



# World Café Town Hall Follow-Up

## February 12, 2026

### 1. Employment First

#### Systems Barriers

The Following barriers were identified by the E1st team. As part of the town hall, the following barriers were discussed and prioritized based on, if they were addressed, which would have the greatest impact on increasing outcomes in competitive integrated employment:

- Fragmented Systems & Siloed Coordination
- Complex Funding and Rate Structures
- Policy Gaps and Governance
- Capacity Constraints
- Data and Shared Metrics
- Lack of Benefits Planning Infrastructure

#### Capacity & Funding Constraints (Highest System-Level Concern)

- Limited provider capacity, especially in rural/frontier regions
- Large VR caseloads and counselor turnover
- Closure of Order of Selection categories
- Concerns about VR funding sustainability and budget management
- Limited Business Services staff statewide

#### Stakeholders emphasized:

Without sufficient system capacity and funding stability, improvements in services will not translate into increased CIE outcomes. Concerns regarding the VR budget and caseload size may also reflect a broader lack of clarity about the distinct roles of Case Managers and Vocational Rehabilitation Counselors, as well as confusion between the responsibilities of the VR and Medicaid service systems.

#### Fragmented Systems & Limited Coordination

- Lack of clarity about “who does what” in the employment journey
- VR, DDP, schools, and workforce systems not consistently aligned
- Lack of shared data and case coordination
- “Right hand doesn’t know what the left hand is doing”
- No unified statewide employer engagement infrastructure
- Over-reliance on schools to deliver Pre-ETS

Participants expressed strong interest in:

- Better data sharing across systems
- Clearer interagency roles
- Coordinated employer outreach

#### Limited System Strategy to Transition from Segregated Settings

- No formal statewide plan to reduce reliance on sheltered work
- VR addressing transition largely alone



- Need stronger Medicaid alignment

There is support for Employment First principles, but stakeholders emphasized the need for implementation beyond proclamation.

### Services Barriers

The Following barriers were identified by the E1 st team and discussed as a part of the townhall:

- Pathway from School to Employment
- Inconsistent Case Management
- Access and Availability
- Provider Practices
- Provider Follow-Up
- Career Planning

### Pathway from School to Employment (Highest Consensus Overall)

This barrier was most frequently identified as having the greatest potential impact on CIE outcomes.

#### Key concerns:

- Inconsistent Pre-ETS delivery across school districts
- Transition expectations vary widely
- Youth “fall through the cracks” when exiting school
- Limited strength-based and career-focused planning
- Insufficient benefits planning education to address fears

#### Participants emphasized:

- Begin transition planning by age 14 or earlier
- Standardize transition expectations statewide
- Strengthen self-advocacy and career exploration

### Access & Availability of Services

- Rural inequities in access to providers and VR offices
- Inconsistent case management contact
- Limited follow-up and follow-along services
- Transportation and childcare barriers

Many participants noted that individuals who are eager to work often cannot access timely services. This barrier was identified as a strong secondary priority for improving CIE outcomes, with others emphasizing that expanding access and availability would positively impact the broader system.

### Provider Practices & Follow-Up

- Inconsistent follow-along services after placement
- Need clearer performance expectations
- Limited accountability tied to outcomes
- Variable quality of career planning



There was interest in:

- Outcome-based contracting
- Stronger provider training and technical assistance
- Expanded Customized Employment practices

### Expectations Barriers

The Following barriers were identified by the E1st team and discussed as a part of the townhall:

- Cross System Learning and Collaboration
- Employer Engagement and Visibility
- Early Exposure to Work
- Low Expectations for Employment and Employers
- Family and Parent Engagement
- Mindset Shift

### Low or Inconsistent Expectations for Employment

- Students with disabilities expected to “prove readiness”
- Overemphasis on job placement rather than career pathways
- Segregated settings remain normalized

Participants emphasized: Employment should be assumed – not earned.

### Family & Individual Fear of Losing Benefits

- Anxiety about healthcare and SSI/SSDI loss
- Benefits planning not consistently accessible
- Families experiencing advocacy fatigue

Benefits planning and education was identified as a critical leverage point.

### Employer Awareness & Culture

- Employers fear liability and injury risk
- Limited understanding of ADA and accommodations
- Need for disability-specific training
- Need proactive engagement rather than reactive placement

Stakeholders noted that employers are often willing – but under-informed.

### Employment First - Overall Themes

Across all categories, three cross-cutting insights emerged:

1. Transition reform and capacity stabilization must occur together.
2. Systems alignment is as important as service improvement.
3. Employment First requires both policy commitment and cultural change.
4. Limited and overburdened benefit planning services.

Stakeholders expressed strong support for Montana moving forward with Employment First, alongside clear recognition that sustainable investment, coordinated systems, and strengthened service delivery are necessary to achieve measurable improvements in CIE outcomes.



## 2. State Plan for Independent Living (SPIL) – Responses to Questions and Comments

Below you'll find the Statewide Independent Living Council (SILC) responses to the questions, comments and concerns that were expressed by participants of the Town Hall. Questions, comments, and concerns have been grouped by the SPIL goal they relate to for clarity. Additional comments and questions that did not apply specifically to one of the current SPIL goals are included at the end of this section.

### **SPIL GOAL 1: Promote awareness of Independent Living Services for those with disabilities across Montana.**

- *Objective 1: Conduct meaningful outreach to current consumers*
- *Objective 2: Conduct meaningful outreach/public relations to perspective consumers, caregivers, and stakeholders*

Comment: "...it would be helpful to expand on what meaningful means... because... there's a lot of ways to interpret that... an expansion of meaningful would be helpful."

Response: The SILC appreciates your perspective and agrees that adding a bit more clarity around what 'meaningful' refers to could be helpful. It's a broad term, and expanding on it would support clearer understanding.

Question: "[Is] this goal... something for each of the Centers do or [does] the SILC... work with each of the Centers to come up with the uniform...satisfaction survey? I think Objective 2 could possibly go beyond... meaningful outreach to prospective consumers that have not yet received services or contacted an independent living [center]."

Response: Presently, the SILC is working with the CIL Directors to develop a statewide, standardized method for measuring CIL satisfaction across the four centers. Outreach conducted by the SILC and the CILs is essential, and gaining a better understanding of the impact CILs have on consumers is critical to identifying and meeting the needs of Montanans with disabilities.

Question: "Why are we still using the term consumers? If the state is serious about going employment first, we need to stop looking at things in such a capitalistic view..."

Response: The SILC appreciates your concern. The National Council for Independent Living (NCIL) advocates for policies, procedures, systems, regulations, and legislation that protect the civil and human rights of people with disabilities, ensuring they can live in the community of their choice and fully participate in all aspects of community life. In Independent Living, the term "consumer" refers to individuals with disabilities who have the authority to make decisions about their own lives and futures. Consumer control is a foundational principle of the Independent Living Movement, which emphasizes personal choice and autonomy in the services and supports people with disabilities receive.

Question: "...how can you quantify...meaningful outreach? There's got to be some quantifiable evidence you know or data that you can use."



Response: The SILC appreciates your perspective, and agrees that adding a bit more clarity around what 'meaningful' refers to could be helpful. It's a broad term, and expanding on it would support clearer understanding.

Comment: "Doing the outreach to perspective people that might not be already linked into independent living centers, I feel like that's... important..."

Response: Outreach to underserved and unserved individuals with disabilities is a high priority for the SILC and the four CILs across the state.

Comment: "We receive calls for service from parents who are about to have their child graduate from high school without understanding what services are available...there is a process that takes time...so [I'd suggest] guiding that transition process earlier."

Response: This activity is one of the five core services of Independent Living, and the SILC fully supports and is willing to participate in this process. The Independent Living framework emphasizes consumer control and community engagement, and the SILC is committed to contributing actively to ensure these services are delivered effectively.

Comment: "...it can be a little intimidating to step into an independent living center and be like, 'I need this this...' [and] allowing people to get used to the kind of people that work here... [Individuals new to IL might think] 'I know this person, I'm comfortable with this person,' so [I'd suggest] finding ways and more fun activities to like bring them [into their Center]..."

Response: The emphasis on relationship building, proactive community engagement, and connecting with individuals in familiar or comfortable settings, the SILC agrees that CILs can introduce their services in a way that feels accessible rather than overwhelming. Establishing these relationships helps ensure that when people do need support, they already feel informed, welcomed, and confident in approaching the Center.

Comment: "...all of us that are involved in one way or another with a Center for independent living really should not just end our commitment to the CIL at 5:00 when we walk out the door..."

Response: The SILC agrees that maintaining engagement outside traditional work hours reflects the spirit of the Independent Living philosophy and strengthens our connection to the communities we serve.

Question: "...our geographical area is so huge... Montana is a very rural state with long drive times in between people and with the level of funding that we have, how do we do that?"

Response: The concern regarding Montana's vast geographic area and the significant travel distances between consumers is both valid and well recognized within the Independent Living network. The SILC agrees that this issue is critically important and supports ongoing efforts to develop creative, cost-effective approaches that ensure individuals across Montana have equitable access to Independent Living services, regardless of location.

Question: "...[this SPIL goal] says you will conduct meaningful outreach to current consumers and do public relations with perspective consumers. Does it say how you're to do that?"



Response: The SILC appreciates your perspective, and agrees that adding a bit more clarity around what ‘meaningful’ refers to could be helpful. It’s a broad term, and expanding on it would support clearer understanding.

Comment: “...yes, getting the word out because [CILs] are the best kept secret...Montana is a challenge because of the how rural it is to have the centers scattered around the state and then there's a lot of area between and getting out into the community is one of the most meaningful ways. [It] is important...”

Response: The SILC agrees that the CILs are Montana’s best kept secret, and it is important to develop creative, cost-effective approaches that ensure individuals across Montana have equitable access to Independent Living services, regardless of location.

**SPIIL GOAL 2: Provide factual evidence to stake holders, community members, and state and local legislatures to provide best practices that advocate for systemic change in the Independent Living community.**

- *Objective 1: Educate ourselves, form our position, and express our position to stakeholders & policy makers using white papers to advocate for systemic change (topics potentially including: employment first, coordinated transportation)*
- *Objective 2: Determine, write, and distribute White Paper(s) focused on topics important to Montanans living with disabilities to create systems change and the implementation of effective practices and policies.*

Question: “What are white papers?”

Response: A white paper is a formal document that explains a complex issue, presents research or analysis, and often outlines recommendations or proposed action(s). They’re often used to guide decision making, inform policy, or align partners around a shared understanding of an issue.

Comment: “...[this SPIIL goal doesn’t] read... right [I’d suggest] changing [the wording] to: ‘create access for the disability community...’ [that would] make that more clear...”

Response: Agreed, word choice matters, and the sentence doesn’t read quite right. We could make it clearer—especially the part about creating access for the disability community.

Comment: “...all that information is already out there, ... it's going to take more than white papers to like convince a legislative body to change...”

Response: We agree, changing a legislative body’s perspective requires more than white papers alone. As the SILC engages in broader advocacy efforts well-developed white papers are an essential foundation, organizing the information that already exists, presenting it in a clear and authoritative way, and ensuring that everyone is speaking from the same set of facts.



Comment: "...for people who are part of CILs, as peer led advocates finding ways and paths to the joint legislature, being a part of boards, and committees are really making these changes and also uplifting and centering voices of individuals with disabilities."

Response: We agree. As peer-led advocates, individuals within the CILs play a vital role in identifying pathways into the legislature and in serving on boards and committees. Their leadership is key to driving meaningful change and to uplifting and centering the voices of people with disabilities.

Comment: "...they're relying on us to show up, they're calling us, [policy makers] want us to come in and talk about accessibility and advocacy during public comments. I think that relationship building versus just handing them information in facts that we expect them to care about has been far more effective for us..."

Response: The SILC agrees that relationship building and showing up in person are often far more effective with policymakers than simply providing written information. At the same time, well crafted white papers remain an important complement to that work—offering clear, organized, and credible documentation that advocates and ensures we are all working from a shared foundation of facts.

Question: "...I'm not that familiar with the SILC activities but do you have the resources you need? Are there partners in the state that can help support that that objective?"

Response: The SILC's existing partnerships are incredibly valuable, and we consistently rely on them to advance our work. At the same time, we are always looking for additional partners across the state who can help support these objectives.

Comment: "...offering comments to get to our local legislators I found that to be probably the best use of my time... there's so many issues that we could discuss, but especially transportation..."

Response: We agree. Providing comments directly to our local legislators is often one of the most effective uses of our time. While there are many issues we could raise, transportation remains a particularly critical area that deserves continued attention and advocacy.

Comment: "...[I'd suggest it's] not just writing these white papers, but testifying to legislators because it's people's lived experience that shows the impact...because that's what's really impactful..."

Response: The SILC agrees, sharing individuals lived experience that illustrates the real impact of policies, and that's what truly resonates. At the same time, well crafted white papers remain an important complement to that work—offering clear, organized, and credible documentation that advocates and ensures we are all working from a shared foundation of facts.

***SILC GOAL 3: Develop integrated community access for Montanans with disabilities.***

- ***Objective 1:*** *SILC will support through its Olmstead Committee education and awareness it will support a unified state plan.*



- Objective 2: Create access to the disability community as contributing participants in development of policy and practice.

Comment: "...Olmstead was a landmark Supreme Court case, but most people in the community probably are not aware of that... it's going to be a key thing... we at the CILs are aware of what Olmstead is, it was a major landmark [but] implementing that across the country has been a nightmare... communicating [and getting] people interested in it is key..."

Response: The SILC agrees, and we believe continued education is essential for a unified state Olmstead plan. While Olmstead was a landmark Supreme Court decision, many community members are still unaware of its significance. Those of us working within CILs understand its impact—and why a unified State plan is so imperative.

Comment: "...basic practice of ensuring accessibility for all is available to all..."

Response: Ensuring 'basic practice of ensuring accessibility for all is available to all' is exactly why a unified state Olmstead plan is so important. Without one, efforts stay inconsistent and lacking. A unified plan creates shared expectations, consistent accessibility standards, and a coordinated approach that strengthens outcomes statewide.

#### **Additional Questions, Comments, and Feedback:**

Comment: "I think just overall to the centers it would be helpful to have clear ongoing communication about how to be involved...I don't know if I know really how to get involved besides joining the SILC."

Response: Absolutely –it's an important insight. When people say, "I don't really know how to get involved besides joining the SILC," it signals a gap we can directly address with clearer, more consistent communication pathways, let's collaborate to get it done.

Comment: "I [suggest] having some consistent materials that every center could share that are in alignment with the independent living philosophies and the way that we do outreach so that we're all giving the same information across the state."

Response: The SILC and the CILs could build these documents, in turn creating documents that are shared, consistent materials that every center can use ensure that the message about Independent Living (IL) philosophy, engagement opportunities, and statewide alignment stays clear, unified, and accessible.

Comment: "Use person first language."

Response: It is always a valuable reminder to use person first language in speaking and outreach materials. This will help individuals communicate in a way that's consistent, respectful, and aligned with Independent Living values.

Comment: "...we just need to do a better job of getting out [and] spreading the word, so people know who we are and know where to go for assistance..."



Response: This is truly a team effort. The SILC is willing and excited to participate, and we all agree: we need to do a better job getting out into our communities, spreading the word, and making sure people know CILS, the SILC, and the IL Philosophy. Most importantly, individuals need to know where to go for assistance.

Comment: “...put all the centers on bus routes.”

Response: Agreed!

Comment: “...offering more than one town hall session at differing times of the day, multiple times to hit different points of the schedule for people...”

Response: Good point – and an important reminder that people can always share feedback or questions by emailing [mtsilc@mt.gov](mailto:mtsilc@mt.gov) at any time. We will discuss with DETD the possibility of hosting more than one Town Hall to increase accessibility.

Comment: “...[Please provide] SILC resources on my Special Education family resources web page...”

Response: Thank you – the SILC will reach out and share this information with you.

Comment: “...If we can over communicate or communicate in different methods. Can we send out invites via email and text and call to get different communication methods. Not sure what all is being done to involve those folks, but some people prefer different communication methods and that might help.”

Response: Yes, the SILC should consider expanding the range of communication tools it uses. Providing information through multiple formats can broaden engagement, support greater participation, and strengthen the SILC’s overall outreach and advocacy efforts.

### 3. Vocational Rehabilitation Portion of Montana’s State Plan – Responses to Questions and Comments

Below you’ll find the questions, comments, and feedback received during the Town Hall as well as written feedback emailed to Lacey Conzelman. The questions, comments, and feedback have been grouped by the prompting questions they relate to for clarity with formal written responses from the VR Leadership Team immediately below each. Additional comments and questions that did not apply specifically to one of the prompting questions are included at the end of this section.

Various sections (a4, b1a, b1b, e2, f1a, f1b, g, & i1e) of the VR State Plan were updated as a part of requesting Priority Category 1 be closed for Order of Selection (OOS). Based on the information provided in those sections and/or what you know about OOS, please share your thoughts and feedback regarding the potential closure of Category 1?



Comment: Hopefully the [Order of Selection] issues can be resolved. VR was doing great work. There is a lot on VR's plate after last legislative session and probably [more following] this [coming] session. I would [recommend VR] try to work things out... It seems like every time we go into Order of Selection (OOS) services get lost. VR is a strong provider of services... we [need] our best workforce out there [because]... if someone isn't finished with their degree...that could be an issue.

Response: Thank you for sharing your perspective. We understand how challenging Order of Selection can feel, especially when people are counting on consistent services to move forward with their education and careers. VR has always taken pride in providing strong, reliable support, and we know how important that is to individuals across the state.

We want to assure you that we are looking at our fiscal forecasts very closely to ensure we stay within our resource limits. Over the past several months, we have implemented cost-containment measures designed to protect the long-term stability of the program and to ensure that our available resources are directed toward serving individuals with the most significant disabilities, as required by federal regulation.

While it is not what we hoped for, closing all categories is necessary at this time to prevent overspending and protect the program. We do not view this as a setback, but rather as a temporary and strategic step to ensure VR remains strong and sustainable. We are optimistic that Category 1 will reopen as soon as resources allow, and we are continually monitoring the budget so we can move in that direction responsibly.

We appreciate you recognizing the pressures VR has been under following recent legislative sessions. Your comments reinforce why it is so important that we continue our work in capacity building and operational adjustments. Ensuring Montanans have access to high-quality VR services remains our commitment, and we will keep pushing toward solutions that minimize disruptions and support the best possible outcomes.

Comment: I would like feedback on Order of Selection. If things change with VR and OOS in Montana, how might VR maintain [the newly implemented legislative initiatives] in the future? VR is doing a lot of good work in many areas and I want to make sure, young and old Montanans, have the opportunity to have a job if needed.

Response: Thank you for asking about Order of Selection and how it intersects with the new legislative initiatives. We share your commitment to ensuring that both young and older Montanans have opportunities to work, and we appreciate your recognition of the progress VR has made across many areas.

We are closely monitoring our fiscal forecasts to ensure we remain within resource limits and maintain program integrity. When resources are constrained, Order of Selection is the mechanism that helps us prioritize services for individuals with the most significant disabilities. To support stability, we've implemented cost-containment measures, so resources are targeted where they have the largest impact, and we continue to refine operations to meet demand more efficiently.

In terms of sustaining newly implemented legislative initiatives, our plan focuses on:



- **Prioritization and phased implementation:** Sequencing activities so core services and high-impact components remain in place even during OOS.
- **Braided funding and partnerships:** Leveraging cross-system collaborations (including waiver programs and community providers) to maintain services and benefits planning supports regardless of VR enrollment.
- **Capacity building:** Investing in training, provider engagement, and process improvements that reduce delays and increase throughput.
- **Outcome monitoring:** Tracking access, timeliness, and employment outcomes so we can adjust quickly if bottlenecks emerge.
- **Transparent communication:** Providing regular updates on OOS status and timelines, including when resource conditions allow us to reopen categories. We are optimistic that Category 1 will reopen as soon as resources permit, and we will move in that direction as quickly—and responsibly—as we can.

Your feedback underscores why steadiness and clarity matter, especially as we carry forward recent legislative work. We remain committed to ensuring Montanans, across age groups and communities, can access high-quality VR services and pursue employment. Thank you for your continued engagement; it helps us keep our focus on practical solutions that protect both service continuity and program sustainability.

Comment: [I am] opposed to closing Priority Category 1 because we have seen that happen in the past. It creates a mentality among the consumers and providers to be in a bit of a holding pattern. I personally think the low outcomes we see [in Montana] are because of a long period of time where all [Priority] Categories were closed. Providers become frozen in the services they provide because it is our livelihood. It is a viscous cycle... [I'd recommend] VR looks at other places to cut funding to keep Priority Category 1 open [to] at least provide some sustainability for the program.

Response: Thank you for sharing this perspective. We understand how closing Priority Category 1 can create a “holding pattern” for consumers and providers, and we recognize the real impact that prolonged closures have on outcomes and on provider stability.

Our goal is to avoid that cycle. We are closely monitoring our fiscal forecasts and statewide caseload to ensure we remain within our resource limits while protecting the long-term integrity of the program. To do that, we’ve implemented cost-containment measures that direct limited resources to individuals with the most significant disabilities, as required by federal regulation, and we are making operational adjustments to manage the current caseload more efficiently.

Importantly, we expect this closure of Category 1 to be **short-term**—we are **optimistic it will not extend beyond approximately six months**, assuming fiscal conditions track as projected. This timeframe allows us to responsibly reduce and manage the current statewide caseload so we can reopen Category 1 as quickly—and sustainably—as possible without risking overspending.

To reduce the “freeze” effect you described and maintain momentum during this temporary period, we are taking the following steps:

- **Active caseload management:** Focusing on timely case progression and right-sizing service plans to match current needs, so individuals can keep moving forward.



- **Provider communication and technical assistance:** Offering clear guidance on available service pathways, including group and short-term interventions that maintain engagement and skill development.
- **Braided supports and partnerships:** Coordinating across waiver systems and community programs to help individuals access critical services regardless of VR category status.
- **Transparent updates:** Providing regular OOS status reports and timelines so consumers and providers can plan with confidence.
- **Targeted re-opening plan:** Aligning budget checkpoints and caseload benchmarks to reopen Category 1 as soon as resources allow, with the expectation of a roughly six-month window.

We hear your recommendation to look for other areas to reduce spending in order to keep Category 1 open. As part of our cost-containment work, we have reviewed and adjusted non-essential expenditures and administrative costs first. Even with these efforts, temporarily closing Category 1 is the most responsible way to prevent overspending while preserving the program's stability for the long term.

We appreciate your advocacy and agree that avoiding extended closures is essential to strong outcomes.

Comment: With OOS, it is hard because there is an uncertainty among partner agencies about whether the service is available for referrals. It creates a distrust in the community because provider agencies cannot confidently refer to VR. There is some system breakdown [when VR is on OOS].

Response: Thank you for naming this challenge so clearly. We absolutely recognize that when VR enters Order of Selection, it creates uncertainty for partner agencies about when and how to refer people. That uncertainty can strain community relationships, and we understand how that can lead to hesitation or even a sense of system breakdown. Your concern is valid, and it's something we take very seriously.

We agree that maintaining trust and clarity with our partners is essential, especially during OOS. To support that, we are actively strengthening our outreach, communication, and information-and-referral resources so that community agencies continue to have clear guidance on what services are available and how to help individuals connect with the right supports. Our goal is to keep those relationships strong and ensure that partners know we remain a reliable point of connection, even when we are temporarily unable to open certain categories.

Comment: [I'd recommend] communication about what closing looks like and what the plan is to reopen those [Priority Categories] too... With the categories closed, I have never gotten the information regarding what that plan is [to reopen]. I realize some of that is not known [such as] when the funding will be available to reopen, but... What else is the program doing behind the scenes to make sure that VR is doing everything fiscally responsible to get funding to serve the people which is the main goal?

Response: When Priority Categories close, people deserve to understand not only what that closure looks like, but also what the roadmap is for reopening. We know that uncertainty makes it harder for partners, providers, and individuals to plan, and you're right that clear information about the steps behind the scenes is essential.



We agree that more transparent, accessible communication would make a big difference. We are actively working on strengthening our outreach and creating clearer information and referral resources, so people know exactly what is happening, why it's happening, and what to expect moving forward. One idea we are exploring is developing a simple, regularly updated webpage or public dashboard that outlines the status of each Priority Category, explains our fiscal checkpoints, and shows what progress has been made toward reopening. We believe this could help partners feel more confident and reduce confusion during periods of OOS.

We appreciate you raising this, and your input will help us shape clearer and more proactive updates going forward.

Comment: I don't like Order of Selection and the idea that Priority Category 1 might be closing. I get it and it sucks. As a CRP, I am genuinely worried now, if VR goes into OOS, those comments I have made about, "you can always go back to VR" become a lie. It is disheartening.

Response: Thank you for being so honest about how this feels. You're not alone, Order of Selection is hard, and the idea of closing Priority Category 1 is disheartening for all of us who care deeply about the people we serve. We understand why it feels like a broken promise when you've told consumers, 'You can always go back to VR.' That uncertainty is real, and it weighs on both consumers and providers.

Your worry comes from a place of true commitment to the people you support, and we genuinely appreciate that. OOS can make the entire system feel unstable, and it's okay to name that frustration.

At the same time, we want to be clear that this step is tied directly to staying within our resource limits and protecting the long-term stability of the program. It's not a reflection on the value of the services you provide or the importance of consumers having access to VR.

Comment: If Priority Category 1 is closed, I assume then everyone goes on a waitlist for services. I think statewide disencumbering of unused or not needed funds would probably be helpful. We have started doing that in our [provider] system. I am sure that is a strategy that VR is also looking at.

Response: You're absolutely correct that when Priority Category 1 is closed, individuals who qualify would be placed on a waitlist, consistent with federal OOS requirements. And we really appreciate you mentioning statewide disencumbering, because you're right, that strategy can make a meaningful difference.

VR has significantly improved our practices in this area. We have been actively and regularly reviewing authorizations and disencumbering funds that are no longer needed. This has become an important part of our ongoing fiscal-management approach and helps us make sure that every available dollar is supporting active cases and individuals with the most significant disabilities.

These improvements are part of a broader effort to strengthen cost containment, manage caseloads effectively, and stay within our resource limits so we can reopen Category 1 as soon as possible. Your comment reinforces that these operational steps matter, and we appreciate you recognizing the value of this practice.



Comment: As VR is closing those Priority Categories, is there anything we can do during that time? For example, take an online course or is there access to other resources to keep individuals progressing and preparing for employment instead of just waiting for VR assistance? I am referring to other WIOA programs or Ed-To-Go programs. Are there opportunities for people to do something while they are waiting so they do not lose momentum and hope, just to keep them moving forward?

Response: While individuals are on the waiting list, we do not want their progress toward employment to stall, and we understand how critical it is to maintain momentum and hope during that time.

Our staff actively provide information on a variety of alternative resources available in each community—including Job Service, Adult Education, and other employment and training programs. We also share information on scholarships and continue to offer guidance as needed while individuals wait for VR services.

We work closely with local Job Service offices to ensure job seekers can access support even while on the waiting list. Additionally, we are currently developing a formal referral process with the Department of Labor and Industry's Office of Re-entry for justice-involved individuals to ensure they receive timely and appropriate services.

In terms of training or skill-building opportunities, individuals may be able to participate in certain community programs, online courses, or other WIOA-funded services while they wait. Although VR cannot directly authorize or fund services until the priority categories fully reopen, we will continue to connect individuals with partners and resources that can help them keep moving forward.

Comment: It is important to think about what resources, referrals, and partnerships can VR start fostering to bridge that gap while people are on waiting lists.

Response: We completely agree that strengthening resources, referrals, and partnerships is essential to supporting individuals while they're on the waiting list. This has long been part of our day-to-day work, and our teams are consistently engaged in connecting people with community programs, workforce partners, and other supports that can help bridge that gap.

That said, we also know there's always room to deepen those partnerships and explore new opportunities. We appreciate the emphasis on continuing to build and expand these connections, and we remain committed to doing that so individuals can keep moving forward even before VR services formally begin.

Comment: Is there a way for a person who is eligible for other supports, long-term supports, such as DD, SDMI, and/or other waivers to access that funding while waiting for VR? Can VR coordinate with those services?

Response: We recognize how important it is for individuals who are eligible for other long-term supports—such as DD, SDMI, or other Medicaid waiver programs—to have continuity of services while they are waiting to access Vocational Rehabilitation. We are actively working with our partners across Medicaid waiver programs to explore opportunities to braid funding and coordinate services so individuals with disabilities who are interested in employment can access the supports they need.



This work is also a priority initiative under the 406 JOBS Executive Order, which emphasizes improving coordination across systems to better support employment outcomes for Montanans with disabilities. Our goal is to ensure people remain supported and motivated throughout the process, regardless of which program they enter first.

Comment: How does closure of Priority Category 1 impact Pre-ETS or does it?

Response: A student with a disability who is 14–21 years old and enrolled in an educational program is eligible for Pre-Employment Transition Services (Pre-ETS). These students may apply for Vocational Rehabilitation (VR) services, but they are not required to do so. Students who have not applied for VR services are considered “potentially eligible,” and their access to Pre-ETS is not affected by an Order of Selection (OOS).

Students who *have* applied for VR services may receive Pre-ETS during OOS as long as they received at least one Pre-ETS service before being placed on the waitlist. For students who require job coaching, transportation, or other supportive services, those services will continue during OOS only if the student is already receiving them under a VR Individualized Plan for Employment (IPE). Students who are not receiving services under an IPE when all categories close will not have access to those additional supportive services.

Comment: [VR had all Priority Categories closed in the past] and then All Priority Categories were eventually wide open again. Then, the Priority Categories slowly started closing again. I think it would be great to get information about what Order of Selection is going to look like long-term. Will there ever be a time when all 3 Priority Categories will be open again or is VR looking at some sort of a waitlist for all of time just to ensure [some people can be served]? What [does VR anticipate] Order of Selection will look like long term as of the result of having [services] wide open the last couple of years?

Response: We understand the interest in what Order of Selection may look like long term, especially given the shifts we have experienced over the past decade. Our federal funding levels change each year, which makes it difficult to project more than a year at a time with certainty. Because of this variability, we cannot reliably predict whether all three Priority Categories will be open again in the future. Factors at both the federal congressional level and the state legislative level will continue to influence the program’s resources and service capacity.

That said, our team has significantly refined our fiscal forecasting methods over the past several years so we can better manage resources and maintain stability over the long term. These improvements help us make more informed decisions and anticipate changes earlier, even within the constraints of annual funding cycles.

While we cannot say today whether all Priority Categories will be open at the same time again, our commitment is to manage the program responsibly, serve as many individuals as possible, and maintain transparency with the public as conditions evolve.

Comment: A concern that we have in Polson is the lack of funding their seems to be for VR services at this time. I’ve talked to a number of people in the last couple of weeks who are now on a waitlist [for VR services]. Our concern is there are people who want VR services, who are considered Priority Category 2 who are waiting for funding. That funding needs to be available because we have people who want to work and want services. Some of them are getting SSI or



SSDI and I'm told they haven't been able to get services... We have people who want to get back to life, but they need VR assistance that isn't available.

Response: Thank you for bringing this concern forward. We understand how difficult it is for individuals and across the state who want VR services but are currently placed on a waitlist. It is frustrating for people who are ready to work, ready to move forward, and simply need VR support to take the next step. We hear that, and we understand how deeply this affects individuals and families.

Right now, the reason some individuals are waiting is because federal regulations require VR agencies to manage services based on available resources. When resources are limited, agencies are required to use an Order of Selection. This means we must serve individuals with the most significant disabilities first. That is why Priority Category 1 is open, while Priority Category 2 and 3 are currently closed.

This is not a situation any of us want, and it is not a reflection of a lack of belief in the abilities or motivation of the people waiting. It's a federal requirement designed to ensure long-term sustainability when resources cannot meet the demand.

We are continually evaluating our resources—staffing, projected costs, and available funding—to determine whether we can open additional categories. This is something we monitor closely and regularly, and we remain committed to reopening categories as soon as resources allow.

What we want most is exactly what you described: for people who want to work to have the support they need to return to work, gain independence, and reconnect with their lives and communities. We will continue to track our financial capacity, communicate transparently, and take every opportunity to expand access to services.

Comment: That is very disturbing to hear that Priority Category 1 might close. What can be done? There has got to be something that can be done. The state has got to have a pocket of money somewhere that the governor can draw from to make sure that doesn't happen. That would be horrible. There must be money somewhere. That is unacceptable. Can a special session, committee, someone being called together to address this issue because that is no good? That is going to do more harm and undoing that is going to take a long time. For example, is there some way to tap into coal tax funds? There must be some way to access state money sitting in state coffers somewhere to make sure that this doesn't happen!

Response: We understand how deeply people care about ensuring Priority Category 1 remains open and how significant the impacts are. I want to assure you that we share that concern, and we are doing everything within our authority to manage resources responsibly and avoid disruptions in service whenever possible.

It's important to note that our federal funding levels change on an annual basis, and that variability makes it challenging to project more than a year at a time. Because those funding levels are set by Congress and influenced by broader national and state-level budget decisions, we do not have the ability to supplement VR funding with other state sources, such as trust funds or coal tax revenues. Current federal regulations also require that VR services be funded primarily through the federal-state match structure, which limits the flexibility to simply draw from state "pockets" of money, even if they exist.



While we do not have the option to convene a special session or tap into unrestricted state funds for VR services, we have taken significant steps over the past decade to refine our fiscal forecasting methods and long-term budgeting strategies. These improvements help us anticipate challenges earlier, manage resources more accurately, and minimize impacts on individuals seeking services. They also position the program to respond more effectively as federal or state funding levels change.

**What goals and objectives do you feel Montana VR should be focusing on in the upcoming years?**

Comment: Montana School for the Deaf and Blind, serving birth through 22, is working with campus staff to figure out a way to get timely information out to families and how best to do that consistently. MSDB has pooled some resources to try to help that. I feel like one of the issues we keep running into as a partner with VR is people either forget VR is there or forget how to access it before they need it. A 20-year-old sitting at home, not connected to anything because, “oh we forgot about that.” I hope one of VR’s upcoming goals involves how to get VR information through schools and other agencies in a timely manner.

Response: Thank you for sharing this concern. VR agrees that ensuring students and families receive timely information about VR services through schools and partner agencies is a high priority. We certainly don’t want anyone to miss out on opportunities or lose access simply because they weren’t aware of the services available. We truly value our ongoing collaboration with the Montana School for the Deaf and Blind, and we appreciate the work MSDB is doing to strengthen communication with families. Our staff regularly partner with MSDB to provide Pre-Employment Transition Services in classrooms, at events, and through activities like the Pre-ETS camp on the MSDB campus. We share the goal of making sure every eligible student is connected to VR and understands the supports we can offer, and we look forward to continuing this work together.

Comment: I haven’t been to VR in years, but last I remember there were problems with staff [turnover]. I want to make sure VR has enough staffing going forward to provide services to people with disabilities. I want Montana VR to focus on [ensuring there are adequate VR staff] to make sure it all happens.

Response: Our counselors truly are the heart and soul of the VR program, and we fully agree that having a strong, stable workforce is essential to providing high-quality services to Montanans with disabilities.

We’re pleased to share that our staffing has stabilized significantly over the past two years. This has helped strengthen continuity of services and improved our overall capacity to support job seekers across the state. At the same time, one of our current cost-containment measures includes a 6 percent vacancy savings requirement. That means when a position becomes vacant, it may remain unfilled for a period of time by design.

Even with that constraint, we continue to prioritize staffing levels that allow us to serve as many individuals as possible. We monitor vacancies closely and make thoughtful decisions about how to allocate resources so we can maintain access to essential services while remaining fiscally responsible.



Comment: I'd like it [to be] easier to get [employment at a] gym/fitness center. I am applying there now for jobs. I am disabled. I have a friend that is going to help me with my resume. I have experience [working in a gym] from before. I am hoping to get this job. They said that if you just turn in an application, you can't just do that. You must have a cover letter so it is more likely you will get a job. I asked a friend to write a cover letter for me, and he is willing to do it. I am trying to get a job because I have experience in gym/fitness work. I am hoping to get that job in the future if they hire me.

Response: Thank you for sharing your experience. We appreciate hearing directly from job seekers about the challenges they're facing. Your interest in returning to work in a gym or fitness center is important, and it's great that you already have experience in that environment. It's also encouraging to hear that you're taking proactive steps by updating your resume and securing support to create a strong cover letter.

Your comment highlights a real barrier many applicants encounter—understanding what employers expect during the application process and having access to the tools needed to meet those expectations. Feedback like yours helps us continue improving how we support individuals with disabilities in preparing for employment, navigating hiring practices, and connecting with opportunities in the community.

We want to ensure the vocational rehabilitation system makes it as straightforward as possible for people to pursue jobs that match their skills and interests. Thank you again for your input and for your determination to reenter the workforce. Your perspective is valuable as we shape a plan that better serves all Montanans.

Comment: Many of [the Centers for Independent Living] have used Charting the Life Course and other [curriculums] to help youth and people find jobs. VR has really worked with businesses, traditional businesses, that hire people with intellectual disabilities through VR's Business Services. Is VR interested in looking at nontraditional ways [for consumers] to present their resumes as part of their training [to businesses]?

Response: VR is absolutely interested in exploring non-traditional ways for job seekers to present their strengths and skills to businesses. In fact, this is already a core part of our Customized Employment approach and our Individualized Placement and Support Supported Employment model, where we often use alternative profiles, visual resumes, and other creative tools to highlight a person's abilities in ways that resonate with employers.

We are always looking to learn more and to expand these strategies so job seekers can present themselves in ways that businesses are receptive to. If there are additional ideas or successful practices you've seen, whether through Charting the LifeCourse, Centers for Independent Living, or other curriculums, we would really welcome hearing more.

Comment: I think VR should focus on [how long it takes] to get the VR process rolling. A lot of people give up or move on to something else [because of how long it takes to get into services]. Improving the speed at which clients are able to receive the quality services would be really helpful.

Response: We take rapid, meaningful engagement very seriously, because we know how important it is for people to feel momentum early in the VR process. It's one of the strongest



predictors of success in our program, and we never want delays to become a barrier for someone who is ready to move forward.

Over the past two years, we've made significant changes to improve that initial experience—streamlining processes, removing unnecessary steps, and tightening our internal timelines. We're proud to share that Montana is now leading the nation in the pace of eligibility determinations and the development of employment plans. That progress reflects exactly the kind of improvement you're advocating for.

We know there is always more we can do, and your input helps us stay focused on what matters most: making sure people can access quality services quickly and without unnecessary frustration.

Comment: When someone is pursuing employment that requires training at one of the universities, it's been a practice for clients to apply for Pell Grants and VR to pick up remainder [of the training bill] that a Pell Grant doesn't cover. VR has also always helped clients with [required] books. I have heard that VR is no longer [assisting college students in this manner]. If the Pell Grant doesn't cover all of tuition, I don't know how college students would have money left over for books. I think [this policy change] is creating an unnecessary barrier for people who have vocational goals that include education.

Response: We understand how important financial support is for students whose employment goals require college training, and we know how stressful it can feel when long-standing practices appear to change.

Pell Grants are considered a federal comparable benefit, which means VR is required by federal regulation to apply them before using VR funds. Through a recent review, we discovered that this was not happening consistently in Montana, and we are now making adjustments to ensure we are in compliance with federal requirements.

What this means moving forward is that Pell Grants will be applied first to costs such as books, internet access, and other college-related expenses. VR's priority will continue to be covering mandatory tuition and fees that are directly required to achieve an employment goal.

We understand that any shift in funding practices can feel like an added barrier, and we want to be clear that our intent is not to reduce support but to ensure we are following federal mandates so the program remains strong and sustainable for all students who need VR services. We remain committed to helping individuals pursue training that leads to competitive, meaningful employment.

Comment: I don't see how VR is going to be able to provide equal access to everyone and provide support to all people with disabilities [when VR is currently] only serving Priority Category 1 clients. It feels like over the last many years VR has constantly been in this loop of not having enough resources. I would encourage that VR really look at their financials [to determine] where the funds are being drained and come up with some kind of sustainability [plan] so VR can keep all Priority Categories open and allow everyone to have access to the services.

Response: Federal regulations recognize that Vocational Rehabilitation (VR) programs operate with finite resources and therefore must manage those resources responsibly to ensure



long-term sustainability. The Rehabilitation Act and its implementing regulations explicitly acknowledge that VR agencies may not always have sufficient staff or financial resources to serve all eligible individuals.

Under **34 C.F.R. § 361.36(a)**, VR agencies are required to implement an **Order of Selection (OOS)** when *“the State unit is unable to serve all eligible individuals”* due to resource limitations. The regulation further clarifies that when resources are insufficient, the agency must **prioritize services based on the significance of disability**—which is why Priority Category 1 is currently open while others remain closed. Operating under an OOS with closed categories is not a failure of planning; it is the federally prescribed sustainability mechanism for periods of resource shortfall.

Additionally, **34 C.F.R. § 361.36(e)** requires VR agencies to **continually evaluate their resources**, including staffing and available funds, to determine whether they can open additional categories or must maintain the current OOS structure. VR does this diligently. We closely monitor expenditures, obligations, and projected costs to ensure that every dollar is accounted for and that we remain in compliance with federal fiscal requirements.

While we share the goal of serving all eligible individuals, the federal regulations make clear that VR agencies must balance that goal with the reality of finite resources. Maintaining an Order of Selection with certain categories closed is the federally mandated approach to ensuring that the program remains financially stable and able to provide high-quality services to those with the most significant disabilities until resources allow broader access.

We remain committed to ongoing financial analysis, transparency, and responsible stewardship of public funds. As resources change, we will continue to reassess our capacity and adjust the Order of Selection accordingly.

Comment: Regarding Goal 4, it doesn't feel like VR is a stable and sustainable organization to the public when it is constantly shutting and opening [the doors to services]. I realize this is related to the budget and whether or not there is funding, but if the goal is to be more stable and sustainable then I suggest figuring out a different way to make the VR process work for folks.

Response: Thank you for raising this concern. We understand how disruptive it can feel when access to VR services appears inconsistent or uncertain. When our doors open and close based on budget fluctuations, it understandably affects public trust and our ability to demonstrate that we are a stable, reliable resource for Montanans with disabilities.

You're absolutely right that stability and sustainability are essential if we want people to fully engage in the VR process. Your comment reinforces why Goal 4 matters so much. While funding constraints are real, it is our responsibility to find better ways to manage resources, plan ahead, and build systems that minimize interruptions in services.

We appreciate your suggestion to rethink how the VR process can work more consistently for the people we serve. Input like yours helps guide our efforts as we explore long-term solutions, streamline processes, and strengthen our organizational foundation. Thank you for sharing your perspective, it's an important reminder of the impact these issues have on individuals and communities across the state.



Comment: Regarding coordination, before VR can provide support for people with disabilities in their employment they need to be able to get feedback from the consumers. How is VR going about getting feedback from the consumers? How is VR going about getting feedback from the providers? To provide good quality coordinated services, VR needs feedback from both of those stakeholders.

Response: We absolutely agree that strong coordination depends on meaningful feedback from both the individuals we serve and the providers who support them.

To strengthen that feedback loop, VR is now actively conducting client satisfaction surveys with job seekers across the full continuum of services. This allows us to gather input while people are still engaged with the program, rather than only collecting feedback after a case has been closed. Hearing directly from clients in real time helps us identify what's working well and where improvements may be needed.

On the provider side, we have established a Provider Fee Schedule Workgroup, which has generated excellent ideas and recommendations on how we can adapt and strengthen our service delivery. We also host monthly provider calls specifically to gather input, answer questions, and maintain open communication with our partners.

We are committed to continuing to improve how we gather feedback. If there are additional approaches or tools that could help us hear more from clients, families, or providers, we welcome those suggestions.

Comment: Regarding equitable access, I know that there are limitations with VR as far as the Priority Categories that have access to the VR system. [What is VR doing] to make sure that all Priority Categories get opened up so that there is equal access to [VR services for] all people with disabilities?

Response: We share the goal of ensuring equitable access to VR services for all people with disabilities. Under federal regulations, however, we are required to close Priority Categories when the agency does not have the resources to serve every eligible individual who applies. This structure—Order of Selection—is not optional; it is a federal mandate designed to ensure that individuals with the most significant disabilities continue to receive services when resources are limited.

To responsibly manage our funding and keep as many Priority Categories open as possible, the agency has implemented a comprehensive set of cost-containment measures over the past year. These include:

- A 6% vacancy savings requirement
- Eliminating overtime
- Moving all staff events from in-person to virtual
- Completing an analysis of comparable benefits usage
- Increasing use of Job Service and One-Stop centers for job placement activities
- Updating community resource lists
- Pulling back Requests for Proposals
- Pausing contracts that were in progress
- Conducting daily review and approval of all agency purchases not included in an IPE, including office supplies and employee travel



- Requiring Bureau Chief approval for all high-risk purchases, such as graduate-level training, out-of-state training, private school tuition, goods over \$3,000, and client reimbursements

These actions are intended to stretch our resources as far as possible and protect access to services for individuals with the most significant disabilities. While we cannot guarantee when or if all Priority Categories will be open at the same time again, we are committed to managing our resources responsibly, complying with federal requirements, and serving as many individuals as we can.

Comment: I would like to see more focus going towards rural communities and employer engagement with small businesses. I am working in some towns that don't have [large employers like] Safeway or Town Pump. I'd like to see VR spreading awareness and education about their services to small businesses.

Response: We completely agree that strengthening our presence in rural communities and deepening engagement with small businesses is essential. Montana's workforce is built on small employers, and we want to make sure they understand the value, resources, and support VR can bring.

We're fortunate to have two Business Engagement Specialists on staff who work closely with small businesses across the state to promote the value proposition of disability employment. They regularly connect with employers of all sizes, including those in rural areas, to help identify opportunities, build confidence, and support successful job matches for our clients.

At the same time, we recognize that this is an area of opportunity for us. We are committed to improving our outreach and expanding our relationships with small employers so we can better meet the needs of both our job seekers and Montana's workforce.

Comment: One idea might be to connect prospective employers with the population looking for a job. It could be called a 'meet and greet.' [I am thinking of] a community function, like a job fair, that was focused more for people that have a disability so employers could meet [potential employees] before an interview. I think both parties would benefit from something like that.

Response: What you're describing is often referred to as a reverse job fair, where job seekers have the chance to showcase their strengths and meet employers in a more informal, relationship-building setting. While we haven't hosted one of these events in Montana yet, we know they've been successful in other states and can be a powerful way for employers and job seekers with disabilities to connect before a formal interview.

We really appreciate ideas like this, and we encourage you to keep them coming. Exploring new ways to bring businesses and job seekers together is something we're always interested in.

Comment: All VR clients should have gotten an invitation to this Town Hall. I found out about it really last minute. I think all people who are in the VR program need to be notified when there are things we can provide input on.

Response: Thank you for sharing this concern. We agree that it's important for people in the VR program to know when there are opportunities to provide input. While we aren't able to realistically reach out individually to every client for every announcement, we did share information about this Town Hall with all of our stakeholder groups, on social media, and



through postings in our offices. That outreach helps us reach a broad audience as efficiently as possible.

We also truly appreciate the help of our partners and stakeholders in spreading the word, and we are always looking for ways to improve how we communicate important updates. We are definitely open to exploring additional or more advanced ways to notify clients in the future and would welcome suggestions from others on effective approaches.

Comment: I believe there is a mindset of “just get a job” and it doesn’t matter what it is. I think there should be a safety net, especially for younger people still living with family or friends, so they can try out different jobs and then have that security of if this job doesn’t work out, I can just leave it and I’m not in an apartment and stuck at the job.

Response: Our goal is to maximize opportunity and support people in moving toward employment that leads to long-term, family-sustaining wages—not just “getting a job” for the sake of getting one.

For many individuals, especially young people who are still learning about themselves and the world of work, that means taking time to explore different jobs, environments, and interests. We understand that exploration is an important part of building confidence and finding the right fit. And we want people to have the space to try, learn, and sometimes discover that a particular job isn’t the right one.

We’ve seen time and again that when individuals have the chance to explore thoughtfully, they make better long-term decisions and are far more likely to succeed and stay employed. Our focus is to set people up for that kind of long-term success—not to push them into something that won’t last.

Comment: There should be more advocacy in VR. For example, when I was in VR the job coach didn’t do their due diligence and I was basically mistreated at my job but I felt stuck there. Having accessibility and being able to talk about what is happening at work [are important]. I had to have people tell me, “What is happening isn’t right” and “you aren’t being treated right.”

Response: Thank you for sharing this, and I’m really sorry that you had that experience. No one should feel mistreated at work or feel like they’re stuck without support. We agree completely that advocacy—both self-advocacy and advocacy from VR when we’re aware something is happening—is essential. People need to feel safe raising concerns and confident that they will be heard.

We also have high expectations for our community rehabilitation providers, including job coaches. The quality of their work has a direct impact on people’s lives, and we take that seriously. We continue to provide training and guidance to strengthen their skills and ensure they deliver the level of service that individuals with disabilities deserve.

Your experience is exactly why we emphasize communication, rights at work, and self-advocacy skills. When something isn’t right, people need to know they can speak up—and they need partners who will stand with them.

**VR’s performance is measured on what training and credentials clients accomplish while actively in the VR program and after exiting VR, how long clients keep their jobs and how much**



money they make. Of those areas, what do you feel is most important for VR to focus on and why?

Comment: VR only has Priority Category 1 open. Most of these outcomes are going to be reflected in Priority Category 2 and Priority Category 3. [VR is] not going to accomplish a lot of this in Priority Category 1. For Montana VR to improve these areas, it is imperative VR improve organizational sustainability to open all Priority Categories. Then, VR will see the [performance] outcomes.

Response: We want to be clear that we do not agree with the idea that individuals in Priority Category 1, those with the most significant disabilities, have a negative impact on our performance measures. In fact, we regularly see individuals in this category achieve meaningful credentials, complete high-quality training programs, obtain competitive integrated employment, and maintain their jobs over time. Many also achieve strong wage outcomes that reflect their skills and the value they bring to their communities.

Our data show that individuals with the most significant disabilities can and do achieve excellent employment outcomes when provided the right supports. Their successes are an important part of our overall performance and reflect the core mission of VR.

Comment: I love that Montana VR is moving towards doing more with On-the-Job Training (OJT). [This service] was used more in years past and I'm excited to be able to promote [this service again.] A lot of the consumers [VR and its CRPs] work with, especially in Priority Category 1, are probably going to benefit more from an OJT. A lot of those consumers are depending on Social Security Income and Medicaid for life sustainability. For VR to be pushing them towards having the higher wage, where they could lose that life sustaining support is unrealistic without other Priority Categories open.

Response: We understand the concern about how earnings may affect Social Security and Medicaid, especially for individuals in Priority Category 1. What we know from both national research and Montana's own experience is that Social Security beneficiaries are generally better off financially when they earn wages. Employment not only increases income but also opens doors to long-term stability and career growth.

That said, decisions about work and earnings are always individual. Our role is to provide clear, accurate benefits counseling so each person can make informed choices that feel right for them. These services help individuals understand how employment affects their benefits and what incentives and protections are available to them.

Montana also has Medicaid for Workers with Disabilities, which gives people the option to keep critical health coverage while earning higher wages. This program has been incredibly valuable in helping individuals confidently step into jobs that pay family-sustaining wages without fear of an immediate loss of support.

Our goal is to honor each person's choices while also supporting the broader mission of helping individuals move toward greater independence, including reducing reliance on public benefits when that becomes possible for them. We appreciate your perspective and agree that OJT can be an excellent pathway for many individuals with the most significant disabilities.



Comment: Emphasize more Work Incentives Planning and Assistance (WIPA) programming. This is a big gap that people have. It takes so long to access those services that if VR re-engaged with more providers to offer that, we would see better outcomes through VR.

Response: We completely agree that timely access to benefits counseling is essential for many job seekers, and we know that delays can make it harder for people to move forward with confidence in their employment plans.

We've been actively working on building capacity and making operational adjustments so we can better meet this demand. That includes re-engaging with providers, expanding our partnerships, and looking closely at how we can strengthen benefits planning supports within and across systems. We're also collaborating with waiver programs and other partners to ensure that individuals who need this crucial guidance can access it—whether or not they are currently involved with VR.

Your feedback reinforces that this work is important and needs to continue. We appreciate your perspective and will keep focusing on improving access to WIPA services as part of our commitment to better outcomes for people with disabilities across Montana.

Comment: I know VR is planning to change some of their closure processes. VR has not been paying the providers outcome fees if the client is continuing on a career pathway. I hope that changes. I think VR will see a big impact in their overall performance [by adjusting this practice]. I think Montana VR is doing a lot better than might be reflecting on paper due to small things, [like when and how the provider outcome fees are paid]. I had 2 high quality and 1 regular outcome placements that weren't counted last month because the consumer was still in services with VR. I think it would be helpful for VR to look at other factors impacting outcomes.

I think it would also be helpful for VR to require some kind of a performance expectation for its providers as well.

Response: We are pleased to share that VR has recently adjusted its successful outcome payment process. In the past, outcome fees were paid only at the time of VR case closure, which sometimes delayed payment to the provider when a VR client continued on a career pathway. Under the updated process, VR now pays the outcome fee at the point when provider services are discontinued, regardless of whether the consumer continues to receive other VR services. This change went into effect February 1 and is intended to ensure timely recognition of provider contributions and to more accurately reflect the successful employment outcomes occurring across the state.

We plan to consider including provider performance expectations in the service agreements for the next State fiscal year.

Comment: From a lived experience and working as a CRP closing cases, I think the most crucial piece of the evidence is the amount of time [a consumer maintains] a job. I know for me, I was in between jobs a lot and it sucked. Keeping track of job maintenance, that needs to be more closely monitored. 3 months and 6 months are okay benchmarks, but tracking job maintenance longer than that is important too.



Response: We completely agree that helping someone not just get a job, but *keep* a job, is one of the most meaningful indicators of success.

As part of our federal performance measures, we do track employment retention at both two and four quarters after exit—so up to a full year. This helps us better understand long-term stability and how individuals are progressing after services end. In addition, our staff have been coached to carefully monitor job stability and not expedite a case closure simply because 90 days have passed. Our goal is true stability, not just a placement on paper.

We really appreciate your insight, and we welcome continued feedback on how we can strengthen this aspect of our work even further. We know this is an area where thoughtful strategy can make a real difference, and we look forward to continuing to improve alongside our partners and the people we serve.

Comment: I'd like to see VR work to ensure there is a robust supportive system of helping with maintaining employment long-term.

Response: We completely agree that having a robust system to support individuals in maintaining employment long-term is essential. Helping someone keep a job—and feel confident and stable in that job—is at the heart of what successful VR services should look like.

We are already working in this direction. Long-term job retention is part of our federal performance measures, and our staff monitor job stability carefully before closing a case to make sure individuals are truly prepared to maintain their employment. At the same time, we know there is more we can do to strengthen ongoing support, and we welcome continued feedback on what would be most helpful.

Comment: I'd suggest VR focus on job and task expansion within a job, reduced reliance on job coaching, and increased hours within a job as part of how they are measuring performance.

Response: We fully agree that focusing on job and task expansion, reducing long-term reliance on job coaching, and supporting individuals to increase their hours are all important components of meaningful, sustainable employment. These are areas where expectations, both for job coaches and within the broader employment culture, play a major role. We recognize that there can sometimes be a tendency toward lower expectations for some of the individuals we serve, and shifting that mindset is essential to supporting people in growing and advancing on the job.

We are actively exploring strategies to strengthen this approach, including work with the VR Technical Assistance Center (VR TAC) to help us think differently about employment progression, natural supports, and job development practices that promote independence and upward mobility.

**Based on what you know about how VR coordinates with Montana's schools, what feedback do you have for us?**

Comment: I have noticed a little bit of confusion with the school districts and involvement with Pre-ETS. For example, Gallatin High in Bozeman seems like they are running their own Pre-ETS program but then in Belgrade, there are Pre-ETS staff more heavily involved. Maybe that is just the way the different schools have contracts for Pre-ETS, but it can be confusing for families.



When, all the Pre-ETS are done by the teachers and [the students] don't meet a Pre-ETS counselor until they move on, ...that transition has been really hard for some.

Response: You're absolutely right that there is variation in how different school districts structure and deliver their Pre-ETS programs. Each school's Pre-ETS contract includes a defined scope of work, and that flexibility allows districts to design services in a way that best meets the needs of the students they serve. At the same time, we recognize that differences between districts, such as the extent of Pre-ETS Specialists' involvement, might be confusing for students and families.

We encourage anyone who would like additional support during the transition process to reach out and schedule time with their Pre-ETS Specialist. VR has also updated internal policies to allow Pre-ETS Specialists to work with students for a longer period as they transition out of high school and into their next step. Our goal is to make sure every student feels supported and connected, regardless of how their individual school structures its Pre-ETS services.

Comment: My understanding is Montana VR partners directly with schools and the school sort of has the first right to provide all five Pre-ETS services to those students. This then doesn't allow students to receive any of those five Pre-ETS services through a partnering agency. Within my service area, if a student doesn't feel like they are getting those services from their school, there is no other way for them to access Pre-ETS. I think it would be a big change, but I'd suggest VR have more conversations about not defaulting to school contracts [to provide Pre-ETS]. How can VR and Pre-ETS allow students and families the choice of where they receive their Pre-ETS services from?

Response: VR recognizes how important it is to ensure students continue to have access to the services they need. VR provides Pre-ETS directly through our Pre-ETS Specialists and also partners with school districts across the state through contracts, although some schools choose not to enter into a Pre-ETS contract. Regardless of whether a student receives Pre-ETS services through their school, they are still able to participate in additional Pre-ETS services outside of the school setting. We understand that some students may need more individualized or extensive Pre-ETS than what their school alone can provide. In those cases, students can request services from a Pre-ETS provider to supplement what they receive from their school. VR values informed choice, and we strive to offer students and families multiple pathways to receive Pre-ETS - whether through direct services from a Pre-ETS Specialist, a school contract, a community provider, career-related competitions, or one of the Pre-ETS camps around the state. Our goal is to ensure every student can access the Pre-ETS services that best meet their needs.

Comment: I am from the southeastern Montana corner, and I wonder about [how VR ensures] equitable opportunities for students in very remote and small areas where there are not a lot of opportunities for a variety of career engagement and exposure to different types of work? I'd like to note that not everyone lives in a largely populated area.

Response: Thank you for raising this important point. We recognize that not everyone lives in a densely populated area, and it is essential for us to ensure that VR and Pre-ETS services are provided equitably across the entire state, including very remote and rural communities.



Even in the most rural corners of Montana, there are generally schools located within reach of students, and we partner closely with those schools to deliver Pre-ETS services. We also make it a priority to host rural Pre-ETS camps around the state. These camps broaden access by bringing hands-on activities, career exploration, and work site tours to students who may not otherwise have those opportunities in their local communities.

Because students in small or isolated areas have limited exposure to different career paths, we also use the LevelAll platform. It provides a large, continually updated library of videos and resources that help students explore careers they might not encounter in their local communities

Overall, our goal is to make sure every student - no matter where they live - has access to meaningful career exploration and the chance to imagine a future beyond what they may see day-to-day in their local community.

Comment: Are there pamphlets/rack cards/information that students can take home to parents about the VR system and Pre-ETS and what they can do to find work? Some information pieces would be great for students in the school systems to be able to take home if it is possible.

Response: We are currently in the process of updating our rack cards and informational materials. Once those updates are complete, the new materials will be available for students to take home and share with their families to help them better understand the VR system and Pre-ETS services.

Comment: I think it is important to also be targeting really young populations, like early childhood, mostly to prepare parents with education [about employment] and to start supporting a mindset shift about work and informing that there are programs to support their child in employment out there.

Response: Thank you for raising this. We completely agree that beginning these conversations early is essential. When families receive information and support early on, it helps build high expectations for their child with a disability and encourages dreaming, planning, and setting meaningful goals around future employment.

We are actively collaborating with the Early Childhood Services Division to begin these conversations through the Part C early intervention program. This partnership allows us to introduce the idea of employment supports much earlier, and we see it as a strong model that we can continue to expand on.

Comment: I think that relying on schools to hold Pre-ETS contracts is a huge barrier to students and other providers who could be providing quality Pre-ETS to students. There are vast differences across the state in what schools can and will do for Pre-ETS. I have experienced schools who have contracts and do almost nothing with them. There are much better ways that Pre-ETS funding can be utilized and it shouldn't be school contracts.

Response: We recognize that the capacity and approach of school districts can vary across the state, and we agree that consistency and quality in Pre-ETS services are essential. While many schools are important partners, we do not rely solely on them to deliver Pre-ETS. We have a broad network of community-based providers across Montana, and we also work with



universities, tribal colleges, Centers for Independent Living, the Department of Military Affairs, and several other organizations to ensure students have a wide range of high-quality service options.

We are always looking at ways to onboard new partners so we can expand that network and offer a diverse set of service delivery models that also align with Montana's high-demand workforce sectors. Ensuring students have meaningful choices and access to strong providers is a priority.

If you are aware of specific schools that hold contracts and are not delivering services, we would appreciate hearing about that directly so we can review and address it as needed. Continued feedback like yours helps us strengthen the program and ensure students receive the supports they deserve.

Comment: Are schools, whether they hold a Pre-ETS contract or not, helping students prepare for life outside of school? Do they offer high school credits for work trial experiences? For example, if a high school student used the last two periods of school to work, [can the student] get credit for that work? Is that part of the program at all?

Response: We believe that schools across Montana are committed to helping students prepare for life after they graduate. Because Montana is a local-control state, each school district makes its own decisions about how to structure classes and whether work-based learning experiences can count for high school credit. Some schools choose to offer credit for these opportunities, while others may handle it differently.

Comment: There are significant barriers with school districts holding contracts. There is a lot of opportunity to improve what Pre-ETS could look like [in Montana]. I think VR would see a lot of turnaround in terms of awareness of Competitive Integrated Employment opportunities for students if VR looked at that space to see what changes can be made there.

Response: We see real value in partnering with schools to deliver Pre-ETS in communities across Montana. At the same time, we are continually looking for ways to expand and strengthen Pre-ETS so students statewide have access to meaningful career exploration, work-based learning, and other Pre-ETS activities. We don't rely solely on school-based programs; students can also access Pre-ETS through specialized programs, contracted providers, and direct services from our Pre-ETS Specialists.

Our overarching goal is to support every student in reaching their fullest potential and moving toward competitive integrated employment. For students who need more individualized or intensive help to participate in Pre-ETS, we encourage them to apply for VR services where they can potentially receive job coaching and other one-on-one supports that Pre-ETS alone cannot

Comment: Is SSA Benefits Planning provided to students as part of Pre-ETS?

Response: SSA benefits planning is not one of the required Pre-ETS activities under federal regulations, so it is not included as part of Pre-ETS itself. However, we know how important it is for students and families to understand how work and earnings may affect their benefits.



While benefits planning is not part of Pre-ETS, it is available through our broader VR services. In addition, the Work Incentives Planning and Assistance (WIPA) program is available at no cost to all Montana Social Security beneficiaries, including youth. WIPA counselors can help students and families understand their benefits and make informed decisions as they explore employment.

As students transition from Pre-ETS into full VR services, we make sure they have access to benefits counseling when it is relevant to their employment goals. And we are always open to exploring ways to introduce this information earlier if it would better support students and families.

Comment: As a person who works in rural areas, I want to stress the importance of the availability of Pre-ETS services to kids in high school in those [rural] areas. I'd like to see some uniformity in what is available across the schools, including rural communities, where kids might not be getting what they really need in those areas. How can that be better addressed?

Response: We agree that ensuring access to Pre-ETS services in rural areas is vitally important. We are continually working to increase the number of Pre-ETS providers serving these communities so students have more opportunities to participate in Pre-ETS activities. In addition, we offer overnight Pre-ETS camps in rural parts of the state to help address potential inequities and ensure students can benefit from a full range of Pre-ETS services such as career exploration and work-based learning experiences.

Comment: Parents need to be aware of the availability of Pre-ETS. It needs to be better communicated through the Special Education programs in the schools. Parents need to be aware of services available, and often they aren't or don't know how to seek out services if there isn't someone coming to their school.

Response: We agree that parents need to be aware of the availability of Pre-ETS, and strengthening communication is an important focus for us. We are working to increase outreach to schools and sharing informational materials that explain our programs and the services available to students.

As part of these efforts, we are part of the Montana Secondary Transition Partnership (MSTP) that has developed and distributed regional transition guides that include information about Pre-ETS, VR, and other programs that can support students with disabilities. We also share high school transition-to-adulthood guides developed by the Montana Empowerment Center with students and families. These resources help ensure parents have clear, accessible information about the services available and how to connect with them.

**Based on what you know about how VR coordinates with other entities like Mental Health, Developmental Disabilities, etc., what feedback do you have for us?**

Comment: Make sure that [VR and CILs] are coordinating together. A lot of time on projects [both entities] are working on... having some coordination and knowledge of what each region is doing is helpful. Making sure that we are up to date in coordination with our services is a big thing.



Response: We completely agree that strong coordination between VR and the Centers for Independent Living is essential. When we stay connected and aware of one another's projects and activities across the regions, it improves messaging, strengthens our collective impact, and helps all of us manage our limited bandwidth more effectively.

We appreciate you highlighting this need, and we will continue exploring ways to enhance communication and collaboration moving forward.

Comment: I personally do not have this experience, but had a consumer who has aphasia, which is difficulty speaking. He could type the most eloquent statement, but with face-to-face communication he has trouble finding words and needs time to find words. This gentleman was placed into a job by VR providing customer service. This was not a good fit [for him and the job] didn't end well. Hoping there is a plan in place to educate those in VR counselor positions about different disabilities and abilities so placements like this could be avoided. [In this situation,] it wasn't so much dignity of risk but loss of dignity for that gentleman. I am hoping there is something in the plan [regarding] education for VR Counselors about abilities and disabilities.

Response: Thank you for sharing this comment. The situation highlights the importance of ensuring Vocational Rehabilitation Counselors have a strong, informed understanding of diverse disabilities and communication needs.

Response: VR is committed to strengthening staff expertise through graduate-level rehabilitation counseling education, continuing education, and ongoing professional development. These efforts aim to improve staff knowledge, placement decisions, and overall service quality to prevent mismatches and better support the dignity and success of the individuals we serve. In addition to graduate training, staff have access to a variety of disability education resources, including the YesLMS learning platform, which houses training on a range of disability-related topics. New staff undergo VR Foundations training to develop an understanding of the values that inform the mission of the profession and best practices to promote excellence in service of our consumers. Staff also utilize tools, including the Job Accommodation Network (JAN), to research a variety of disabilities, accommodations, and resources to better understand the experiences of those they serve.

We appreciate this valuable feedback as we continue to advance training standards and elevate the competency of our workforce.

Comment: [I sense] there is some feeling of overwhelmingness [due to] lack of resources... Is there access to [employment and other resources] in school classrooms? Maybe providing some guidelines and resources, mostly for parents, might help. Creating easy access to resources for individuals would be good.

Response: We know many in the community are feeling a sense of overwhelm, especially when resources feel limited or hard to access. That feeling is completely understandable, and we appreciate you naming it.

Your suggestion about increasing access to information and resources in school classrooms—and creating easy-to-use materials for families—is incredibly helpful. We agree that early, clear, and accessible resources can make a meaningful difference for students and their families as they begin thinking about employment and future opportunities.

#### **Additional Questions, Comments, and Feedback:**



Comment: I am happy to see that Voc Rehab is working on many initiatives this year, particularly, Competitive Integrated Employment (CIE). I am honored to be a partner in [these initiatives through] Independent Living. I have supported [legislative] initiatives for VR's Behavioral Health [counselor positions] and the [Adjustment to] Blindness position and other VR related initiatives in the last legislative session.

Response: We're grateful for your support of the initiatives we're moving forward this year, especially our work around Competitive Integrated Employment. Independent Living partners play a vital role in helping us advance these efforts, and we truly value your collaboration.

We also want to thank you for your advocacy during the last legislative session, including your support for the Behavioral Health counselor positions, the Adjustment to Blindness position, and other VR-related initiatives. Your engagement makes a meaningful difference, and we appreciate the commitment you bring to improving services for Montanans with disabilities.

Comment: I got a phone call for a survey that was done about VR services. I was wondering when we can expect the information or outcome of those survey results to be published?

Response: Thank you for your question. We appreciate you taking the time to participate in the recent survey about VR services. We anticipate having the information available in the coming months and will communicate an exact timeline as soon as we can. Thank you for your patience and for contributing your feedback to help improve our services.

Comment: A hallmark of the public vocational rehabilitation program is its partnership with people with disabilities. Professionals and consumers together should advance the civil rights and responsibilities of citizens with disabilities. Collaborations should be accountable and transparent. Sadly, Montana's Vocational Rehabilitation and Blind Services (VRBS) violated the trust of the organized blind when the agency terminated its contract with Montana Business Enterprises, Inc. It wasn't so much the decision, but rather how VRBS decided and defended its choice without the involvement of blind Montanans. Many acknowledge the importance of the disability rights mantra, "Nothing about us without us." VRBS turned its back on this principle. and the stain of this exclusion persists.

Response: We recognize how important partnership, transparency, and the principle of "nothing about us without us" are to the vocational rehabilitation program, and we also understand the deep commitment of the organized blind community to these values.

We hear the concerns about how the decision regarding the Montana Business Enterprises, Inc. contract was made and communicated. Regardless of the intent, we understand that the process left members of the blind community feeling excluded, and we take that feedback seriously. Trust and collaboration are essential, and we know that honoring those commitments requires not only strong working relationships but also clear communication and meaningful involvement in decisions that affect people directly.

We are committed to rebuilding that trust and strengthening our engagement moving forward. Your comments reinforce how important it is that we continue improving the ways we collaborate, listen, and ensure that blind Montanans have a real voice in decisions. We



appreciate you raising this, and we want to continue this dialogue as we work to do better together.

Comment: VRBS committed to grow the Randolph Sheppard Act and the Montana Blind Vendors Act programs, but those promises have yet to be realized. As a result, program participants face limitations and denials of critical support. For example, VRBS promised to replace aging vending machines with new ones. No replacement machines have been provided. Circumstances are dire the program, so much so that the program faces an existential crisis. VRBS must change its ways, or blind Montanans will pay the price of underemployment and unemployment. Montana needs a healthy blind vending program. The State Plan should address these concerns in deliberate and positive ways. Additionally, VRBS should re-commit working with Montanans with disabilities as respected partners.

Response: We agree that a strong, healthy Blind Vending Program is essential, and we remain committed to supporting the Randolph-Sheppard and Montana Blind Vendors Act programs.

I want to provide a clear update: the vending machines that were promised have been ordered and are scheduled to ship at any moment—likely by the time this response is published. We know how important this equipment is, and we appreciate everyone’s patience as this has moved forward. There were some parts of the process that took longer than expected due to statewide procurement adjustments, but the work has continued, and nothing has been denied.

We continue to support VR participants in exploring the Business Enterprise Program as an option for their employment goals, and we are dedicated to growing a strong and sustainable program.

Comment: The NFB of Montana requests VRBS to fund service coordination of NFB Newslines, the unduplicated information system for Montanans with print disabilities. During the 2023 Legislative Session, VRBS graciously agreed to fund NFB Newslines. The NFB of Montana appreciates the continuation of this funding. However, so far, VRBS refuses to fund coordination of NFB Newslines. It’s our understanding that the current rationale not to fund coordination is the Order of Selection. The Order of Selection applies to Individual Plans for Employment and not to services to groups such as NFB Newslines. Pointedly, when the Montana State Library managed NFB Newslines with full support for NFB Newslines coordination, the number of subscribers and usage of the service increased. Paying for NFB Newslines without funding coordination of the service limits and denies access to the program by Montanans with print disabilities. It’s disingenuous for VRBS to claim the Order justifies the denial of coordination funding. VRBS has never funded NFB Newslines coordination even when VRBS returned unspent funds to the federal government during recent budget surplus fiscal years. Under the Library administration, Montana enjoyed the second highest per capita increase in the use of NFB Newslines in the country. It takes coordination to sustain the program, and the NFB of Montana requests VRBS to fund NFB Newslines service coordination in the State Plan.

Response: Thank you for your comments and for highlighting the importance of NFB Newslines for Montanans with print disabilities. We want to clarify that VRBS is fully funding the NFB Newslines Service, and we have continued this support since State Library funding ended.

If constituents are experiencing challenges accessing or connecting to the service, please let us know. We are happy to troubleshoot with individuals to ensure they can fully utilize Newslines.



We will continue reviewing the issue within our program and policy framework. In the meantime, our priority is ensuring that all eligible Montanans are able to access the Newsline service without interruption.

Comment: The NFB of Montana requests VRBS to fund AIRA, the visual interpreting service for blind and low vision citizens. Visual interpreting uses modern telecommunications technology to provide reader and scribe services, navigation, and sign language interpreter services via a mobile telephone or Windows computer. One option is using Montana's Telecommunications Access program to fund the service. The NFB of Montana hopes to collaborate with VRBS in making this revolutionary technology available to blind and low vision Montanans statewide. Even though technology is relatively new, it liberates individuals to secure and sustain employment and independent living. Other states are paying for AIRA. The evidence of the positive impact of AIRA is abundant and convincing.

Response: AIRA is an excellent tool, and we agree that it has tremendous potential to support independence, employment, and daily navigation for blind and low-vision Montanans. Our staff already provide information, referral, and training on AIRA as part of our standard services, and we're always excited to introduce people to technology that can make a real difference.

Your concept proposal has been shared with the Montana Accessible Communication Program (formerly the Montana Telecommunications Access Program). They will be exploring this idea further and presenting it to their citizen council, which provides direction on the program's services and budget. We appreciate your interest in partnering, and this will help ensure the conversation includes the right stakeholders and expertise.

Comment: We are the Montana Vending Operators Committee (VOC) for the Business Enterprise Program for Blind Vendors (BEP) and are licensed vending operators through the state and following the Randolph Shepard Act (RSA) guide lines.

We are writing you to ask for your assistance to correct the lack of management, support and the lack of funding from the VR for the Business Enterprise Program. For well over twenty years the BEP was managed by a nominee called the Montana Business Enterprises, Inc. (MBEI). They ran the program very efficiently with a small budget from the state and always had a blind person on staff or as CEO. The program kept four blind and low vision people working along with three route drivers and one half time MBEI assistant. In addition, each year the MBEI would purchase at least 3 new machines for our routes, but that has stopped since VR took over.

On September 1<sup>st</sup> 2023 the VR stopped funding the MBEI and moved the program in house without knowing or understanding the operations of the program and the vending business as a blind vendor. The blind CEO of three years for the MBEI was faded out of her job. Prior to her position as CEO, she ran a large successful vending route business for nineteen years. She was very knowledgeable of the BEP, the vending business and well connected with vending manufactures.

Under the VR's management of the BEP all three vendors are experiencing a loss of income and seeing our businesses shrink over the last two and half years. One of the biggest problems we have is getting new equipment to expand our routes and replace old machines. Some of our machines are so old that we can no longer find replacement parts to keep them running. We now are required to order replacement parts through the state BLVS which has been a slow and



somewhat cumbersome process. This has caused repairs to take longer with down times and with no income from that machine. This makes the program look bad, it makes the vendors look bad and the vendors take the brunt of lost income while we wait for parts or new equipment.

We are self employed, hard working and self motivated people. We do not have health insurance, workman's comp, unemployment Insurance, sick leave, overtime pay, paid holidays or annual leave or retirement benefits. In addition, our incomes fluctuate from month-to-month and we pay 15% to Social Security instead of 7.5% as an employee would pay. People with low vision or blindness have an extremely difficult time finding employment. That is why we need these jobs despite having no benefits. We are proud of our businesses and want to see them stay strong and profitable for us and for the next blind person to take over after we leave. We want more from life than what a Social Security disability check can give.

Once again, we are asking for help to keep our businesses running and to keep 3 employment positions for blind people available for now and into the future, before the VR closes the Business Enterprises Program completely.

Response: We genuinely appreciate the commitment, resilience, and pride that each of you brings to your businesses and to the Business Enterprise Program. We also understand how disruptive this transition has been. The impact on your income, operations, and confidence in the program is real, and we hear that.

We want you to know that addressing the equipment challenges has been a priority. New machines are currently being built and should be delivered soon. To help prevent the procurement barriers we saw with the last order, we have developed an RFP that is now moving forward. The goal is to ensure the state has a single vendor able to consistently supply the equipment, specifications, and support that BEP operators need to serve their customers and grow their businesses.

We also recognize the delays in getting replacement parts and understand how downtime affects your revenue and your relationships with customers. We are working to improve that process as well.

At the same time, we're seeing current VR clients who are exploring or actively pursuing opportunities in the vending and food service field. The goal is not only to stabilize the program now but also to strengthen it so future blind vendors have viable career paths.

We sincerely appreciate the dedication you bring to this work and your commitment to keeping employment opportunities available for blind Montanans.