and seamless using functionality in VRBS' case management system.**
5. Increase recruitment of qualified candidates to fill vacancies throughout the agency by establishing a recruitment strategy to help identify, hire, and retain employees and expand talent networks.
 - **VRBS Response: VRBS currently uses recruitment tools such as LinkedIn and Handshake to attract candidates from a wider national network in addition to recruitment strategies already in place. The agency is always looking to improve recruitment and retention strategies.**

6. Increase referral and transition services among WIOA partners and other community programs to improve client services and program performance outcomes.
 - **VRBS Response:** VRBS co-hosted 7 WIOA Convenings across the state of Montana with Adult Education and Department of Labor over the summer of 2023 and talked to over 250 staff members employed by WIOA core partners. Additionally, local staff jointly developed stakeholder engagement plans to address improved performance measures across programs. In 2024, VRBS leadership will be monitoring progress on the local plans and hold local teams accountable to their plans. VRBS is also actively monitoring co-enrollment data which will be shared amongst WIOA partners.
7. Improve focus on community partnerships to ensure that the diverse needs of the individual clients are met through wraparound coordinated services.
 - **VRBS Response:** VRBS has a long history of community partnerships. This is an area of continuous improvement. For example, VRBS is currently prioritizing partnerships with mental health agencies in the following ways: expanding opportunities for individuals with serious mental illnesses to access Individual Placement and Support (IPS) programs, an evidence-based supported employment model developed for this population and working with the Montana State Hospital to ensure individuals interested in pursuing employment are enrolled in VRBS, assigned a rehabilitation counselor, and have initial appointments scheduled upon discharge.
8. Consistently provide region/area specific resources to clients throughout all phases of the program from intake through exit.
 - **VRBS Response:** VRBS has long history of providing regional resources to clients through all phases of the program and is continually seeking to improve and update resources. For example, Job Service staff hold offices hours at VRBS local office in Kalispell and utilize Microsoft Teams platform to co-manage cases that have co-enrolled participants.
9. Monitor Community Rehabilitation Providers' activities with VRBS clients and provide needed tools to increase the number of client successful closures annually.
 - **VRBS Response:** VRBS actively monitors CRP services to clients as prescribed by the contract agreements with the providers. Also, VRBS has incentivized high-quality outcomes by paying a higher successful outcome fee to Community Rehabilitation Providers when they assist a client to get employed at a job that pays at or over \$20 per hour, works 25 or more hours per week, and/or is offered employer paid benefits.

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

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

SUMMARY FINDINGS

- Customized employment is a gap for people with significant disabilities needing supported employment. Montana is reshaping its approach to customized employment to support increased access and use of this service.
- Supported employment and extended employment are considered effective; however, access is mixed. VRBS and DDP stakeholders work to coordinate supported and extended employment services for clients. Access is hindered by limited staff and job coach capacity, especially in rural areas.

PEOPLE WITH SIGNIFICANT DISABILITIES

VRBS staff, CRP, and partner respondents were asked to consider the adequacy and quality of training and career services for people with significant disabilities. More respondents across all respondent groups were more likely to disagree or strongly disagree than agree or strongly agree that the availability and quality of training and career services for people with significant disabilities is adequate. Partner respondents were less familiar with the availability and quality of training and career services for people with significant disabilities needing supported employment; a larger share of partner respondents responded, “don’t know,” which influenced their overall assessment of services.

CUSTOMIZED EMPLOYMENT: Some of the perceived inadequacy of training and career services is related to limited access to customized employment services for people with significant disabilities. In January 2024, Montana will be shifting its approach to a model that has proven successful in comparable states. In this new approach, people with significant disabilities will start with customized employment services, without first struggling with mainstream VRBS career services.

Recommendation: Analyze outcomes associated with the new customized employment approach and adjust as needed through a continuous improvement process.

TRANSPORTATION AND JOB-RELATED CHALLENGES: Survey respondents provided additional details on challenges serving people with significant disabilities, reflecting feedback about basic needs and job-related challenges shared earlier in the report. These challenges included transportation, aligning client skills and abilities with jobs, limited job opportunities in small towns and rural areas, and employer reluctance to hire people with significant disabilities.

COORDINATING SERVICES AND RESOURCES: People with significant disabilities are typically served by VRBS and DDP in addition to other potential supporting agencies, requiring coordination of service delivery and funding sources, which complicates serving this population. Limited resources in smaller or more rural communities make this harder.

EXTENDED EMPLOYMENT: Stakeholders felt that the extended employment program is valuable. Extended employment services have the same coordination requirements as supported employment.

STAFF AND CONTRACTOR CAPACITY: CRP staffing shortages and VRBS staff capacity limitations impact people with significant disabilities in many ways that are similar to impacts on the broader VRBS client population, including inability to provide sufficient one-on-one job coaching support needed by this population. VRBS agency investments and CRPs will be discussed in more detail in later sections of the report.

- (B) **Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program;**

SUMMARY FINDINGS

- Working age Native Americans and people who identify as two or more races experience the highest rates of disability among racial/ethnic groups in Montana. Latinos have the third highest rate of disability.
- Individuals who are Native American and those who identify as English language learners identified increased barriers to success and challenges in accessing services. Barriers include lack of jobs, transportation, housing, and service providers.
- More VRBS staff, CRP, and partner respondents considered people with behavioral health disabilities and brain injuries to be unserved or underserved compared to people with other types of disabilities. However, respondents felt every type of disability was underserved or unserved to some degree.
- More staff, CRPs, and partners considered people living in rural areas of the state and those experiencing homelessness to be unserved or underserved compared to other groups. As with disability type, respondents said every subgroup was underserved or unserved to some degree.
- Improving transportation options was the top action recommended by staff and CRP respondents to improve service provision for unserved and underserved people.

PREVALENCE BY RACE/ETHNICITY

Working age Native Americans and people who identify as two or more races experience the highest rates of disability among racial/ethnic groups in Montana. Approximately 1 in 7 working age Native Americans have a disability (14.5% of all Native Americans). This is followed by people who identify as two or more races, of which 13.3% have a disability. Latinos have the third highest rate of disability; 1 in 8 Latinos (12.6% of all Latinos) experience disability, which is higher than the national rate of 8.5%. The rate of disability among the working age white population of Montanans (10.9%) is roughly on par with the national rate 10.4% for the white working age population. At the other end of the continuum, racial groups that had lower rates of disability compared to other racial or ethnic groups in Montana include people who identify as Pacific Islander, Black, Asian and some other race. However, it should be noted that the estimates for these comparatively small populations in Montana have a high margin of error; therefore, disability prevalence rate estimates for these groups are unstable.

VARIATION IN BARRIERS AND SERVICE RECEIPT AMONG RACIAL AND CULTURAL SUBGROUPS

The share of individuals who identified barriers to success varied somewhat by subgroup within the VRBS clients population. American Indians were more likely to identify barriers to basic needs than non-American Indians, and English language learners were more likely to report jobrelated challenges compared to non-English language learners. Similarly, access to needed services varied among individuals from racial and cultural subgroups within the VRBS and Pre-ETS client population. English language learners were more likely to identify challenges accessing needed Pre-ETS services compared to non-English language learners, and American Indian respondents were more likely to identify gaps in accessing needed supportive services and Pre-ETS services compared to respondents who did not identify as American Indian.

As noted in the un/underserved section below, interviewees and focus group participants agreed with staff, CRP, and partner survey respondents that American Indians, especially people living on reservations, faced increased barriers related to lack of jobs, transportation, housing, and service providers. Additionally, there are

service delivery challenges related to tribal and state WIOA and health and human services program coordination, cultural competency, and federal requirements for tribal jobs.

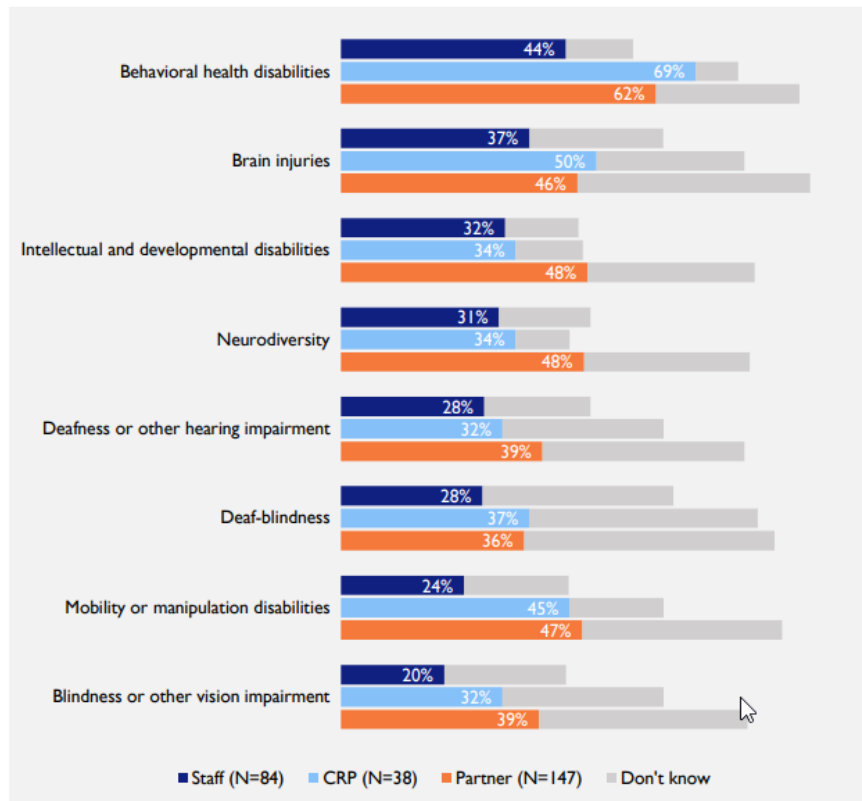
Recommendation: Develop organizational performance measures focused on racial and cultural equity.

STAKEHOLDER INPUT ON UNSERVED AND UNDERSERVED

The assessment grouped underserved and unserved questions into two broad groups: (1) people with a specific disability, and (2) people with disabilities in specific subgroups (e.g., low-income, living in rural areas, former prisoners).

BY DISABILITY TYPE: STAFF AND PARTNER RESPONDENTS IDENTIFIED PEOPLE WITH BEHAVIORAL HEALTH DISABILITIES AS MOST UNSERVED/UNDERSERVED

Figure 1. Percent of VRBS staff, CRP, and partner respondents who considered people with disabilities to be unserved or underserved, by disability type



Source: Montana VRBS Staff, CRP, Partner Surveys, 2023

Feedback from focus group participants and interviewees aligned with feedback from survey respondents in terms of which disabilities are underserved or unserved.

BEHAVIORAL HEALTH: Staff, CRP, and partner stakeholders in focus groups noted that people with behavioral health needs are hard to serve, and serving them is often made harder because of compounding issues such as housing and transportation.

Clients with behavioral health needs make up approximately one-third of the VRBS client population. This is a considerable percentage of clients with complex, compounding needs that are hard to serve well. VRBS is implementing an Individual Placement and Support (IPS) model in collaboration with State of Montana mental health and Medicaid to improve services to individuals with serious mental illness. IPS is expected to be an effective approach to serving the unserved and underserved population. Partners and staff expressed excitement about this new service coming online.

BRAIN INJURY: Brain injuries can cause physical dysfunction, including vision and hearing issues, cognitive challenges, and behavioral health issues. This complexity means it is hard to ascertain the number of people with brain injuries served by VRBS in the RSA data. Clients with brain injury often must work across additional partner agencies to access the full range of needed services. VRBS staff reflected on the complexity of serving these individuals in focus groups. Clients with brain injury who responded to the survey identified relatively more VRBS service gaps than those without brain injury and relatively more challenges than those without brain injury.

INTELLECTUAL AND DEVELOPMENTAL DISABILITIES (IDD): Over one-third of VRBS clients have a cognitive disability as their primary disability type. Staff and partners discussed how individuals with IDD receive limited DD services while waiting for a DD waiver slot, and thus are more reliant on VRBS services while waiting. VRBS / Pre-ETS are not designed to meet the full range of needs for individuals with IDD. Clients with IDD who responded to the survey said they had more service gaps and more challenges than respondents without IDD.

DEAFNESS: About four percent of VRBS clients have auditory or communicative disabilities as their primary disability type. Only approximately one percent of clients were deaf (44 clients, 1.3%) in the fourth quarter of program year 2022. Interpretation needs create a barrier to service for people who are deaf. Survey respondents who were deaf said they experienced relatively more VRBS service gaps and more challenges than did respondents who were not deaf.

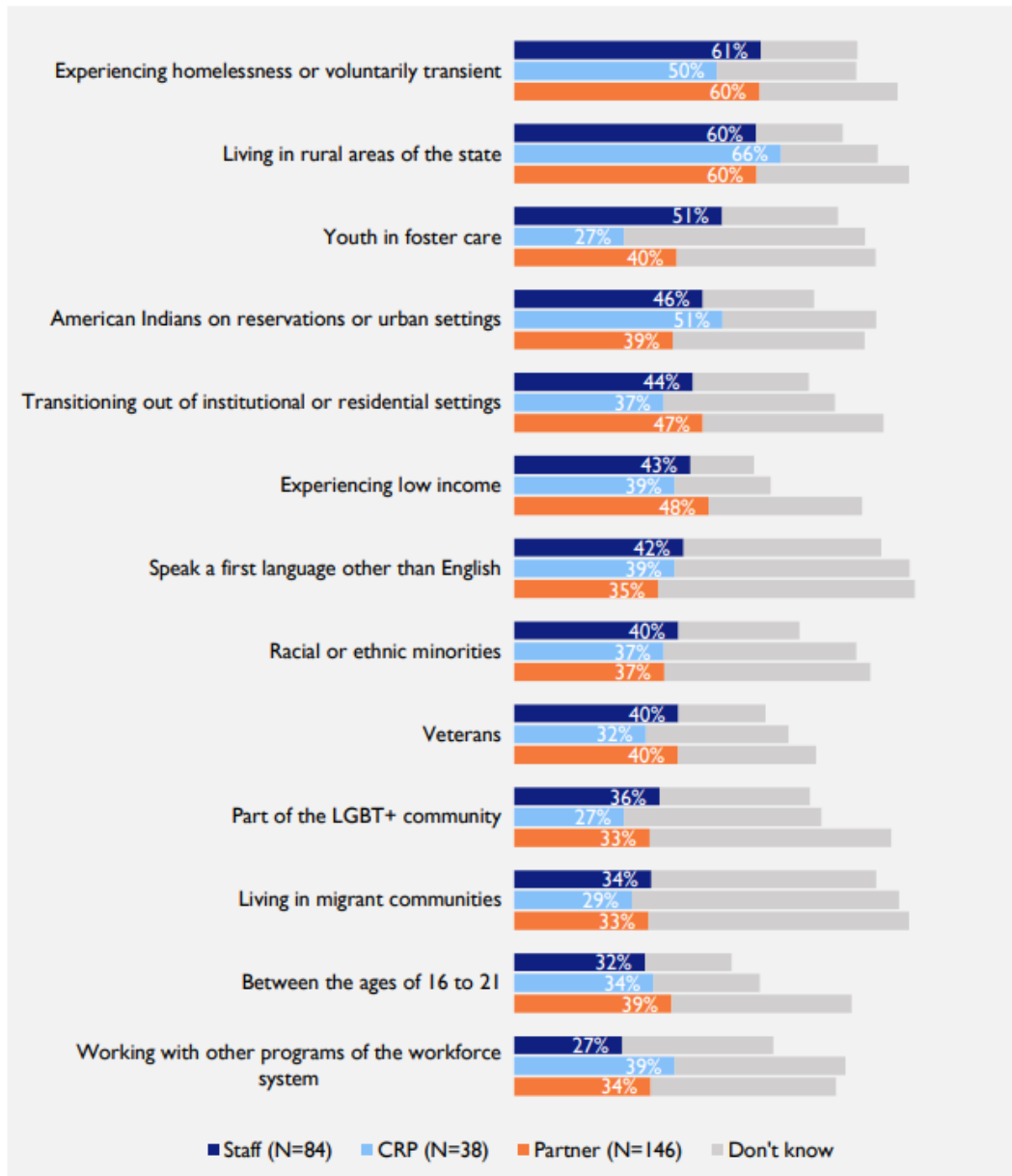
DEAF-BLINDNESS: RSA data show that VRBS serves a very small number of people who have deaf-blindness (seven in program year 2022, quarter 4). Staff believe the actual number of deaf-blind people served is higher and there are issues causing this disability to be miscategorized in the data. Staff also say this is a challenging population to serve well because of extremely diverse needs. VRBS has a project focused on improving services to this population through a holistic tool to better serve this population.

BLINDNESS: Approximately four percent of the client population has visual impairments as their primary disability category, with about half being blind (72 clients, 2.2% in program year 2022, quarter 4). Staff discussed challenges in serving this population, including transportation challenges for VRBS staff who are also blind (“I can’t serve clients in our outer counties because I am blind and don’t drive,”) transportation challenges for clients, and stigma associated with receiving benefits in the older blind population. Survey respondents who were blind also felt underserved in terms of VRBS service gaps, reporting relatively more VRBS service gaps than respondents who were not blind. Blind respondents also reported more challenges than did respondents who were not blind.

SIGNIFICANT DISABILITIES: As discussed in the previous report section, many staff and partners feel that people with the most significant disabilities are underserved.

BY SUBPOPULATION: RESPONDENTS CONSIDER RURAL AND HOMELESS TO BE MOST UNSERVED OR UNDERSERVED

Figure 2. Percent of VRBS staff, CRP, and partner respondents who considered people with disabilities to be unserved or underserved, by subgroup



Source: Montana VRBS Staff, CRP, Partner Surveys, 2023

HOMELESS: VRBS clients who said they are homeless represent about five percent of the 2022 point-in-time count of people who are homeless. While people who are homeless are only a small number of overall VRBS clients, staff in focus groups echoed survey respondents in their concerns about this population being underserved. It can be hard for unhoused people to participate in VRBS services because they do not have a stable place to live, may not have a consistent way to communicate and may have compounding factors such as basic needs challenges, behavioral health conditions, and physical health needs that require a holistic, team-based approach to fully address. The assessment of people experiencing homelessness as underserved by staff, CRPs, and partners aligns with the participant identification of service gaps; survey respondents who said they

were unhoused identified the most significant perceived gaps in services compared to other subgroups. This respondent population also identified more challenges than respondents who were not unhoused or transient.

RURAL: Focus groups participants and interviewees reflected on the challenges of serving rural populations. Clients living in rural areas identified relatively more service gaps than clients not living in rural areas; however, people with disabilities in rural areas identified fewer overall challenges than survey respondents not living in rural areas.

AMERICAN INDIAN: As noted above, American Indian clients identified more service gaps and more challenges than survey respondents who were not American Indian, and stakeholders noted additional challenges for this group of clients, including lack of jobs, transportation, housing, and service providers, and insufficient tribal and state WIOA and health and human services program coordination, cultural competency, and federal requirements for tribal jobs.

YOUTH IN OR EXITING THE FOSTER SYSTEM: VRBS serves very few individuals (1% or 37 people) who are in or are known to have aged out of the foster system. One interviewee reflected on how youth exiting the foster system are often underserved because these youth are not being identified as former foster children.

REFUGEES: Focus group participants in Missoula shared that they have a large refugee population and that these individuals can be underserved because of language barriers.

HISPANIC/LATINO: Clients who said they were English language learners identified more VRBS service gaps and more challenges than respondents who were not English language learners and preliminary cost and outcome data suggest possible opportunities for improved service delivery for this client group.

LGBTQ+: Although staff, CRPs, and partners were less likely to say this subgroup was underserved than others, clients and non-participants identified significantly more challenges, and clients who are LGBTQ+ said they experienced more service gaps than respondents who did not identify as LGBTQ+.

VRBS staff and CRP respondents provided input on the actions that VRBS can take to improve provision of services to unserved and underserved people. Improving transportation options was identified by the vast majority of both staff (80%) and CRP (74%) respondents. Substantial proportions of staff (42%) and CRP (46%) respondents also suggested increasing interagency collaboration to better serve unserved and underserved individuals. CRP respondents also suggested increasing training regarding specific disabilities (46%) or diagnosis and increasing staff outreach to clients (36%).

Focus groups, interviews, and open-ended survey responses provide more detail to these recommendations for increasing access to VRBS services for underserved and unserved populations.

Recommendations:

- ***Seek prior approval to utilize establishment authority to implement and expand IPS programs and services to better serve individuals with behavioral health disabilities.***
- ***Collaborate with Behavioral Health and Developmental Disabilities to determine how to strengthen vocational services within the newly defined, less intensive Assertive Community Treatment service requirements. This could include VRBS training or centralized VRBS services for ACT teams.***

- *Participate in HB872/Behavioral Health System for Future Generations committee meetings to understand and influence behavioral health funding decisions.*
 - *Analyze approaches to better serving individuals with brain injury in collaboration with partner agencies. Consider the need to develop a brain injury waiver or other focused program to coordinate diverse service needs.*
 - *Support Developmental Disabilities Program efforts to reduce the 0208 DD Medicaid waiver waiting list, including processes to ensure Pre-ETS participants are on the waiting list.*
 - *Work with partners to consider innovative, collaborative models of shared service delivery for rural and tribal regions. This may include cross-training, job sharing, or cross-agency service pathway development.*
 - *Increase advocacy for and provide more supportive services.*
 - *Analyze opportunities to better serve people with disabilities who identify as Hispanic/Latino, including hiring multi-lingual staff, having forms and online information in Spanish, and conducting increased outreach through partner organizations working with this population.*
 - *Identify youth who are in or have exited the foster system and communicate this information to colleges.*
 - *Reach out to partner agencies focused on serving people who identify as LGBTQ+ to determine approaches to better serving this population.*
 - *Increase awareness and understanding of VRBS and enhance relationships with partners, tribes, businesses, people with disabilities, and families.*
 - *Increase investment in cultural competency training for staff, consulting with partners about effective professional development options.*
 - *Build program capacity to serve the vocational needs of people with disabilities through increased hiring and retention of staff and CRPs.*
 - *Increase case review communication for clients receiving services from multiple agencies.*
- (C) [Individuals with disabilities served through other components of the workforce development system;](#)
[and](#)

SUMMARY FINDINGS

- VRBS staff identified a strong partnership with Job services, post-secondary schools, and Adult Education. Clients are satisfied with how well their VRBS counselors connected them with other community organizations to help them get the services they need.
- Collaboration and shared service delivery across partners could be improved. VRBS staff and partners want more communication and collaboration to better serve shared clients and better use collective program resources. Collaboration challenges include understanding partner programs and how they overlap/intersect, communication and data sharing, and limited staff capacity.

WIOA PROGRAM INVOLVEMENT

Over the last two years, WIOA program participation has generally declined as a proportion of overall vocational rehabilitation participation, from 12 percent to 8 percent. However, participation for most programs has increased in absolute terms, growing by 9 percent across all programs and as high as 136 percent growth in Job Corps. The Dislocated Worker and Wagner-Peyser Employment programs also saw robust growth (100%

and 89% growth, respectively). Adult Education grew 12 percent. In contrast, Youth program involvement fell 49 percent and Adult program involvement fell 24 percent.

VRBS staff were asked to assess the strength of their partnership with community agencies. More than 50 percent of staff characterized their relationship with the following agencies as “strong”:

- Job Services (67%)
- Post-secondary schools (60%)
- Independent Living (53%)
- Montana Developmental Disabilities Program (52%)
- Adult Education (52%)

Roughly one-third of staff respondents sometimes (35%) or frequently (31%) refer clients to Job Services for employment-related services. The most common service referrals are from job search or referral activities or resume writing and interview preparation. Despite a positive view of the partnership between VRBS and Job Services, stakeholders noted the impact of turnover in both agencies on maintaining awareness of the services Job Services and VRBS provide.

Stakeholders reflected on the challenges associated with the current data sharing and referral processes, including not using the designated Job Services point of contact for referrals and the manual process for referring clients. Moreover, WIOA stakeholders, as well as other partner stakeholders, reflected on the challenges of effectively serving dispersed, rural communities. One interviewee suggested cross-training staff in VRBS and Job Services to improve services to clients.

One-third of staff respondents sometimes referred clients to Adult Education for employment related services (35%), and nearly one-third frequently or always did (29%). Most VRBS staff respondents (90%) indicated referring clients to Adult Education for HiSET classes. Other common Adult Education referral purposes included:

- TABE test (73%)
- Basic computer classes (65%)
- Occupational or vocational certification (55%)
- Remedial education classes (53%)

Adult education partners, like Job Services, expressed a desire for more communication and coordination.

Recommendations:

- ***Continue or reinvigorate WIOA training and awareness activities.***
- ***Institute or reinvigorate process to give and receive updates across WIOA programs.***
- ***Evaluate opportunities to more effectively share information across disparate data systems, including leveraging functionality developed as part of the MPATH (Montana’s Program for Automating and Transforming Healthcare) project and the common client and provider indices.***

- *Analyze opportunities to support a shared or universal application across WIOA programs, as well as potentially other health and human services partner agencies.*
- *Explore the possibility of developing shared WIOA counselor positions to address service delivery challenges in rural areas.*

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

SUMMARY FINDINGS

- Nearly half (49%) of Montana’s accredited high schools have a Pre-ETS contract. VRBS has a total of 76 Pre-ETS school contracts in 73 percent of counties and 17 Pre-ETS provider contracts. In the context of locally controlled school districts, high school engagement is based on relationships with school administrators and special education teachers.
- Students with disabilities have inconsistent access to vocational services because of this limited, but growing number of school contracts, and inconsistencies across schools’ capacities to implement Pre-ETS services.
- Students with disabilities are less served in the summer and after school. Pre-ETS services are primarily provided by schools, with limited contractor engagement to supplement special education capacity. Students with disabilities often don’t receive vocational services in the summer or after school unless they are enrolled in VRBS.

YOUTH DISABILITY PREVALENCE AND CHARACTERISTICS

Multiple population and administrative data sources provide a picture of Montana youth with disabilities:

- Six percent of Montana youth ages 5 through 17 have a disability.
- Over five years, there has been a 12 percent increase in the number of teens and young adults with IEPs and a 36 percent increase in the number of teens and young adults with 504 Plans.
- The count of students with disabilities with IEPs declines with age, while the count of students with 504 Plans is relatively steady until age 18.
- A higher proportion of mixed-race Montana youth have disabilities compared to the national average.
- The most common disability types among youth are cognitive difficulties and self-care difficulties.
- Learning disabilities are the most common type of disability among Montana students.

CHALLENGES TO PRE-ETS SERVICES

In the two-year period between July 2021 and June 2023, the number of students with disabilities reported and the number and percentage receiving Pre-ETS has increased. The needs assessment collected information regarding challenges to Pre-ETS services from diverse stakeholders.

Students receiving Pre-ETS services, parents of students with disabilities, staff, and partners identify transportation and awareness of and connection to resources as students leave high school as the primary Pre-ETS challenges. Because Pre-ETS services are integrated with special education services for students in

participating schools, student responses reflect the combined universe of special education and Pre-ETS services. In focus groups, students were often unfamiliar with the term Pre-ETS.

More than one-third of VRBS staff, CRP, and partner respondents indicated that “most” or “all” of youth under 18 with disabilities face the following barriers to Pre-ETS services:

- Lack of information or confusion about available services
- Transportation challenges
- Not knowing where to get help or find services after high school
- Lack of job skills
- Concern over impact on Social Security benefits

Stakeholders also discussed the following challenges to Pre-ETS services:

- 1) **TRANSITIONS:** Students in focus groups said they would go to their special education teachers or parents with questions about navigating services after high school. Those who were planning to pursue post-secondary education, particularly in schools they had visited within their Pre-ETS/special education programs, felt surer of their next steps than others. Students in the psychiatric residential treatment facility focus group expressed less certainty about their post-high school options.
- 2) **TRANSPORTATION:** Students, parents, and staff shared perspectives on transportation challenges and their impact on youth and their families or caretakers. Young people said it was hard to participate in vocational activities outside of school because of transportation challenges. Parents reported transporting their children creates additional burdens on them. Driver’s education is generally hard to access for all students, regardless of disability. Staff felt that private coaches are likely the best option for addressing this challenge.
- 3) **SELF-CONFIDENCE:** Students talked about how their worries and lack of confidence negatively impact them.
- 4) **FAMILY ENGAGEMENT:** Staff discussed how family engagement and family attitudes varied, particularly as it relates to transitioning students into VRBS services for ongoing support.

PRE-ETS SERVICES RECEIPT

ADMINISTRATIVE INFORMATION:

Montana’s Pre-ETS program is serving a growing number of students with disabilities with an increasing number of services. The most common and fastest growing service is job exploration counseling, growing 24 percent between program year 2021 and 2022. This is followed by 23 percent growth in counseling on post-secondary enrollment opportunities and 19 percent growth in both instruction in self-advocacy and work-based learning experiences. Workplace readiness training services grew 18 percent.

STUDENT PERSPECTIVE:

VRBS participants eligible for or receiving Pre-ETS services were both more likely to indicate receipt of pre-ETS services compared to adult clients and also more likely to identify that they needed but did not receive distinct Pre-ETS services. The Pre-ETS services identified as received by the largest share of respondents were learning about good work habits (84%) and exploring what their job interests are (82%). Across all Pre-ETS

services, smaller shares of respondents received work-based learning services, and the largest shares of respondents received career exploration and workplace readiness services.

- Students learned about post-secondary options but identified gaps in receipt of application assistance. Two-thirds (62%) of Pre-ETS participant respondents said they had learned about different post-secondary options and half (51%) had learned which post-secondary options would help them get the career they want. One-fifth of respondents needed to learn how to apply for college or their chosen post-secondary option but had not received the service (20%) or needed to learn how to apply for financial aid but had not received the service (22%).
- Relatively high proportions of Pre-ETS participants received career exploration services. Most respondents (82%) explored their job interests, and about seven in ten learned about available jobs (71%) or learned which jobs are a good fit (70%). About half of respondents (52%) listened to guest speakers talk about their jobs.
- Work-based learning services were less accessed. Pre-ETS respondents were less likely to identify receipt and more likely to identify a service gap (they needed by did not receive a service) for work-based learning services versus other Pre-ETS services. Some focus group participants echoed the survey respondents' desire for more work based learning services.
- Students received workplace readiness services. Most Pre-ETS respondents (84%) indicated receipt of services to help them learn about good work habits, and a majority had received the breadth of workplace readiness options. The greatest services gap was noted for services to learn about budgeting (20% of respondents said they needed but did not receive the service) and practice interviews (19% needed but did not receive the service).
- Students were informed about their accommodations. More than half (57%) of Pre-ETS respondents had learned about the accommodations they needed. Half (50%) learned how to talk about their disability. Fewer indicated leading their own IEP (26%) or learning to schedule their own appointments (38%).

LEARNING ABOUT POST-SECONDARY OPTIONS: Students in focus groups shared their positive experiences exploring options for education, training, or work after high school. Students in one focus group talked about how they wish they had a career center that could support them learn about different career pathways, including nursing and automotive skillsets.

Recommendation: Explore opportunities to develop career or innovation centers.

COLLEGE APPLICATIONS: Some Pre-ETS focus group participants expressed a desire for more college application support.

FINANCIAL AID APPLICATIONS: Students talked about how they would like to learn about financial aid options and how to apply for them.

FINANCIAL LITERACY: Like survey respondents, many Pre-ETS focus group participants expressed a desire for financial literacy classes, specifically naming that they want to know how to pay taxes, write checks, and balance a checkbook. Multiple students said they wanted the opportunity to take life skills courses with this content.

Recommendation: Clarify the scope of financial literacy services to increase consistency of services. Work with WIOA partners to ensure that a full continuum of financial literacy courses is available to meet diverse needs.

WORK HABITS: Students commonly said they learned good work habits from working. Students shared many successful experiences they had through support from their special education teachers.

STAFF, CRP, AND PARTNER PERSPECTIVE:

Despite VRBS staff and partner respondent perception of widespread need for Pre-ETS services, they indicated limited service adequacy to address the needs of students and youth under 18 with disabilities. Adequacy of services in general varies by who is delivering the services. Schools with motivated special education teachers provide the majority of Pre-ETS services. Some regions use contracts to support service provision, which often results in fewer available services because of limited contractor provider capacity or limited willingness to provide youth services if also contracted for adult VRBS services.

PRE-ETS SPECIALISTS: Eight Pre-ETS specialists cover the entire state, with most traveling across large geographic areas to develop and maintain relationships with contracted high schools. Most staff also maintain a caseload for students who receive VRBS services in addition to Pre-ETS, with a cap of 50 clients. Pre-ETS specialists, like VRBS staff in general, express a sense of being overwhelmed and unable to complete their responsibilities successfully.

HIGH SCHOOL ENGAGEMENT AND CAPACITY: Schools with Pre-ETS contracts generally integrate Pre-ETS services with special education programming. Pre-ETS specialists reflected on the variable capacity of schools to serve students with disabilities in general and to take on Pre-ETS programming on top of special education responsibilities. Pre-ETS specialists talked a lot about the importance of relationships with school administrators and special education teachers, teacher willingness to engage in work outside of the classroom, and the importance of understanding how Pre-ETS services can benefit schools and their students. However, turnover with school staff and Pre-ETS specialists makes consistent relationships and teacher/school understanding of Pre-ETS services harder.

Recommendation: Continue to build relationships with statewide and local education entities to increase awareness and understanding of Pre-ETS services and how they benefit schools and students with disabilities. Consider creating tools to help schools understand the program, developing detailed instructions for how to use funds, and sharing data with schools and teachers to understand the impact of Pre-ETS funding.

STUDENT RECORDS: Stakeholders suggest that rural schools don't want to share student SSNs, which are needed for Pre-ETS services, so special education teachers have to talk to parents individually to understand why their child's SSNs had to be shared and how they would keep this information secure, which can be a barrier for some students to participate.

Furthermore, special education and RSA disability codes do not align. Special education can use a general category of health impairment, which is not an RSA category. Pre-ETS specialists need to go back to teachers to get a specific disability listed.

Recommendation: Analyze options for more efficient, automated Pre-ETS application and enrollment with built-in business rules and error coding.

PRE-ETS FUNDING: Pre-ETS has a tiered reimbursement rate based on school classification. AA school districts receive a lower reimbursement than class A, B, or C districts. In addition, the CRP section of the report reflects on contracting challenges for Pre-ETS services because of, at least in part, lower reimbursement rates for Pre-ETS compared to VRBS. Lower reimbursement rates may be less of an issue for larger schools; however, additional funding flexibility and external supports could improve service delivery. Some mid-sized and smaller schools developed new services or programs because of Pre-ETS contracts.

Recommendations:

- ***Analyze Pre-ETS costs and outcomes by school district classification to evaluate the effectiveness of tiered reimbursement rates.***
- ***Consider contracting mechanisms to engage special education teachers and school staff in summertime and after school Pre-ETS service provision as part of the broader re-evaluation of Pre-ETS contracting approaches.***

OVERLAP WITH VRBS: Some students with disabilities apply for and receive VRBS services to obtain services that are only paid through VRBS for individuals with IPEs. Pre-ETS specialists shared varied approaches to communicating with schools, teachers, and students about why and when students should be referred to VRBS. Staff expressed that increased Pre-ETS contractor capacity may lessen the demand for VRBS services by high school students.

Recommendations:

- ***Determine if there are more efficient and effective approaches to layering VRBS and Pre-ETS funding to provide services to broadly needed by Pre-ETS participants, like driver's education and summer training.***
- ***Support consistent staff understanding of and communication about VRBS referrals for Pre-ETS participants***

[\(2\) Identify the need to establish, develop, or improve community rehabilitation programs within the State.](#)

SUMMARY FINDINGS

- All counties have at least one CRP serving clients in that county. Missoula County has nine CRP contracts serving the county, the highest number among counties. Over one in three counties have two contracts (36%), and about one in five have three contracts (21%) or one contract (18%).
- Staff and CRP respondents consider CRPs successful in helping individuals get and keep jobs. The vast majority of VRBS staff and CRP respondents agreed or strongly agreed that CRPs help people get and keep jobs, and that CRPs are knowledgeable about providing appropriate services for VRBS clients. Most respondents in both groups also noted that there are an inadequate number of CRPs to meet the needs of people with disabilities seeking employment, and that CRP agencies have inconsistent staff and struggle with staff turnover.

- CRPs face similar caseload challenges. Like VRBS staff respondents, the majority of CRP respondents identified high caseloads as a challenge to providing vocational rehabilitation services. Utilizing establishment authority to train existing and bring on additional CRP providers to support improved client access and outcomes.
- VRBS clients report positive experiences with job coaches. Clients considered job coaches to be knowledgeable, able to see them quickly, and respectful of their culture and background.

CRPs were asked to provide input on their experience as a CRP and VRBS staff were asked to share their experience working with CRPs. The vast majority of VRBS staff and CRP respondents agreed or strongly agreed that CRPs help people get and keep jobs, and that CRPs are knowledgeable about providing appropriate services for VRBS clients. Most respondents in both groups noted that there are an inadequate number of CRPs to meet the needs of people with disabilities seeking employment, and that CRP agencies have inconsistent staff and struggle with staff turnover. Both staff and CRPs also disagreed that it is easy to coordinate services between VRBS and CRPs and disagreed that the VRBS contracting process is easy for CRPs. Perspectives between staff and CRP respondents varied somewhat on other measures. Almost half (49%) of staff respondents felt that CRP staff have the skillsets to work with individuals with various types of disabilities, compared to 87 percent of CRP respondents. Thirty-six percent of staff agreed or strongly agreed that CRP staff have the skillsets to work with individuals from diverse backgrounds, compared to 87 percent of CRP respondents, and one-third (34%) of staff agreed or strongly agreed that CRPs understand the vocational services delivered by VRBS, compared to two-thirds (68%) of CRP respondents.

Focus group attendees and interviewees consistently discussed the lack of CRPs as problematic for client service delivery. Opening up the order of selection increased the number of VRBS clients and the caseloads of CRPs and staff supporting them. When there are not enough CRPs to serve clients or cover a region, VRBS counselors fill this role. This creates an inconsistent delegation of responsibilities for VRBS staff across the state, and even within one regional office.

Recommendation: Utilize establishment authority to train existing and new CRPs as well as add new CRPs to enhance service-delivery capacity.

VRBS does not have any state owned or operated CRPs. Nevertheless, there are several nonprofit community rehabilitation programs in Montana per the definition of nonprofit in 34 CFR 361.5(c)(36): ***Nonprofit***, with respect to a community rehabilitation program, means a community rehabilitation program carried out by a corporation or association, no part of the net earnings of which inures, or may lawfully inure, to the benefit of any private shareholder or individual and the income of which is exempt from taxation under section 501(c)(3) of the Internal Revenue Code of 1986.

Per 34 CFR 361.5(c)(16)(iii), VRBS plans to seek prior approval in PY 2024-2027 for the “improvement of a public or nonprofit community rehabilitation program that are necessary to make the program functional or increase its effectiveness in providing vocational rehabilitation services to applicants or eligible individuals but are not ongoing operating expenses of the program.”

(16) Establishment, development, or improvement of a public or nonprofit community rehabilitation program means—

(iii) Other expenditures and activities related to the establishment, development, or improvement of a public or nonprofit community rehabilitation program that are necessary to make the

program functional or increase its effectiveness in providing vocational rehabilitation services to applicants or eligible individuals, but are not ongoing operating expenses of the program.

Recommendation: Consider developing a self-direction services option to increase capacity of CRPs. This could be modeled after self-direction in other Montana Medicaid waiver and state plan services.

Some CRPs are also contracted to provide services to students participating in Pre-ETS services. Many of these Pre-ETS CRPs are less likely to take youth referrals because of the lower rate paid for serving this population (\$15/hour less than paid for VRBS services) and because of the inconsistencies associated with young people (e.g., high no-show rate), making it hard to estimate the workload.

Recommendation: Reconsider the contracting approach for Pre-ETS services outside of schools. This may include a focus on contracting with youth-focused agencies and/or considering a deliverable-based payment approach versus using an hourly reimbursement.

VRBS clients report positive experiences with job coaches. Roughly one-third (32%) of clients reported using services from a job coach. Among those clients, 59 percent said that their job coach helped them to get or keep a job (not shown in figure). Clients were generally satisfied with their services from job coaches, with 77 percent agreeing or strongly agreeing that their job coach respected their culture and background, 69 percent agreeing or strongly agreeing that their job coach was knowledgeable about the supports they needed, and 66 percent agreeing or strongly agreeing that their job coach was able to see them quickly after their referral. Clients in focus groups who were able to use CRP services agreed with this positive feedback.

Like VRBS staff respondents, CRP respondents reported high caseloads as the most commonly endorsed challenge (59%) to providing vocational rehabilitation services. More than half of CRP respondents also identified lack of community services (54%), lack of financial resources, the increased number of individuals with multiple disabilities, and too much paperwork and data entry as challenges to service provision (51% each).

COLLABORATION: CRP respondents were asked how collaboration between CRPs and VRBS could be improved. Some said they would like to increase the sense of shared ownership for cases and their success with VRBS staff. Some requested more regular meetings (e.g., monthly) between VRBS counselors and CRP staff, with CRPs reimbursed for meeting participation. Others wanted improved frequency and quality of communication from VRBS counselors to CRPs with clarity around service requests, appropriate referrals, and needed information. Joint trainings with CRPs and VRBS counselors were also suggested as a way to increase collaboration.

Recommendation: Analyze opportunities to improve communication and collaboration with CRPs, including regular case review meetings, improved referral processes, data sharing through Madison, and joint trainings.

COMPENSATION: As the cost of living has rapidly increased throughout Montana, wages struggle to keep up. CRPs and VRBS staff both felt that CRP rates needed to increase to retain and ideally expand CRP capacity.

Recommendation: Continue to increase CRP rates.

DATA SYSTEMS AND PROCESSES: Many of the issues and recommendations included in the VRBS staff section above apply to and would benefit CRPs, specifically regarding authorizations, case notes, and invoicing. CRPs would also like streamlined billing requirements.

Recommendation: Work with partners to enhance Madison system to support shared service delivery and coordination through Madison, including centralized/consolidated case notes, authorized hours, utilization of authorized hours, and invoicing.

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

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

In 2022, VRBS posted a Request for Proposal to hire a contractor to complete the Comprehensive Statewide Needs Assessment (CSNA). Prior to pursuing this activity, the idea was shared with the SRC at a quarterly meeting and the SRC were unanimously supportive of VRBS pursuing this idea. Once the procurement process was complete and a contractor was selected, the contractor was added to the agenda of the summer 2022 SRC meeting where the contractor presented to the SRC on the process and timeline for the CSNA and SRC members’ input and feedback was solicited. Additionally, SRC was included in data collection by receiving and completing surveys as well as participating in focus groups.

Following the completion of the CSNA in December 2023, VRBS held a strategic planning session on January 5, 2024 and invited various stakeholders, including the entire SRC, to participate. Approximately 8 SRC members attended and participated in developing a new strategic plan. During the strategic planning session, the findings and recommendations from the CSNA were comprehensively reviewed with the attendees as well as the previous strategic plan goals and strategies. Attendees, including SRC members, then participated in discussions related to refining goals and prioritizing strategies that align with VRBS’ vision, mission, and core values

Following the strategic planning session on January 5, 2024, VRBS leadership met twice to further discuss and refine the strategic plan goals and associated strategies. VRBS leadership then presented the strategic plan to the full SRC on February 8, 2024 at the first quarterly meeting for their review, feedback, revisions, and approval.

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

- (A) Support innovation and expansion activities;
- (B) Overcome barriers to accessing VR and supported employment services;
- (C) Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post secondary education, employment, and pre-employment transition services); and
- (D) Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.

For 2024-2027, the SRC and VRBS jointly agreed upon the following goals using the CSNA, performance accountability measures, SRC recommendations, and strategic planning to guide goal development:

1. **Equitable Access and Quality.** All Montanans with disabilities can access high-quality competitive, integrated employment.

Objectives	Strategies
1.1 Increase awareness and understanding of VRBS.	1.1.1 Develop and implement a plan to continue to enhance relationships with partners, tribes, businesses, and people with disabilities, including satellite office hours or increased outreach.
1.2 Improve quality and delivery of VRBS services.	1.2.1 Identify an approach for more consistent soft skills/workplace readiness training skills and collaborate with Workforce Innovation and Opportunity Act (WIOA) partners to implement. 1.2.2 Provide consistent benefits counseling services to more individuals, including those not yet employed. 1.2.3 Explore how to make the Transportation Coordinator position best serve individuals needing transportation services. 1.2.4 Explore and promote innovative, collaborative transportation service options, including volunteer programs. 1.2.5 Analyze opportunities to increase access to driver’s education instruction. 1.2.6 Build a robust blind vendor program that is accessible statewide. 1.2.7 Maintain momentum on the implementation of Individual Placement and Support (IPS) services.
1.3 Increase the percentage of VRBS clients employed,	1.3.1 Work with partners to define a statewide Employment First policy.

Objectives	Strategies
retained, and promoted in competitive, integrated jobs.	<p>1.3.2 Continue to move people out of sheltered workshops and day programs and into competitive, integrated employment, with the goal of no longer needing sheltered workshops in Montana.</p> <p>1.3.3 Analyze program outcomes, including wages after exit, by race, ethnicity, and disability type.</p>

2. **Youth Engagement.** Montana youth with disabilities are effectively engaged in vocational exploration and work readiness training.

Objectives	Strategies
2.1 Increase participation of students (14-21) with disabilities engaged in high quality Pre-ETS.	<p>2.1.1 Continue to build relationships with statewide and local education entities to increase awareness and understanding of Pre-ETS services and how they benefit schools and students with disabilities.</p> <p>2.1.2 Develop tools to share information with youth, families, educators, and service providers about available services.</p> <p>2.1.3 Explore additional community agencies to provide Pre-ETS services.</p>
2.2 Increase participation for youth in foster system.	<p>2.2.1 Enhance the approach to capturing and analyzing data to better identify and serve foster youth.</p> <p>2.2.2 Engage with partners in the foster care network to identify and engage youth who could benefit from VRBS.</p>

3. **Coordination.** Montana’s workforce system is coordinated to effectively support people with disabilities and their employers.

Objectives	Strategies
3.1 Increase coordination with partner organizations.	<p>3.1.1 Develop and implement an approach to sharing resources and work with partners doing related work with shared clients in smaller/rural communities.</p> <p>3.1.2 Analyze options to develop a coordinated, streamlined WIOA referral process.</p> <p>3.1.3 Hold regular collaboration meetings with partners, including a focus on partner and VRBS services and trainings.</p>

Objectives	Strategies
	3.1.4 Continue to engage with Job Service Employers' Committees (JSEC) and Community Management Teams (CMTs) local committees.
3.2 Enhance coordination with businesses/employers.	<p>3.2.1 Provide increased training to employers to understand the benefits of hiring people with disabilities.</p> <p>3.2.2 Continue to manage collecting employer data in the Madison data system.</p> <p>3.2.3 Identify a solution for the VRBS counseling staff to follow through with business connections made through the business services team.</p>

4. Organizational Sustainability. VRBS is a stable, sustainable organization.

Objectives	Strategies
4.1 Increase staff recruitment, retention, and professional development.	<p>4.1.1 Improve the onboarding and orientation process to integrate new hires into our organizational culture and provide support.</p> <p>4.1.2 Refine training for adult learners and create tools and trainings in different modalities to increase understanding and integration.</p> <p>4.1.3 Define the training and support needs for VRBS support staff and implement improvements.</p> <p>4.1.4 Continue to integrate the VRBS culture into everything we do. Talk with staff about our mission, vision, and values, and how this relates back to the individuals VRBS serves.</p>
4.2 Increase CRP capacity.	<p>4.2.1 Explore options to increase to CRP capacity through establishment authority.</p> <p>4.2.2 Continue to explore developing a self-direction services option to increase capacity of CRPs.</p>
4.3 Enhance Madison.	<p>4.3.1 Continue to improve Madison's functionality by looking for and implementing efficiencies and providing training on new work processes.</p> <p>4.3.2 Include CRP invoicing in Madison.</p> <p>4.3.3 Explore artificial intelligence interfaces with Madison.</p>

Objectives	Strategies
4.4 Increase organizational and fiscal stability.	<p>4.4.1 Focus on achieving excellence on the WIOA performance measures.</p> <p>4.4.2 Continue to enhance internal controls for financial monitoring.</p>

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

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

The goals/priorities listed below are from the previous strategic plan that VRBS wrapped up at the end of 2023. As mentioned in c(1) above, a new strategic plan was developed in January 2024 and VRBS has just begun working on those updated goals and strategies and will report on them in the Modification report in 2026.

1. Access and Quality: Montanans with disabilities can access high-quality competitive, integrated employment.

Objectives	Strategies	2022 Progress	2023 Progress
1.1 Increase the number of clients served by VRBS.	<p>1.1.1 Reduce the waiting list and order of selection.</p> <p>1.1.2 Improve community outreach and encourage more people to apply for VRBS services.</p>	<p>Bureau Chief working to get a mental health liaison, TBI liaison, refugee liaison and Adult Ed liaison in each local office</p> <p>Each local office tasked with reaching out to 6 different agencies to present on VR and recruit referrals</p>	<p>Category 2 opened August 10, 2022. Category 3 opened and waitlist cleared January 1, 2023.</p> <p>Moved from 178 applicants on 10/1/22 to 209 applicants on 8/1/23. Moved from 2486 in IPEs on 10/1/22 to 2891 in IPEs on 8/1/23.</p>

Objectives	Strategies	2022 Progress	2023 Progress
<p>1.2 Increase the percentage of VRBS clients employed, retained, and promoted in competitive, integrated jobs.</p>	<p>1.2.1 Continue to move people out of shelter and group placements into competitive, integrated employment.</p> <p>1.2.2 Eliminate sub-minimum wage jobs.</p> <p>1.2.3 Increase access to customized employment opportunities.</p> <p>1.2.4 Increase access to self-employment opportunities.</p> <p>1.2.5 Provide higher education, trade school, apprenticeship, and certificate program opportunities to assist with sustaining and/or advancing people with disabilities.</p> <p>1.2.6 Implement mechanisms for VRBS Counselors and Community Rehabilitation Providers (CRPs) to be more aware of the economy and labor market projections.</p> <p>1.2.7 Provide Benefits Counseling to clarify the impact of working on state and federal benefits.</p>	<p>Staff from UofM presented at All Staff in September on Self Employment modules and will present again in early 2022</p> <p>Business Services Specialist tracking self-employment cases/plans on spreadsheet</p> <p>Business Services Specialist encouraging self-employment team to participate in webinars from National Center on Self-Employment</p> <p>Multiple trainings on CE topics for VRBS staff and providers – 11/1 & 11/2 (MG&A retreat), 11/29, 12/3 and 12/14 (Documents of Discovery trainings)</p> <p>Planning for more Gateway Trainings in 2022</p> <p>OGSM developed for meeting with all individuals working in facilities and on crews to discuss community employment and/or retirement</p>	<p>VRBS continues contracting with CILs to complete CCIR annually.</p> <p>DDP and VRBS leadership working on learning Employment First.</p> <p>Self-Employment procedure was written and published in January 2023.</p> <p>Self-Employment team meets regularly to review, provide TA on, and approve business plans.</p> <p>1099 Self-Employment procedure to be reviewed by P&P team on 9-7-23.</p> <p>VRBS leadership met Healthcare Apprenticeship and Registered Apprenticeship. Registered Apprenticeship had a staff attend the Business Services Conference in Butte.</p> <p>Business Services Specialist working on new model for in-house training for providers in CE.</p> <p>VRBS contracted with MSU-B to hire a benefits counselor to work with only VRBS clients. The benefits planner is now fully certified and taking referrals from VRBS using the procedure previously established.</p> <p>Transportation Coordinator just finished WIP-C training and took her certification test last week.</p>
<p>1.3 Improve the quality of VRBS services.</p>	<p>1.3.1 Provide high quality, holistic, long-term, relationship-based counseling services.</p> <p>1.3.2 Integrate counselors with</p>	<p>Assistive Technology (AT) Team sends out monthly newsletters to VRBS staff</p> <p>AT Team close to completing an AT</p>	<p>AT Team meetings have vendors attend to discuss the technology they offer, the populations it could work best for, how it works, etc.</p> <p>MonTECH gave presentation at Disability Employment Conference to employers regarding AT that could be beneficial to their employees.</p>

Objectives	Strategies	2022 Progress	2023 Progress
	<p>the internal team structure of subject matter experts.</p>	<p>assessment form for VRCs</p> <p>MonTECH presented at All Provider Call in August 2021</p> <p>ALL BLV staff are to actively participate in another team</p> <p>Deaf Services Program Manager joined Pre-ETS team and Pre-ETS team members joined Deaf and HOH team to better collaborate</p> <p>All Pre-ETS staff have a subject matter expert for: BLV, Deaf/HOH, Foster care youth, mental health, and addictions</p> <p>Business Services Specialist worked with MG&A in November to develop a fidelity scale for CE services.</p>	<p>Transportation Coordinator approached MonTECH about bringing on an OT that can do modified driving assessments.</p> <p>Leadership encouraging cross training and SMEs in offices that can assist with "specialized" topics.</p> <p>Shawn now a VRC for Deaf clients.</p> <p>Collaborating with BHDD through ODEP's ASPIRE project to build capacity for IPS service delivery statewide</p>
<p>1.4 Increase the percentage of clients meeting and exceeding WIOA performance indicators.</p>	<p>1.4.1 Use measurable skill gains to increase quality of placements and outcomes.</p> <p>1.4.2 Train counselors on measurable skill gains and regularly monitor their accuracy.</p>	<p>Published MSG procedure</p> <p>Developing an MSG Report in Madison to track and measure skills gains per counselor</p> <p>Training on MSG reporting occurred during Madison Go-Live Training (6/28-7/2) and refresher training held on 9/2/21</p>	<p>MSG Madison Chapter was re-written, and changes shared with field staff.</p> <p>MSGs - Ops Bureau Chief individually e-mails every counselor every quarter about their MSG rate with a reminder of what the statewide expected goal is for the Program Year (39%).</p> <p>Credential Attainment – Ops Bureau Chief has been steadily working on the credential attainment procedure and clarifying data reporting expectations to field.</p>

2. Youth Engagement: Montana youth with disabilities are effectively engaged in vocational exploration and work readiness training.

Objectives	Strategies	2022 Progress	2023 Progress
2.1 Increase participation of students (14-21) with disabilities engaged in high quality Pre-ETS.	<p>2.1.1 Build capacity in Pre-ETS programs to reach eligible students with disabilities statewide.</p> <p>2.1.2 Expand outreach efforts to qualified students, their families, and schools.</p> <p>2.1.3 Improve application process to enroll students in Pre-ETS services.</p> <p>2.1.4 Enhance collaboration and relationships between VR Counselors, Pre-ETS specialists, and students with disabilities.</p> <p>2.1.5 Improve outcomes for students with disabilities as they transition out of Pre-ETS.</p>	<p>Developed outcome surveys for Pre-ETS clients</p> <p>Pre-ETS specialists now developing IPEs and managing cases for student while they are in high school. After graduation, cases transfer to general VRC.</p> <p>Improved, more user-friendly student request forms developed and using DocuSign for ease of form completion</p> <p>Pre-ETS Specialists recently tasked with reaching out to all Home School Groups in their areas to improve participation of home-schooled youth</p> <p>Pre-ETS has presented to OPI Special Education staff, Deaf/Blind Project, MT Empowerment Center, Hands and Voices, and 2021 MYT Conference</p> <p>Pre-ETS received interest in new contracts this year from 5 schools that have not previously contracted</p> <p>Ongoing - MYLF and Movin' On</p> <p>Hired a Pre-ETS Specialist in Havre</p>	<p>Outreach with Shodair Children's Hospital, Yellowstone Academy, tribal schools, colleges, 121 programs etc. is ongoing.</p> <p>"Roles and Responsibilities" document has been updated to reflect the opening of Category 2 and then 1.</p> <p>The "Pre-ETS Specialist's Role in IPE Development" has also been updated.</p> <p>VR & Pre-ETS Bureau Chiefs meet regularly to discuss relationships and collaboration between VRCs and Pre-ETS Specialists and problem solve issues as they arise.</p> <p>Student request forms were amended to add space for student to indicate if in foster care. DocuSign continues to be used for student request forms and applications.</p> <p>More Pre-ETS camps added in 2023 including: Starbase and Bloom. MYLF and Movin' On have continued.</p> <p>Targeted attempts to establish vendors in Choteau.</p> <p>Pre-ETS Specialists provide services directly in areas where providers are not available.</p> <p>Efforts continually made to recruit new schools and tribal schools into Pre-ETS School Contracts.</p> <p>Mountain Home Missoula and Family Reunification Solutions (both new CRPs) are also interested in contracting for Pre-ETS.</p>

3. Equity: All people with disabilities are engaged and valued for their abilities and contributions to our workforce, with extra emphasis on reaching underserved and unserved populations.

Objectives	Strategies	2022 Progress	2023 Progress
3.1 Increase resources for people who are deaf or	3.1.1 Contract with additional qualified interpreters.	Deaf Services Program Manager coordinating with MSDB Superintendent on	Ongoing activities to keep sign-language interpreter lists updated.

Objectives	Strategies	2022 Progress	2023 Progress
hearing impaired.	3.1.2 Work to collaboratively start training programs for sign language interpreters. 3.1.3 Enhance access to assistive technology.	options for sign-language interpreter education programs in Montana Deaf Services Program Manager is testing non-physical interpreter options for VRBS clients	Options to use Sorenson interpreters via Zoom explored and implemented. AT Team meetings have vendors attend to discuss the technology they offer, the populations it could work best for, how it works, etc. Deaf Program Manager and MTAP director meeting quarterly to coordinate services
3.2 Increase blind and low vision supports.	3.2.1 Partner with doctors across the state to share resources and improve information access for the newly blind. 3.2.2 Enhance access to assistive technology.	BLV Bureau Chief and BLV staff coordinating with Diabetic Retinopathy Project to identify people at earlier stages of vision loss for VR services and get training from them for staff Outreach to Northern Montana Vision Center in March Bozeman Low Vision Center working more closely with Butte BLV staff	Ongoing outreach targeting vision clinics happening AT Team meetings have vendors attend to discuss the technology they offer, the populations it could work best for, how it works, etc.
3.3 Increase resources and access to rural and migrant communities as well as language minorities.	3.3.1 Analyze and modify staffing to ensure highly trained, specialized staff are effectively supporting rural, migrant, and language minorities. 3.3.2 Conduct outreach to organizations working with people in language minorities in Montana. 3.3.3 Improve outreach to rural communities. 3.3.4 Enhance strategic partnerships to increase awareness of VRBS as an option for migrant	REO presented on the Disability, Inclusion, and Equity panel for VRBS All Staff in May 2021 4 VRBS staff attended National AgrAbility Conference 2021 held in Billings, MT Spanish versions of Pre-ETS student request form, application materials, and Great Falls referral list created New Pre-ETS contracts with rural (and reservation) schools	Missoula coordinating with Soft Landings CSNA contractors held focus group with Soft Landings VR Bureau Chief working with CSAVR folks to facilitate DIE presentation for VRBS staff. New Pre-ETS contracts with St Ignatius, Winifred and Grass Range among others. 2 Pre-ETS camps for students in rural communities established in 2023 in Miles City and Lewistown. VR Bureau Chief recently reviewed Language Link procedure at supervisor meeting.

Objectives	Strategies	2022 Progress	2023 Progress
	and refugee workers.		
3.4 Increase collaboration with 121 programs and resources to American Indians on reservations and in urban settings.	<p>3.4.1 Increase outreach and communication with tribal partners, including 121 programs, health and human services providers, and high schools.</p> <p>3.4.2 Partner with tribal colleges.</p> <p>3.4.3 Build relationships with tribal businesses.</p>	<p>Tribal Liaison working intensively with CSKT 121 Program in transition to new program manager</p> <p>Quality Assurance Specialist assisted CSKT with developing a “training assignment” hiring agreement for new program manager</p> <p>Tribal Liaison planning to recruit new program manager of CSKT 121 to apply for SRC</p> <p>Tribal Liaison updated Cooperative Agreements with all 121 programs in Montana. They are pending approval with a goal of getting signatures by the end of the year.</p> <p>New Pre-ETS Specialist on the hi-line who will work to contract with more reservation schools</p> <p>Great Falls supervisors presented for Disability Awareness Day to the Blackfeet Manpower in Browning in October.</p> <p>OGSM regarding Little Shell that VR Leadership and staff are working on</p>	<p>Program Supervisor continues to meet regularly with Carmelita from CSKT.</p> <p>BLV Bureau Chief regularly attends meetings with the Office of American Indian Health.</p> <p>Stephanie Iron Shooter presented at 2022 Annual All Staff in Havre.</p> <p>Data being gathered through CSNA process to determine how to improve partnerships with American Indians.</p>
3.5 Increase support for people with disabilities in institutional settings.	3.5.1 Enhance outreach and communication with institutions to increase awareness of and engagement with VRBS services.	OGSM to engage in concerted effort to deliver transition services to youth in psychiatric residential facilities and therapeutic group homes	<p>VRBS leadership met with Warm Springs leadership in spring 2023. Working to increase/coordinate referrals with goal to have eligibility and IPEs written prior to discharge.</p> <p>VRBS involved in DPHHS Olmstead Plan development</p>

Objectives	Strategies	2022 Progress	2023 Progress
3.6 Increase support for youth in foster placements.	<p>3.6.1 Actively work with Child and Family Services to identify and engage with youth who could benefit from VRBS.</p> <p>3.6.2 Enhance partnerships with schools, programs, and professionals serving homeless and at-risk youth.</p>	OGSM to collaborate with Child and Family Services to identify and engage with youth who could benefit from VRBS	Ongoing - Field offices tasked with identifying their local CHAFFE coordinator and CFS office and invite to staff meetings.

4. Coordination: Montana’s workforce system is coordinated to effectively support people with disabilities and their employers.

Objectives	Strategies	2022 Progress	2023 Progress
4.1 Increase coordination with partner organizations.	<p>4.1.1 Increase community awareness and understanding of VRBS.</p> <p>4.1.2 Develop and implement a partner engagement plan, inclusive of Job Services, SRC, tribal vocational rehabilitation programs, CRPs, Developmental Disabilities Program, Adult Education, community block grant programs, Temporary Assistance for Needy Families (TANF), and others.</p> <p>4.1.3 Increase coordination with Local Transportation Advisory Committees,</p>	<p>New transportation coordinator hired</p> <p>DDP/VRBS Joint Referral procedure published and monthly meetings with VRBS and DDP leadership</p> <p>Collaboration with Children’s Mental Health and Foster Care/Homeless Youth and Diabetic Retinopathy</p> <p>Intensive collaboration with CSKT 121 program</p> <p>Bureau Chief and Program Manager working with IPS to facilitate a conference and expand IPS offerings</p>	<p>VRBS and DDP have good, well-established working relationship and are in process of implementing MOU.</p> <p>VRBS leadership as well as Medicaid and Mental Health leadership continue to work on expanding IPS.</p> <p>VRBS liaisons in each of the 9 local field offices for attendance at local TAC meetings.</p> <p>Transportation Coordinator participates in CARs committee annually, maintains relationships with MDT, and attends fall and spring MDT conferences.</p> <p>VRBS, Adult Education, and Workforce Services are holding local WIOA convenings in each area of the state to provide education and allow for local goal setting and planning</p>

Objectives	Strategies	2022 Progress	2023 Progress
	<p>Montana Transit Association, and other transportation stakeholders.</p> <p>4.1.4 Develop a community performance appraisal tool and baseline measures for co-enrolled participants.</p>		
<p>4.2 Enhance coordination with businesses/employers.</p>	<p>4.2.1 Increase awareness of VRBS with businesses and analyze options for improved information sharing.</p> <p>4.2.2 Coordinate business relationship management with partner organizations.</p> <p>4.2.3 Provide increased Windmills training to employers.</p> <p>4.2.4 Increase business representation on the SRC.</p>	<p>SRC working hard to recruit business representatives to the council</p> <p>Windmills Delivery procedure published February 2021</p> <p>VRBS facilitated Hearts of Glass viewing and panel discussion in October for National Disability Employment Awareness Month</p>	<p>First Annual VRBS hosted Disability Employment Awareness Conference held in May 2023.</p> <p>All business services team members are trained in Windmills and Windmills offerings are happening 1-2x per quarter.</p> <p>As of February 2023, all business seats on the SRC are filled.</p>

Objectives	Strategies	2022 Progress	2023 Progress
4.3 Enhance eligibility and navigation processes for clients.	<p>4.3.1 Analyze options for a common intake process.</p> <p>4.3.2 Analyze options for tools and methods to share client information.</p>	<p>VRBS Leadership working on technical specifications for SARA to interface with Wellsky</p> <p>State Verification Exchange System (SVES) is approved for Montana VRBS. Long-term goal is to integrate SVES with Wellsky</p> <p>Chaz Compton of TAC presented to all VRBS staff on eligibility and IPE developing with emphasis on rapid engagement</p>	<p>VRBS leadership working with DLI, Adult Ed, and SWIB to implement accountability measures on co-enrollment. Working on sharing co-enrollment data.</p> <p>VRBS, Adult Education, and Workforce Services are holding local WIOA convenings in each area of the state to provide education and allow for local goal setting and planning</p> <p>SVES implementation into Madison ongoing but getting closer.</p> <p>Local offices learning about CONNECT at WIOA Convenings</p>

5. Organizational Stability: VRBS is a stable, sustainable organization.

Objectives	Strategies	2022 Progress	2023 Progress
5.1 Increase fiscal stability.	<p>5.1.1 Improve Ticket to Work milestone payments collection process.</p> <p>5.1.2 Put internal controls in place for financial monitoring.</p>	<p>Three TTW procedures and internal controls published</p> <p>All Staff participated in financial audit training by Legislative Audit Division</p> <p>Open communication and responsive relationship with BFS D</p> <p>Mentoring relationship established with Public Health (Program 7) with budget analysts</p> <p>Operations Bureau Chief working with BFS D to write RSA-17 Procedures and Internal Controls</p> <p>All Staff participated in interactive training on Internal Controls</p>	<p>TTW processes continue per procedure.</p> <p>August 2022 to August 2023: \$1,645,504.83 in reimbursements.</p> <p>Procedure and Internal Control development, implementation, and monitoring are ongoing and continuous.</p> <p>Relationship between DETD Fiscal Unit and BFS D continues to be very good.</p> <p>DETD Fiscal Unit continues to utilize RSA fiscal liaison and VRTAC QM TA as needed.</p> <p>Procedures and Internal Controls accepted by RSA to date:</p> <ul style="list-style-type: none"> • Internal Control for General Cost Allocation and Personnel Cost Allocation • Rate Setting Methodology procedure • Procedure SF-425 for Supported Employment SE • Procedure SF-425 for Older Individuals Who Are Blind (OIB) • Procedure SF-425 for Supported Employment Youth SE

Objectives	Strategies	2022 Progress	2023 Progress
		<p>Utilize fiscal liaison at RSA as needed</p> <p>Ongoing work writing procedures and internal controls on various fiscal (OGSM) and program tasks</p>	<ul style="list-style-type: none"> • Procedure RSA-17 Reporting • Procedure General Cost Allocation and Personnel Cost Allocation Requirements • Procedure Period of Performance • Internal Control for Period of Performance • Pre-ETS Time Tracking Procedure • Internal Control on SF-425s for SE-A and SE-B <p>2019 Corrective Action Plan has been cleared!</p>
<p>5.2 Increase staff professional development.</p>	<p>5.2.1 Provide earlier Foundations training.</p> <p>5.2.2 Develop and implement approaches to keep up to date on changes.</p> <p>5.2.3 Provide ongoing, continuing education for staff.</p> <p>5.2.4 Develop system to track staff professional development.</p> <p>5.2.5 Conduct performance-based evaluations to support high quality work.</p> <p>5.2.6 Enhance CRP training.</p>	<p>Foundations facilitated in July and multiple times per year as needed</p> <p>All Staff participated in interactive training on Eligibility and IPE Development</p> <p>VRBS Leadership attended Change Management interactive training provided by consultant</p> <p>VRBS Leadership participated in Leadership Training provided by Dr. Fred MacFarland</p> <p>Providing mini-trainings to CRPs during monthly All Provider Calls on: DRM, labor market, MonTECH, and IPS</p> <p>Group case review held in Helena in September</p> <p>Counselor Supervisors do monthly targeted case reviews</p> <p>Performance Appraisals due the end of the year</p>	<p>Collaborative Safety implemented division wide.</p> <p>Talent platform for staff performance monitoring implemented statewide.</p> <p>Turnover in field offices has resulted in leadership overseeing cases and staff in the local offices.</p> <p>Case Management expectations procedures published.</p> <p>VRBS leadership and staff completed case reviews last week.</p> <p>Deputy Administrator and Pre-ETS Bureau Chief currently participating in NRLI. VR Bureau Chief, BLV Bureau Chief, Ops Bureau Chief, and DET Administrator have already completed NRLI.</p> <p>Transportation Coordinator just finished WIP-C training and took her certification test last week.</p> <p>Ongoing procedure development happening as well as follow-up coffee chats to review procedures and answer questions following publication.</p> <p>Training on SS Benefits provided at 2023 All Staff.</p> <p>RSA Dashboards regularly reviewed with staff.</p> <p>VRBS has contracted with Yang Tan Institute at Cornell University to provide training for CRPs. First training was provided in-person</p>

Objectives	Strategies	2022 Progress	2023 Progress
		Started doing APIs on client benefit purchases	in September 2022 in Billings and Missoula. Monthly training sessions for providers have also been provided by Yang Tan since November 2022 and will continue through December 2023 per the current contract. VRBS added training requirements to CRP contracts and plans to move to requiring asynchronous training for all new CRP employees starting in the 2024 CRP contracts.
5.3 Increase staff engagement and satisfaction.	<p>5.3.1 Celebrate staff and team successes.</p> <p>5.3.2 Monitor workloads and determine need for work redistribution.</p> <p>5.3.3 Ensure staff have updated, adequate tools.</p> <p>5.3.4 Continually evaluate staff training needs and desires and develop training and career paths to support staff.</p> <p>5.3.5 Continually evaluate employee engagement and make management decisions based on evaluations.</p>	<p>VRBS Director working on OGSM on employee engagement with Director's Office</p> <p>Plan to again implement employee engagement survey previously used by VRBS</p> <p>Moved a VRC position from Butte to Bozeman</p> <p>Anticipate repurposing a position to a Bozeman Pre-ETS position when a vacancy becomes available</p> <p>Bozeman office is growing so they got a new office space</p> <p>Pre-ETS specialists have taken on more responsibilities by writing IPEs in each of the offices</p> <p>Approved to hire temp VR tech workers</p> <p>Miles City staff have been assisting with a lot of overflow work from the other offices including support staff duties and VRC case work</p> <p>Staff celebrations: Billings and Missoula VR success stories</p>	<p>All 10 VRT positions will remain filled for the time being.</p> <p>Created Program Supervisor position in Ops Bureau & Deputy Division Administrator position.</p> <p>New staff spend 1 week in Missoula after hired for training in foundational areas of the job.</p> <p>Optional leadership book club held monthly. Leadership attended CSAVR in Bethesda, MD.</p> <p>3 VRCs attended national symposium for VRCs in Madison, WI.</p> <p>VRBS leadership worked closely with HR and Union to secure raises for VR professional staff. Additionally, DOA provided "bonuses" in May 2023 and 4% raises to all staff July 2023.</p> <p>Staff awards are given at Annual All Staff Training. In 2023, new award for "The Flash" given out. Plans for 2024 awards include 6 common performance measures and best E&E report for support staff.</p> <p>Team building exercise on Four Lenses held with Billings and Miles City staff.</p> <p>Celebrate VRT, administrative assistant, and VRC days annually.</p> <p>In process of writing JD and posting new Business Services Specialist position.</p> <p>VR Counselor position posted to work out of Polson, position will be double-filled until there is attrition in the Kalispell Office.</p> <p>VR Supervisor retreat scheduled for Aug 21 & 22</p>

Objectives	Strategies	2022 Progress	2023 Progress
		shared in leadership meetings, Wellsky Testers awarded Amazon gift cards and prizes, team selection of VRBS mission/vision/values, emails to counselors and staff regarding TTW reimbursements, and case of the year will be showcased in December	

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

The following is PY2022 data for the performance accountability indicators taken from the WIOA Statewide and Local Performance Report for the VR program.

Performance Indicator PY2022	Negotiated Level PY2022	Actual Level PY2022	Explanation for Discrepancies
Employment (Second Quarter After Exit)	63.3%	54.6%	VRBS' negotiated level of 63.3% was an ambitious goal, given the legacy data system that it was calculated from was less reliable than the current data system and that the PY2021 Actual Levels of this measure was 23.7%. VRBS moved case management systems on 7-1-21, and with the new case management system, has greater visibility and reliability into the data calculations in this measure. Concentrated efforts are being made within VRBS to both 1) ensure the post-exit data remains accurate and 2) focus on high-quality and lasting employment outcomes when exiting our participants.
Employment (Fourth Quarter After Exit)	45.5%	44.3%	VRBS was very close to meeting this performance measure in PY2022, only 1.2 points away. Additionally, the PY2021 Actual Level of this measure was 14.6%, so there has been tremendous improvement in PY2022. Concentrated efforts are being made within VRBS to both 1) ensure the post-exit data remains accurate and 2) focus on high-

			quality and lasting employment outcomes when exiting our participants.
Median Earning (Second Quarter After Exit)	\$3775	\$3456	VRBS has analyzed this decline in median earnings and will continue to work on high quality employment outcomes in PY2024-2027 to reflect this work.
Credential Attainment Rate	38.9%	26.4%	VRBS' analysis of this rate has revealed that staff were not properly inputting some of the data elements that go into this measure in PY2022, so VRBS does not believe this rate is a true reflection of the performance in Montana. In PYs 2024-2027, the data elements that comprise this calculation will be accurate.
Measurable Skill Gains	37.5%	55.3%	Met Negotiated Level
Effectiveness in Serving Employers	Not applicable	Not applicable	

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

On the most recently completed RSA-17 for Federal Fiscal Year 2022 (in its carryover year which ended 9-30-23) a total of \$29,355 was spent from the funds reserved for innovation and expansion activities. Activities supported specifically by innovation and expansion funds include the SRC's consumer satisfaction survey and meeting plus project costs for the State Rehabilitation Council (SRC) and the Statewide Independent Living Council.

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

(1) Acceptance of title VI funds:

VR agency requests to receive title VI funds.

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

The goal of the state's supported employment program is to maintain a system whereby individuals, including youth, with the most significant disabilities are afforded the opportunity to participate in competitive integrated employment.

Supported employment services are provided on a statewide basis through the Title VI, Part B funds. Individuals eligible for supported employment are those individuals with the most significant disabilities for whom competitive integrated employment has not historically occurred, or for whom competitive integrated employment has been interrupted or intermittent as a result of a significant disability, and who, because of the nature and severity of their disabilities, has had supported employment identified as the appropriate employment service followed by long term supports after the VR case is closed. Fund allocation on a statewide basis ensures an equitable statewide service delivery.

Vocational Rehabilitation and Blind Services (VRBS) will continue to encumber Title VI, Part B funds on a fee-for service basis. When supported employment services exhaust Title VI, Part B funds, then Title I funds will be utilized to provide needed supported employment services. At this time and in recent years, this procedure has made it possible to provide all planned supported employment services for individuals receiving VRBS services. If in the future VRBS determines that there are inadequate funds to provide all needed supported employment services for individuals on the VRBS caseload then supported employment will be funded with Title I dollars.

In addition, VRBS prioritizes the use of supported employment models that maximize integration of persons with the most significant disabilities in real work sites, doing meaningful work. Most recently, VRBS has created a fee schedule, procedures, processes, and specialized contracts offered to Montana mental health centers to provide evidence based IPS services to individuals involved in their mental health treatment teams who are also VRBS participants. Title VI funds will be used to purchase IPS services for these individuals.

VRBS has implemented and continues to refine the Customized Employment (CE) program to enhance competitive integrated employment opportunities for individuals with the most significant disabilities in Montana. At this time, VRBS continues to issue CE-specific contracts to providers in Montana who have employees with Discovery and/or Customized Job Development certifications from Marc Gold & Associates.

In the coming years, VRBS will implement a new, in-house Customized Employment training system based on the system implemented by the State of Minnesota, who has agreed to train Montana and assist with ACRE certification. Title VI funds may be used to purchase Customized Employment services for VRBS participants if it is determined that the client meets supported employment eligibility criteria and long-term supports will be needed despite the customized job created for the client.

VRBS does not support the use of segregated bench work, sheltered, enclave or segregated crew models.

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

VRBS most commonly enrolls supported employment providers who:

- are Developmental Disabilities Program (DDP) supported employment providers,**

- have staff with Discovery and/or Customized Job Development certifications through Marc Gold & Associates, or
- are Community Mental Health Centers (CMHC)s,

Providers who do not fall into the aforementioned categories are individuals or organizations who have been enrolled to provide services for a limited number of participants in rural areas where there are no other established providers.

VRBS participants eligible to receive Title VI Part B funded supported employment services are those individuals with the most significant disabilities:

1. for whom competitive integrated employment has not historically occurred, or
2. for whom competitive integrated employment has been interrupted or intermittent as a result of a significant disability, and
3. who, because of the nature and severity of their disabilities, has had supported employment identified as the appropriate employment service followed by long term supports after the VR case is closed.

Once it is determined that a participant meets supported employment eligibility criteria, Supported Employment Services (SES) are listed in the participants Individualized Plan for Employment (IPE) and Data Element 49 “Supported Employment Goal on Current IPE” is marked as “1=Individual has a supported employment goal on the current IPE”. If the participant is also a youth (age 24 and under), Extended Services is also listed on the IPE. Once the participant has gained employment, VRBS begins using Title IV Part B funds for the client’s SES.

Quality of services is continually monitored by the VRBS counselors through regular meetings with employment specialists serving clients and monthly review of provider case notes. Additionally, VRBS counselor supervisors meet quarterly to monthly with providers in their areas to discuss service provision and address issues as needed. The Program Manager conducts regular reviews of the providers’ supported employment services.

Extended Services are available through VRBS for youth, age 24 or under for up to 48 month and for all other exiting participants are available through the Developmental Disabilities Program (DDP), the Extended Employment Program (EE), other Medicaid-funded waivers (ex. Severe Disabling Mental Illness [SDMI] waiver), and private pay for individuals exiting VRBS. VRBS may also fund Extended Services for youth, age 24 or under for up to 48 months. The vast majority of supported employment participants utilize DDP or EE for Extended Services.

When a VRBS participant receiving Title IV Part B or Title 1 funded supported employment has access to Medicaid-funded waiver services through DDP, the Vocational Rehabilitation Counselor (VRC) obtains a signed cooperative agreement form from DDP indicating DDP agrees to fund the long-term supported employment. The VRC also coordinates with DDP to ensure DDP has all needed information and processes completed to take on funding the supported employment and a transition date is mutually agreed upon. The transition date is communicated to the supported employment provider. Once an individual transitions to DDP funded supported employment, the VRBS case remains open for a minimum of 90days to ensure seamless transition before the VRBS case is exited.

When a VRBS participant receiving Title IV Part B or Title 1 funded supported employment does not have access to a Medicaid waiver to fund their supported employment, they transition to EE. The VRC obtains a signed cooperative agreement from the EE Program Manager indicating EE agrees to fund the long-term supported employment and the EE Program Manager provides a transition date to the VRC and supported employment provider. Once an individual transitions to EE, the VRBS case remains open for a minimum of 90 days to ensure seamless transition before the VRBS case is exited.

VRBS may provide supported employment services using Title VI Part B funds for a period not to exceed 24 months (for over-24 years old) or 48 months (for youth 16-25th birthday). The "time clock" starts ticking when the individual is hired and stops when the client is no longer employed, or when the VRBS case is exited. The time clock re-sets at zero should the client be hired at a different employer. Should an individual re-open a new VRBS case, the time clock again starts at zero.

VRBS staff are expected to keep a tally of how many months have been used in each of their cases and notate this in their case documentation. The length of time that VRBS funds this service before moving to another funding source depends on several factors*:

- 1. Whether the individual has a long-term funding source immediately available (for example, Extended Employment (EE), Developmental Disabilities Program (DD) or Severe Disabling Mental Illness (SDMI) Wavier,**
- 2. The amount and availability of Title VI Part B and Title 1 funds the VRBS program has designated for supported employment,**
- 3. The age of the individual, and**
- 4. How many months of the "time clock" the individual has already used.**

***VRBS does not limit or delay the start of any service to any individual based on the above criteria.**

After VRBS is no longer funding the individual's supported employment services (coded as SES in the IPE), the individual then transitions into the Extended Services needed for job maintenance. Extended Services may be funded by VRBS, but this can only occur for youth. The Extended Services that VRBS funds for youth continue to count towards the individuals' accumulated months on the "time clock" and cannot exceed 48 months or the individual's 25th birthday, whichever occurs first.

Exceptions: In rare instances, the individual may exceed the 24 and 48-month provision if the VR counselor and the individual have determined that such services are needed to support and maintain the individual in SE. Should SE take longer than 24/48 months, it must be approved by the Counselor Supervisor and SE Program Manager, documented on the Individualized Plan for Employment (IPE) and in a case documentation note.

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

As mentioned above, when the appropriate funder for the participant’s extended services has been identified, the VRBS Counselor is responsible for getting a cooperative agreement signed by the funder and the provider of the extended services. The cooperative agreement states:

“As funded by the source noted below, the undersigned service provider agrees to provide ongoing and other support services needed to maintain the designated individual’s competitive integrated employment. Services will:

1. Be based on the needs of the individual as specified in the Individualized Plan for Employment (IPE) and
2. Include, at a minimum, twice-monthly monitoring of the individual to assess employment stability.”

A copy of the signed cooperative agreement is provided to the supported employment provider, the extended services funder, and the VRBS counselor for inclusion in the case file.

See sections I(5), I(6), and I(7) for cooperative agreements between VRBS, Medicaid, and mental health as well as between VRBS and DDP that are in effect or in draft respectively.

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

(1) Estimates for next Federal fiscal year—

(A) VR Program; and

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
Priority Category 1	2362	2362	\$4,429,000	0
Priority Category 2	1363	1363	\$2,556,000	0
Priority Category 3	262	262	\$429,000	0

(B) Supported Employment Program.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported	Costs of Services using Title I	No. of Eligible Individuals Not Receiving
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		Employment Program	and Title VI Funds	Services (if applicable)
Priority Category 1	190	190	\$602,000	0
Priority Category 2	Not served with Supported Employment	Not served with Supported Employment	Not served with Supported Employment	0
Priority Category 3	Not served with Supported Employment	Not served with Supported Employment	Not served with Supported Employment	0

(g) Order of Selection.

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

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

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

(1) For VR agencies that have defined priority categories describe—

(A) The justification for the order;

Montana’s Vocational Rehabilitation and Blind Services program (VRBS) does not know if it will be able to serve all eligible individuals with the available resources; therefore, we have implemented an order of selection.

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

Priority Category One - Most Significantly Disabled (MSD): Eligible individuals with serious functional limitations in three or more functional capacities, and who will require multiple services over an extended period of time.

Priority Category Two- Significantly Disability (SD): Eligible individual(s) with serious functional limitations in one or more functional capacities, and who will require multiple services over an extended period of time. - OR - The individual is a recipient of Social Security Disability Benefits (SSDI) or Supplemental Security Income (SSI) as a result of disability or blindness.

Priority Category Three-Not Significantly Disabled (NSD): All other eligible individuals with disabilities.

Those individuals in Priority Category One will have the highest priority and will be served first, followed by individuals in Priority Category Two, and finally by those individuals in Priority Category Three. All individuals within a higher priority category will be served before any individual in the next lowest priority category. Regardless of which category closure scenario is in effect, eligible individuals will be released from the statewide waiting list first by priority category, most significant to least significant; and then by order of application date, oldest to newest.

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

The VRBS administration, in consultation with the State Rehab Council, will determine when OOS what priority categories may be served. VRBS will continue to provide services to individuals currently receiving services in an IPE in all open priority categories until it is projected resources are not sufficient to support more participants.

When OOS is in effect, counselors will continue to take applications and make eligibility determinations. If a priority category closes VRBS will provide all eligible individuals who are assigned a closed priority category with information about, and referral to, other federal or state programs (including components of the statewide workforce investment system) that can assist them in preparing for, securing, retaining or regaining employment. The information and referral information is provided to these individuals via a packet developed specifically for their local community.

VRBS will notify each individual determined eligible, in writing of:

- The priority categories
- The individual's assignment to a particular priority category classification
- Any reclassification of priority category assignment due to changes in the individual's circumstances, or due to any misclassifications
- The individual's right to appeal the category assignment; and
- The availability of assistance from the Client Assistance Program.

Individuals on the OOS waiting list will be contacted at least once in the first 180 days after being placed on the waiting list, and every 180 days thereafter.

- (2) Has the VR agency elected to serve eligible individuals outside of the order of selection who require specific services or equipment to maintain employment?

[X] No

(h) Waiver of Statewideness. The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 CFR 361.26. If the VR agency is requesting a waiver of statewideness or has a

previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 CFR 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate “not applicable.”

Not Applicable

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

(1) Analysis of current personnel and projected personnel needs including—

- (A) The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;
- (B) The number of personnel currently needed by the VR agency to provide VR 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 VR agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Division Administrator	1	1	1
Deputy Administrator	1	1	1
Bureau Chiefs (Program Support; Field Services; Pre-ETS; Blind and Low Vision)	4	4	4
Program Managers (Independent Living; Deaf; Social Security; Transportation; Business Services)	6	6	6
Central Office Admin Support Staff	1.5	1.5	1.5
Counseling Staff (Counselors and	40	44	50

Counselor Supervisors for both General and BLVS programs)			
Pre-ETS Specialists	7	8	9
Rehabilitation Technicians	8	8	8
Orientation and Mobility Specialists	3	4	4
Vision Rehabilitation Therapists	4	5	5
Field Administrative Support	19	20	20
Technical Support (Budget Analysts, Business Analyst, Technology Assistant, Contract Specialist)	5	5	5

(D) **Ratio of qualified VR counselors to clients: As of January 1, 2024 VRBS served a total of 3537 clients with 31 Counselors and 13 Counselor Supervisors across the agency. The average caseload per Counselor is 88 and the average per Counselor Supervisor is 60.**

(E) **Projected number of individuals to be served in 5 years: 4,000**

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

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

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
Western Michigan University	Vision Rehabilitation Therapy	2	
Western Michigan University	Orientation and Mobility Specialist	1	
Utah State University	Rehabilitation Counseling	1	
St. Cloud State University	Rehabilitation Counseling	4	

George Washington University	Rehabilitation Counseling	4	1
Montana State University- Billings	Rehabilitation Counseling	3	1
UMass Boston	Rehabilitation Counseling	1	1
Virginia Commonwealth University	Rehabilitation Counseling	3	
University of Wisconsin- Stout	Rehabilitation Counseling	2	

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

Montana VRBS works to recruit qualified personnel in a variety of ways including working closely with Montana State University-Billings, to share open positions with students of their rehabilitation counseling program. VRBS works with all colleges across the state in order to recruit individuals from minority backgrounds, including Montana’s tribal population and people with significant disabilities. Recruitment efforts also include posting positions to Handshake at universities nationwide that offer rehabilitation counseling programs, posting positions to the RSA PIMS recruitment site and the CRCC recruitment site. Additionally, positions are posted to LinkedIn and also shared with networks including local partners to include Job Service and professional associations.

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

- i. Particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and
- ii. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.

Montana VRBS utilizes a Comprehensive System of Personnel Development (CSPD) to monitor and track staff development. This is maintained by the Deputy Administrator and is comprised of all staff who are working toward a master’s degree in rehabilitation counseling, vision rehabilitation therapy and orientation and mobility. The CSPD tracking spreadsheet includes information for all personnel in the following respective CSPD statuses: 1)those who hold a master’s degree and CRC or other certification,

2) those who are in training assignments and working toward a master's degree and certification, 3) those who have been newly hired and are preparing for graduate studies.

The Deputy Administrator tracks CSPD progress through this spreadsheet and updates when a new staff member is hired, signs a CSPD agreement, enters graduate school, earns a master's degree, and obtains a credential (e.g., CRC). This information is regularly shared with the program administrator to assist in staffing decisions.

Additionally, all staff participate in ongoing staff development and training. All new employees undergo VRBS Foundations Training to establish an understanding of the values that inform the mission of our profession and best practices to promote efficiency and excellence in service of our consumers. Staff also have access to virtual training that has been customized to Montana through collaboration with the Interwork Institute at San Diego State and emphasize points of staff development important to VRBS including informed choice, ethical decision making and comprehensive assessment.

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

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

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

Montana VRBS requires professional counseling and supervisory staff to have a master's degree in Rehabilitation Counseling. The Certified Rehabilitation Counselor credential is preferred. VRBS incentivizes this credential by providing a pay raise to those who earn their CRC credential. Additionally, in order to ensure that staff are continuing to meet the standards of adequate training, VRBS provides financial assistance for continuing education to maintain certification and provides staff development opportunities both internally through ongoing training and externally promotes opportunities through partners including several vocational rehabilitation training institutes such as The Centre for Rehabilitation Counseling Research at George Washington University and UA Currents. VRBS also has strong relationships with several national technical assistance centers (VR-QMTAC and OIB TAC; Rural Institute on Disability) that produce training focused on best practices and emerging knowledge in the field.

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

Montana VRBS utilizes several methods of communication to ensure that applicants or consumers are able to effectively communicate with staff. When a person speaks a language other than English, staff have access to Language Link interpretive services which allows for communication. VRBS also hires sign language interpreters to assist applicants and eligible individuals who are Deaf or Hard of Hearing to communicate and engage in the vocational rehabilitation process. VRBS also has dedicated staff who work specifically with these consumers. Applicants and eligible individuals are also able to communicate with staff through a variety of methods including meeting in person, email and text communication and phone calls and can access teletype communication. Alternate formats and other accommodations are also routinely used by VRBS to ensure effective communication and staff consult with the consumer to determine their preferred method of communication.

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

VRBS is committed to coordinating the agency's comprehensive system of personnel development with the personnel development activities of the state education agency whenever possible. Training and education will be identified for staff regarding service provision, coordination and best practices in serving students with disabilities. Training opportunities offered by VRBS which are relevant to both educators and vocational rehabilitation professionals will be opened to school staff for participation when applicable.

A Pre-ETS Specialist is assigned to actively participate on the Montana Special Education Advisory Panel, which promotes interagency cooperative planning, information sharing, and the collaborative use of resources at the state and local level. This panel works to ensure that training needs are adequately identified and then addressed through shared training opportunities.

VRBS staff and OPI staff routinely give transition presentations at events such as the Montana Youth Transitions Conference. This event brings together students with disabilities, parents, public educators, VR staff and other programs. The Office of Public Instruction (OPI), VRBS and other agencies are currently planning joint transition panel presentations at the OPI Summer Institute and Montana Council for Exceptional Children Conference.

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

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

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

VRBS created a Pre-ETS Bureau in 2019 which included 7 Pre-ETS Specialists, 1 Data Technician and the Bureau Chief. In June of 2022, a Pre-ETS Specialist position was added for the Bozeman area, one of Montana's fastest growing communities. The Pre-ETS Specialists routinely meet with their assigned high schools sharing resources and working together to provide Pre-ETS to students with disabilities. There is also a VRBS Vocational Rehabilitation Counselor assigned to each high school in Montana to ensure a smooth transition into adult services.

Each year, VRBS reaches out to all accredited high schools in Montana to give them the opportunity to collaborate in providing Pre-ETS to students with disabilities. Every accredited high school has the opportunity to enter into a contract and receive funding from VRBS to provide Pre-ETS. School districts develop scope of work plans to describe how they will provide the five required components of Pre-ETS and receive funding quarterly based on the number of Pre-ETS services provided to students with disabilities who request the services. The school districts are required to provide VRBS with the documentation of Pre-ETS services they are providing to students with disabilities. VRBS offers this opportunity to all schools including those located in institutional settings, the juvenile justice system and the Department of Military Affairs.

Montana has been participating in a national grant with several other states and Utah State University to develop a Transition Readiness Toolkit (TRT). The TRT survey instruments will provide a way to measure the effectiveness of Pre-ETS services. Montana is piloting the TRT this year and will roll it out to schools and providers in the future.

A Pre-ETS Bureau staff member is assigned to actively participate on the Montana Special Education Advisory Panel, which promotes interagency cooperative planning, information sharing, and the collaborative use of resources at the state and local level. This Panel works to ensure that training needs are adequately identified and then addressed through shared training opportunities. Additionally, the Pre-ETS Bureau Chief has been asked to present at the Special Education Director's meetings during their Spring meeting for the past few years.

Working through the National Technical Assistance Center on Transition: the Collaborative (NTACT:C) Montana has pulled together a Capacity Building Institute (CBI) interagency team to focus on strategic planning around transition. NTACT:C is a jointly funded RSA and OSEP technical assistance center focused on collaboration between special education and vocational rehabilitation and other stakeholders. Some of the CBI focus areas include student-focused planning, student development, family engagement, program structures and interagency collaboration. Working together, this CBI team is developing panel presentations on transition for the Montana Council on Exceptional Children and the Office of Public Instruction Summer Institute. In a recent meeting with the new State Special Education Director, we discussed how to work together to provide cross training to our respective staff members to ensure that they were aware of the content of the MOU and available transition resources.

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

The State Special Education Director position in the Office of Public Instruction (OPI) was vacant for an extended period of time so VRBS was unable to move forward in updating the formal interagency agreement with the state educational agency. The position was recently filled, and VRBS has already met with the new Director and OPI staff to work collaboratively on updating the Memorandum of Understanding (MOU) which expired in 2022.

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

The following is from the most recent MOU with OPI that details the technical assistance responsibilities of each agency. It includes suggested revisions for the current MOU that is in development.

- VRBS will provide consultation and technical assistance to assist LEAs in planning for the transition of students with disabilities from school to post-school activities including Pre-ETS.
- Pre-ETS Specialists will consult with and provide technical assistance to LEA administrators, school counselors, transition specialists, families, individuals, public and private stakeholders, community agencies, and teachers including those who work in special education, general education, career technical fields, etc.
- VRBS will provide consultation and technical assistance through informational sessions, face to face meetings, phone calls, video conferencing, virtual meetings, webinars, brochures, rack cards, and shared information on the agency website.
- LEA and VRBS staff will be encouraged to collaborate through their Regional Youth Transition Committees and Comprehensive System of Personnel Development (CSPD) Meetings in planning and implementing efforts that are focused on the transition of students with disabilities.
- Pre-ETS Specialist will provide consultation and technical assistance during their routine visits to the LEAs, during IEP meetings, at conferences, at training activities, and at other times as requested by OPI or LEAs.
- VRBS will disseminate information about transition services, Pre-ETS, processes for outreach, VR eligibility, scope of VR services, effective practices, training opportunities, funding strategies, assistive technology, and other relevant topics.
- LEA and VRBS staff will inform each other about policies or procedural changes that may impact transition services.

In addition, VRBS has an MOU with Office of the Commissioner of Higher Education (OCHE). The purpose of this MOU is to develop and adopt principles which will guide the planning and delivery of support services to individuals with disabilities who are mutual clients of VRBS and students enrolled in the Montana University System (MUS). This MOU has provisions which include:

1. VRBS and the units of the MUS maintain different requirements for determination of eligibility, documentation of disability, and the provision of services or accommodations. This MOU does not require either VRBS or MUS to alter its policies for providing services or supports, and this MOU is not to be used as a basis for determining eligibility for VRBS or MUS services.
 2. The units of the MUS through the guidance of the OCHE are required to provide services and accommodations to VRBS' clients to the same extent as they are provided to other students with disabilities, in accordance with Montana state law, the Americans with Disabilities Act of 1990 (PL 101-336) and Section 504 of the Rehabilitation Act (PL 93-112, as amended).
 3. VRBS is not prohibited in this agreement from contracting with units of the MUS to provide services or support for VRBS' clients beyond those required to assure equal access to equal educational opportunities.
 4. The MOU will provide both parties with the opportunity to enhance communication and the exchange of information regarding services offered by VRBS and the various campuses of the MUS.
 5. VRBS and the units of the MUS will work together to enhance cross-referrals of individuals with disabilities, as appropriate to each individual's needs. Personal information about the individual will not be shared without an appropriate release of information.
 6. The MUS will not require students who have a disability to apply for VRBS before providing services or support. For students who have applied for VRBS, the MUS will not deny or delay the provision of services or support while VRBS is in the process of determining eligibility for services.
 7. VRBS are provided pursuant to an individualized plan for employment (IPE) which is developed jointly by the rehabilitation counselor and the eligible individual. In those situations where referral has been made to campus disability support services, the appropriate disability services staff may also be involved in helping to develop the IPE.
 8. The VRBS' rehabilitation counselor and the MUS campus disability support services staff will respect the individual's right and responsibility to fully participate in all decisions regarding his or her vocational future. The IPE shall be developed and implemented in a manner that allows the individual an opportunity to exercise informed choice in selecting an employment outcome, the specific vocational rehabilitation services that are to be provided, the entity that will provide those services, and the methods that will be used to procure the vocational rehabilitation services.
- (B) [Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs \(IEPs\) under section 614\(d\) of the Individuals with Disabilities Education Act;](#)

The following is from the most recent MOU with OPI that details the transition planning responsibilities of each agency. It includes suggested revisions for the current MOU that is in development.

- VRBS and OPI agree to work collaboratively to facilitate and coordinate the smooth transition of students with disabilities from school to post-school activities, including the receipt of Pre-ETS, transition services, and other vocational rehabilitation services.
- Pursuant to 34 CFR 300.321(b)(3), to the extent appropriate, with consent of the parent or adult student, VRBS will be invited to participate in IEP development meetings for shared students with disabilities, depending on availability. VRBS may participate in person or through use of

alternative means such as video conferencing or other methods. When VRBS is unable to attend the IEP meeting, LEA and VRBS will communicate regarding IEP goals and needed transition services after the IEP meeting.

- VRBS will provide assistance in transition planning for students with disabilities to facilitate development and completion of their IEPs. VRBS can provide information, technical assistance, case consultation and information/referral as needed for eligible or potentially eligible students.
 - VRBS will coordinate with non-educational agencies such as juvenile justice, treatment facilities or foster care programs for referrals of out of school youth with disabilities. These youth will be encouraged to participate in transition services and programs to improve future employment opportunities.
 - VRBS will inform LEA teachers of community events such as job fairs, transition fairs, and career days to introduce students with disabilities to possible career goals.
 - LEA and VR staff will provide guidance and counseling to students with disabilities regarding post-school options such as employment, post-secondary education, vocational training, and adult education.
 - VRBS shall determine the eligibility of all students with disabilities who have applied for VRBS services within 60 days from the date of application.
 - VRBS and LEAs will collaborate on the provision of ongoing joint staff training on topics such as development and implementation of IEP's, Pre-ETS, accommodations under Section 504 and limitations on youth entering employment paying sub-minimum wage.
 - VRBS and LEAs will work together to facilitate the local level engagement of potential employers to provide job shadows, paid and unpaid work-based learning opportunities, etc. for students with disabilities.
 - VRBS, in collaboration with OPI/LEAs, will provide or arrange for the provision of Pre-ETS to all students with disabilities identified as requiring these services.
- (C) [The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services;](#)

The following is from the most recent MOU with OPI that details the roles and responsibilities of each agency. It includes suggested revisions for the current MOU that is in development.

Joint Responsibilities of OPI and VRBS:

- OPI and VRBS shall jointly sponsor training for their respective staff members and LEA personnel. Training shall focus on existing and new State or Federal requirements or initiatives that impact the provision of services by both entities concerning education of individuals with

disabilities, their transition from school to employment, vocational rehabilitation services, assistive technology, and the substance of this MOU.

- OPI and VRBS shall ensure that timely notice of training is provided to each other and to the LEAs as appropriate.
- OPI and VRBS shall each designate a single point of contact who will serve as the lead person to coordinate joint training programs, communicate with the respective programs and for collaboration of pre-employment transition services and transition activities.
- OPI staff and VRBS will be available to give joint presentations on transition services at conferences such as MYTransitions.

Responsibilities of OPI:

- OPI will facilitate and coordinate the smooth transition of students with disabilities from school to post-school employment-related activities, including working with VRBS to ensure the receipt of appropriate Pre-ETS, transition services, and competitive, integrated employment.
- OPI will host an Annual Joint Stakeholders meeting to network, collaborate, communicate and discuss issues regarding services for students and youth with disabilities.
- OPI will encourage LEAs to participate in local multi-agency Transition Team meetings.
- OPI will request that LEAs identify points of contact to work with the VRBS liaison assigned to each school.
- OPI will disseminate information regarding relevant training and workshops to VRBS including courses available through the Teacher Learning Hub.
- OPI will encourage LEAs to reach out to parents and students to make them aware of coordinated transition services and opportunities. Examples include the Montana Youth Leadership Forum (MYLF), MSUB Movin' On campus program, Rural On the Right Track Pre-ETS Camps, Montana Youth Transitions Conference, and STARBASE STEM Careers Camps.
- OPI will encourage LEAs to provide relevant resource materials to stakeholders, parents, families, guardians and students relating to the provision of Pre-ETS and other transition services.
- The OPI Data Accountability Specialist will provide the most recent Special Education State Child Count data upon request. A data driven estimate of the number of students receiving 504 accommodations in the state will also be provided upon request. The OPI Annual Performance Report which includes exit data information for students with disabilities will be shared with VRBS.

- **OPI will require LEAs who work with students with disabilities seeking subminimum wage employment to send documentation of transition services/Pre-ETS provided to VRBS within 30 days of service delivery.**
- **For students with disabilities seeking subminimum wage employment, OPI will require the LEA to provide documentation to VRBS of transition and Pre-ETS services they provided. Documentation will be provided to VRBS within 30 days of service delivery.**
- **For students with disabilities seeking subminimum wage employment, OPI will require the LEA to provide documentation to VRBS of the student's refusal to participate in transition services when this situation occurs.**
- **LEAs will be offered the opportunity to enter into a contract with VRBS to provide Pre-ETS to students with disabilities. LEAs will be provided funding based on the classification size of the school and the number of Pre-ETS Services provided each quarter according to the contract fee schedule. LEAs providing Pre-ETS through a VRBS contract will be responsible for securing parent/guardian signatures on student Pre-ETS requests granting permission for VRBS and LEAs to exchange information.**
- **OPI will teach LEAs to inform VRBS of students with disabilities who may be in need of transition or pre-employment services through VRBS. OPI will encourage LEAs to inform VRBS as soon as students with disabilities are identified as having a disability regardless of whether the student intends to apply for VRBS services.**
- **OPI shall encourage LEAs to inform VRBS of students with disabilities who are disconnected or in danger of dropping out.**
- **OPI shall encourage LEA staff to share transcripts or report cards and verification of high school graduation with VRBS when requested. (This information will only be requested for students who are receiving services under an IPE through VRBS).**
- **OPI shall provide technical assistance to LEAs concerning the provision of FAPE including the responsibility to provide assistive technology to assist with the education of students approaching transition to independent living and employment as appropriate.**
- **OPI shall assist LEAs with coordination of vocationally related services with VRBS for eligible students. Coordination should commence in the early stages of transition. Vocationally related service coordination and corresponding agency responsibilities should be identified in the IEP and included on the student's IPE when appropriate.**
- **OPI shall encourage LEAs to inform VRBS of IEP meetings in advance to allow sufficient time for VRBS to participate, subject to parental approval. Development of vocational goals and objectives shall occur in collaboration with the IEP Team.**

- **OPI will identify needed Pre-ETS and transition services, to include as appropriate, a statement of interagency responsibilities or linkages with other entities (e.g. mental health agencies, Social Security Administration) beginning at age 14. OPI will encourage LEAs to work closely with VRBS to ensure that interested students with disabilities are identified and referred for Pre-ETS at an early age.**
- **LEAs are responsible for providing and paying for any transition service that is considered special education or related services necessary for ensuring a FAPE as required under IDEA. Special Education and related services similar to VR Services may include:**
 - **Interpreting services;**
 - **Psychological services;**
 - **Physical and occupational therapy;**
 - **Early identification and assessment of disabilities in children;**
 - **Counseling services, including rehabilitation counseling;**
 - **Orientation and mobility services;**
 - **Medical services for diagnostic or evaluation purposes;**
 - **Work experiences; and**
 - **Job coaching and support services.**

Responsibilities of VRBS:

- **VRBS Counselors and Pre-ETS Specialists will participate in the evaluation process of students who have applied for VRBS and subject to parental consent, in the development of IEPs for students with disabilities**
- **VRBS shall encourage former students who are still eligible for IDEA services to enroll again in school for further study and training to enhance their opportunities for employment. Such former students shall also be eligible for vocational rehabilitation services customarily provided by VRBS to adults over the age of 21.**
- **VRBS will provide assistive technology services relevant to functions outside those assistive technology services required to access the educational program.**
- **After the eligible individual exits the LEA, VRBS will continue to provide vocational services, i.e., vocational assessment, career exploration, job shadowing, vocational guidance and counseling, and other required services outlined in the IPE.**
- **VRBS will accept referral of students with disabilities during the transition planning process for the provision of Pre-ETS. Students are not required to apply for VRBS services to receive Pre-ETS.**
- **VRBS will provide consultation with LEA district staff on transition planning to prepare a student to move from school to work or post-secondary education in accordance with the student's unique needs as determined through the IEP process and provision of Pre-ETS.**

- **An IPE which is consistent with and which takes into consideration the eligible student's IEP, their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice will be developed within 90 days of the VRBS eligibility determination.**
- **Students with disabilities who apply for VRBS, are determined eligible and complete an IPE may receive services such as evaluation, career guidance and counseling, medical or psychological services, training, job development and placement services, rehabilitation technology or other services to help them enter and maintain employment.**
- **VRBS will provide or arrange for the provision of services required by the IPE goal, when the student has been determined eligible for VR and the services are specific to his/her employment outcome and are not services customarily provided to the student by the LEA under the IDEA.**
- **VRBS Staff will provide consultation to assist in the identification of eligible and potentially eligible students with disabilities and assessment of their individual needs for Pre-ETS.**
- **VRBS is responsible for providing information to parents and/or guardians, students and teachers regarding VR eligibility, vocational assessment for employment and postsecondary planning and the CAP.**
- **VRBS will offer students who wish to apply for VRBS the opportunity to complete and sign a VRBS application form. The student will provide access to available information necessary to determine eligibility and priority for services. Eligibility for VRBS will be determined within 60 days. Students who are only interested in Pre-ETS and do not wish to apply for VRBS services will be given the opportunity to complete and sign the Student Request Form. Verification of disability and student status will be included on the Student Request Form or provided by the student. For students under 18 years of age, the application and Request Form will be signed by a parent or guardian.**
- **VRBS will obtain written consent for the release of confidential information, pursuant to VRBS policy and procedures, federal and state laws and regulations regarding confidentiality.**
- **VRBS will share information regarding policies, procedures, guidelines, programs and services for the purpose of improving the access to, and availability of, transition services.**
- **VRBS will provide brochures and materials about the VR process and services to the LEAs for distribution to students, parents, legal guardians, teachers and others. VRBS staff will also be available to provide information on changes in the law or VRBS policy regarding transition services.**
- **VRBS will promote employer participation in providing opportunities for work-based learning for students with disabilities.**

VRBS is responsible for coordinating the provision of Pre-ETS.

- **VRBS will inform OPI staff, teachers, students, legal guardians and parents of the mandates found in the Rehabilitation Act, which require the student with a disability exiting the LEA to be referred to VRBS prior to entering subminimum wage employment.**
 - **For a student with disabilities seeking subminimum wage employment, VRBS will provide the individual with documentation of the required activities within the timelines specified under 34 CFR 397.**
 - **For students with disabilities seeking subminimum wage employment who refuse to participate in transition services, VRBS will provide documentation to the student of their refusal to participate within the timelines specified under 34 CFR 397.**
 - **VRBS's Pre-ETS Bureau Chief shall coordinate with OPI and LEAs to develop and promote a seamless transition system. The Pre-ETS Bureau Chief will take the lead in working with OPI and LEAs to ensure that students with disabilities receive Pre-ETS to prepare them for life after high school.**
 - **The Pre-ETS Bureau Chief and Pre-ETS Specialists will meet with staff and other interested parties to develop Pre-ETS contracts, initiate joint training, share best practices and facilitate communication between the parties. The Pre-ETS Bureau Chief will be the contact person for any questions regarding the provision of services under the Pre-ETS contracts.**
- (D) **Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals;**

The following is from the most recent MOU with OPI that details the procedures for outreach to and identification of students with disabilities needing transition services. It includes suggested revisions for the current MOU that is in development.

- **VRBS assigns a Vocational Rehabilitation Counselor and Pre-ETS Specialist to each public high school in the state. Counselors shall inform students, families, special and regular education teachers, school administrators, advocacy groups, and others about VRBS.**
- **Counselors and Pre-ETS Specialist will give presentations and distribute both print and electronic materials that explain transition and pre-employment services along with traditional vocational rehabilitation services. The information provided will include a description of the purpose of VRBS, eligibility requirements, application procedures and scope of services that may be provided to eligible and potentially eligible individuals.**

- **Students who wish to apply for VRBS services will be offered the opportunity to complete and sign a VRBS application form. The student will provide access to available information necessary to determine eligibility and priority for services. Eligibility for VRBS will be determined within 60 days. Students who are only interested in Pre-ETS and do not wish to apply for VRBS services will complete and sign the Student Request Form. Verification of disability and student status will be included on the Student Request Form or provided by the student. For students under 18 years of age, the application and Request Form will be signed by a parent or guardian.**
- **OPI shall assist the LEAs with methods and procedures for outreach and identification of students and families who may benefit from VRBS. Assistance with the methods and procedures should include actions needed to engage those who are not aware of VRBS, including how the LEAs identify and work with transition aged students who may be in alternative high schools, residential facilities, or are incarcerated.**
- **VRBS will reach out to eligible and potentially eligible students with disabilities who are in need of transition services and Pre-ETS as early as possible through outreach activities such as information sharing at IEP's, transition planning meetings, career fairs, orientations, back to school nights, work with parent support groups, and other activities.**
- **VRBS Counselors and Pre-ETS Specialists will work with LEA staff to identify and reach out to all students with disabilities to include those served in special education, those receiving an accommodation under Section 504 of the Rehabilitation Act of 1973, and other students and youth with disabilities. Outreach activities will include students with disabilities receiving school psychological, health, nursing or social work services, and students with disabilities enrolled in an educational program and not in special education. VRBS will also reach out to youth with disabilities who have dropped out of an education program or students who are at risk of dropping out of high school.**
- **VRBS will inform students with disabilities about the availability of and opportunities to exercise informed choice; including the availability of support services for individuals with the most significant disabilities who require assistance in exercising informed choice throughout the vocational rehabilitation process;**
- **The designated Pre-ETS Specialist will work closely with each LEA to coordinate, identify students and implement Pre-ETS. VRBS will provide the necessary forms and templates for required documentation including Student Request Forms for Pre-ETS.**
- **VRBS will work with the LEA to ensure collaboration between transition services provided under IDEA and the Pre-ETS provided by VRBS through direct provision of services or through contracts with LEAs and other providers.**
- **OPI will provide written guidance to LEAs that Pre-ETS funds can only be used to provide the required Pre-ETS to students with disabilities and that Pre-ETS funds are for additional services**

to students with disabilities, not to pay for the services required under the IDEA. OPI will continue to work with LEAs to ensure that they follow this guidance.

- Not all eligible or potentially eligible students with disabilities will require all five core Pre-ETS services, however, they should receive all requested services, as determined through informed choice and consultation with each student based on their strengths and needs and consistent with their IEP, when applicable.
- (E) Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 regarding students and youth with disabilities who are seeking subminimum wage employment;

The following is from the most recent MOU with OPI that details the coordination and documentation requirements for students and youth with disabilities who are seeking subminimum wage employment. It includes suggested revisions for the current MOU that is in development.

Coordination and Documentation for Subminimum Wage Employment (Section 511(d) of the Rehabilitation Act of 1973):

Under section 511 of Rehabilitation Act of 1973, no entity, including businesses which hold a special wage certificate as described in Section 14(c) of the Fair Labor Standards Act of 1958, may compensate any individual with disabilities who is 24 years of age or younger at subminimum wage, unless they have met specific requirements including participation in Transition or Pre-ETS, application for VRBS and receipt of career counseling, information and referral services. The purpose of Section 511 is to ensure that individuals with disabilities have access to information and services that will enable them to achieve competitive integrated employment.

Responsibilities of OPI and LEAS under Section 511(d) of the Rehabilitation Act of 1973

- OPI will provide guidance to LEAs that when a student with a disability is known to be seeking subminimum wage employment, the LEA will share the specific requirements with the student, parents, guardians and teachers as soon as possible. This information should also be shared with participants during IEP meetings for transition planning.
- The student will be referred to VRBS and the Vocational Rehabilitation Counselor will be informed by the LEA that the student is known to be seeking subminimum wage.
- Pursuant to 34 CFR §397.30(b)(1), the LEA will provide VRBS with documentation that contains at a minimum, the: (i) Youth's name; (ii) Description of the transition services under IDEA and Pre-ETS completed; (iii) Name of the provider of the required service or activity; (iv) Date required service or activity completed; (v) Signature of LEA personnel documenting completion of the required service or activity; (vi) Date of signature and (vii) Signature of LEA personnel transmitting documentation to VRBS; and (viii) Date and method (e.g., hand-delivered, faxed, mailed, e-mailed, etc.) by which document was transmitted to VRBS. The LEA Personnel must provide the documentation to VRBS as soon as possible upon completion of the required actions, but no later than 30 calendar days after completion of the required action or 60 days of additional time is needed due to extenuating circumstances. 34 CFR § 397.30(b)(2)(i). Extenuating circumstances should be interpreted narrowly to include unexpected lengthy absence due to illness or family emergency of LEA personnel necessary to produce the documentation due to

illness or family emergency or a natural disaster. 34 CFR 397.30(b)(2)(i)(B). When the LEA personnel transmits the final determination or activity completed to VRBS, as required by 34 CFR §397.20 and 397.30(a), the LEA personnel must provide a cover sheet that itemizes the documentation that has been provided to VRBS regarding that student.

- When a student refuses to participate in transition services, the LEA will provide VRBS with documentation of the refusal to participate. Pursuant to 34 CFR§397.30(b)(2) such documentation must at a minimum contain at a minimum the (i) Youth's name; (ii) Description of the refusal and the reason for such refusal; (iii) Signature of the youth or, as applicable, the youth's parent or guardian; (iv) Signature of the LEA personnel documenting the youth's refusal; (v) Date of signatures; (vi) Signature of LEA personnel transmitting documentation of the refusal to the designated State unit; and (vii) Date and method (e.g., hand-delivered, faxed, mailed, emailed, etc.) by which documentation was transmitted to VRBS. The LEA must provide this documentation to VRBS within 5 calendar days of the youth's refusal to participate. 34 CFR § 397.30(b)(2)(ii).
- The LEA must retain a copy of all documentation provided to VRBS.
- The transmittal of all documentation from the LEA to VRBS will be consistent with the confidentiality requirements of the Family Education Rights and Privacy Act (FERPA) (20 USC 11232g(b) and 34 CFR 99.30 and 99.31) and IDEA (20 USC 1417(c) and 34 CFR 300.622).

Responsibilities of VRBS under Section 511(d) of the Rehabilitation Act of 1973

- Pursuant to 34 CFR § 397.20(a) documentation of the activities listed below must be provided by VRBS to the student in an accessible format, as soon as possible after completion of the required action, but no later than 45 calendar days after determination or completion of the required activity or service or within 90 calendar days if additional time is needed due to extenuating circumstances. 34 CFR §397.10(c)(2). Extenuating circumstances should be interpreted narrowly such as unexpected lengthy absence of VRBS personnel necessary for the production of the documentation due to illness, family emergency or natural disaster. 34 CFR § 397.10(c)(2)(B).
 - The individual has received transition services under (IDEA) or Pre-ETS through VRBS or the LEA.
 - The individual has applied for VR services and been found ineligible; or applied and was found eligible for VR services and;
1. Had an IPE developed
 2. Had been working toward an employment outcome with appropriate supports and services for a reasonable period of time (determined on an individual basis, but up to 24 months for an individual with a supported employment outcome identified in their IPE) without success; and
 3. The individual's case is closed; and
 4. Has been provided career counseling, and information and referrals to Federal and State programs and other resources in the individual's geographic area that offer employment-related services and supports designed to enable the individual to explore, discover, experience, and attain competitive integrated employment.

- If a youth with a disability or, as applicable, the youth's parent or guardian, refuses, through informed choice, to participate in the activities required by section 511 or the implementing regulations in part 34 CFR part 397, documentation must, at a minimum:
- Contain the information in 34 CFR § 397.10(a)(2); and
- The documentation of the youth's refusal must be provided to them in an accessible format within 10 calendar days of their refusal to participate 34 CFR §397.10(c)(2)(i).
- The youth will be informed that their right of refusal to participate in the required activities outlined in this section will result in their inability to engage in employment at a sub minimum wage.

VRBS contracts with LEAs to provide Pre-ETS to students with disabilities. The coordination and documentation requirements for students and youth with disabilities who are seeking subminimum wage employment is included in the current Pre-ETS School Contract as outlined below:

- The Contractor must provide additional documentation for students with disabilities who are known to be seeking subminimum wage employment. The documentation must at a minimum, contain the: (i) Youth's name; (ii) Description of the transition services under the Individuals with Disabilities Education Act (IDEA) and Pre-Employment Transition Services completed; (iii) Name of the provider of the required service or activity; (iv) Date required service or activity completed; v) Signature of school personnel documenting completion of the required service or activity; (vi) Date of signature described in paragraph and (vii) Signature of school personnel transmitting documentation to Vocational Rehabilitation and Blind Services (VRBS); and (viii) Date and method (e.g., hand-delivered, faxed, mailed, e-mailed, etc.) by which document was transmitted to the designated State unit. The school personnel must transmit the documentation required of this section to VRBS as soon as possible upon the completion of the required services, but no later than 30 calendar days after the completion of the service; or 60 calendar days, if additional time is necessary due to extenuating circumstances
- In the event a student with a disability or, as applicable, the youth's parent or guardian, refuses to participate in the Pre-Employment Transition Services, documentation must, at a minimum, contain the (i) Youth's name; (ii) Description of the refusal and the reason for such refusal; (iii) Signature of the youth or, as applicable, the youth's parent or guardian; (iv) Signature of the school personnel documenting the youth's refusal; (v) Date of signatures; (vi) Signature of school personnel transmitting documentation of the refusal to the designated State unit; and (vii) Date and method (e.g., hand-delivered, faxed, mailed, e-mailed, etc.) by which documentation was transmitted to VRBS. Documentation required when a youth has refused to participate in Pre-Employment Transition Services must be provided to VRBS within 5 calendar days of the youth's refusal to participate.
- When the school personnel transmit the last documentation to VRBS regarding the services provided to the student, the school personnel must provide a cover sheet that itemizes the documentation that has been provided to VRBS regarding that student. The educational agency must retain a copy of all documentation provided to VRBS.

and

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

The following is from the most recent MOU with OPI that includes the assurance that neither the SEA nor the LEA will enter into a contract with an entity for the purpose of operating a program under which youth with a disability are engaged in work compensated at a subminimum wage.

Responsibilities of OPI and LEAS under Section 511(d) of the Rehabilitation Act of 1973

- OPI or LEAs may not enter into a contract or other arrangement with an entity for the purpose of operating a program for an individual age 24 or younger under which work is compensated at subminimum wage.

VRBS contracts with LEAs to provide Pre-ETS to students with disabilities. The assurance that the LEA will not enter into a contract with an entity for the purpose of operating a program under which youth with a disability are engaged in work compensated at a subminimum wage is included in the current Pre-ETS School Contract as outlined below:

- The Contractor is prohibited from entering into a contract or other arrangement with any entity who is a 14(c) certificate holder as defined by Section 14(c) of the Fair Labor Standards Act under the U.S. Department of Labor for purposes of operating a program in which students with disabilities are employed at subminimum wage.
- A “14(c) Certificate Holder” is any employer which has been authorized under Section 14(c) of the Fair Labor Standards Act, after receiving a certificate from the Wage and Hour Division, to pay Subminimum wages - wages less than the Federal minimum wage - to workers who have disabilities for the work being performed.

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

VRBS provides multiple services to businesses across Montana. These services include Recruitment, Training, Retention, and Incentives.

Recruitment/Acquisition Services include accommodation services for employees, ADA Training, consultation and evaluation for employees; identify potential employees using multiple methods (eSkill that is employer specific, etc); assisting with basic skill preparation for candidates through the use of WIOA partners (Adult Education, Job Service, etc); Customized Training- train clients to meet industry standards through a variety of training situations; On-The-Job training; On-The-Job Evaluations;

Apprenticeship; job description/essential functions of job; employee recruitment; Disability related policies/ handbook; Disability awareness/sensitivity training/ consultation. Other acquisition services include Work Opportunity Tax Credits, Federal bonding program, and Section 503 letters.

Disability Management Services involve providing accommodation/ergonomic training/consultation and referrals, ADA training/consultation and referral, ADA Accessibility guideline referral, Disability Awareness/Sensitivity Training, Job/Task Analysis, and Windmills.

Retention Services involve providing accommodation services for retention, ADA Training, Consultation, Job coaching for Retention, Other Retention Services, Vocational Counseling for Retention, and EOP (Emergency Operating Plan) for Retention.

All of these services are available to employers who hire VRBS clients and provide work-based learning activities and experiences for Pre-ETS students and adult participants.

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

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

Disability Employment and Transitions Division (DETD), which houses Montana’s Vocational Rehabilitation and Blind Services (VRBS) program, acted as the Lead Agency contracting with MonTECH (the Implementing Agency) housed at the University of Montana (UM) to provide the required services of the Assistive Technology(AT) Act of 1998 through September 30, 2022. Following multiple conversations between MonTECH and DETD leadership regarding the benefits and implications of shifting the Lead Agency from the State of Montana to MonTECH, DETD sought approval from the Governor to pursue transfer of Lead Agency role to MonTECH. It was determined that redesignating UM as the Lead Agency for the AT Grant would improve efficiency in managing MonTECH’s budget and other administrative tasks. The existing contractual, financial management, and administrative processes were reviewed and it was agreed the change was in the best interest of the stakeholders of the AT program, would be the most effective way to simplify processes, and would have minimal impact to the well-established working relationship between DETD and MonTECH. On June 13, 2022, Montana’s Governor sent a letter to the Administration for Community Living formally requesting the transfer. On July 29, 2022, a response letter from ACL was received granting the transfer of Lead Agency to MonTECH.

Since the transfer has taken place, no formal memorandum of understanding or cooperative agreement has been developed between the two agencies. In the coming years, VRBS will pursue an MOU with MonTECH. Despite no formal agreements being in place, VRBS views MonTECH as an integral partner and stakeholder and the programs have continued to cooperate through:

- Having a VRBS representative on the MonTECH advisory board,**

- **Having a MonTECH representative on the VRBS Assistive Technology Team.**
- **Training VRBS counselors in available assistive technology and how to access consumer evaluations related to assistive technology.**

(2) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

Montana has attended the Agribility Conferences. Montana is actively involved in discussions with partners and stakeholders on the possibility of creating an Agribility program in Montana.

(3) Non-educational agencies serving out-of-school youth;

VRBS continually seeks opportunities for interagency cooperation with non-educational agencies serving out-of-school youth. While VRBS works closely with statewide workforce development system agencies to serve out-of-school youth, there are non-WIOA agency partnerships as well. The monthly VRBS Youth Services Team meetings routinely include presentations from different agencies that provide services to youth including out-of-school youth. VRBS is also partnering with Child Protective Services (CPS) and Chafee providers to reach foster care youth with disabilities. Together, VRBS and CFS are striving to achieve the goal of a 50% increase in the number of foster youths aged 14 and older participating in vocational rehabilitation services.

(4) State use contracting programs;

State agencies may purchase supplies and services from sheltered workshops or work activity centers. Such purchases are exempt from competitive bidding laws and rules. The Montana Department of Administration maintains a list of certified sheltered workshops or work activity centers located in the state. The list includes the supplies and services provided by each sheltered workshop or work activity center. (Administrative Rules of Montana 2.5.607).

VRBS does not currently make purchases related to this agreement.

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

In late 2022, Montana VRBS, in collaboration with Montana’s mental health block grant program, applied for the Office of Disability Employment Policy’s Advancing State Policy Integration for Recovery and Employment (ASPIRE) project. In early 2023, Montana was one of seven states selected to receive tailored, targeted, and intensive technical assistance for integrating state policy, program and funding infrastructures to expand the evidence-based Individual Placement and Support (IPS) model to address the supported employment needs of individuals with serious mental health conditions. Montana’s assigned ASPIRE Subject Matter Experts (SMEs) encouraged the Montana ASPIRE team to reach out to and partner with our State Medicaid leadership. The team connected with and enrolled Isaac Coy, the Treatment Bureau Chief, into the Montana ASPIRE team and collaboratively developed the following MOU between VRBS, Mental Health Block Grant (Prevention Bureau), and Medicaid (Treatment Bureau):

Section 1. Parties and Purpose of Agreement:

- 1.1 The Memorandum of Understanding (“MOU”) is entered between the Department of Public Health and Human Services, Disability Employment and Transitions Division (DET), Vocational Rehabilitation and Blind Services (“VRBS”) and Department of Public Health and Human Services, Behavioral Health and Developmental Disabilities Division (BHDD), Prevention Bureau (“BHDD-Prevention”) and Department of Public Health and Human Services, Behavioral Health and Developmental Disabilities Division (BHDD), Treatment Bureau (“BHDD-Treatment”)
- 1.2 This agreement is predicated on the beliefs that employment contributes to better overall health and well-being and is a critical mental health intervention for individuals with Serious Mental Illnesses (“SMI”) Individual Placement and Supports (“IPS”) is an evidence Based Practice demonstrating improved employment outcomes for individuals with SMI and must be offered in more locations and by more Community Mental Health Centers (“CMHC”) across Montana to improve access to competitive integrated employment for Montanans with SMI.
- 1.3 The purposes of this MOU are to:
- 1.3.1 Describe financial obligations and clarify roles and responsibilities of VRBS, BHDD-Prevention, and BHDD-Treatment.
 - 1.3.2 Share efforts in order to improve competitive integrated employment outcomes for individuals with SMI and enrolled in Individual Placement and Supports (“IPS”) programs.
 - 1.3.3 Outline a collaborative framework of coordinated, cost efficient employment services for individuals with SMI.
 - 1.3.4 Ensure non-duplication in the coordination of services and resources to support provision of IPS services and common clients.
 - 1.3.5 Provide basic guidance for ongoing coordination between VRBS, BHDD-Prevention, and BHDD-Treatment as it relates to implementation, expansion, sustainability, and fidelity of IPS in Montana.

Section 2. General Duties and Responsibilities:

- 2.1 **VRBS** operates under the Rehabilitation Act of 1973 (the Act) as amended by the 2014 Workforce Innovation and Opportunity Act (WIOA) and its joint implementing regulations and is responsible for the provision of vocational rehabilitation services within the framework of the Act and the WIOA joint implementing regulations. VRBS presumes all people with disabilities, including those with the most significant disabilities, can work in competitive integrated settings with advancement opportunities and believes collaborating with partners makes us stronger and more effective.

(a) VRBS agrees to:

1. Support 100% the cost of the IPS trainer for the first year (10/1/2023-9/30/2024) of the MOU.
2. Explore annually Disability Innovation Funds (“DIF”) grant for additional IPS funding.
3. Develop an IPS fee schedule and execute contracts with existing MHBG-funded IPS programs (Yellowstone Boys and Girls Ranch, Inc. and Mountain Home Montana) as well as newly implemented IPS programs in Montana.
4. Train one Vocational Rehabilitation Counselor per VRBS office on the IPS model, contracts, processes and procedures by December 31, 2024.
5. Create a VRBS IPS Leadership team.
6. Meet quarterly to review this document and report on progress on the following dates:
 - i. Friday November 24, 2023
 - ii. Friday February 23, 2024
 - iii. Friday May 24, 2024
 - iv. Friday August 23, 2024
7. Participate in fidelity reviews.
8. Collect data on number served and employment outcomes of those served by VRBS through an IPS program.

(a) VRBS contacts:

Chanda Hermanson, DETD Administrator

406-444-4179

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Brook Hodge, Bureau Chief of Field Services

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Lacey Conzelman, Program Supervisor

406-655-7673

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2.2 **BHDD-Prevention** provides services through Block Grants, Formula Grants, Discretionary Grants, and Emergency Grants. These are Federal Grants to provide Substance Use Treatment & Prevention, Peer Support Services, Individuals Experiencing Homelessness, and Recovery Support Services. The Prevention Bureau works with a diverse group of stakeholders to help support the mission of DPHHS: improving and protecting the health, well-being, and self-reliance of all Montanans.

(a) BHDD-Prevention agrees to:

- a. Continue supporting, with available block grant funding, the existing IPS programs through the transition to VRBS and Medicaid funding.
- b. As existing programs enhance their funding abilities through other means (VRBS & Medicaid & other grant opportunities), issue Request For Proposal (RFP) for unused block grant funds to create further IPS program implementation in Montana.
- c. Support 100% the cost of the IPS trainer starting FFY24 (10/1/2024-9/30/2025) and moving forward.
- d. Collect and process monthly invoices from MHBG-funded IPS Programs within 30 days of receipt.
- e. Collect and analyze quarterly data and outcomes for MHBG-funded IPS Programs.
- f. Use outcome data to improve best-practices for MHBG-funded IPS Programs.
- g. Utilize MHBG to garner one or two additional IPS Supported Employment sites in Montana.
- h. Conduct an annual site review at each of the MHBG-funded IPS Programs.
- i. Assist MHBG-funded IPS Programs to monitor their budget to successfully complete the fiscal year reasonably within their allocated funding/budget.
- j. Participate in fidelity reviews.

(b) BHDD-Prevention contacts:

Rebecca De Camara, BHDD Administrator

rdecamara@mt.gov

406-444-6951

Jami Hansen, Prevention Bureau Chief

Jami.Hansen@mt.gov

406-444-3055

2.3 **BHDD-Treatment** is responsible for the certification of Mental Health Professional Person, State Approval for Substance Use Disorder (SUD) providers, and development of Medicaid Manual for both SUD and Adult Mental Health Services. BHDD-Treatment ensures services are meeting federal and state standards efficiently and effectively. The BHDD-Treatment works with Office of Inspector General (OIG) to provide routine monitoring of programs. BHDD-Treatment also reviews and analyzes Medicaid billing practices with Surveillance Utilization Review Section (“SURS”) and Fraud unit to review costs to ensure practices are being followed by reviewing records from SUD programs that have been licensed by OIG and are state approved. Additionally, BHDD-Treatment provides oversight for the Severe and Disabling Mental Illness (SDMI) Home and Community Based Services (HCBS) 1915 waiver and State funding for crisis diversion.

- (a) BHDD-Treatment agrees to:
 1. Meet with existing MHBG-funded IPS programs (Yellowstone Boys and Girls Ranch, Inc. and Mountain Home Montana) to provide education regarding Medicaid billable services specific to the program.
 2. Meet with newly implemented IPS programs within 30 days of implementation to provide education regarding Medicaid billable services specific to the program.

- (b) BHDD-Treatment contacts:

Rebecca De Camara, BHDD Administrator

rdecamara@mt.gov

406-444-6951

Isaac Coy, Treatment Bureau Chief

icoy@mt.gov

406-444-7922

2.4 VRBS, BHDD-Prevention, and BHDD-Treatment mutually agree to:

- (a) Outreach to a minimum of four CMHCs per year to expand IPS programs in Montana and assist with IPS implementation for new programs who want to participate.
- (b) Meet with IPS providers monthly.
- (c) Join the International Learning Community for IPS and create a specialized and Montana-specific steering committee through Behavioral Health Advisory Committee (BHAC).
- (d) Attend the IPS International Learning Community Conference as permitted by respective Administrator.
- (e) Meet quarterly to review this document and report on progress on the following dates:
 - a. November 24, 2023
 - b. February 23, 2024
 - c. May 24, 2024
 - d. August 23, 2024
- (f) Prioritize IPS meeting attendance by attending all scheduled meetings or appointing a designee to attend or communicate in advance the inability to attend and commit to reading meeting minutes/notes.
- (g) Communicate to external stakeholders via attendance at Local Advisory Council and Behavioral Health Alliance of Montana (BHAM) meetings as invited and written information provided via BHDD’s weekly newsletter and periodic VRBS’ Friends of Rehab newsletter.
- (h) Jointly create a clear funding guidance tool for distribution to existing MHBG-funded IPS Programs and newly implemented programs.
- (i) Jointly create statewide IPS fidelity procedures and internal controls.

Section 3. Expected Outcomes:

- 3.1 Add a minimum of two new IPS sites achieving fidelity.
- 3.2 Ensure one full-time or two part-time trainer positions staffed and sustainably funded.
- 3.3 Create clear funding tools for IPS Programs to navigate billing.
- 3.4 Collect and analyze baseline data of successful competitive integrated employment outcomes to monitor progress in throughout the duration of this MOU.
- 3.5 Develop and implement internal IPS fidelity procedures and internal controls to monitor high quality service delivery and provide technical assistance to programs not meeting fidelity.
- 3.6 Solidify collaboration among VRBS, BHDD-Prevention and BHDD-Treatment.

Section 4. Resolution of Conflict:

- 4.1 In the event that VRBS, BHDD-Prevention, and/or BHDD-Treatment find themselves in a conflict, the programs agree to meet to discuss the issues and navigate conflict resolution using the programs’ respective leadership.

Section 5. Term and Effective Date:

- 5.1 This MOU is effective on the date signed, October 1, 2023 and shall terminate automatically, without notice to the other party, on September 30, 2025.
- 5.2 Any party may terminate this MOU with 30 days written notice to the other party.

Section 6. Modification:

- 6.1 This document contains the entire agreement between the parties and any statements, promises, or inducements made by either party, or agents of either party, which are not contained in this MOU shall not be valid or binding. The MOU shall not be enlarged, modified, or altered except upon written agreement signed by all parties to the agreement.

VRBS will continue to work towards developing memorandums of understanding with other programs within the Department of Public Health and Human Services (DPHHS), who manage other Medicaid waivers, such as the Big Sky Waiver and Physical Disability (PD) waiver, to outline the roles and responsibilities of all parties regarding the delivery of VRBS services and long-term supported employment services for individuals with the most significant disabilities who have been determined to be eligible for Medicaid waivers.

(6) State agency responsible for providing services for individuals with developmental disabilities;

VRBS has had a long and productive relationship with Montana’s Developmental Disabilities Program (DDP). The program continues to sign off for extended long-term support services for many individuals with significant disabilities who have Medicaid cost plans to fund long-term supported employment services. Cross-training and technical assistance between VRBS and DDP to make available the required supported employment services continues to be ongoing.

Over the last few years, VRBS leadership has maintained a close working relationship with DDP leadership through monthly meetings. During those meetings, both agencies worked extensively to create a current, updated memorandum of understanding (MOU). Due to significant turnover and staffing difficulties within DPHHS Legal, this MOU has not yet been approved, despite our best efforts, and signed by the appropriate parties. However, VRBS and DDP are committed to fully executing this MOU in 2024.

The current draft of the MOU, which has not been updated since spring 2023 and now needs additional revisions, reads as follows:

Section 1. Parties and Purpose of Agreement:

- 1.1 The Memorandum of Understanding (“MOU”) is entered between the Department of Public Health and Human Services, Disability Employment and Transitions Division (DET), Vocational Rehabilitation and Blind Services (“VRBS”) and Department of Public Health and Human Services, Behavioral Health and Developmental Disabilities Division (BHDD), Developmental Disabilities Program (“DDP”).
- 1.2 The purpose of this MOU is to establish procedures to assure continued coordination between DDP and VRBS. This agreement is implemented in response to the vision of collaboration and innovation articulated in the 2014 Workforce Innovation and Opportunity Act (WIOA). DDP and VRBS enter into this agreement for the purpose of increasing competitive integrated employment outcomes, including supported and customized employment, for people with

disabilities, including those with the most significant disabilities served by both DDP and VRBS. This agreement strives to clarify and facilitate the coordination of services and resources to support competitive integrated employment outcomes in a seamless and non-duplicative manner. The increased focus on competitive integrated employment outlined in this document is not intended to disallow other levels of employment related entitlements provided to eligible individuals through DDP.

Section 2. General Duties and Responsibilities:

2.1 **VRBS** operates under the Rehabilitation Act of 1973 (the Act) as amended by the 2014 Workforce Innovation and Opportunity Act (WIOA) and its joint implementing regulations and is responsible for the provision of vocational rehabilitation services within the framework of the Act and the WIOA joint implementing regulations. VRBS presumes all people with disabilities, including those with the most significant disabilities, can work in competitive integrated settings with advancement opportunities and believes collaborating with partners makes us stronger and more effective.

(b) VRBS agrees to:

- Consider recommendations of the DDP case manager, contracted case manager, and/or PSP team regarding the needs of individuals that they refer.
- Presume every eligible individual referred to VRBS by DDP will benefit from VRBS in terms of achieving a competitive integrated employment outcome.
- Coordinate with the PSP team and long-term service providers regarding mutual client Individualized Plan for Employment (IPE).
- Provide existing documentation and referral recommendations to DDP to assist in the DDP eligibility process with appropriate signed release of information.
- Collaborate through regularly scheduled meetings between VRBS and DDP leadership:
 - to ensure maximization of shared provider network to ensure seamless supports for individuals jointly served by communicating regarding provider changes and issues.
 - to promote and support Employment First initiatives and the Customized Employment model to increase competitive integrated employment outcomes for mutual clients.

2.5 **DDP** works with people who are eligible for the State of Montana Developmental Disabilities Program and administers the 0208 DDP Waiver through contracted service providers to provide Home and Community Based Services (HCBS) across Montana.

(c) DDP agrees to:

- Promote competitive integrated employment as a valuable and viable option to all individuals
- Refer individuals to VRBS that want to pursue, competitive integrated employment.
- Provide existing documentation and referral recommendations to VRBS to assist in the VRBS eligibility process.
- Support the competitive integrated employment goal in the PSP by having Supported Employment written into the cost plan for long-term follow-along services.
- Collaborate through regularly scheduled meetings between VRBS and DDP leadership:
 - to ensure maximization of shared provider network to ensure seamless supports for individuals jointly served by communicating regarding provider changes and issues.
 - to promote and support Employment First initiatives and the Customized Employment model to increase competitive integrated employment outcomes for mutual clients.

Section 3. Term and Effective Date:

3.1 This MOU is effective on the date signed, February 1, 2023, and shall terminate automatically, without notice to the other party, on January 31, 2025.

Section 4. Modification:

4.1 This document contains the entire agreement between the parties and any statements, promises, or inducements made by

either party, or agents of either party, which are not contained in this MOU shall not be valid or binding. The MOU shall not be enlarged, modified, or altered except upon written agreement signed by both parties to the agreement.

DDP and VRBS have a joint procedure that outlines the steps to efficiently and effectively refer a client to the Developmental Disabilities Program (DDP) from Vocational Rehabilitation and Blind Services (VRBS) as well as the steps to correctly refer a client to VRBS from DDP. This procedure also outlines proper procedure for securing long-term funding for supported employment, steps for procuring signed Cooperative Agreements, and assigns responsibility to specific employees throughout both programs to ensure the process is completed as outlined. DDP and VRBS administration and management as well as mutual contracted providers worked collaboratively to develop this procedure and agree upon the common rules.

Additionally, DDP and VRBS are working on a project to transition several clients currently receiving supported employment services through Montana's Extended Employment program (EE) to receiving supported employment services funded through their Medicaid funded cost plans to make room in EE for VRBS clients without Medicaid funded cost plans who are stable in competitive integrated employment and ready to exit VRBS.

(7) State agency responsible for providing mental health services;

For at least five years, VRBS leadership met regularly with Montana's Mental Health Block Grant (Prevention Bureau) leadership in an attempt to formalize collaborative processes between VRBS and Mental Health Block Grant to improve existing IPS programs and implement new IPS programs across the state. While working together to advance our initiatives in this realm, VRBS and Mental Health Block Grant often included individuals from IPS Works into discussions. It was the IPS Works staff who encouraged Montana to apply for the ODEP's ASPIRE project. As explained in section I (5), Montana was one of seven states selected into the ASPIRE project and through that project VRBS and Mental Health Block Grant were able to deepen their collaboration through developing systems of braided funding for IPS.

See section I (5) above for the full, collaboratively developed MOU between VRBS, Mental Health Block Grant (Prevention Bureau), and Medicaid (Treatment Bureau) executed on October 31, 2023.

Lastly, Montana's VRBS Director, Chanda Hermanson, is an ex-officio member of the Behavioral Health Advisory Council (BHAC).

(8) Other Federal, State, and local agencies and programs outside the workforce development system; and

- VRBS works closely with the Social Security sponsored Work Incentives Planning and Assistance (WIPA) project at Montana State University-Billings to assist consumers to understand the impact of working on their benefits, including Medicaid. This past year VRBS began contracting with the WIPA project to create a Community Work Incentives Coordinator to work specifically with VRBS clients.**
- VRBS presently has cooperative agreements with all of the five Section 121 projects (Flathead Reservation, Fort Belknap Reservation, Fort Peck Reservation, Rocky Boy's Reservation, and the**

Blackfeet Reservation) located in Montana. The purpose of these agreements is to establish procedures to assure continued coordination between the 121 projects and VRBS. These agreements are implemented for the sole purpose of enhancing, to the greatest extent possible, the delivery of rehabilitation services to persons with disabilities living in the state of Montana and residing on or near the five reservations that currently have a tribal vocational rehabilitation project.

- VRBS has contracted with San Diego State University Interwork Institute to develop and maintain a VRBS Staff training series, which is a series of electronic training modules that are being used to onboard new staff and provide continuing education to current staff.
- The local VRBS offices and the local Small Business Development Centers (SBDC) all have well established and productive working relationships with each other. SBDCs share information on classes and upcoming offerings to the VRBS offices and VRBS regularly refers clients interested in self-employment to participate in various SBDC trainings and services. VRBS will explore enhancing our current relationship with SBDCs by exploring a contract to provide technical assistance to our participants who are pursuing self-employment.
- VRBS is a member of Montana's Work-Based Learning Collaborative which is a group of statewide partners who work together to expand student opportunities, support educators, and support Montana businesses in work-based learning activities.
- VRBS has contracted with Montana's Department of Military Affairs to provide a unique STEM Careers Summer Camp for high school students with disabilities through their STARBASE program. At the STARBASE camp students participate in challenging “hands-on, minds-on” STEM activities. They interact with military personnel to explore careers and observe STEM applications in the world of work.
- VRBS is partnering with Montana's Child Protection Services agency to increase opportunities for older youth in foster care to obtain skills necessary for economic stability as adults. VRBS wants to ensure all youth in foster care who are eligible for Pre-ETS have the opportunity to participate and have the opportunity to apply for VR services should they choose.
- VRBS has MOUs with various public transportation programs in counties across the state. The MOUs commit to procedures to assist VRBS’s clients to obtain documentation necessary to receive transportation services at reduced fares.
- VRBS works with the Social Security Administration to collaborate on employment incentives and supports and to maximize Social Security Administration/Vocational Rehabilitation (SSA/VR) reimbursement activity through the Ticket to Work Program.
- VRBS routinely collaborates with other organizations to provide training opportunities for VRBS’ staff. The following is a list of collaborating organizations: University of Montana-Rural Institute on Disabilities, Montana State University Billings-Montana Center for Inclusive Education, Centers of Independent Living, Office of Public Assistance, Department of Labor and Industry, Cornell-Yang Tan Institute, San Diego State University-Interwork Institute, The Harkin Institute, Office of Public Instruction, Child and Family Services, Children's Mental Health Bureau, Disability Rights Montana, MonTECH, Disability Determination Services, Developmental Disabilities Program, Montana Association for Rehabilitation, MYTransions Project, and the Veteran's Administration.

(9) Other private nonprofit organizations.

VRBS works with the Montana Association for the Blind and a partnership with their Summer Orientation Program. This partnership increases education and outreach for all of our Blind and Low Vision (BLV) programs with a focus on our Older Individuals who are Blind program.

VRBS has a partnership with Northwest Association for Blind Athletes to help provide access to exercise, sports, and outdoor activities for blind and low vision individuals.

VOCATIONAL REHABILITATION CERTIFICATIONS AND ASSURANCES

CERTIFICATIONS

States must provide written and signed certifications that:	
1.	The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by title IV of WIOA, ¹ and its State Plan supplement under title VI of the Rehabilitation Act;
2.	In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency or the designated State unit when the designated State agency has a designated State unit) ² agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan ³ , the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations ⁴ , policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;
3.	As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency or the designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the administration of the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan ⁵ , the Rehabilitation Act, and all applicable regulations ⁶ , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;

¹ Public Law 113-128.

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

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

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

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

⁶ Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 CFR part 363.

States must provide written and signed certifications that:	
4.	The designated State unit, or if not applicable, the designated State agency has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement, and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c);
5.	The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.
6.	All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.
7.	The (enter title of State officer below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;
8.	The (enter title of State officer below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;
9.	The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

ASSURANCES

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

The State Plan must provide assurances that:	
1.	Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.
2.	Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the

The State Plan must provide assurances that:	
	submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 C.F.R. 76.140.
3.	<p>Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:</p> <ul style="list-style-type: none"> (a) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act. (b) either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. (c) consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act. (d) the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3). (e) as applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. (f) as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. (g) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. (h) the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act. (i) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act. (j) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act. (k) the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act. (l) the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A). (m) the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.

The State Plan must provide assurances that:	
4.	<p>Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:</p> <ul style="list-style-type: none"> (a) comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act. (b) impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act. (c) provide the full range of services listed in section 103(a) of the Rehabilitation Act, as appropriate, to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act. (d) determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act. (e) comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act. (f) comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act. (g) provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act. (h) comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act. (i) meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs. (j) with respect to students with disabilities, the State: <ul style="list-style-type: none"> (i) has developed and will implement, <ul style="list-style-type: none"> (A) strategies to address the needs identified in the assessments; and (B) strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and (ii) has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15),101(a)(25), and 113).

The State Plan must provide assurances that:	
	(iii) shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5.	<p>Program Administration for the Supported Employment Title VI Supplement to the State plan:</p> <p>(a) The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.</p> <p>(b) The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.</p>
6.	<p>Financial Administration of the Supported Employment Program (Title VI):</p> <p>(a) The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(H) and (I) of the Rehabilitation Act.</p> <p>(b) The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.</p>
7.	<p>Provision of Supported Employment Services:</p> <p>(a) The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.</p> <p>(b) The designated State agency assures that</p> <p style="padding-left: 40px;">the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act , which is developed and updated with title I</p>

The State Plan must provide assurances that:

funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.

VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

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

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

Certification Signature

Chanda Hermanson

Disability Employment and Transitions Division Administrator

	Vocational Rehabilitation Program			
	Program Year: 2024		Program Year: 2025	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit) ²²	55.2%		55.7%	
Employment (Fourth Quarter after Exit) ²²	45.5%		45.7%	
Median Earnings (Second Quarter after Exit) ⁷	\$3550		\$3560	
Credential Attainment Rate	28.6%		29.3%	
Measurable Skill Gains	49.4%		50%	

GEPA 427 Form Instructions for Application Package - Vocational Rehabilitation

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

VRBS ensures equal access and participation to all persons regardless of their gender, race, color, national origin, age, or disability in its education programs, services, and/or activities. VRBS will enforce all federal and state laws/regulations designed to ensure equitable access to all program beneficiaries and to overcome barriers to equitable participation.

VRBS's commitment to equitable access is reflected in the program's Core Values:

- **We value informed choice; our staff guide, and the people we serve decide.**
- **We presume all people with disabilities, including those with the most significant disabilities, can work in competitive integrated settings with advancement opportunities.**
- **We believe work provides a sense of purpose.**
- **Our services promote the civil rights of each participant.**
- **We respect and value diversity.**
- **We value our ethical foundations of autonomy, beneficence, fidelity, justice, non-maleficence, and veracity.**
- **We promote healthy interdependence, independent living, and community integration.**
- **Collaborating with partners makes us stronger and more effective.**
- **We continually innovate and provide state of the art services**

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

Gender, Race, Color, Disability

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

Steps taken to ensure equitable access and to eliminate access barriers based on gender, race, national origin, color, disability, and age include but are not limited to:

- **Providing accessible materials**
- **Providing materials to blind persons or other persons with print disabilities in a timely manner, including specialized formats such as Braille, Audio, enlarged print, and Electronic Text**
- **Providing professional development opportunities with the goal of empowering staff in culturally responsive practices**
- **Offering interpretation services for language and communication needs, including translation, transliteration, and cued speech**
- **Utilizing a broad range of assistive technology which includes a variety of tools that range from no- to low- to high-tech options;**
- **Providing reasonable accommodations based on disability**
- **Utilizing technologies to convey content of program and curricular materials**
- **Providing professional development activities in accordance with the Americans with Disabilities Act (ADA), the Rehabilitation Act of 1973 Section 504, and the Individuals with Disabilities Education Act (IDEA) to staff and contractors**

- **Providing individualized resources designed to support diverse students to be college, career, and community ready, including integrated employment experiences, access to STEM-related curricula, and enrollment in Career and Technical Centers**
- **Hiring, recruiting, and involving individuals from diverse social and ethnic minority groups to the greatest extent possible**

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

This state plan cycle.

GEPA 427 Form Instructions for Application Package - Supported Employment

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

VRBS ensures equal access and participation to all persons regardless of their gender, race, color, national origin, age, or disability in its education programs, services, and/or activities. VRBS will enforce all federal and state laws/regulations designed to ensure equitable access to all program beneficiaries and to overcome barriers to equitable participation.

VRBS's commitment to equitable access is reflected in the program's Core Values:

- **We value informed choice; our staff guide, and the people we serve decide.**
- **We presume all people with disabilities, including those with the most significant disabilities, can work in competitive integrated settings with advancement opportunities.**
- **We believe work provides a sense of purpose.**
- **Our services promote the civil rights of each participant.**
- **We respect and value diversity.**
- **We value our ethical foundations of autonomy, beneficence, fidelity, justice, non-maleficence, and veracity.**
- **We promote healthy interdependence, independent living, and community integration.**
- **Collaborating with partners makes us stronger and more effective.**
- **We continually innovate and provide state of the art services**

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

Gender, Race, Color, Disability

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

Steps taken to ensure equitable access and to eliminate access barriers based on gender, race, national origin, color, disability, and age include but are not limited to:

- **Providing accessible materials**

- **Providing materials to blind persons or other persons with print disabilities in a timely manner, including specialized formats such as Braille, Audio, enlarged print, and Electronic Text**
- **Providing professional development opportunities with the goal of empowering staff in culturally responsive practices**
- **Offering interpretation services for language and communication needs, including translation, transliteration, and cued speech**
- **Utilizing a broad range of assistive technology which includes a variety of tools that range from no- to low- to high-tech options;**
- **Providing reasonable accommodations based on disability**
- **Utilizing technologies to convey content of program and curricular materials**
- **Providing professional development activities in accordance with the Americans with Disabilities Act (ADA), the Rehabilitation Act of 1973 Section 504, and the Individuals with Disabilities Education Act (IDEA) to staff and contractors**
- **Providing individualized resources designed to support diverse students to be college, career, and community ready, including integrated employment experiences, access to STEM-related curricula, and enrollment in Career and Technical Centers**
- **Hiring, recruiting, and involving individuals from diverse social and ethnic minority groups to the greatest extent possible**

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

This state plan cycle.