# CALIFORNIA DEPARTMENT OF REHABILITATION

Vocational Rehabilitation Services Program and Supplement for the Supported Employment Services Program State Plan

Program Years 2016 - 2020



Employment, Independence & Equality

Joe Xavier Director

### **Table of Contents**

Executive Summary	3
a. Input of State Rehabilitation Council	8
b. Request for Waiver of Statewideness	.14
c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System	.19
d. Coordination with Education Officials	.26
e. Cooperative Agreements with Private Nonprofit Organizations	.32
f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services	.35
g. Coordination with Employers	.39
h. Interagency Cooperation	.39
i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development	.41
j. Statewide Assessment	.57
k. Annual Estimates	.61
I. State Goals and Priorities	.64
m. Order of Selection	.67
n. Goals and Plans for Distribution of Title VI Funds	.70
o. State's Strategies	.73
p. Evaluation and Reports of Progress: VR and Supported Employment Goals	.90
q. Quality, Scope, and Extent of Supported Employment Services	105
Certifications	111
Certification Regarding Lobbying — Vocational Rehabilitation	114
Certification Regarding Lobbying — Supported Employment	116
Assurances	118

#### **CALIFORNIA DEPARTMENT OF REHABILITATION**

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

### **Executive Summary**

The California Department of Rehabilitation's (CDOR) State Plan is submitted to the United States Department of Education's Rehabilitation Services Administration to describe the vocational rehabilitation (VR) and supported employment services provided to Californians with disabilities under Title I and Title VI, Part B of the Rehabilitation Act of 1973, as amended. The State Plan addresses administration functions and reporting requirements and identifies areas where service delivery can be improved, modified or enhanced. As a part of the California workforce development system, and as a core partner identified in the Workforce Innovation and Opportunity Act (WIOA), which President Barack Obama signed into law on July 22, 2014, CDOR's State Plan is an Appendix to California's Unified State Plan, which is submitted every four years through the California Workforce Development Board.

The enactment of WIOA constitutes significate changes to the VR and supported employment programs with an emphasis on transition services to youth, business engagement, program partnerships and competitive integrated employment. The State Plan, developed in collaboration between CDOR and the California State Rehabilitation Council (SRC), demonstrates CDOR's commitment to changes within the law and empowers individuals to maximize employability, independence, and integration into the work place and community. CDOR continues to work with the California Workforce Development Board towards the development of performance goals as identified in WIOA.

This State Plan presents a departure from the format used in prior years. Previously, CDOR's State Plan was structured with the Rehabilitation Services Administration's Preprint, which outlined the content and assurances required for the State Plan, serving as the first portion, followed by attachments responding to particular Preprint requirements. The 2016 – 2020 VR Services Portion of the Unified State Plan is organized according to the new description format provided by the Rehabilitation Services Administration.

### **PRIORITIES AND GOALS**

The CDOR and SRC jointly developed priorities and goals to ensure the VR and supported employment programs are in alignment with WIOA and include transition services for youth, business engagement, program partnerships and competitive integrated employment. To this end, the four priorities and seven goals identified are:

#### Priority 1: Youth

Goal 1.1: Increase opportunities and outcomes for training and employment services for youth with disabilities.

Goal 1.2: Outreach to potentially eligible students with disabilities to enhance awareness of, and the opportunities to receive, CDOR services.

Goal 1.3: Increase coordination of services between CDOR and other partners to support youth with disabilities.

**Priority 2:** Business Engagement

Goal 2.1: Increase partnerships with businesses within the local areas to develop or expand work experience, internship, and employment opportunities for adults and youth with disabilities.

Goal 2.2: Promote participation in career pathways to meet business sector and consumer employment needs.

**Priority 3:** Capacity Building

Goal 3.1: Establish or enhance partnerships with WIOA core programs to improve service delivery for adults and youth with disabilities.

Priority 4: Competitive Integrated Employment

Goal 4.1: Increase competitive integrated employment opportunities and outcomes and supports for adults and youth with disabilities, particularly those with the most significant disabilities and those underserved.

# SERVICE DELIVERY AND OUTREACH ACTIVITIES

During Federal Fiscal Year (FFY) 2016 and 2017, CDOR estimates it will allocate \$363,114,000 in federal funds to provide VR services to approximately 222,000 individuals with disabilities of working age. These funds will be used to provide a broad range of VR services, which include counseling and guidance; assessment, training, and education; mobility and transportation aids; job search and placement assistance; job retention services; post-employment services; and, accommodations or auxiliary aids connected to the consumer's vocational goal. The Vocational Rehabilitation Service Delivery (VRSD) team, along with service partners including Community Rehabilitation Programs (CRP), third-party cooperative programs, or in partnership with local public agencies, provides the VR services to applicants and eligible consumers.

Due to limited funding and staff resources, CDOR projects it will be unable to provide services to all eligible individuals and is operating under an Order of Selection. Once applicants are determined eligible for services, they are placed in one of three priority categories. CDOR currently has sufficient funding available to serve eligible individuals with the most significant disabilities (Priority Category 1) who apply on or before June 30, 2016, individuals with significant disabilities (Priority Category 2), who apply on or before June 30, 2016, and, all other eligible individuals with disabilities (Priority Category 3), who apply on or before June 30, 2016 and have not withdrawn their application or been removed from the Waiting List due to failure to confirm continued interest in receiving VR services. The Order of Selection may change in the future based on budgetary constraints.

The triennial Comprehensive Statewide Needs Assessment is designed to identify the rehabilitation needs of Californians with disabilities, as well as stakeholder needs. CDOR, in collaboration with the SRC, conducted the first year of the Comprehensive Statewide Needs Assessment. First year preliminary results identified the need for closer coordination, cross referrals, and cross training between CDOR VRSD teams, vendors, and WIOA program partners. The preliminary results also identified the need to

raise awareness of VR services in the Asian American, Hispanic, and Latino communities and the need for more service delivery models that address the unique needs of youth and students with disabilities. The preliminary results were considered when developing the State Plan priorities, goals, objectives, and strategies to meet the needs of consumers and stakeholders and align with requirements under WIOA.

#### PERSONNEL DEVELOPMENT

To meet the State Plan priorities, goals, objectives, and strategies, CDOR relies on qualified staff, and maintains a comprehensive system of personnel development to ensure a sufficient workforce of qualified state rehabilitation personnel, including professionals and paraprofessionals, is in place for the timely and successful delivery of VR services to Californians with disabilities. To ensure effective provision of services to consumers, CDOR offers a variety of training and work experience opportunities to develop employee competencies, knowledge, skills, abilities, and comply with mandated training requirements.

In 2014, CDOR successfully completed the statewide implementation of the VRSD teams located in field offices throughout California and, in 2015, developed and implemented an evaluation and assessment plan to collect and analyze VRSD team data. The evaluation and assessment plan measured the impact of the team approach and identify improvements on program design and implementation which, in turn, inform the strategies for personnel development in this and future State Plans.

The CDOR only hires individuals that meet the state standard for VR Counselors exclusively responsible for the five non-delegable functions. In academic year 2014-15, CDOR and the Rehabilitation Services Administration sponsored 82 employees enrolled in Master's Degree in Rehabilitation Counseling programs and 47 graduates who obtained their Master's Degrees. CDOR ensures a sufficient number of VR Counselors are in place to deliver VR and Supported Employment services to applicants and consumers. Based on historical vacancy data and the number of individuals to be served, CDOR projects 166 VR counselors may be needed to provide VR services in the next five years.

#### CONCLUSION

The implementation of the Unified State Plan is the combined efforts of the California Workforce Development Board, CDOR, SRC, community programs, and WIOA core program partners to work towards the common goals, objectives, and outcomes. The State Plan aims to achieve CDOR's mission of working in partnership with consumers and other stakeholders to provide services and advocacy resulting in employment, independent living, and equality for individuals with disabilities.

#### VR Portion of WIOA State Plan for the State of California Program-Specific Requirements for Vocational Rehabilitation

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan\* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

\* Sec. 102(b)(D)(iii) of WIOA

# a. Input of State Rehabilitation Council

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;

#### CDOR Response: Input of the State Rehabilitation Council (SRC).

Throughout the year, the SRC works in partnership with the California Department of Rehabilitation (CDOR) to improve Vocational Rehabilitation (VR) services for individuals with disabilities. The 2015 SRC Annual Report (posted on CDOR's public website) provides information on the complete scope of the SRC's activities. Highlights of the SRC's input and recommendations to CDOR in 2015 include the following:

• The CDOR and the SRC jointly developed, reviewed and agreed to the State Plan priorities and goals presented in Description (I) – State Goals and Priorities of the State Plan.

• The CDOR collaborated with the SRC to develop and administer the annual Consumer Satisfaction Survey, which provides feedback on CDOR's progress in meeting its VR program responsibilities. The results are used to inform CDOR and the SRC on how to increase effectiveness and efficiency in the VR service delivery process. In 2015, CDOR received satisfactory marks for its services. CDOR also received satisfactory marks for its assistance to consumers who were employed. To assist CDOR in its quality improvement efforts, the SRC will further evaluate the 2015 survey results to determine if recommendations might be warranted.

• The SRC continues to be an active partner with CDOR on the Comprehensive Statewide Needs Assessment, which is conducted over a three–year period to identify the rehabilitation needs of individuals with disabilities. In 2015, the SRC participated in interactive discussions regarding the development and methodology for the Comprehensive Statewide Needs Assessment, including the development of questions used during public meetings. During each Quarterly meeting, the SRC reviewed the Comprehensive Statewide Needs Assessment progress and provided input and suggestions. Notably, in 2015, the SRC created a new committee that will work with CDOR on the Comprehensive Statewide Needs Assessment. Additional information regarding the Comprehensive Statewide Needs Assessment is available in Description (j) – Statewide Assessment.

• During the August 2015 Quarterly meeting, the SRC approved recommendations for inclusion into CDOR's State Plan. The SRC's recommendations with CDOR's response are provided below:

#### **SRC Recommendation**

It is widely recognized in business and industry that soft skills are important 21st Century skills and are part of workplace readiness. The SRC commends CDOR for developing and implementing its Soft Skills program. The SRC recommends:

a. In an effort to gauge the extent to which this program has been implemented, the SRC requests additional information on how many consumers have attended soft skills training by CDOR, and how many Districts have participated in these efforts.

b. The SRC further recommends CDOR develop an integrated approach to providing soft skills training for all consumers, including youth with disabilities, throughout a consumer's development towards employment, including training by curriculum, workplace training, and job coaching. This integrated approach must include strong business engagement to ensure consumers have the skills to succeed in their employment choice.

#### **SRC** Recommendation

To understand the evolving hiring needs of business and to implement changes needed to improve quality employment outcomes, the SRC recommends CDOR expand engagement with business at each level of CDOR, including executive leadership, and ensure a focus on business engagement is disseminated throughout the organization.

#### **SRC Recommendation**

To more effectively partner with the regional and local Workforce Development Boards, the SRC recommends CDOR should develop a consistent partnership agenda to guide District Offices to successfully engage in regional planning and local service delivery efforts with Workforce Boards.

#### **SRC Recommendation**

As CDOR expands engagement efforts with the California Department of Education and deepens connections with Local Education Agencies and Special Education Local Plan Areas, the SRC recommends CDOR should include students with 504 Plans in these engagement efforts to provide services to students with disabilities.

#### **SRC Recommendation**

In order to provide consumers with equal access to the benefits of the 21st century technology, the SRC recommends CDOR proactively educate and inform staff and consumers of the importance of Assistive Technology and the tools and user competency which is taken for granted in today's workplace.

#### **SRC** Recommendation

In its review of the 2015 Consumer Satisfaction Survey results, the SRC noted several areas of continuing concern to consumers. To assist CDOR in its quality improvement efforts, the SRC will further evaluate survey results to determine if recommendations might be warranted.

# 2. The Designated State unit's response to the Council's input and recommendations; and

#### **SRC** Recommendation

It is widely recognized in business and industry that soft skills are important 21st Century skills and are part of workplace readiness. The SRC commends CDOR for developing and implementing its Soft Skills program. The SRC recommends:

a. In an effort to gauge the extent to which this program has been implemented, the SRC requests additional information on how many consumers have attended soft skills training by CDOR, and how many Districts have participated in these efforts.

b. The SRC further recommends CDOR develop an integrated approach to providing soft skills training for all consumers, including youth with disabilities, throughout a consumer's development towards employment, including training by curriculum, workplace training, and job coaching. This integrated approach must include strong business engagement to ensure consumers have the skills to succeed in their employment choice.

#### **CDOR Response**

a. The CDOR has provided soft skills training to consumers in all 13 Districts. Although all Districts are providing soft skills training, only two Districts (Greater East Bay and San Diego) have created a tracking mechanism. In those Districts, it is estimated that 123 consumers have received soft skills training between October 2014 and November 2015. CDOR will assess how to best track consumers who are receiving soft skills training.

b. The CDOR will continue to provide soft skills training as part of the ongoing VR services, and as appropriate based on need, as identified in each individual's Individualized Plan for Employment, including youth with disabilities. Additionally, CDOR will provide continual training to Employment Coordinators and other service delivery team members. Soft skills training will be incorporated into the curriculum for youth with disabilities. In order to increase the quality and the number of successful job placements, CDOR will consider business feedback, as appropriate, when updating its existing soft skills curriculum and, or training needed for its consumers.

#### **SRC Recommendation**

To understand the evolving hiring needs of business and to implement changes needed to improve quality employment outcomes, the SRC recommends CDOR expand engagement with business at each level of CDOR, including executive leadership, and ensure a focus on business engagement is disseminated throughout the organization.

#### **CDOR Response**

The CDOR welcomes continued opportunities to speak and collaborate with businesses on their employment and training needs. CDOR recognizes that understanding the ever changing business environment and the skills needed by employers will benefit its consumers in their training plans and employment goals. As CDOR builds partnerships and relationships with businesses throughout the state, CDOR will provide training and resources to management and staff. CDOR is committed to ensuring that business needs are met, consistent with the Workforce Innovation and Opportunity Act (WIOA) and Section 508, and incorporated into practices that lead to successful employment outcomes for our consumers.

#### **SRC Recommendation**

To more effectively partner with the regional and local Workforce Development Boards, the SRC recommends CDOR should develop a consistent partnership agenda to guide District Offices to successfully engage in regional planning and local service delivery efforts with Workforce Boards.

#### **CDOR Response**

Through collaboration with the California Workforce Development Board, CDOR is developing a partnership at the State level that can be replicated at the regional and local levels based on the operational needs of each district. Through the Unified State Plan, CDOR has provided four priorities (Youth, Business Engagement, Capacity Building, and Competitive Integrated Employment) to the California Workforce Development Board. CDOR has also identified how it may partner at the regional and local levels to address service delivery needs with the intention of increasing skills attainment and quality employment outcomes. CDOR is interested in leveraging resources to benefit its consumers and creating partnership models that may be replicated throughout the state to ensure CDOR is fully engaged in those efforts.

### **SRC Recommendation**

As CDOR expands engagement efforts with the California Department of Education and deepens connections with Local Education Agencies and Special Education Local Plan Areas, the SRC recommends CDOR should include students with 504 Plans in these engagement efforts to provide services to students with disabilities.

### **CDOR Response**

In order to increase the number of high school students with disabilities receiving services through CDOR, students with, or eligible for 504 Plans, will be included in outreach efforts, as appropriate. Through district needs assessments, satisfaction surveys, outreach efforts, and collaboration with Local Education Agencies, CDOR will assess the service needs of students and youth with disabilities and increase the number of eligible students receiving services through the Department. CDOR is in the initial stages of creating marketing material and developing advertising strategies geared towards youth and students with disabilities. CDOR has a social media presence to educate youth with disabilities about the services and to highlight the achievements of people with disabilities.

#### **SRC Recommendation**

In order to provide consumers with equal access to the benefits of the 21st century technology, the SRC recommends CDOR proactively educate and inform staff and consumers of the importance of assistive technology and the tools and user competency which is taken for granted in today's workplace.

#### **CDOR Response**

The CDOR will continue to pursue innovation(s) and advanced technology to educate and inform consumers on assistive technology and determine how to increase user competency. In collaboration with the California Department of General Services, CDOR developed and maintains the State Price Schedule to make improvements in identifying and purchasing assistive technology goods and services in a timely manner. Additionally, CDOR administers the Assistive Technology Grant and the Assistive Technology Advisory Committee provides advice to CDOR regarding Assistive Technology programs. Digital Access Project, developed by Ability Tools, the Assistive Technology grant contractor, provides low–cost Internet service and Wi–Fi devices to people with disabilities.

### **SRC Recommendation**

In its review of the 2015 Consumer Satisfaction Survey results, the SRC noted several areas of continuing concern to consumers. To assist CDOR in its quality improvement efforts, the SRC will further evaluate survey results to determine if recommendations might be warranted.

#### **CDOR Response**

The CDOR continues to make efforts to address consumer concerns and welcomes SRC recommendations to enhance and improve services for CDOR consumers. Each consumer that requested follow up was contacted by the Customer Service Unit, and District Administrators and Team Managers received their district results in order to address training needs and make service delivery improvements.

# 3. The designated State unit's explanations for rejecting any of the Council's input or recommendations.

Not applicable – CDOR did not reject any of the SRC's recommendations.

# **b.** Request for Waiver of Statewideness

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

# 1. A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;

**CDOR Response: Request for Waiver of Statewideness.** CDOR requests a continuation of its waiver of statewideness for third–party

cooperative arrangements (referred to in California as Cooperative Agreements) with local education agencies, public higher education agencies, and county human services agencies. These arrangements between CDOR and local public agencies are designed to increase the availability and quality of VR services which assist consumers to achieve competitive integrated employment. Although cooperative arrangements exist in each CDOR district, CDOR does not have sufficient staff or budget authority to contract with every potential cooperative partner in the state. In geographic areas where a cooperative arrangement is not available, individuals can apply for VR services at any local CDOR field office.

Cooperative arrangements include the following required federal assurances:

• Local funds used as match are certified as non-federal monies. The nonfederal share of funds are made available by the local public agencies to CDOR and are either paid through a cash match contribution or reported as certified expenditures of redirected agency staff time to provide a unique pattern of VR services exclusively to CDOR applicants and consumers. Each cooperative arrangement identifies the type and amount of match to be provided by the local public agency.

• The types of VR services provided to CDOR applicants and consumers by the local public agency or associated vendor are identified by the VR Counselor.

• Prior written approval is issued by CDOR to the local public agency or associated community rehabilitation provider, which designates the specific type of VR services to be provided to CDOR applicants and consumers.

• The VR services provided are only for CDOR applicants and consumers and are new services that have a VR focus or existing services that have been modified, adapted, expanded, or reconfigured to have a VR focus; and, that are not customary services the local public agency is legally mandated to provide. The services included in each cooperative arrangement are based on the local needs of CDOR applicants and consumers and the local public agency.

• Program expenses for cooperative arrangement services are under the administrative supervision of CDOR through the cooperative arrangement.

• Each cooperative program and CDOR District establishes a mutual referral system for individuals to apply for VR services.

• The requirements of the VR Services Portion of the Unified State Plan will apply to all services provided to CDOR applicants and consumers under the cooperative arrangement, including the Order of Selection identified in the response for Description (m) – Order of Selection.

The CDOR administers VR services through the following cooperative programs for which the waiver of statewideness is requested. Through these arrangements, the participating cooperative program provides one or more new or expanded VR services to CDOR consumer.

#### **Transition Partnership Programs**

The CDOR administers 111 Transition Partnership Programs cooperative programs with Local Education Agencies, County Offices of Education or Special Education Local Plan Areas providing VR services to eligible students in hundreds of individual schools. CDOR also administers six case service contracts through associated Community Rehabilitation Programs (CRPs) in conjunction with Transition Partnership Programs cooperative programs. The goal of the Transition Partnership Programs is to serve high school students with disabilities including blind, deaf, intellectual, developmental and mental health disabilities by facilitating the effective transition from school to meaningful competitive integrated employment.

The Local Education Agency or Special Education Local Plan Area will refer students with disabilities ages 16 through 21 who can benefit from VR services to CDOR. The assigned VR Counselor will then open a case and work in partnership with the individual to complete an Individualized Plan for Employment as early as possible, but at the latest before the consumer leaves school. Through the cooperative arrangement or case service contract, the participating Local Education Agencies, Special Education Local Plan Areas, or CRP provides one or more new or expanded VR services to students.

These services conform to the definition of Pre–Employment Transition Services required by WIOA and contain the following key features: job exploration counseling; work based learning experiences; counseling on post–secondary opportunities; workplace readiness training; and, instruction in self advocacy. These services, in addition to others provided on an individual basis are intended to ultimately result in competitive integrated employment.

#### WorkAbility | Program

The WorkAbility I program is administered through the California Department of Education. The goal of the WorkAbility I is to provide pre– employment training, employment placement and follow up for high school students in special education who are transitioning from school to work, independent living and postsecondary education or training.

### **WorkAbility II Cooperative Programs**

The CDOR administers four WorkAbility II cooperative programs with Local Education Agencies, Adult Schools, or Regional Occupational Programs. The goal of the WorkAbility II is to assist adult and out–of–school youth with disabilities to obtain competitive integrated employment. The VR services provided include vocational assessment, employment preparation and vocational instruction, job development, placement, and job retention, and non–Supported Employment job coaching.

#### WorkAbility III Cooperative Programs

The CDOR administers 24 WorkAbility III cooperative programs with community colleges. The goal of the WorkAbility III is to assist college students with disabilities to obtain competitive integrated employment. The VR services provided include vocational assessment, employment preparation, job development, placement, and job retention services.

# WorkAbility IV Cooperative Programs

The CDOR administers 11 WorkAbility IV cooperative programs with the California State University (CSU) or University of California (UC). The goal of the WorkAbility IV is to assist college students with disabilities to obtain competitive integrated employment. The VR services provided include internships, employment preparation, job development, placement, and job retention services.

#### Mental Health Cooperative Programs

The CDOR administers 23 mental health cooperative programs with county mental health agencies and 34 case service contracts with associated CRPs. The goal of the mental health cooperative programs is to assist individuals with mental health disabilities live independently in the community through obtaining successful competitive integrated employment. The VR services provided include vocational assessments, personal vocational and social adjustment, work adjustment, employment preparation, job development, placement, and job retention services, as well as non–Supported Employment job coaching.

#### Welfare Cooperative Programs

The CDOR administers two Welfare cooperative programs with county human services agencies and one case service contract with an associated CRP. The goal of the Welfare cooperative programs is to assist individuals with disabilities who receive Temporary Assistance to Needy Families to achieve competitive integrated employment. County Welfare programs provide work related programs for recipients of Temporary Assistance to Needy Families, but have exempted people with disabilities. The services they have available for non–disabled Temporary Assistance to Needy Families recipients do not meet the needs of people with disabilities. The VR services provided include vocational evaluations, employment preparation, job development, placement, and job retention services.

# 2. The designated State unit will approve each proposed service before it is put into effect; and

Refer to the bullet point under Description (b)(1) – Request for Waiver of Statewideness, which states, "Prior written approval is issued by CDOR to the local public agency or associated community rehabilitation provider, which designates the specific type of VR services to be provided to CDOR applicants and consumers."

#### 3. All State plan requirements will apply

Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver. Refer to the bullet point under Description (b)(1) – Request for Waiver of Statewideness, which states, "The requirements of the VR Services Portion of the Unified State Plan will apply to all services provided to CDOR applicants and consumers under the cooperative arrangement, including the Order of Selection identified in the response for Description (m) – Order of Selection."

# c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System.

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

# 1. Federal, State, and local agencies and programs;

#### CDOR Response: Cooperation with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System.

CDOR works cooperatively with the following state and local agencies that do not carry out activities under the statewide workforce investment system, through Cooperative Agreements, Memorandum of Understandings, Interagency Agreements, or grants:

# **California Association of Student Financial Aid Administrators**

Memorandum of Understanding: Guidelines for Joint Financial Support – establishes guidelines for the joint financial support of CDOR student consumers to achieve their educational goals, eventually leading to employment. This Memorandum of Understanding supports students enrolled in the California post–secondary setting with a financial aid office on campus.

# **California Commission on Disability Access**

Interagency Agreement: California Commission on Disability Access promotes disability access in California through dialogue and collaboration with stakeholders including, but not limited to, the disability and business community and all levels of government.

### CSU

Memorandum of Understanding: Service Commitment for CSU Students who are CDOR Consumers – details the commitment of the CSU and CDOR to work cooperatively to provide services to eligible CSU students who are CDOR consumers with disabilities.

#### **CSU Sacramento**

Interagency Agreement 1: Supervisory Training – provides 80 hours of supervisory training to CDOR supervisors and managers and reflects the mission and goals of the California Health and Human Services Agency.

Interagency Agreement 2: Project, Meeting, and Workgroup Consultation – CSU Sacramento, Center for Collaborative Policy provides the California Committee on Employment of People with Disabilities with strategic consultation for project planning, meeting support, and facilitation of work groups.

#### **California Department of General Services**

Statewide Contracts: CDOR Purchasing Agreements – The California Department of General Services oversees the statewide contracts for purchasing where agreements establish a pre–qualified list of vendors and simplify the purchasing process. Cooperative agreements are available to all State of California governmental entities, including CDOR, that expend public funds for the acquisition of both goods and services. The California Multiple Award Schedules offers a wide variety of commodities, non– information technology services and information technology products and services at prices which have been assessed to be fair, reasonable, and competitive. The Western States Contracting Alliance is used for cooperative purchasing agreements with other states for information technology hardware, software, and non–information technology products.

Interagency Agreement 1: CDOR Applicant and Consumer Mediation Assistance – the California Department of General Services, Office of Administrative Hearings mediators assist applicants and consumers who request fair hearing or mediation to explore options for mutual resolution of a dispute in a timely, non–confrontational manner. Through mediation, applicants and consumers can better understand CDOR regulations and policies, and CDOR can better understand the individual's needs. Interagency Agreement 2: Business Enterprise Program Fair Hearing Services – the California Department of General Services, Office of Administrative Hearings provides fair hearing services for CDOR Business Enterprise Program vendor appeals.

Interagency Agreement 3: CDOR Applicant and Consumer Fair Hearing Services – the California Department of General Services, Office of Administrative Hearings provides fair hearing services to review determinations made by CDOR that affect VR services to individuals with disabilities and applicants and consumers.

Interagency Agreement 4: Business Enterprise Program Insurance Management – the California Department of General Services, Office of Risk and Insurance Management provides management of the Business Enterprise Program statewide insurance program funded from food service vending machine locations.

#### California Department of Health Care Services Information Exchange

Interagency Agreement: Verification of CDOR Applicant's Benefit Status – used by CDOR to verify an applicant's Supplemental Security Income or Social Security Disability Insurance benefit status to assist in determining eligibility for CDOR services including application of the presumptive eligibility rules for Supplemental Security Income or Social Security Disability Insurance beneficiaries in accordance with Title I of the Rehabilitation Act.

California Department of Developmental Services: Individuals Eligible for Home and Community Based Waiver Programs – CDOR has a formal agreement with the California Department of Developmental Services, California's State agency responsible for administering the Home and Community Based Services waiver for the State Medicaid plan under Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.). The California Department of Developmental Services has the primary responsibility to provide services and supports for individuals with intellectual disabilities and individuals with developmental disabilities, including extended services, or individuals with the most significant disabilities who have been determined to be eligible for home and community–based services under a Medicaid waiver, Medicaid State plan amendment, or other authority related to a State Medicaid program period.

#### **California Department of Technology Services**

Interagency Agreement: Data Processing – provides CDOR data processing services.

#### **Independent Living Centers**

Statewide Grants: Administration and Oversight of Independent Living Services – Title VII Rehabilitation Act Funds are used to administer CDOR's Independent Living program and monitor 28 Independent Living Centers that provide federally required services, including Independent Living skills and assistive technology services to individuals with disabilities.

Grant 1: Provision of Independent Living Services – Assembly Bill 204 grants that are issued to non–profit Independent Living Centers provide Independent Living services that assist individuals with disabilities in achieving social and economic independence. Core services provided include peer counseling, advocacy, attendant referral, housing assistance, and Independent Living skills training; and others services and referrals deemed necessary such as transportation, job development, equipment maintenance and evaluation, and mobility assistance and communication.

Grant 2: Independent Living Long–term Stability – Title VII B grants funds used for technical assistance and capacity building to achieve greater long–term stability for Independent Living networks.

#### Older Individuals who are Blind

Grants: The Older Individuals who are Blind Program Administration and Services – Title VII, Chapter 2 Rehabilitation Act funds used to administer and monitor the delivery of local Older Individuals who are Blind program services to visually impaired individuals age 55 and older to assist them to live independently, including funding 22 vendors to provide training in low– vision assistance, adaptive equipment, orientation and mobility, communication, daily living skills, self–advocacy, adjustment counseling, and transportation skills services to eligible individuals.

#### The Regents of the UC

Memorandum of Understanding: Service Commitment for UC Students who are CDOR Consumers – details the commitment of the UC and CDOR to work cooperatively to provide services to eligible UC students who are CDOR consumers with disabilities.

#### California State Controller's Office

Interagency Agreement 1: Claim Processing – expedites services to process claim schedules containing vendor invoices for goods and services provided to CDOR staff and consumers to ensure timely payment for continuance of services and compliance with the California Prompt Payment Act.

Interagency Agreement 2: Employee Leave System – provides CDOR Human Resource staff access and use of the State Controller's Office California Leave Accounting System for CDOR employees to perform a variety of functions necessary to accurately record and track leave system eligibility, balances, state service credits, and leave benefit activity.

Interagency Agreement 3: Human Resource Reports – provides CDOR Human Resource staff access and use of the Management Information Retrieval System to generate pre–written reports or create ad hoc reports on CDOR employee employment history, payment history, employer– sponsored deductions, and position inventory.

#### **State Independent Living Council**

Grants: State Independent Living Council Operation – Title VII B, Rehabilitation Act funds used to operate the State Independent Living Council and provide State Independent Living Council funds for various sub–grants and contracts necessary to carry out objectives of the State Plan for Independent Living by programs for people with disabilities.

#### **California State Personnel Board**

Interagency Agreement 1: Training Agreement – CDOR provides training on the Introduction to Fair Employment and Housing Act and the Americans with Disabilities Act, Practical Solutions to Reasonable Accommodation, and Writing an Effective Duty Statement. Interagency Agreement 2: Exam Access – State Personnel Board's Selection System provides CDOR computer access to conduct departmental civil service examinations, as well as process and maintain civil service eligible lists and certification lists.

#### Ticket to Work and Self–Sufficiency Program

The CDOR actively coordinates with the Ticket to Work and Self– Sufficiency Program. Ticket to Work is a voluntary work incentive program for Social Security Disability Insurance or Supplemental Security Income beneficiaries between the ages of 18 and 64 who are interested in going to work. The Ticket to Work Program provides beneficiaries with access to VR, training, and placement services, as well as other services and support. Beneficiaries can use their ticket to obtain employment services and support from CDOR or they can take their ticket to an approved service provider called an Employment Network. A ticket cannot be assigned to an Employment Network and in–use with CDOR at the same time.

The CDOR's Work Incentives Planners and VR Counselors have an active role in the Ticket to Work program. CDOR's Work Incentives Planners verify ticket status, provide information as needed, and facilitate referrals to Employment Networks at case closure. VR counselors distribute CDOR's Ticket to Work fact sheet at intake, verify the ticket status prior to approving the Individualized Plan for Employment, and facilitate sequential services.

# **Coordination with the State Agency Responsible for Providing Mental Health Services**

In California, the State agency responsible for mental health services is the California Department of Health Care Services. Currently, CDOR has an informal relationship with the California Department of Health Care Services to work together to support collaboration between county mental health agencies and local CDOR districts. When the WIOA regulations are finalized, CDOR will explore formalizing a relationship with the California Department of Health Care Services through an Interagency Agreement or memorandum of understanding.

# 2. State programs carried out under section 4 of the Assistive Technology Act of 1998;

For information on State programs carried out under section 4 of the Assistive Technology Act, refer to the response for Description (o) – State's Strategies, specifically the information under the following header: "Identify how a broad range of Assistive Technology services and assistive technology devices will be provided to individuals with disabilities at each stage of the rehabilitation process; and on a statewide basis".

# 3. Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture;

#### U.S. Department of Agriculture

The CDOR is not a part of an interagency cooperation on the utilization of services and facilities of the programs carried out by the Undersecretary for Rural Development of the U.S. Department of Agriculture. However, CDOR field offices in rural areas do collaborate with local farm worker programs, such as CalAgrAbility, to coordinate and deliver services to farmworkers with disabilities.

#### 4. Non-educational agencies serving out-of-school youth; and

#### Non-educational Agencies Serving Out-of-School Youth

The CDOR serves out–of–school youth through multiple venues and methods. CDOR Districts provide unique types of programs and services for youth and adults with disabilities. The majority of programs are with educational agencies (short or long term training or educational programs). The local CDOR Districts have very strong working relationships with the local regional centers that serve youth and adults with intellectual disabilities and developmental disabilities. Similarly, CDOR Districts also have established working relationships with local county mental health and county welfare programs that also serve youth and adults with psychiatric disabilities. Additionally, some CDOR Districts have also formed connections with foster youth programs.

#### 5. State use contracting programs.

Refer to the response for Description (c)(1) – Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System for information on State use contracting programs (particularly with the California Department of General Services).

# d. Coordination with Education Officials

Describe:

#### 1. DSU's plans

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

#### **CDOR Response – Coordination with Education Officials.**

#### Interagency Agreement with the California Department of Education

As required by the Individuals with Disabilities Education Improvement Act and the Rehabilitation Act, CDOR participates with the California Department of Education through an Interagency Agreement to create a coordinated system of educational and VR services, including Pre– Employment Transition Services, for eligible students with disabilities. This agreement helps to facilitate a smooth and seamless transition for students with disabilities from school to employment in addition to addressing consultation and technical assistance, transition planning, identifying roles and responsibilities, and outreach activities.

#### **Consultation, Technical Assistance and Community of Practice**

The CDOR provides consultation and technical assistance to support state and local agencies in planning for the transition of students with disabilities, including the provision of Pre–Employment Transition Services. Locally, Transition Liaison staff in each CDOR District provide outreach, consultation and technical assistance to Local Education Agencies seeking information on VR services for students with disabilities. In addition, CDOR participates in the Community of Practice, which is supported by the National Association of Special Education Administrators and has created a shared work website for programs that support transition practices for students with disabilities. The Community of Practice leadership team includes representatives from CDOR, the California Department of Education, the California Department of Developmental Services, the California Department of Social Services, the California Employment Development Department, the State Independent Living Council, educators, and parents who all share the goal of providing a seamless delivery of transition services to students with disabilities that lead to positive post school outcomes.

# **Regional Training and Technical Assistance Curriculum**

In keeping with the goal of collaboration to support transitioning students with disabilities, CDOR provides a core series of regional training and technical assistance curriculum to local CDOR and Local Education Agency staff and partners. Expert consultants provide training on topics related to vocational services and supports leading to employment for students and youth with disabilities. The training topics include: employment preparation, job development and placement; transition–age youth; disability, medication, and vocational impact; benefits planning and management; and collaboration and team building. These trainings help support the further success of CDOR consumers who are students with disabilities in securing and maintaining employment.

#### **Collaborative Team Process**

In the coordination of goals, objectives, and services for transitioning students with disabilities, CDOR and Local Education Agencies are encouraged to use a collaborative team process to develop the transition services section of the Individualized Education Program for students determined eligible for VR services. This process should include the involvement of the student, family, representatives of the Local Education Agency, CDOR staff when invited, and other service providers, as appropriate.

The CDOR and the California Department of Education's specific responsibilities are defined in the Interagency Agreement by each agency's applicable rules and regulations. The Local Education Agency is identified

as the lead agency responsible for providing transition services by qualified personnel to students with disabilities to the point of exit from school. In planning for transition, the school should inform the parents and the student with a disability no later than age 16 about CDOR services and facilitate the referral process.

#### Determining Eligibility and Individualized Plan for Employment Development

The CDOR is responsible to determine eligibility for VR services needed to prepare for or obtain employment and is designated as the lead agency responsible for providing VR services by qualified personnel to students with disabilities meeting eligibility and Order of Selection requirements, as identified in the response for Description (m) – Order of Selection. When a student with a disability is referred to CDOR, is determined eligible, and is able to be served under Order of Selection, CDOR develops the consumer's Individualized Plan for Employment. The Individualized Plan for Employment is developed within 90 days or by an agreed–upon extension date, and before leaving the school setting. CDOR is responsible for providing and paying for the transition services, including Pre–Employment Transition Services, agreed upon in the Individualized Plan for Employment while the student with a disability is still in high school and continuing for the period the consumer is participating in the VR program.

#### Individualized Education Program or Individualized Plan for Employment Responsibilities

The CDOR and the California Department of Education's responsibilities include the provision of services outlined and required by the Individualized Education Program or Individualized Plan for Employment. When developing these plans, both agencies work to ensure duplication of services does not occur. Where responsibilities overlap, the primary responsibility for specific services rests with the most appropriate agency, as determined by the consumer's present status and when an agency is legally obligated and funded to provide that service. The local agency (Local Education Agency, Special Education Local Plan Area, or other entity) that develops the eligible students' Individualized Education Program is responsible for paying for the agreed upon transition services required to be provided under the Individuals with Disabilities Education Improvement Act. CDOR is responsible for providing and paying for the VR services, including Pre–Employment Transition Services, included in the consumer's agreed upon Individualized Plan for Employment for the period the consumer is in high school and continues to participate in the VR program.

# Outreach

Currently, CDOR does not have the fiscal and staffing resources available to cover statewide transition needs, including Pre–Employment Transition Services, for students with disabilities through third–party cooperative agreements, as identified in the response for Description (b) – Request for Waiver of Statewideness. However, CDOR implements procedures for enhancing outreach and identification of students with disabilities in need of transition services. CDOR provides local presentations and informational literature to Local Education Agencies, educators, student associations, and parents about CDOR eligibility and program services. Additionally, CDOR assigns liaison VR Counselors to many secondary schools as a single point of contact for Special Education departments. Throughout the next four years, CDOR will continue to provide outreach and information to high schools about available VR services.

#### **Collaboration with Partners**

The CDOR communicates the value and benefits of CDOR services by reaching out to organizations that serve and represent students with disabilities, including parent resource centers, Independent Living Centers, Regional Centers, and organizations that serve youth with disabilities who are blind or visually impaired or deaf or hard of hearing.

# **Cooperative Programs Advisory Committee**

In an effort to support the provisions of this Interagency Agreement, CDOR established a Cooperative Programs Advisory Committee comprised of representatives from the California Department of Education, Local Education Agencies, mental health agencies, and community based organizations. The Cooperative Programs Advisory Committee assists CDOR in the development of policies and procedures to promote the transition of CDOR students with disabilities from secondary to post–secondary school, and training and employment activities. The Cooperative Programs Advisory Committee members present on the availability and benefits of CDOR services to students with disabilities and advocacy

groups. An example of these groups include the County Mental Health Directors Association.

#### **Pre-Employment Transition Services**

The CDOR will engage in the following activities to coordinate with schools and provide Pre–Employment Transition Services:

• Outreach to schools and closer collaboration between VR and Local Education Agency staff that do not currently have a Transition Partnership Programs cooperative arrangement.

• Expand transition services beyond school to work to include school to postsecondary training transitions.

• Provide information about the transition from school to work at an earlier age to students with disabilities.

• Provide benefits education planning and services to students as well as parents and guardians of students with disabilities.

• Provide specialized training and increase awareness for VR staff and service providers on the unique needs of students with disabilities.

In addition, there are a number of methods that CDOR will utilize to ensure the provision of the core Pre–Employment Transition Services to students with disabilities:

 Job exploration counseling: This service will be provided by CDOR VR counselors as part of the vocational counseling and guidance provided to every CDOR consumer. It will also be provided for some students with disabilities through Transition Partnership Programs third party arrangements and through vocational services provided through other contracts or fee for service arrangements through local education agencies or CRPs.

• Work based learning experiences: CDOR VR counselors will arrange for on the job trainings, internships, apprenticeships, and work experiences for students with disabilities through direct interaction with employers, Transition Partnership Programs third party arrangements and through vocational services provided through other contracts or fee for service arrangements through local education agencies or CRPs.

• Counseling on post-secondary opportunities: This service will be provided by CDOR VR counselors as part of the vocational counseling and guidance provided to every CDOR consumer and in their Individualized Plan for Employment planning specific to the transition needs of students with disabilities. It will also be provided through Transition Partnership Programs third party arrangements and through vocational services provided through other contracts or fee for service arrangements through local education agencies or CRPs.

• Workplace readiness training: CDOR VR counselors will arrange for training on workplace readiness skills, including soft skills through Transition Partnership Programs third party arrangements as well as through vocational services provided through other contracts or fee for service arrangements through local education agencies or CRPs.

 Instruction in self advocacy: CDOR VR counselors will continue to provide training on self advocacy as part of the vocational counseling and guidance provided to every CDOR consumer. Likewise, this will continue to be a component of the services provided through Transition Partnership Programs third party arrangements as well as through vocational services provided through other contracts or fee for service arrangements. In addition, CDOR is issuing a Request for Proposals to contract for self advocacy training services as a stand alone service to be provided through local education agencies, independent living centers, or CRPs.

Activities that will support the Pre–Employment Transition Services methods above will include:

• The CDOR plans to release Request for Proposals to contract for self– advocacy training and summer employment academies. The training and academies will include employment search activities, soft skills, and work experience. It is anticipated that the Request for Proposals will be released in 2016 for contract services in 2017.

• The Transition Partnership Programs contract services will be for Pre– Employment Transition Services. 2. Information on the formal interagency agreement with the State educational agency with respect to:

# A. Consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;

Refer to Description (d)(1) – Coordination with Education Officials, specifically the paragraphs titled "Consultation, Technical Assistance and Community of Practice" and "Regional Training and Technical Assistance Curriculum".

#### B. Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

Refer to Description (d)(1) – Coordination with Education Officials, specifically the paragraph titled "Collaborative Team Process".

# C. Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

Refer to Description (d)(1) – Coordination with Education Officials, specifically the paragraphs titled "Collaborative Team Process" and "Individualized Education Program or Individualized Plan for Employment Responsibilities".

# D. Procedures for outreach to and identification of students with disabilities who need transition services.

Refer to Description (d)(1) – Coordination with Education Officials, specifically the paragraph titled "Outreach".

# e. Cooperative Agreements with Private Nonprofit Organizations

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

**CDOR Response: Cooperative Agreements with Private Nonprofit Organizations.** CDOR develops federally–required cooperative agreements with private non–profit organizations consistent with California State Contracting Rules, CDOR Title 9 Regulations, and internal policy and procedures for the establishment, development, or improvement of CRPs. CDOR pays CRPs through fee–for–service or contractual agreements to deliver authorized assessment, training, employment, and specialized support services provided to CDOR applicants or consumers.

#### Fee-for-Services

Fee-for-services are paid to approved vendors per CDOR's Uniform Fee Structure for CRP Providers. The Uniform Fee Structure applies only to those CRPs in a fee-for-service relationship with CDOR. The Uniform Fee Structure does not apply to services provided under a cooperative program or case service contract as described in the response for Description (b)(1) – Request for Waiver of Statewideness. The types of services provided include:

• Assessment Services – improves a consumer's outcome by identifying specific barriers to employment and recommendations to eliminate those barriers.

• Training Services – enhances a consumer's employability by providing necessary interactions that remove employment barriers, provide for specific occupational training, or develop appropriate personal and work behaviors, as outlined in a rehabilitation plan.

• Job–Related Services – assists a consumer, in an organized planned manner, to prepare for, obtain, and retain employment.

• Support Services – provides direct services such as Independent Living skills training and Assistive Technology assessments that enhance independence and employability for CDOR consumers.

#### **New or Expanded VR Services**

The need for new services or expansion of VR services by a CRP may be directly identified by CDOR's District, through the needs assessment process identified in Description (j) – Statewide Assessment, or by individual requests by consumers. When a needed VR service is identified

for a consumer, CDOR will first seek services from current CDOR certified CRPs. In establishing a new vendor, or a new or added service, CDOR staff considers departmental priorities using the following criteria: there is an identified need for the service, and a sufficient number of CDOR applicants and consumers exist to sustain the service; there are no other providers; current providers or cooperative partners cannot fill the need; and, the new service or vendor will fill a service gap for the unserved or underserved population.

# **CDOR Community Resources Development Section**

The CDOR's Community Resources Development section is responsible for the vendorization and certification functions of CRPs. All new CRPs go through a vendorization process. Further, any new or expanded services beyond those currently approved and offered by a current vendor is subject to the approval procedures in place at the time of the submission of the request. Certain vendors or service categories may require CDOR executive level approval. Once vendorized to provide VR services, each CRP is formally notified of the approved VR service type(s), along with the corresponding CDOR approved standardized fee rate(s) established in 2009.

#### **Case Service Contracts**

When CDOR identifies a need for VR services to be provided by CRPs to consumers served through local public agency cooperative arrangements identified in the response for Description (b) – Request for Waiver of Statewideness, CDOR's Cooperative Programs Section assists Districts and CRPs in developing case service contracts. These contracts are negotiated between CDOR and the CRPs to indicate the specific VR services, the number of consumers to be served, expected contract outcomes, and the costs needed to provide these services to consumers. Currently, the majority of these contracts are developed to provide VR services to consumers participating in the mental health cooperative agreements.

#### **Certification, Review and Technical Assistance**

All CRPs are required to maintain their certification, and those providing work–related programs are required to be accredited by the Commission on Accreditation of Rehabilitation Facilities. CDOR's Community Resources Development's Section reviews that CRPs are consistent with CDOR Title 9 Regulations to assure the quality of services, as well as the safety of consumers, and identify any needed improvements. For CRPs associated with cooperative agreements, the Cooperative Programs Section will also perform program reviews to evaluate their effectiveness in meeting the contract VR service objectives and identify any needed improvements. In addition, CDOR's Community Resources Development Section and, or, the Cooperative Programs Section will provide technical assistance in response to CRPs' questions or concerns when needed or upon request.

### **Efforts to Ensure Quality Services and Resources**

The CDOR strives to maintain regulatory compliance and advocates for consumer and vendor service quality. Several efforts are taking place to provide quality services and resources for consumers:

• The CDOR continues to review and consolidate Individual Service Providers services in an effort to maintain consistent, fair, and effective services.

• The CDOR's Community Resources Development Section continues to conduct comprehensive certification and site reviews of CRPs. The focus of the review process is maximizing employment outcomes for CDOR consumers.

• Efforts are taking place to update the CRP Vendorization and Certification Guidelines with information on Pre–Employment Transition Services and Customized Employment WIOA services.

• In early 2014, a proof of concept titled "Placement Plus" was administered in select CRPs to test a new employment services fee for service structure. The lessons learned and evaluation of the Placement Plus is informing CDOR's current efforts to redesign employment services statewide.

# f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended

employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

**CDOR Response: Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.** CDOR identifies and makes arrangements with private non–profit organizations, as identified in the response for Description (e) – Cooperative Agreements with Private Nonprofit Organizations, to provide Supported Employment services for individuals with the most significant disabilities, including youth.

The CDOR collaborates with entities including the California Department of Developmental Services, Regional Centers, CRPs, the California Department of Education, the California workforce development system, local county mental health agencies, CRPs (including Independent Living Centers), business partners, and other community partners to provide competitive integrated Supported Employment services to eligible individuals. Currently, CDOR has 123 Supported Employment vendors (CRPs) statewide with associated locations and satellite offices.

In California, the hourly rates for Supported Employment job coaching, intake, placement, and retention services are statutorily–defined. The current rates were set in 2008 (Assembly Bill 1781). CDOR sets a rate structure policy that is consistent with state statutes and policies, including the State Administration Manual, and the California Department of General Services requirements. The California Department of Developmental Services, Community Rate Section is responsible to set and maintain billing rates for the Work Activity Program. The California Department of Developmental Services funds the Work Services Program for extended services to consumers with intellectual and developmental disabilities who achieve Supported Employment outcomes through CDOR's VR program and who are eligible for Work Services Program services.

For consumers not served under the Work Services Program, other extended services can be used. These sources vary depending on the individual's eligibility for other programs or availability of other resources. Funding for extended services for individuals with mental illness may be provided by county mental health agencies, which may allocate Medi–Cal, Mental Health Services Act, or Short–Doyle funds as determined by each county. Social Security Administration Work Incentives, such as Impairment Related Work Expense or an approved Plan for Achieving Self Support, may be used. Supported Employment services provided under Veteran's Health Administration Compensated Work Therapy Program may also be used to fund extended services.

California state regulations do not allow Traumatic Brain Injury state match funds to be used for extended services. Consumers with a Traumatic Brain Injury that require extended services such as ongoing support needed to maintain Supported Employment, such as job coaching can be served through additional resources at local Independent Living Centers.

Whenever possible, building natural supports at the workplace for consumers with Supported Employment needs is encouraged. Natural supports allow the strengthening of the relationship between employer and consumer, thus supporting long-term successful outcomes and to develop opportunities for competitive integrated employment, to the greatest extent practicable.

#### **California Initiatives**

California has enacted legislation and implemented statewide initiatives that have made an impact on the provision of Supported Employment services to individuals with intellectual and developmental disabilities:

• The Lanterman Developmental Disabilities Services Act (Welf. & Inst. Code, § 4500 et seq.) provides Californians with intellectual and developmental disabilities the right to obtain the services and supports to enable them to live a more independent life; this includes the funding for Supported Employment extended services. This Act is unique to California.

• AB 287 (2009) established the Employment First Policy, which led to a standing Employment First Committee formed by the State Council on Developmental Disabilities. The bill expands employment opportunities for people with intellectual and developmental disabilities, and identifies best practices and incentives for increasing integrated employment and gainful employment opportunities for people with intellectual and developmental disabilities. The Employment First policy requires Regional Centers to develop Individual Program Plans to ensure individuals with intellectual and developmental disabilities beginning at age 14 are provided options, competitive integrated employment, and post–secondary education to enable the consumer to transition from school to work. CDOR is an active

participant in the Employment First Committee to help with transition planning.

• California Competitive Integrated Employment: Blueprint for Reform for Individuals with Disabilities. In December 2014, CDOR, the California Department of Education, and the California Department of Developmental Services entered into a Memorandum of Understanding to further advance the state's "Employment First" Policy and other federal and state laws to address employment in integrated settings, at competitive wages, for individuals with intellectual and developmental disabilities. The goal of the California Competitive Integrated Employment effort is to develop a "blueprint" that will outline plans for:

 Improving collaboration and coordination between the three departments to prepare and support all individuals with intellectual and developmental disabilities who choose competitive integrated employment;

 Building capacity to increase opportunities for individuals with intellectual and developmental disabilities who choose competitive integrated employment to prepare for and participate in the California workforce development system; and,

- Increasing the ability of individuals with intellectual and developmental disabilities to make informed choices, adequately prepare for, transition to, and engage in competitive integrated employment.

Notably, the California Competitive Integrated Employment effort serves populations that have been underserved and unserved in response to WIOA and also expands the provision of services to a broader group of youth. A focus of the California Competitive Integrated Employment effort is exemplary, effective and emerging practices and "Real Work for Real Pay in the Real World."

 Promoting the Readiness of Minors in Supplemental Security Income (CaPROMISE) is a joint initiative of the U.S. Department of Education, Social Security Administration and Department of Health and Human Services and Department of Labor and awarded to California in October 2013. CDOR is the lead coordinator for the grant in California. CaPROMISE will improve the coordination of services and supports for child Supplemental Security Income recipients and their families in order to achieve improved education and employment outcomes and reduce reliance on Supplemental Security Income.

# g. Coordination with Employers

(Formerly known as Attachment 4.8(b)(5)). Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

## 1. VR services; and

**CDOR Response – Coordination with Employers.** WIOA calls for a description of how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of: 1) VR services; and, 2) transition services for youth, and Pre–Employment Transition Services for students. In regards to coordination with employers and VR services, CDOR provides this description through the "Business Engagement" goals and objectives in Description (o)(1) – State's Strategies.

# 2. Transition services, including pre-employment transition services, for students and youth with disabilities.

In regards to Pre–Employment Transition Services for students and youth with disabilities, CDOR provides this information in Goal 1 and Objective 1.1 for the "Youth" priority in Description (o)(1) – State's Strategies.

# h. Interagency Cooperation

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

### 1. The State Medicaid plan under title XIX of the Social Security Act;

Refer to Description (c)(1) – Cooperative Agreements with Agencies Not Carrying out Activities under the Statewide Workforce Development System, specifically the following paragraph: **California Department of Developmental Services: Individuals Eligible for Home and Community Based Waiver Programs** – CDOR has a formal agreement with the California Department of Developmental Services, California's State agency responsible for administering the Home and Community Based Services waiver for the State Medicaid plan under Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.). The California Department of Developmental Services has the primary responsibility to provide services and supports for individuals with intellectual disabilities and individuals with developmental disabilities, including extended services, or individuals with the most significant disabilities who have been determined to be eligible for home and community–based services under a Medicaid waiver, Medicaid State plan amendment, or other authority related to a State Medicaid program period.

# 2. The State agency responsible for providing services for individuals with developmental disabilities; and

CDOR's cooperation with the California Department of Developmental Services is described throughout the State Plan, particularly in Description (f) – Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.

### 3. The State agency responsible for providing mental health services.

Refer to Description (c)(1) – Cooperative Agreements with Agencies Not Carrying out Activities under the Statewide Workforce Development System, specifically the following paragraph:

# **Coordination with the State Agency Responsible for Providing Mental Health Services**

In California, the State agency responsible for mental health services is the California Department of Health Care Services. Currently, CDOR has an informal relationship with the California Department of Health Care Services to work together to support collaboration between county mental health agencies and local CDOR districts. When the WIOA regulations are finalized, CDOR will explore formalizing a relationship with the California Department of Health Care Services through an Interagency Agreement or memorandum of understanding.

# i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development

(Formerly known as Attachment 4.10)). Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

### 1. Data System on Personnel and Personnel Development

### A. Qualified Personnel Needs.

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

#### i. The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

**CDOR Response: Comprehensive System of Personnel Development.** CDOR, in partnership with the SRC, develops and maintains a Comprehensive System of Personnel Development to ensure a sufficient workforce of qualified state rehabilitation personnel, including professionals and paraprofessionals, is in place for the timely and successful delivery of VR services to Californians with disabilities.

### DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

The CDOR has a comprehensive system for collecting, maintaining, and analyzing, on an annual basis, data on qualified personnel needs, training, and development.

#### **Data on Qualified Personnel**

The CDOR tracks the following positions: VR Counselor; Teacher, Orientation and Mobility for the Blind; Medical Consultant; Dental Consultant; Consulting Psychologist; Optometric Consultant; and Work Incentive Planner. Employees in each of these positions are required to meet education and, or, certification standards as a condition of employment that CDOR tracks in a database and validates with the appropriate programs. Current staffing patterns and projected vacancies, including personnel expected to retire or leave positions, over the next five years are outlined in the chart below:

Position Title	Total Positions	Current Vacancies	Projected Vacancies Over the Next 5 Years
VR Counselor	537	16.5	166
Teacher, Orientation and	6	0	2
Mobility for the Blind			
Medical Consultant	7	0	2
Dental Consultant	1	0	0
Team Manager	122	4	38
Service Coordinator	201.5	10.5	64
Employment Coordinator	81	9	27
Case Support Staff	184	16.5	60
Consulting Psychologists	6	0	2
Optometric Consultant	1	0	0
Work Incentives Planner	31	0	10

### Current staffing patterns – End of Federal Fiscal Year (FFY) 2015

Data Source: CDOR's Personnel Services Section and Budgets, Fiscal Forecasting and Research Section

# Comprehensive System of Personnel Development Personnel and Caseload Projections

As of the end of FFY 2015, CDOR actively provided VR services to 71,228 applicants and eligible consumers. CDOR is currently operating under an Order of Selection, as identified in the response for Description (m) – Order of Selection. Currently, the full range of VR services may be provided to consumers assigned to Priority Categories 1, 2 and 3 who apply on or before June 30, 2016, including individuals who are on the Waiting List. The Order of Selection may change in the future based on budgetary constraints.

### Vocational Rehabilitation Service Delivery (VRSD) Teams

In FFY 2015, CDOR developed and implemented an evaluation and assessment plan to collect and analyze VRSD team data to measure the impact of the team approach and identify improvements on program design and implementation. The evaluation and assessment found that the VRSD team model had cultivated a team environment; majority of CDOR staff were satisfied with the VRSD team model; VRSD team model had standardized practices; and, VRSD team model had led to an increase in the number of employment outcomes. Wages at closure, however, had not increased.

In FFY 2016, 104 VRSD teams will provide services to an estimated 73,000 individuals in open status. In the VRSD team, the VR Counselors are exclusively responsible for the five non-delegable functions (eligibility determination; priority of service; Individualized Plan for Employment approval and signature; Individualized Plan for Employment revisions or amendments; and determination that a successful employment outcome has been achieved and the record of services can be closed). Collectively, the VR Counselor, Service Coordinator, Employment Coordinator, and Case Support Staff focus on providing VR services necessary for consumers to prepare for, find, and retain employment. Each VRSD team typically includes 10 direct service personnel: five VR Counselors; two Service Coordinators; one Employment Coordinator, and two Case Support Staff; however, specific teams could vary due to resource or operational needs. On average, each VRSD team provides services to approximately 678 individuals, or about 62 individuals per team member.

## **Orientation Center for the Blind**

The CDOR operates the Orientation Center for the Blind to assist CDOR consumers who are blind and visually impaired adjust to their vision loss. Credentialed teachers, including Teachers, Orientation and Mobility for the Blind, provide training and services to CDOR consumers at the Orientation Center for the Blind including independent travel, daily living skills, assistive technology use, and pre–vocational preparation.

# ii. The number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

Refer to Description (i) – Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development (specifically (i)(1)(A)(i)).

iii. Projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Refer to Description (i) – Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development (specifically (i)(1)(A)(i)).

### **B.** Personnel Development

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

# i. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

### **Personnel Development of VR Counselors**

The Council on Rehabilitation Education provides academic preparation for professional rehabilitation counseling positions and undergraduate programs in Rehabilitation and Disability Studies. CDOR ensures effective systematic coordination with the Council on Rehabilitation Education–accredited programs by discussing, at least biannually, the progress of CDOR staff participating in the Master's in Rehabilitation Counseling programs.

In California, there are six Council on Rehabilitation Education–accredited Master's Degree in Rehabilitation Counseling programs and one Council on Rehabilitation Education–accredited undergraduate Bachelor's of Science Degree in Rehabilitation Services program through the following universities: CSU Fresno, CSU Los Angeles, CSU Sacramento, CSU San Bernardino, San Diego State University, and San Francisco State University. Only CSU Los Angeles offers a Bachelor's of Science Degree in Rehabilitation Services.

# ii. The number of students enrolled at each of those institutions, broken down by type of program; and

The tables below provide data on the number of students enrolled in or graduated from a Council on Rehabilitation Education–accredited Master's or Bachelor's Degree program and the numbers of students sponsored by CDOR and, or, the Rehabilitation Services Administration.

#### Students Enrolled in or Graduated from a Council on Rehabilitation Education–Accredited Master's Degree in Rehabilitation Counseling Program for Academic Year 2014–15

University	Students Enrolled	Employees Sponsored by CDOR and, or, Rehabilitation Services Administration	Graduates sponsored by CDOR and, or, Rehabilitation Services Administration	Graduates from the previous academic year
CSU Fresno	27	4	12	2
CSU Los Angeles	56	3	2	24
CSŬ				
Sacramento	32	0	0	10
CSU San	50	20	0	10
Bernardino	58	20	9	12
San Diego State				
University	107	55	21	39
San				
Francisco				
State				
University	21	0	3	21
Total	301	82	47	108

Data Source: CDOR's Staff Development Unit

Students Enrolled in or Graduated from a Council on Rehabilitation Education –accredited Bachelor's of Science Degree in Rehabilitation Services Program for Academic Year 2014–15

University	Students Enrolled	Employees Sponsored by CDOR and, or, Rehabilitation Services Administration	sored by DORsponsored by CDORd, or, oilitation rvicessponsored by CDOR and, or, Rehabilitation Services	
CSU Los Angeles	325	0	0	122
Total	325	0	0	122

Data Source: CDOR's Staff Development Unit

iii. The number of students who graduated during the prior year from each of these institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

Refer to Description (i) – Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development (specifically (i)(1)(B)(ii)).

# 2. Plan for Recruitment, Preparation and Retention of Qualified Personnel

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

#### RECRUITMENT, PREPARATION, AND RETENTION OF VR COUNSELORS AND PARAPROFESSIONALS

The CDOR has a 2012–15 Recruitment and Retention Plan that is reviewed, implemented, monitored, and updated annually by the Department's Diversity Officer. The plan provides a comprehensive strategy to recruit, prepare, and retain educated, high quality, and culturally competent employees by identifying specific goals and strategies. Factors that include achieving and maintaining diversity in the workplace, unserved and underserved population needs by District, alternative communication needs, and CDOR's long–term succession planning were crucial to the development of the plan. The strategies for retraining, recruiting, and hiring personnel involve collaborative approaches among CDOR's field offices, Council on Rehabilitation Education, and CDOR's Executive Leadership Team. The 2016–19 Recruitment and Retention Plan is in development and will include talent management needs across the Department, and support CDOR's efforts to provide effective customer–focused services to consumers, partners, employers, and employees.

### **Current and Projected Needs for Qualified Personnel**

To meet the current needs for qualified personnel, CDOR's Staff Development Unit will continue to collaborate with other CDOR Sections to develop employee competencies, knowledge, skills and abilities; provide staff retraining; and comply with mandatory training requirements. The Staff Development Unit will provide logistical support for internal and external training.

The CDOR plans to offer a variety of training to support current professional development needs including:

• Academies for VR Counselors, Service Coordinators, Employment Coordinators and Office Technicians. These academies will increase the capacity of personnel to provide services to consumers and will also enhance existing knowledge of personnel duties.

- Quarterly knowledge-based trainings.
- Training on the medical aspects of disability.
- Continual training for VR Counselors.

To meet the projected needs of personnel, the Staff Development Unit will rely on a number of tools including CDOR's:

- Triennial Comprehensive Statewide Needs Assessment
- Staff Development Unit Needs Assessment
- State and Strategic Plans
- Workforce Strategic Plan
- Triennial Organizational Climate Survey

The Staff Development Unit will identify projected training needs through analysis of audit findings, program reviews, policy inquiries, and an evaluation of WIOA. Delivery of training regarding services to youth, use of labor market information, and Pre–Employment Transition Services will be priority.

The Staff Development Unit will support continuing education by offering a variety of methods and topics including rehabilitation technology, documentation, case assessment and post–secondary education. The Staff Development Unit will also coordinate additional classes focusing on Section 508 compliance.

# Coordination of CDOR, Higher Education Institutions and Professional Associations

The CDOR offers volunteer internships for VR students looking to gain experience and get a first-hand look at rehabilitation counseling at CDOR. CDOR partners with the Council on Rehabilitation Education universities to conduct "How to Apply to the CDOR" workshops that help the Council on Rehabilitation Education university students navigate the civil service application process. CDOR also partners with the Council on Rehabilitation Education universities and professional associations to promote CDOR career opportunities to their databases.

# Personnel from Minority Backgrounds and Individuals with Disabilities

The CDOR is committed to recruiting and hiring employees representative of California's multicultural population including people with disabilities that support the vision of employment, independence, and equality for all Californians with disabilities. As of December 31, 2015, CDOR employed 1,904 staff. Of those, 620, or 32.6 percent indicate they are a person with a disability. Of the 620, 82, or 13.2 percent are in a leadership role. CDOR fosters a workplace environment that respects the diversity of its staff and consumers. CDOR's Diversity and Inclusion Advisory Committee, composed of CDOR management and staff, meets quarterly to discuss practices to ensure a culturally competent and diverse workforce in order to meet consumer's needs.

# 3. Personnel Standards

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

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

### **Personnel Standards**

The CDOR maintains adherence to the highest personnel standard that will ensure professional and paraprofessional staff are adequately trained and prepared for employment. Candidates applying for all positions must meet California's personnel standards prior to appointment, including proof of possession of degree, certification, licensing, and registration requirements applicable for each position.

The standard CDOR utilizes to certify Senior Vocational Rehabilitation Counselor, Qualified Rehabilitation Professionals (referred to as "VR Counselors" throughout the State Plan) is possession of a Master's Degree in Rehabilitation Counseling from a recognized institution or –

• Possession of a Master's Degree or Doctorate Degree in a closely related field with successful completion of one graduate course with a primary focus on the Theories and Techniques of Counseling, or

• Possession of an active national certification as a Certified Rehabilitation Counselor.

The CDOR recruits entry level Service Coordinators and Employment Coordinators using the state civil service Staff Services Analyst classification. California's standard for the Teacher, Orientation and Mobility for the Blind; Medical Consultant; Dental Consultant; Consulting Psychologist, Optometric Consultant and Work Incentive Planner classifications includes certification, licensing, and registration requirements. These standards are detailed below:

#### Teacher, Orientation and Mobility for the Blind

Possession of a valid California Teaching credential authorizing the teaching of orientation and mobility to the visually disabled and either:

• Completion of an approved graduate curriculum leading to a Master of Arts degree in Orientation and Mobility Training or Peripatology. Candidates who are within six months of completing the required education will be admitted to the examination, but they will not be appointed until they have completed the curriculum. Or –

• Two years of experience working with the blind in training in mobility skills and physical conditioning (Completion of an approved training course in the orientation and mobility in a Veterans Administration Hospital may be substituted for up to one year of the required experience on the basis of one year of training for one year of experience.) and,

• Equivalent to graduation from college.

#### **Medical Consultant**

Possession of legal requirements for the practice of medicine, as determined by the California Board of Medical Quality Assurance or the California Board of Osteopathic Examiners, in addition to one year of experience in the practice of medicine exclusive of internship. Applicants who are in the process of securing approval by the Board of Medical Quality Assurance or the California Board of Osteopathic Examiners will be admitted to the examination, but the Board to which the application is made must determine that all legal requirements have been met before candidate will be eligible for appointment.

### **Dental Consultant**

Possession of the legal requirements for the practice of dentistry in California as determined by the California Board of Dental Examiners and one year of experience in the practice of dentistry. Applicants may be admitted to the examination before meeting these requirements, but the Board of Dental Examiners must determine that all legal requirements have been met before candidates will be eligible for appointment.

### **Consulting Psychologist**

Possession of a valid license as a Psychologist issued by the California Board of Psychology and possession of an earned Doctorate Degree in Psychology from an educational institution meeting the criteria of Section 2914 of the California Business and Professions Code. Unlicensed individuals who are recruited from outside the State of California and who qualify for licensure may take the examination and may be appointed for a maximum of two years at which time licensure shall have been obtained or the employment shall be terminated.). Experience: Either –

• Two years of experience in the California state service performing clinical psychology duties equivalent to those of a Psychologist (Various Specialties), Psychologist (Health Facility) (Various Specialties), or Psychologist Clinical, Correctional Facility. Or,

• Three years of full-time postdoctoral, post-internship experience in the practice of psychology involving either training, research, consultation, or program planning in mental health services.

### **Optometric Consultant**

Possession of the legal requirements for the practice of optometry in California as determined by the California State Board of Optometry. Applicants who are in the process of securing approval of their qualifications by the State Board of Optometry will be admitted to the examination, but that Board must determine that all legal requirements have been met before candidates will be eligible for appointment. Experience – Two years of experience within the past five years as a practicing Optometrist. Experience as an Optometrist in the consultant function of a medical care program can be substituted on a year–for–year basis.

#### **Work Incentive Planner**

The CDOR recruits Work Incentive Planners using the state civil service Staff Services Analyst Classification. After the CDOR Work Incentive Planners are hired, they participate in and complete the Cornell University Work Incentives Practitioner Credentialing training for certification.

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

#### 21st Century Understanding

WIOA describes the need for personnel to have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities. CDOR's existing requirement for VR Counselors to have a Master's Degree in Rehabilitation Counseling supports this need. In addition, CDOR will offer the following training in 2016:

- 21st Century Labor Market (Job–Driven Economy)
- Building Effective Partnerships with America's Job Center of California
- Building Effective Partnerships with Employers
- Competitive Integrated Employment
- Customized Employment
- Medical Aspects of Disability

#### 4. Staff Development.

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

## A. System of staff development

A system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

#### **Staff Development**

In 2016, CDOR will provide training through four training tracks to professional and paraprofessional staff:

**Track 1: Onboarding Training** – provides CDOR employees with an introduction to the Department and how to function successfully within it. Key components include CDOR's mission, CDOR and VR history, and the rehabilitation process. In 2016, onboarding trainings will be offered regularly throughout the year in various modalities and will include:

- Orientation
- Welcome to CDOR
- Accessible Web-based Activity Reporting Environment
- Disability Awareness and Etiquette
- Workplace Communication

**Track 2: The Academies** – provides practical, job–specific training for each classification of the VRSD team: Team Manager, VR Counselor, Service Coordinator, Employment Coordinator, and Office Technician. Assessment, vocational counseling and job development are all key components of the curriculum.

**Track 3: Continuing Education** – provides ongoing training via webinar on a range of current VR topics, including:

Case Assessment

- Case Assessment Services
- Documentation
- Employment Outcomes
- Medical Aspects of Disability
- Post–Secondary Education
- The Case (Record of Services) Process

Instructor-led continuing education trainings will be offered once or twice a year and include:

- Diffusing Difficult Situations
- Diversity and Inclusion
- Health and Benefits Training on Work and Disability
- Plan to Achieve Self–Support
- Rehabilitation Technology

**Track 4: WIOA–Based Training** – to be offered regularly and include:

- 21st Century Labor Market (Job–Driven Economy)
- Introduction to WIOA
- Pre-Employment Transition Services
- Working Effectively With Youth

#### **Training for Supervisory Staff**

In addition to the four training tracks, the following is offered for supervisory staff:

 California Health and Human Services Agency Supervisor's Academy and Leadership Development Academy

- Leadership and Management Balance training
- Managing Diversity

National Rehabilitation Leadership Institute Executive Leadership Seminar

• Quarterly Knowledge–Based Trainings covering various VR topics

#### **Training–Related Support**

The Staff Development Unit provides the following training–related support services to CDOR employees:

- A master training calendar via CDOR's Intranet site
- CDOR Resource Library
- Technical support for new users of the web–conferencing software Adobe Connect, used for online meetings and virtual classroom instruction
- Timely processing of training request and reimbursement forms

#### **B.** Acquisition and dissemination of significant knowledge

Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

The CDOR continues to routinely acquire and disseminate significant VR research, including:

• Newly published research disseminated via CDOR's Intranet site.

• Procedures for the acquisition and dissemination of significant knowledge from research and other sources to CDOR personnel.

• Topical webinars from VR leaders including the Research Technical Assistance Center, the National Center on Leadership for the Employment and Economic Advancement of People with Disabilities, and the Employment and Training Administration.

#### **5. Personnel to Address Individual Communication Needs**

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

### PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

California is a culturally diverse state and CDOR is committed to providing timely and quality language services, as required, to all persons seeking services. The Dymally–Alatorre Bilingual Services Act is a state law that ensures individuals seeking state government services whose primary language is not English are not precluded from receiving State of California Services because of language barriers. CDOR has a Bilingual Services Program that ensures its services are effectively communicated to limited or non– English speaking individuals, as required by the Act.

To ensure effective communication with applicants and eligible individuals with disabilities, CDOR provides a variety of language services including, but not limited to, bilingual oral interpretation, bilingual written translation, and American Sign Language Interpreting. CDOR translates a variety of written materials that communicate its services in the following languages: Armenian, Cambodian, Chinese, Korean, Spanish, Tagalog, and Vietnamese. Additionally, appropriate auxiliary aids and services are also provided, where necessary and as required, to afford an individual with a disability an equal opportunity to participate in CDOR services. Auxiliary aids include services or devices such as qualified interpreters; assistive listening devices; real time, open, closed captioning; teletypewriters or Video Relay services; videotext displays; readers; taped texts; Braille materials; and large print materials.

# 6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act

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

# **Coordination of Personnel Development Under The Individuals With Disabilities Education Improvement Act**

The CDOR has an Interagency Agreement with the California Department of Education supporting the provisions outlined in the Individuals with Disabilities Education Improvement Act. Through the Interagency Agreement, CDOR and the California Department of Education coordinate statewide educational and VR services for eligible secondary students with disabilities to result in an effective transition from school to employment.

The CDOR and the California Department of Education are jointly responsible for providing Local Education Agencies and CDOR staff with leadership, monitoring, and training. CDOR and the California Department of Education facilitate the development of cooperative programs for secondary students to increase the number of secondary and post–secondary transition–age youth with disabilities who receive services from CDOR. To foster state collaboration, a California Department of Education representative is also a member on the SRC.

The CDOR and the California Department of Education established a core series of regional training and technical assistance curriculum designed for CDOR and Local Education Agency staff. These trainings are initiated by cooperative program partners and include topics on VR–relevant subjects such as Employment Preparation, Job Development and Placement; Transition–Age Youth; Disability, Medication, and Vocational Impact; Benefits Planning and Management; Collaboration and Team Building; and Strategies for Veterans Entering and Reentry into the Civilian Workforce. Additionally, CDOR provides cross–training to Local Education Agencies with designated school district VRSD teams to inform and support educators on CDOR services and application processes.

# j. Statewide Assessment

(Formerly known as Attachment 4.11(a)).

# 1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:

A. With the most significant disabilities, including their need for supported employment services;

#### **CDOR Response: Comprehensive Statewide Needs Assessment.**

CDOR and the SRC jointly conducts a Comprehensive Statewide Needs Assessment annually over a three year period to identify the VR services needs of Californians with disabilities and CRPs within the State. The first year of the Comprehensive Statewide Needs Assessment was conducted during FFY 2014–15.

#### **Comprehensive Statewide Needs Assessment Methodology**

The quantitative data consists of CDOR's caseload data compared to other demographic data sets within local, state, and Federal resources, such as the California Department of Education, the California Department of Finance, the California Employment Development Department, and the American Community Survey. The qualitative data consists of input provided through a public meeting, public forums, an annual Consumer Satisfaction Survey, and fair hearings determinations, which are then grouped into themes.

# Comprehensive Statewide Needs Assessment – Year One – Preliminary Findings

The Comprehensive Statewide Needs Assessment analyzes quantitative and qualitative data to identify the needs and barriers of CDOR consumers and populations potentially unserved or underserved by CDOR. The results are used to help guide future State Plan priorities, goals, objectives, and strategies to best meet the needs of Californians with disabilities.

The following needs were identified.

For individuals with the most significant disabilities:

- Additional specialized job development and job retention services.
- Counseling on identifying natural support resources within the community and building the support network necessary to maintain long-term employment.
- Increased Supported Employment training provided to vendors on employment and retention strategies for consumers.

• Individualized advocacy focused on increasing success in competitive integrated employment settings.

#### B. Who are minorities;

For individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program:

• Additional Pre–Employment Transition Services for Hispanic and Latino consumers.

• Increase career pathway services for Hispanic and Latino consumers.

• Increase outreach to potentially eligible individuals in the Asian American, and Hispanic, and Latino communities

• Increase services and collaboration with American Indian organizations.

#### C. Who have been unserved or underserved by the VR program;

Refer to the response for Description (j) – Statewide Assessment (specifically (j)(1)(B)).

# D. Who have been served through other components of the statewide workforce development system; and

For individuals who have been served through other components of the statewide workforce development system include:

• Better coordination with America's Job Center of California, Adult Education Programs, and Dislocated Worker Programs.

• Closer collaboration with workforce service providers who assist English language learners.

• Ensure physical, electronic, and programmatic accessibility to other WIOA core programs for individuals with disabilities.

• Increased Disability Awareness and Sensitivity Training at the America's Job Center of California and other WIOA core program partners.

• More CDOR staff assigned to liaison with the America's Job Center of California.

# E. Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

Based on the information and data available for Year One of the Comprehensive Statewide Needs Assessment, the preliminary findings (listed below) present the needs of both youth with disabilities and students with disabilities grouped together. For the two–year revision of the 2016 – 2020 VR Services Portion of the Unified State Plan, CDOR will provide a separate assessment of the rehabilitation needs of youth with disabilities (individuals ages 14 through 24) and students with disabilities (individuals in high school, ages 16 through 21), and clearly identify the needs for each group.

For both youth with disabilities and students with disabilities:

• Outreach to schools and closer collaboration between VR and Local Education Agency staff that do not currently have a Transition Partnership Programs cooperative agreement.

• Expand transition services beyond school to work to school to postsecondary training transitions.

• Provide information about the transition from school to work at an earlier age to youth with disabilities and students with disabilities.

• Provide benefits education planning and services to students with disabilities and youth with disabilities as well as parents and guardians of youth with disabilities and students with disabilities.

• Provide specialized training and increase awareness for VR staff and service providers on the unique needs of youth with disabilities and students with disabilities.

# 2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and

For CRPs within the state:

• Evaluate the vendor reimbursement model to ensure it adequately covers the cost of providing quality services.

• Expand job exploration and placement services for VR consumers to include more time and focus on career pathways and business sector strategies.

• Identify ways for CDOR to assume more of the vendor's risks such as paying for no-show appointments and background checks for new jobs.

• Increase training and coordination efforts between CDOR staff and CRPs regarding the use of assistive technology, including the procedures for purchasing and requesting repairs.

• More in-depth training for consumers and CRP staff regarding CDOR's process for plan development and employment services so consumers and vendors will better understand their roles and responsibilities to each other and to the VRSD team.

#### 3. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act.

For information on how transition career services and Pre–Employment Transition Services are coordinated with transition services provided under the Individuals with Disabilities Education Improvement Act, refer to the sections titled "Interagency Agreement with the California Department of Education", "Individualized Education Program or Individualized Plan for Employment Responsibilities", and "Coordination of Personnel Development Under the Individuals with Disabilities Improvement Act".

# k. Annual Estimates

(Formerly known as Attachment 4.11(b)). Describe:

## 1. The number of individuals in the State who are eligible for services;

**CDOR Response: Annual Estimates.** The U.S. Census Bureau, 2012 American Community Survey estimates that in 2015 there will be 1,861,223 adults ages 18–64 with a disability residing in California. These individuals may qualify for VR services under Title I, Part B or Title VI, Part B.

### 2. The number of eligible individuals who will receive services under:

#### A. The VR Program;

During FFY 2016, CDOR estimates it will provide a range of services to approximately 111,000 individuals with disabilities who will meet the Order of Selection policy, as identified in the response for Description (m) – Order of Selection. Approximately 40,000 applications will be received from individuals with disabilities; of which 27,700 may be determined eligible consumers.

During FFY 2017, CDOR estimates it will provide a range of services to approximately 112,000 individuals with disabilities who will meet the Order of Selection policy, as identified in the response for Description (m) – Order of Selection. Approximately 40,500 applications will be received from individuals with disabilities; of which 28,000 may be determined eligible consumers.

Currently, the full range of VR services may be provided to consumers assigned to Priority Categories 1, 2 and 3 who apply on or before June 30, 2016, including individuals who are on the Waiting List.

#### B. The Supported Employment Program; and

Refer to the response for Description (n) – Goals and Plans for Distribution of Title VI Funds, specifically "During FFY 2016, CDOR anticipates 2,460 consumers will receive Supported Employment services under Title VI, Part B and Title I funds. Of this number, an estimated 500 consumers will be funded from Title VI, Part B funds."

In addition, during FFY 2017, CDOR anticipates 6,000 consumers will receive Supported Employment services under Title VI, Part B and Title I funds. Of this number, an estimated 1,200 consumers will be funded from Title VI, Part B funds.

## C. Each priority category, if under an order of selection;

Refer to the Priority Category descriptions provided in Description (m)(1)(B) – Order of Selection.

# 3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

#### Number of Eligible Individuals Not Receiving VR Services

As of a modification effective April 22, 2016 to the 2015-16 Order of Selection Declaration, all three Priority Categories are eligible for, and receiving, services; there is no wait list.

# 4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

The charts below include the estimated costs of services and number of individuals to be served for each priority category.

	Title I or	Estimated	Estimated Number to	Average Cost of
Priority Category	Title VI	Funds	be Served	Services
Category 1: Individual With a Most Significant Disability	Title I	\$101,329,470	58,442	\$1,734
Category 1: Individual With a Most Significant Disability	Title VI	\$3,186,000	500	\$6,372
Category 2: Individual With a Significant Disability	Title I	\$76,441,530	51,826	\$1,475
Category 3: All Other Eligible Individuals	Title I	\$600,000	500	\$1,200
Totals		\$181,557,000	111,268	\$1,632

#### FFYs 2016 Estimates of Cost of Services for Consumers Served\*

Data Source: CDOR's Budgets, Fiscal Forecasting and Research Section

TT TS 2017 Estimates of Cost of Services for Consumers Served						
	Title I or	Estimated	Estimated Number to	Average Cost of		
Priority Category	Title VI	Funds	be Served	Services		
Category 1: Individual With a Most Significant Disability	Title I	\$101,329,470	58,442	\$1,734		
Category 1: Individual With a Most Significant Disability	Title VI	\$3,186,000	500	\$6,372		
Category 2: Individual With a Significant Disability	Title I	\$76,441,530	51,826	\$1,475		
Category 3: All Other Eligible Individuals	Title I	\$600,000	500	\$1,200		
Totals		\$181,557,000	111,268	\$1,632		

# FFYs 2017 Estimates of Cost of Services for Consumers Served\*

Data Source: CDOR's Budgets, Fiscal Forecasting and Research Section

\*Adjustments to the annual estimates table may be needed to distinctly separate the new 15 percent PETS funding and 50 50 Supported Employment funding requirements.

# I. State Goals and Priorities

The designated State unit must:

# 1. Identify if the goals and priorities were jointly developed

Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

**CDOR Response: Goals and Priorities**. CDOR and the SRC jointly developed, reviewed, and agreed to the following State Plan Priorities and Goals.

# 2. Identify the goals and priorities in carrying out the VR and Supported Employment programs.

**Priority: Youth** 

Goal: Increase opportunities and outcomes for training and employment services for youth with disabilities.

Goal: Outreach to potentially eligible students with disabilities to enhance awareness of, and the opportunities to receive, CDOR services.

Goal: Increase coordination of services between CDOR and other partners to support youth with disabilities.

#### **Priority: Business Engagement**

Goal: Increase partnerships with businesses within the local areas to develop or expand work experience, internship, and employment opportunities for adults and youth with disabilities.

Goal: Promote participation in career pathways to meet business sector and consumer employment needs.

#### **Priority: Capacity Building**

Goal: Establish or enhance partnerships with WIOA core programs to improve service delivery for adults and youth with disabilities.

#### **Priority: Competitive Integrated Employment**

Goal: Increase competitive integrated employment opportunities and outcomes and supports for adults and youth with disabilities, particularly those with the most significant disabilities and those underserved.

# 3. Ensure that the goals and priorities are based on an analysis of the following areas:

Refer to the response for description for the Goals and Priorities, specifically (I)(1).

# A. The most recent comprehensive statewide assessment, including any updates;

The priorities and goals were based on input received from stakeholder public forums, WIOA, collaboration with the California Workforce

Development Board and the preliminary results of the Comprehensive Statewide Needs Assessment.

The Youth priority and its corresponding goals, as defined by WIOA, addresses both youth with disabilities (14 through 24 years old) and students (16 through 21 years old) with disabilities, as students may be youth but not all youth may be students. The second Youth goal is specific to Pre–Employment Transition Services.

The Business Engagement priority and its corresponding goals focuses on business engagement and partnerships and on career pathways and sector needs at the local and regional level.

The Capacity Building priority and its corresponding goal focuses on building and broadening capacity within CDOR and core programs to serve individuals with disabilities.

The Competitive Integrated Employment priority and its corresponding goal focuses on increasing competitive integrated employment opportunities and outcomes and supports for adults and youth with disabilities, particularly those with the most significant disabilities and those underserved.

# B. The State's performance under the performance accountability measures of section 116 of WIOA; and

The CDOR's performance in 2014 and 2015 regarding VR and Supported Employment outcomes, advancing accessibility and equality, and delivery system and administration operations improvements informed the development of the priorities and goals for the 2016 – 2020 VR Services Portion of the Unified State Plan. The CDOR and SRC jointly developed the 2016 – 2020 priorities and goals to ensure the VR and Supported Employment programs are in alignment with WIOA and include transition services for youth, business engagement, program partnerships and competitive integrated employment.

C. Other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and finding and recommendations from monitoring activities conducted under section 107. Refer to the response for description for the Goals and Priorities, specifically (I)(3)(A).

## m. Order of Selection

Describe:

1. Whether the designated State unit will implement and order of selection. If so, describe:

A. The order to be followed in selecting eligible individuals to be provided VR services.

### **Description of Priority Categories**

Under the Order of Selection process, California has three priority categories in the following order: Priority Category 1, Individual With A Most Significant Disability; Priority Category 2, Individual With A Significant Disability; and Priority Category 3, All Other Eligible Individuals with Disabilities.

After an individual is found eligible for VR services, the VR Counselor evaluates the functional limitations, anticipated services needed, and duration of the services to identify the level of significance of disability. Factors that cannot be used in determining the Level of Significance of Disability of eligible individuals include: residency, type of disability, age, race, color, or national origin, referral source, type of expected employment outcome, need for or anticipated cost of specific VR services required for an individual's plan for employment, nor an individual's or family's income level. The Level of Significance of Disability is used to determine the applicable Order of Selection priority category.

### B. The justification for the order.

Since 1995, CDOR has operated the VR program under a Declaration of Order of Selection due to inadequate resources to provide VR services to all individuals with disabilities in California. Annually, CDOR reviews projected resources and projected costs for each state fiscal year, which starts July 1 and ends June 30, as provided by California Code of Regulations, title 9, section 7052(a), and determines whether the projected resources continue to be inadequate to meet all the projected costs for state fiscal year. If projected resources remain inadequate to provide VR services to all individuals with disabilities in California, a new Order of Selection is issued, before June 30, informing the public that projected resources are not adequate to serve all eligible individuals, and lists the priority categories which can be served during the next state fiscal year.

### Priority Category 1: Individual With A Most Significant Disability

An individual with a disability who has a serious limitation in terms of employment in at least four functional capacity areas; is expected to require multiple VR services over an extended period of time (more than six months); and has one or more physical or mental disabilities.

### **Priority Category 2: Individual With A Significant Disability**

An individual who the Social Security Administration has determined is eligible for Social Security benefits as a result of a disability or blindness; or, an individual who meets the following three criteria: has a serious limitation in terms of employment in at least one functional capacity area; is expected to require multiple VR services over an extended period of time (more than six months); and has one or more physical or mental disabilities resulting from another disability or a combination of disabilities as determined by the basis of an assessment for determining eligibility and VR needs to cause comparable substantial functional limitation.

### Priority Category 3: All Other Eligible Individuals with Disabilities

An individual with a disability who has at least one limitation in terms of employment in any functional capacity area; and, is not expected to require multiple VR services over an extended period of time.

#### C. The service and outcome goals.

#### **Service and Outcome Goals**

During FFY 2016, CDOR estimates it will serve approximately 111,000 individuals with disabilities who will meet the Order of Selection policy. The total spending for all consumers served is estimated at \$181,557,000. CDOR estimates 13,909 individuals will be Closed–Rehabilitated, of which 4,847 will be in Priority Category 1, 9,002 will be in Priority Category 2, and 60 will be in Priority Category 3.

Priority	Number	Closed -	Closed -	Months In Plan	Cost of
Category	Served	Rehabilitated	Other	To Closure	Services
1	58,942	4,847	6,810	22	\$104,515,470
2	51,826	9,002	18,413	23	\$76,441,530
3	500	60	150	28	\$600,000
Total	111,268	13,909	25,373	-	\$181,557,000

#### FFY 2016 Estimated Service Numbers and Outcome Goals

Data Source: CDOR's Budgets, Fiscal Forecasting and Research Section

During FFY 2017, CDOR estimates it will serve approximately 112,000 individuals with disabilities who will meet the OOS policy. The total spending for all consumers served is estimated at \$184,057,000. CDOR estimates 14,009 individuals will be Closed-Rehabilitated, of which 59,342 will be in Priority Category 1, 52,176 will be in Priority Category 2, and 550 will be in Priority Category 3.

#### FFY 2017 Estimated Service Numbers and Outcome Goals

Priority Category	Number Served	Closed - Rehabilitated	Closed - Other	Months In Plan To Closure	Cost of Services
1	59,342	4,877	6,810	22	\$105,930,670
2	52,176	9,062	18,413	23	\$77,466,330
3	550	70	150	14	\$660,000
Total	112,068	14,009	25,373	-	\$184,057,000

Data Source: CDOR's Budgets, Fiscal Forecasting and Research Section

# D. The time within which these goals may be achieved for individuals in each priority category within the order.

Refer to the table in the response for the Order of Selection, specifically description (m)(1)(c).

# E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and

#### **Priority of Order of Selection Categories**

The CDOR formally notifies all VR program applicants of their Order of Selection Priority Category in writing. Currently, the full range of VR services may be provided to consumers assigned to Priority Categories 1, 2 and 3 who apply on or before June 30, 2016, including individuals who are on the Waiting List.

# 2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.

### New WIOA Order of Selection Language

New language (as follows) was added by WIOA regarding the Order of Selection: "If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment." The CDOR is examining the impact of such a policy change to programs and existing resources and will revisit this option during the two–year revision of the program years 2016 – 2020 State Plan. At this time, CDOR has elected to not alter the existing Order of Selection policy to allow provision of services to eligible individuals, whether or not receiving VR services, who require specific services or equipment to maintain employment.

# n. Goals and Plans for Distribution of Title VI Funds

# 1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.

**CDOR Response: Goals and Plans for Distribution of Title VI, Part B Funds**. CDOR will utilize an estimated \$2,759,000 in funds received under the Rehabilitation Act Title VI, Part B to provide Supported Employment services for eligible individuals with most significant or significant disabilities. In accordance with WIOA, 50 percent of the funding received is designated for transition–aged youth with the most significant disabilities. During FFY 2016, CDOR anticipates 2,460 consumers will receive Supported Employment services under Title VI, Part B and Title I funds. Of this number, an estimated 500 consumers that are youth with the most significant disabilities will receive Supported Employment services and be funded from Title VI, Part B funds. When these funds are exhausted, CDOR will utilize Title I funds as necessary to meet the needs of the remaining consumers determined eligible and in need of Supported Employment services.

The CDOR's goal for Title VI, Part B funds is identified in the response for Description (I) – State Goals and Priorities under the competitive integrated employment priority: "Goal: increase competitive integrated employment opportunities and outcomes and supports for adults and youth with disabilities, particularly those with the most significant disabilities and those underserved."

The actions that will be used to advance competitive integrated employment of consumers receiving Supported Employment services include:

• Coordinating with CDOR Districts to identify outreach strategies and procedures to unserved and underserved populations including minority groups, transition–aged youth with disabilities, and individuals in rural areas who may be eligible for Supported Employment services.

- Exploring natural supports as a source for extended services.
- Identifying additional funding sources for extended services.
- Working collaboratively with all extended service providers, including employers.

The CDOR's collaboration efforts regarding Supported Employment services and extended services are identified in the response for Description (f) – Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.

#### Collaboration with Schools Regarding Required Documentation Specified in Section 511 Regarding Career Exploration Activities for Individuals Considering Sub–Minimum Wage Employment

The CDOR is working closely with the California Department of Education and the Department of Developmental Services on the "Competitive Integrated Employment Blueprint for Change." The overarching goal of the Blueprint is to increase employment outcomes for adults and youth with developmental and intellectual disabilities. Strategies include local level collaboration and the development of Local Partnership Agreements that address joint actions to support competitive integrated employment. These actions include, but are not limited to: a) communication with local educational agencies about the requirements to document Pre– Employment Transition Services for students with disabilities prior to beginning employment at subminimum wage; and, b) exploring an interagency data sharing agreement. The intent is to use existing processes or develop new processes to collaborate with schools and obtain the required documentation in a manner that recognizes the unique needs and resources of each local partnership.

#### Are there youth with other disability types that need supported employment services and extended services that are not met under the Lanterman Developmental Disabilities Services Act (Welf. & Inst. Code, § 4500 et seq.)?

While the Lanterman Developmental Disabilities Services Act (Welf. & Inst. Code, § 4500 et seq.) funding is a primary source of extended services for youth with developmental and intellectual disabilities in California, CDOR is continuing to evaluate the need for Supported Employment services and extended services for youth with other disability types (e.g, mental health disabilities, traumatic brain injuries, etc.). In the interim, CDOR intends to provide VR services to youth with other types of disabilities, as appropriate, who are not eligible for habilitation services under the Lanterman Developmental Disabilities Services Act (Welf. & Inst. Code, § 4500 et seq.).

# 2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:

# A. The provision of extended services for a period not to exceed 4 years; and

In regards to leveraging other public and private funds to increase resources for extended services and expanded Supported Employment opportunities for youth with the most disabilities, California is unique in that through the Lanterman Developmental Disabilities Services Act (Welf. & Inst. Code, § 4500 et seq.), the California Department of Developmental Services provides extended services.

# B. How the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

Refer to the response for Goals and Plans for Distribution of Title VI funds, specifically description (n)(2)(A).

### o. State's Strategies

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

### 1. The methods to be used to expand and improve services to individuals with disabilities.

**CDOR Response: State's Strategies.** CDOR developed measurable objectives to support CDOR's achievement of the Priorities and Goals identified in the response for Description (I) – State Goals and Priorities. These program goals and objectives represent CDOR's approach to serving youth, expanding business engagement, enhancing capacity building, and increasing competitive integrated employment. Actions (referred to as "Strategies") to achieve the priorities, goals and objectives, consistent with the comprehensive statewide needs assessment are identified below.

### **CDOR Priority: Youth**

**Goal 1**: Increase opportunities and outcomes for training and employment services for youth with disabilities.

**Objective 1.1**: By June 30, 2017, provide 2,000 additional students with competitive integrated work experience placements with employers at an average of 100 hours per student for Pre–Employment Transition Services. (Note – this is a new objective and CDOR does not yet have an established baseline).

#### Strategies:

• The CDOR's Cooperative Programs Section, Contracts and Procurement Section, and the CDOR Districts will collaborate to add Pre–Employment Transition Services into the Transition Partnership Programs contracts.

• The CDOR's Cooperative Programs Section will oversee work experience placements for eligible youth through monitoring of contracts developed with program partners.

• The CDOR will contract for approximately \$4.0 million dollars to Local Education Agencies for direct funding of work experience placements for eligible students.

• The Local Education Agencies will provide real work experience opportunities to youth in a variety of settings and types of jobs in the community and on campus.

• The CDOR will establish business partnerships on a continual basis to provide opportunities for youth including situational assessments, job shadowing, trial work experience, volunteer work, nonpaid work experience, paid work experience, on the job training, and employment.

• At the local level, with a focus on youth, develop employer outreach materials, facilitate informational interviews and participate in job fairs.

• The CDOR will engage in outreach activities to market the services available for students with disabilities, such as attending Local Education Agencies parent meetings and discussions with Local Education Agencies administrators.

**Goal 2**: Outreach to potentially eligible students with disabilities to enhance awareness of, and the opportunities to receive, CDOR services.

**Objective 2.1**: By June 30, 2016, conduct a needs assessment in each CDOR District, focused on outreach to schools without a Transition Partnership Program that provide services to Pre–Employment Transition Services–eligible youth to identify service gaps and the number of unserved students.

#### Strategies:

• The CDOR's Cooperative Programs Section will collaborate with CDOR's District Administrators to design the needs assessment.

• The CDOR's Cooperative Programs Section will collaborate with the VRSD teams and field offices to conduct the needs assessment and summarize the results.

**Objective 2.2:** By June 30, 2018, CDOR will develop a process that schools can use to identify eligible students, make referrals, and conduct outreach.

### Strategies:

• The CDOR will develop strategies for conducting outreach to eligible students through multiple and emerging modalities.

• The CDOR Districts will develop local processes for high schools to make referrals for eligible students.

• VR staff will participate in Individualized Education Program meetings when invited and will be encouraged to visit campuses to provide information about CDOR, conduct outreach, make referrals and identify students.

• The CDOR will conduct an outreach campaign to inform Transition Partnership Program recipients, Local Education Agencies, and other program partners serving eligible students on the definition and requirements of Pre–Employment Transition Services.

• The CDOR will disseminate information on VR services to students with disabilities through written communications, Individualized Education Program meetings, and one-on-one conversations.

• Through the existing Transition Partnership Programs contracts and new youth employment initiatives, CDOR will conduct outreach to develop new opportunities for the provision of work experience services and permanent employment opportunities.

**Goal 3**: Increase coordination of services between CDOR and other partners to support youth with disabilities.

**Objective 3.1**: By June 30, 2017, release approximately \$1.0 million dollars in Request for Proposals for self advocacy training, as well as summer youth employment readiness and work experience training.

#### Strategies:

• Provide public information about the availability of Request for Proposals when they are released.

• Conduct research on best practices for self advocacy training, summer youth employment readiness and work experience training models.

• CDOR's Cooperative Programs Section, Contracts and Procurement Section, and Districts will collaborate to issue and administer the Request for Proposals.

• The CDOR and Local Education Agencies will continually coordinate with the Local Workforce Development Board Youth Councils to participate in summer and year-round youth programs.

• As students training (or working at) work sites through unpaid or paid work experiences and employer paid jobs near the "ready for hiring" process, students will be provided additional services to facilitate placement in permanent competitive integrated employment.

### **CDOR Priority: Business Engagement**

**Goal 4**: Increase partnerships with local businesses to develop or expand work experience, internship, and employment opportunities for adults and youth with disabilities.

**Objective 4.1**: By June 30, 2018, develop relationships and provide direct services to at least 100 new business partners. (Note – this is a new objective and CDOR does not yet have an established baseline).

#### Strategies:

• Develop a "menu" of CDOR services to be used by CDOR staff when conducting outreach to local business partners.

• Coordinate with the local Workforce Development Boards when conducting outreach to local business partners.

• Identify other stakeholders, such as local business associations, to partner with for outreach efforts.

• Develop an online service request system for businesses.

• Identify and approach businesses that have public contracts with requirements for the hiring of individuals with disabilities.

• Support the recruitment of job seekers with disabilities through direct referral from CDOR offices and through the Talent Acquisition Portal online job matching system.

• Serve as a resource to the local Workforce Development Boards, America's Job Center of California, and core partners to support the hiring, retention and promotion of adults and youth with disabilities.

• Provide Disability Awareness and or Windmills trainings to private and public employers.

• Continue to provide outreach, education, and technical assistance to state and federal employers with the purpose of increasing the number of people with disabilities that they hire.

• Continue engaging business partners with marketing materials to provide information on Section 503.

**Goal 5**: Promote participation in career pathways (which are multi–entity, partnership efforts) to meet business sector and consumer employment needs.

**Objective 5.1**: By June 30, 2018, develop at least two pilot partnerships with businesses focused on using sector strategies to meet business sector and consumer employment needs.

### Strategies:

• Work up–front with businesses to determine local hiring needs and design training programs that are responsive to those needs.

• Measure and evaluate employment and earnings outcomes in different sectors and with different businesses to identify potential pilot partners.

• The CDOR will provide information to direct service providers and program partners on the career pathways model for the purpose of supporting consumers in obtaining employment that meets market sector needs.

**Objective 5.2:** By January 2017, provide field guidance to CDOR Districts on how to use current local and regional labor market data during the consumer planning and placement process.

### Strategies:

• Host quarterly statewide (or regional) calls addressing different sectors (e.g. finance, transportation, healthcare) with businesses and CDOR staff.

• During the calls, have discussions about career pathway options within those businesses to educate CDOR staff.

• The CDOR's Workforce Development Section in collaboration with the staff will recruit business partners for participation in the calls.

• Work in collaboration with the California Employment Development Department, local Workforce Development Boards, America's Job Center of California, and the Chambers of Commerce and economic development agencies to provide labor market information and identify areas for competitive integrated employment.

### **CDOR Priority: Capacity Building**

**Goal 6**: Establish or enhance partnerships with the WIOA core programs to improve service delivery for adults and youth with disabilities.

**Objective 6.1**: By June 30, 2018, develop and implement a work plan to enhance the WIOA core program partner's capacity to serve individuals with disabilities.

#### Strategies:

• Conduct focus groups to solicit feedback about what the partners think is needed to enhance services for people with disabilities.

• Develop a CDOR referral form and referral process for the America's Job Centers of California.

• Provide training to local America's Job Center of California staff on topics such as: CDOR services; eligibility; job placement; case management; benefits counseling; job readiness and soft skills; disability awareness and etiquette; hiring persons with disabilities; disability disclosures; competitive integrated employment; customized employment; assistive technology; and, reasonable accommodation.

• Provide tools and resources to the WIOA core programs serving individuals with disabilities such as accommodations for individuals who are blind and visually impaired or deaf and hard of hearing.

• Identify the single point of contact for all local WIOA core program partners.

**Objective 6.2**: By June 30, 2018, develop and implement a work plan to leverage partnerships with WIOA core program partners to increase CDOR's capacity to serve consumers.

#### Strategies:

• Develop a CDOR resource guide that includes information about the WIOA core program partners including their services and resources.

• Share data outcomes with the local America's Job Centers of California, such as the number of referrals, Individualized Plans for Employment developed and closures.

• Increase and maintain communication with the WIOA core program partners about policies, procedures, and outcomes.

• Assess each CDOR District's unserved and underserved populations and use this information as a strategy to leverage partnerships.

• CDOR Districts to have reoccurring meetings with the WIOA core program partners to identify issues and implement solutions.

• Provide training and educational opportunities including, but not limited to, webinars, on-line instruction, classroom training, presentations, workshops, fairs, and events in the areas of disability employment, physical access, program access, and digital access.

• Increase technical assistance and informational responses for WIOA core program partners in the areas of disability employment, physical access, program access, and digital access.

### **CDOR Priority: Competitive Integrated Employment**

**Goal 7**: Increase competitive integrated employment opportunities and outcomes and supports for adults and youth with disabilities, particularly those with the most significant disabilities and those underserved.

**Objective 7.1**: By June 30, 2018, implement a statewide cross– departmental partnership for increasing competitive integrated employment opportunities, outcomes and supports for adults and youth with disabilities.

Note: The first five strategies listed below are activities included in the proposed Competitive Integrated Employment Blueprint for Change titled "Employing Individuals with Intellectual Disabilities and Developmental Disabilities in California – Real Work for Real Pay in the Real World." The Blueprint is a proactive interagency plan between CDOR, the California Department of Education and the California Department of Developmental Services. It is anticipated that the Blueprint will be finalized in the summer of 2016. Although the primary focus of the Blueprint is individuals with intellectual disabilities and developmental disabilities, the Blueprint efforts will benefit the disability community at large.

### Strategies:

• Continue coordination and collaboration with the California Department of Education and the California Department of Developmental Services as outlined in the Blueprint to prepare and support all individuals with intellectual and developmental disabilities who choose competitive integrated employment.

• Promote collaboration at the local level and develop local partnership agreements between CDOR Districts, local education agencies, and the

California Department of Developmental Services–funded local regional centers that address competitive integrated employment.

• Improve data collection and sharing between CDOR, the California Department of Education, and the California Department of Developmental Services.

• Hold stakeholder meetings and forums to communicate information on achieving competitive integrated employment for individuals with intellectual and developmental disabilities.

• Amend the current Interagency Agreements between CDOR, the California Department of Education, and the California Department of Developmental Services to include an emphasis on competitive integrated employment and local linkages, as referenced in the Blueprint.

• Consistent with WIOA Section 511, the new VRSD teams will support competitive integrated employment consistent with WIOA and will provide additional career counseling services. The career counseling services will be delivered in a manner that facilitates independent decision making and informed choice as the individual with a disability makes decisions regarding employment and career advancement activities.

#### 2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.

The Assistive Technology Act of 1998, as amended in 2004, funds each state and U.S. territory to provide Assistive Technology services. In California the program is the Assistive Technology Unit, which is housed within CDOR and funded by a federal grant through the U.S. Department of Health and Human Services' Administration for Community Living. To implement the required services, CDOR contracts with the California Foundation for Independent Living Centers to provide Assistive Technology services statewide to assist individuals with disabilities to live independently and participate in the community. Through these activities, as detailed below, CDOR assures coordination with Assistive Technology programs.

The CDOR provides Assistive Technology services and devices for applicants and consumers based on their need at each stage of the rehabilitation process, from initial interview through case closure and post– employment services to help achieve their employment goal. Assistive Technology services include providing devices, equipment, hardware, and, or, software to promote greater independence. CDOR informs applicants and consumers about their rights and remedies for decisions made regarding Assistive Technology services and devices.

To educate VR Counselors, Service Coordinators, and Employment Coordinators about Assistive Technology options for applicants and consumers, CDOR offers a Rehabilitation Technology two-day training class at least once per year. This training includes reviewing the different types of assistive devices available to consumers, and where and how to obtain appropriate assessments and recommendations for these devices. A statewide CDOR Assistive Technology Services Coordinator is available to assist CDOR staff with technical assistance and guidance.

Through a statewide contract, CDOR also provides Assistive Technology services through the California Assistive Technology Systems, a statewide program federally funded through the Assistive Technology Act of 1998, as amended in 2004 including:

• Device Loan Program: Short-term loans can be provided up to one month to qualifying individuals and can be renewed.

• Device Reutilization Program: A web-based program for individuals and organizations to list assistive technology devices for sale. There are five centers providing reused equipment to their communities at low or no cost.

• Assistive Technology and Transportation Loan Guarantee Program: An individual with a disability, family member or legal guardian of a child with a disability, and an employer (only for the Assistive Technology Loan Program) can apply for a loan to purchase a vehicle, modifications for a vehicle, Assistive Technology services and devices.

Individuals with disabilities can access CDOR's Internet website for information on Assistive Technology program resources and services. To address ongoing issues with timely delivery of Assistive Technology goods and services for consumers, CDOR worked with the California Department of General Services to streamline the procurement process. In 2013, CDOR negotiated a contract with the California Department of General Services to streamline the procuring assistive technology goods and services through the State Price Schedule. CDOR also created an Assistive Technology vendor website where field staff can search for and select products and services for consumers. CDOR continues to evaluate ways to increase the number of vendors and the timeliness of services to meet consumer Assistive Technology needs. CDOR continues to identify improvements to assistive technology processes, including upgrading the Assistive Technology vendor website to make it easier to use, providing training to field staff and vendors, and addressing focused concerns regarding use of the State Price Schedule for purchases for individuals with particular physical impairments.

#### 3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.

Through the Comprehensive Statewide Needs Assessment, as identified in Description (j) – Statewide Assessment, CDOR conducts an assessment on the level of its outreach to individuals with disabilities, including those who are minorities, with the most significant disabilities to determine who may be unserved or underserved by the VR program.

Based on the assessment, strategies to better serve consumers who may be from unserved or underserved minority groups are shared with staff. For example, CDOR established bi-monthly meeting taskforces to address the needs, barriers, and services deficits of individuals with disabilities who are Asian American, African American, and Hispanic. CDOR also established the Diversity and Inclusion Advisory Committee to conduct outreach to unserved and underserved individuals and consumers, and to diversify CDOR employee applicant pools to ensure a diverse workforce in order to meet consumer needs. The Diversity and Inclusion Advisory Committee meets guarterly to identify outreach and diversity gaps and determine potential solutions for consideration by CDOR's Executive Leadership Team. To enhance CDOR's ability to reach out to individuals with disabilities, consumers, and stakeholders electronically, CDOR maintains Facebook, Twitter, You Tube, Vimeo, and Intranet and Internet websites. Through these sites, CDOR provides information about current events, resources, consumer highlights, and VR services for staff, consumers, and the public. To promote deaf awareness and sensitivity, CDOR provides annual training to VRSD team members on how to effectively serve individuals who are deaf, hard of hearing, late-deafened, and deaf-blind.

4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).

Refer to the "Youth" priority, goals, objectives and strategies in the response for Description (0)(1) – State's Strategies.

### 5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.

The CDOR continues to implement plans to establish, develop, and improve CRPs that address the needs of consumers. Efforts continue to take place to identify improvements to CDOR program evaluation processes for CRPs. Established in 2012, CDOR created a review process to create consistency and increase efficiencies, particularly for CRPs receiving payments to provide CDOR services to applicants and consumers under different VR and Supported Employment programs. CDOR continues to evaluate the effectiveness of the review processes and update the master program review calendar each year.

The CDOR's Community Resources Development Section continues to update and use the Rehabilitation Resources Directory, an online resource on CDOR's website that provides users with complete information about CRPs throughout California. CDOR's Community Resources Development Section is updating the CRP Vendorization and Certification Guidelines with information on Pre–Employment Transition Services and Customized Employment WIOA services. In early 2014, a proof of concept titled "Placement Plus" was administered in select CRPs to test a new employment services fee for service structure. The lessons learned and evaluation of the Placement Plus is informing CDOR's current efforts to redesign employment services statewide.

### 6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

In FFY 2015, CDOR passed performance indicators 1.1, 1.2, 1.3, 1.4, 1.6, and 2.1, but experienced challenges in meeting performance indicator 1.5., Average Hourly Earnings.

The performance indicators under WIA will remain in effect until the new performance indicators, under WIOA, go into effect July 1, 2016. Until that time, CDOR will implement current and new strategies to improve performance, including: monthly monitoring of performance indicator data; attend California Model Employer Initiative meetings in order to increase the number of individuals with disabilities in state employment; identify and implement improvements in furtherance of the state's "Employment First" policy to gain integrated competitive wages for persons with intellectual and developmental disabilities; increase jobs-driven employment and consumer self-sufficiency for consumers who are job ready through work incentives planning; establish new partnerships with employers through the National Employment Team; maximize the use of Talent Acquisition Portal, an online system which includes both a national talent pool of VR candidates looking for employment and a job posting system for businesses looking to hire individuals with disabilities, to link job ready consumers with employers; and, enhancement of staff training curriculums to include the use of social media strategies and the electronic job application process. These efforts are expected to contribute towards passing the performance indicators in FFY 2016.

### **Local Partnerships**

The CDOR will partner with the local Workforce Development Boards and America's Job Center of California. CDOR Central Office staff will provide support to the CDOR District Administrators and local Team Managers as they implement the priorities and strategies at the local level. CDOR will also coordinate with the California Workforce Development Board to develop local and regional level Memorandum of Understandings for the America's Job Center of California.

### **WIOA Performance Measures**

The CDOR will utilize an updated Accessible Web-based Activity Reporting Environment system to collect some of the data needed to calculate the WIOA performance measures. The data will be collected and entered by VRSD Teams located throughout California. Wage data is currently (and will continue to be) collected through an Interagency Agreement with the California Employment Development Department. CDOR may also partner with the California Employment Development Department or the California Department of Education to collect postsecondary credential or diploma or its recognized equivalent. CDOR will report individual consumer record data quarterly through the report titled "Rehabilitation Services Administration–911" as required by WIOA.

#### 7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.

The CDOR's Director is a member of the WIOA Implementation Work Group, which is responsible for a collaborative approach on how to adequately implement WIOA. The WIOA workgroup includes state department heads who are experts in policy, education, and employment. CDOR collaborates with the California Workforce Development Board as an active partner with the 49 Local Workforce Development Boards, and has contracts with the America's Job Center of California for co–locating staff, and collaborates with the following agencies within the workforce investment system to meet consumer need:

### **California Department of Education**

See Description (f) under "California Initiatives".

### Chancellor's Office of the California Community Colleges

The California Community Colleges offers academic and vocational education at the lower division level for both younger and older students, including those persons returning to school. Potentially eligible students are referred to CDOR for eligibility determination and, if appropriate, services.

### UC Regents

The UC provides services to students who are CDOR consumers with disabilities.

### The California Association of Student Financial Aid Administrators

The California Association of Student Financial Aid Administrators supports mutual students who are consumers with disabilities to achieve their educational goals leading to employment. Guidelines are established for joint financial support of CDOR student consumers in the California post–secondary educations system.

### Sycuan Inter-Tribal Vocational Rehabilitation Program

The Sycuan Inter–Tribal Vocational Rehabilitation Program implements effective liaison, outreach, referral, and VR service delivery for Native American people with disabilities living on or near reservations in San Diego County.

### CSUs

The CSU campuses refer appropriate student to CDOR for eligibility determination and if qualified for services. CDOR will refer appropriate consumers to the CSU as part of the consumer's Individualized Plan for Employment.

### 8. How the agency's strategies will be used to:

### A. Achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

The CDOR will achieve its priorities and goals as identified in Description (I) – State Goals and Priorities. In addition, CDOR continues to establish initiatives and continuous improvement efforts designed to improve service delivery, outreach, and administrative business operations.

In addition, refer to the response for description (o)(1), specifically – CDOR developed measurable objectives to support CDOR's achievement of the Priorities and Goals identified in the response for Description (I) – State Goals and Priorities. These program goals and objectives represent CDOR's approach to serving youth, expanding business engagement, enhancing capacity building, and increasing competitive integrated employment. Actions (referred to as "Strategies") to achieve the priorities, goals and objectives, consistent with the comprehensive statewide needs assessment are identified below.

### B. Support innovation and expansion activities; and

The CDOR will use Section 110 funds of the Rehabilitation Act towards improvements to the Accessible Web–based Activity Reporting Environment case management and financial modules and to support the activities of the SRC.

### Accessible Web-based Activity Reporting Environment

Working closely with the Accessible Web–based Activity Reporting Environment vendor, CDOR will implement enhancements for the case services and financial modules to continuously improve the user interface and provide a more streamlined business process. On September 2, 2015, Accessible Web–based Activity Reporting Environment update 5.17 was implemented. Future releases are under development and will include new features for WIOA reporting requirements.

### **State Rehabilitation Council**

Section 110 funds will be used to support SRC travel and administrative costs. The SRC meets at least eight times a year as a full council or for executive planning. The SRC is a partner with CDOR in major programs, policies, and projects including the State Plan, Comprehensive Statewide Needs Assessment, and Consumer Satisfaction Survey.

In addition to the activities supported by Section 110 funds, CDOR has several additional innovation and expansion activities taking place. Examples include:

### California Department of Human Resources Core Group and Workgroups

The CDOR is participating in the California Department of Human Resources' Core Group and Workgroups which will increase the number of persons with disabilities working in state service; improve the reasonable accommodation process to enable employees with disabilities to work more effectively; and will enhance promotional opportunities.

### **Consumer Highlight Campaign**

The CDOR's Consumer Highlight Campaign is designed to increase the visibility of the Department, highlight the work of CDOR staff and consumers, and showcase CDOR's contributions to the community. Key elements of the campaign include brief audio interviews with present and former consumers, their friends and family, CDOR staff, and other community members; a rolling blog housing the audio interviews accompanied by a picture and written synopsis; media pitches and social media spotlights.

### **District Quality Assurance Project**

The CDOR established the District Quality Assurance Project to support operational excellence and quality service delivery through the provision of management tools, activities and resources for performance management, quality assurance and oversight of districts. Notably, a District Management Portal was created on CDOR's Intranet to provide tools and resources for CDOR management and staff on the Accessible Web–based Activity Reporting Environment, benefits planning, case management, communication, desk manuals, fair hearings, regulations, the California Rehabilitation Administrative Manual, and tracking and monitoring supports.

## C. Overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

The CDOR's policy is to serve all qualified individuals with a disability without discrimination based on their protected status, including: physical or mental disability, age, sex, color, ethnic group, race, national origin, ancestry, religion, medical condition, sexual orientation, or marital status. Through CDOR's Comprehensive Statewide Needs Assessment, potential barriers and strategies identified in the response for Description (j) – Statewide Assessment.

• The need for closer coordination, cross referrals, and cross training between CDOR VRSD teams, vendors, and WIOA program partners.

• Awareness of VR services and benefits of receiving services, particularly in the Asian American, Hispanic, and Latino communities.

• The need for more service delivery models that address the unique needs of youth and students with disabilities.

In compliance with Section 427 of the U.S. Department of Education's General Education Provisions Act, CDOR continuously plans to identify and provide services to individuals with disabilities to ensure equitable access to and participation in VR and Supported Employment services. As outlined in the strategies described above and the recommendations in Description (j) – Statewide Assessment, to overcome identified barriers and ensure equal access to all individuals with disabilities, CDOR will:

• Undertake capacity building of internal resources, vendors, and of WIOA program partners through cross training, entering into more formalized partnerships, establishing more regular communication opportunities, and developing systems for sharing data.

• Conduct outreach through a variety of modalities and languages, directly and indirectly through program partners, while continuously assessing which communities continue to be unserved or underserved.

• Conduct assessments, provide training, establish new partnerships, and develop new services with the aim of addressing the Pre–Employment Transition Services needs of youth and students with disabilities.

### p. Evaluation and Reports of Progress: VR and Supported Employment Goals

Describe:

1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals.

**FFY 2014 CDOR Response: Evaluation and Reports of Progress.** CDOR, jointly with the SRC, established three program goals for FFY 2014. These program goals were developed based on information from the Comprehensive Statewide Needs Assessment, requirements related to the federal Standards and Performance Indicators, CDOR's 2013–2018 Strategic Plan, and stakeholder input. The information below provides an evaluation of both the VR and Supported Employment goals (in particular, reference Objective 1.2 for Supported Employment).

### FFY 2014 STATE PLAN PROGRAM GOALS

**Program Goal 1**: Increase the quality and quantity of VR and Supported Employment outcomes for CDOR consumers, including unserved and underserved individuals with disabilities.

**Objective 1.1**: By September 30, 2014, increase the number of applications for individuals with Autism Spectrum Disorder and Acquired Brain Injury and Traumatic Brain Injury by one percent over the FFY 2013 level.

FFY 2014 target: 842 Autism Spectrum Disorder and 392 Acquired Brain Injury and Traumatic Brain Injury

FFY 2014 achieved: 1,415 Autism Spectrum Disorder and 410 Acquired Brain Injury and Traumatic Brain Injury

**Objective 1.2**: By September 30, 2014, increase the number of successfully rehabilitated Supported Employment consumer case closures by two percent over the FFY 2013 level.

FFY 2014 target: 1,443 consumers

FFY 2014 achieved: 1,552 consumers

**Objective 1.3**: By September 30, 2014, increase the median hourly wage of consumers achieving competitive integrated employment by five percent to increase placement outcomes in higher–wage positions.

FFY 2014 target: \$10.50

FFY 2014 achieved: \$9.90

**Objective 1.4**: During FFY 2014, reduce the number of cases closed from "Service–Status" to "Closed–Other" with a closure outcome description of "Other Than Rehabilitated" and the reason description of "Unable to Locate, Contact or Moved" by 25 percent under the FFY 2013 level.

FFY 2014 target: 3,130 outcomes

FFY 2014 achieved: 3,948 outcomes

**Program Goal 2**: Advance accessibility and equality to improve opportunities for individuals with disabilities to achieve their employment goals and independence.

**Objective 2.1**: By September 30, 2014, make Assistive Technology Network and Assistive Technology Loan Guarantee Program information available to all applicants and consumers.

FFY 2014 target: Meet by September 30, 2014

FFY 2014 achieved: Partially met by September 30, 2014

**Objective 2.2**: By September 30, 2014, improve the Soft Skills Training curriculum and instructional delivery provided by the Staff Development Unit.

FFY 2014 target: Meet by September 30, 2014

FFY 2014 achieved: Met by September 30, 2014

**Program Goal 3**: Continuously improve the service delivery system and administrative operations to better serve consumers.

**Objective 3.1**: By September 30, 2014, implement VR Modernization project activities that will result in an improved VR and Supported Employment service delivery system.

FFY 2014 target: Meet by September 30, 2014

FFY 2014 achieved: Met by September 30, 2014

**Objective 3.2**: During FFY 2014, increase the response rate of the Consumer Satisfaction Survey by 15 percent over the 2012 level. Based on the mid–year 2013 estimate, the FFY 2014 projection is 1,457 surveys will be returned.

FFY 2014 target: 1,457

FFY 2014 achieved: 1,911

#### FFY 2015 CDOR Response: Evaluation and Reports of Progress.

CDOR, jointly with the SRC developed, reviewed, and agreed to the State Plan Goals and Priorities for FFY 2015. The CDOR and the SRC agreed to maintain the three goals from FFY 2014. These goals were developed based on input received from stakeholder public meetings, Comprehensive Statewide Needs Assessment, Standards and Performance Indicators, Consumer Satisfaction Surveys, CDOR's 2013–18 Strategic Plan, and the results of monitoring activities on CDOR's operation and effectiveness received from oversight agencies.

### FFY 2015 STATE PLAN PROGRAM GOALS

**Program Goal 1**: Increase the quality and quantity of VR and Supported Employment outcomes for CDOR consumers, including unserved and underserved individuals with disabilities.

**Objective 1.1**: By September 30, 2015, CDOR will increase the average hourly wage earned by consumers in competitive employment by 5% to improve placement outcomes in higher–wage positions. Based on FFY 2013 results of \$11.76, the FFY 2015 average hourly wage is projected to be \$12.35.

FFY 2015 target: \$12.35 average hourly wage

FFY 2015 achieved: \$12.46 average hourly wage

**Objective 1.2**: By September 30, 2015, increase the number of consumers achieving successful employment outcomes by 10%. Based on FFY 2013 results of 12,239, the FFY 2015 number of consumers achieving successful employment outcomes is projected to be 13,463.

FFY 2015 target: 13,463 consumers

FFY 2015 achieved: 13,416 consumers

**Objective 1.3**: Increase the number of successful employment outcomes for transition–age youth (age 16 to 24) with disabilities by 5%. Based on FFY 2013 results of 4,120, the FFY 2015 number of transition–age consumers achieving successful employment outcomes is projected to be 4,326.

FFY 2015 target: 4,326 consumers

FFY 2015 achieved: 4,494 consumers

**Program Goal 2**: Advance accessibility and equality to improve opportunities for individuals with disabilities to achieve their employment goals and independence.

**Objective 2.1**: By September 30, 2015, CDOR will provide work incentives and benefits planning services to 1,000 consumers on Supplemental Security Income and Social Security Disability Insurance.

FFY 2015 target: 1,000 consumers

FFY 2015 achieved: 1,247 consumers

**Objective 2.2**: By September 30, 2015, individuals with disabilities who gain state employment with a Limited Examination and Appointment Program certificate will increase by 30%. Based on FFY 2013 results of 344, the FFY 2015 number of individuals is projected to be 447.

FFY 2015 target: 447 individuals

FFY 2015 achieved: 575 individuals

**Program Goal 3**: Continuously improve the service delivery system and administrative operations to better serve consumers.

**Objective 3.1**: By September 30, 2015, Team Employment Coordinator and Service Coordinator academies will be implemented.

FFY 2015 target: Meet by September 30, 2015

FFY 2015 achieved: Met by September 30, 2015

**Objective 3.2**: By September 30, 2015, reduce the timeline from CDOR receipt of an acceptable vendor invoice to payment by the State to 30 calendar days.

FFY 2015 target: 30 calendar days

FFY 2015 achieved: 36 calendar days

### Factors Contributing to the Achievement of VR Goals

In FFY 2014, CDOR was successful in achieving Goal 3. Factors that contributed to the success included:

- CDOR communication through internal and external websites.
- Stakeholder meetings on the VRSD team model implementation.
- The VRSD model cultivated a team environment with standardized practices.
- The Consumer Satisfaction Survey increased response rate is attributed to reminder letters that were sent out to consumers.
- Enhanced communications with the district staff.

In FFY 2015, CDOR was successful in achieving Goal 2, and was partially successful in meeting Goals 1 and 3. Factors that contributed to the success included:

• Employment Coordinators served as a "single–point–of contact" for employers and or were registered with the Talent Acquisition Portal and have leveraged relationships with local employers to enhance consumer placements.

• CDOR staff locally and statewide increased collaboration efforts with large and medium sized businesses. CDOR, in collaboration with local businesses, developed 419 On–The–Job training agreements.

• CDOR management and District Administrators receive monthly case movement and monitoring performance reports that provide status updates and ensure prompt case movement.

• CDOR convened a statewide Business Partner Forum and supported local Job Placement Circles where employers seeking candidates with specific skills, qualifications and experience are matched with job–ready consumers.

• CDOR collaborated with the California Department of Education, Community Colleges Chancellor's Office, CSU, and UC Offices to address the educational and training needs and developed strong relationships with the Social Security Administration, Work Incentives Planning and Assistance Projects, and CRPs.

• Best practices were developed to ensure that Work Incentives Planners were successfully integrated into the CDOR teams, who worked closely with counselors to identify strong candidates for enrollment into Work Incentives Planning services.

• CDOR worked with transition-age youth to increase work experience opportunities through work training and internship programs.

• CDOR collaborated with Local Education Agencies through third party cooperative arrangements to provide work experience, employment preparation, and job placement and retention services to transition-age youth with disabilities.

• Improved case management system.

• Comprehensive benefits summary and analysis and other deliverables were provided to enrolled consumers to make an informed choice about employment with a full understanding of how it may impact their benefits.

• The California Department of Human Resources merged the traditional and Limited Examination and Appointment Program applicant list so hiring managers did not have to specially order the Limited Examination and Appointment Program applicant list. This provided more opportunities for Limited Examination and Appointment Program applicants to be engaged in the hiring process.

• CDOR provided Windmills and Disability Etiquette and Awareness training to State hiring managers.

• The California Department of Human Resources and the California State Personnel Board, in partnership with CDOR, co–sponsored a project designed to increase the number of persons with disabilities working in California state government and improve the reasonable accommodation process to enable employees with disabilities to work more effectively and enhance promotional opportunities.

• CDOR Staff Development Unit produced a new curriculum, the Service Team Academy Reference, designed to provide all VR team members with the knowledge and tools needed to effectively serve CDOR applicants and consumers under the VRSD model implemented by CDOR.

• As discussed in Description (i)(1)(A)(i), in FFY 2015, CDOR developed and implemented an evaluation and assessment plan to collect and analyze VRSD team data to measure the impact of the team approach and identify improvements on program design and implementation.

### PERFOMANCE ON THE STANDARDS AND INDICATORS

In both FFY 2014 and 2015 (based upon preliminary data), CDOR met the federally–required performance for Evaluation Standard 1– VR's Impact on Employment and Evaluation Standard 2 – Equal Access Opportunity for Individuals of All Groups and Backgrounds.

To meet Evaluation Standards, federal regulations require VR agencies to pass at least four of the six performance indicators: Change in Employment Outcomes (1.1), Percent of Employment Outcomes (1.2), Competitive Employment Outcomes (1.3), Significance of Disability (1.4), Earnings Ratio (1.5), and Self–Support (1.6); and Minority Background Service Rate (2.1). Also, federal regulations require passing at least two of the three performance indicators 1.3, 1.4, and 1.5.

### Strategies Contributing to the Successful Passing of Performance Indicators

In FFY 2014, CDOR passed performance indicators 1.1, 1.2, 1.3, 1.4, 1.6, and 2.1 and in FFY 2015 (based on preliminary data), the CDOR passed performance indicators 1.1, 1.3, 1.4, 1.6 and 2.1. CDOR credits its success to the combined efforts of CDOR staff and community providers. CDOR engaged in local partnerships with community partners to help provide VR services to consumers. These partners included third–party cooperative programs, CRPs, and Individual Service Providers who contributed to or supported the consumers' employment outcomes.

### B. Describe the factors that impeded the achievement of the goals and priorities.

Factors Limiting the Achievement of VR Goals

In FFY 2014, CDOR had challenges in achieving Goals 1 and 2 due to the following:

**FFY 2014 – Goal 1, Objective 1.3**: By September 30, 2014, the median hourly wage of consumers achieving competitive integrated employment was not increased by five percent to increase placement outcomes in higher–wage positions.

The limiting factors to achieving Objective 1.3 include:

• CDOR convened the Business Partner Forum in October 2014. As this was the inaugural forum, actual business partner attendance was limited to only five partners.

• Due to limited staff resources, only new VR Counselors were trained on emerging labor market trends and job seeking strategies via the New Counselor Academy.

• Employer utilization of Talent Acquisition Portal was not commensurate with CDOR consumer enrollment levels.

• While Employment Coordinators continue to collaborate with the Workforce Development Section to coordinate employment resources and job opportunities for consumers via monthly conference calls, many Employment Coordinators are just now acclimating to their new roles. Employment Coordinators receive job–leads from large employers statewide via "Hot Jobs" and, or, direct email from the Workforce Development Section.

To improve on objective 1.3, CDOR's Staff Development Unit is currently engaged with enhancing appropriate staff training curriculums to also include the use of social media strategies and the electronic job application process.

**FFY 2014 – Goal 1, Objective 1.4**: During FFY 2014, CDOR did not reduce the number of cases closed from "Service–Status" to "Closed– Other" with a closure outcome description of "Other Than Rehabilitated" and the reason description of "Unable to Locate, Contact or Moved" by 25 percent under the FFY 2013 level.

As an unplanned, and most likely a temporary consequence following VRSD implementation, due to team involvement, more consumer cases were identified and closed as "unable to locate, contact, or moved". This resulted in frequent attempts to reestablish contact which allowed for a timely determination that the consumer had moved, relocated or discontinued working on their VR program. Factors limiting the successful achievement of objective 1.4 included the vacancies of the Deputy Director and Assistive Technology staff positions within the Independent Living and Community Access Division and Assistive Technology Unit.

To improve on objective 1.4, CDOR will prepare the VRSD teams with training opportunities, resources, and tools to monitor the effectiveness of services delivery to consumers; and further improve communication between the VRSD team, consumers, service providers, employers and others, as appropriate, resulting in timely identification of consumers who have moved, discontinued participation in the VR process or who, due to non–responsiveness, are determined to have lost contact with CDOR.

**FFY 2014 – Goal 2, Objective 2.1**: CDOR was partially able to make Assistive Technology Network and Assistive Technology Loan Guarantee Program information available to all applicants and consumers by the goal date of September 30, 2014.

Factors limiting the complete achievement of objective 2.1 include the:

• Need to strengthen the structure of the Assistive Technology Advisory Committee.

• Lack of lender participation in CDOR's low-interest Loan Guarantee Program.

• CDOR does not engage in direct marketing of the Assistive Technology program, which created challenges for increasing the number of organizations that donated new assistive technology products and devices to the Assistive Technology Network; however, CDOR's subcontractor did engage in marketing activities as part of the Assistive Technology Act funding contract.

To improve on the partially met goal, CDOR is currently working to strengthen the structure and better define the purpose of the Assistive Technology Advisory Committee. The Assistive Technology Advisory Committee continues to be updated on current issues related to the Assistive Technology Network, WIOA and the status of the Loan Guarantee Program. In regards to the Loan Guarantee Program, CDOR has a strategy in place that will allow the Department to partner with lenders next year.

In FFY 2015, CDOR partially met Goals 1 and 3 due to the following limiting factors:

**FFY 2015 – Goal 1, Objective 1.2**: By September 30, 2015, CDOR increased the number of consumers successfully achieving employment outcomes to 13,416, nearly meeting the target of 13,463 consumers. Factors included:

• CDOR increased employment outcomes from FFY 2013 to FFY 2015 by 1,177 employment outcomes. This difference (47) represents a 0.3% objective shortfall.

• While CDOR developed 419 On-the-Job-Trainings in FFY 2015, efforts have been initiated to increase On-the-Job-Trainings utilization statewide. CDOR has drafted revised California Regulations to remove the dollar limit approval thresholds pertaining to On-the-Job-Trainings.

• CDOR has experienced significant Employment Coordinator turnover over the past 24 months. This turnover limits the availability of journey–level, well experienced staff that can work in support of consumer job search and placement. Furthermore, this limits the business relationship building and maintenance success of CDOR service delivery teams. Training and retaining qualified Employment Coordinators, whose primary responsibility is job development and placement, is a CDOR priority and steps, including the development of a comprehensive "certificate–type" training program are being taken. Additionally, CDOR is exploring opportunities to develop and implement a retention strategy for CDOR team Employment Coordinators.

• While the California economy continues to improve, entire regions (such as the California Central Valley and rural northern and eastern areas) continue to experience high unemployment rates. For example, in September 2015, the U.S. unemployment rate was 5.0%, California's rate was 5.5%, but, Fresno (8.0%), Merced (8.1%), Tulare (9.9%), Kern (8.3%) counties all had rates at or above 8%. Obtaining successful employment outcomes for individuals with significant disabilities in these areas continues to prove challenging.

**FFY 2015 – Goal 3, Objective 3.2**: By September 30, 2015, the CDOR decreased the average number of invoice processing days to a statewide average of 36 calendar days; however, CDOR did not fully achieve the statewide target goal of 30 calendar days.

The CDOR implemented the Centralized Invoicing Process statewide in November 2014. All vendor invoices for VR goods and services are now sent to and processed by District Operations Support staff, with support from the VRSD team who confirm that the goods and services were received. Within six months after implementation, CDOR significantly decreased the average number of processing days by 29% statewide. During the evaluation period, three Districts successfully achieved the 30 day target goal and all districts improved their invoicing timelines; and, between March and May 2015, six Districts achieved CDOR's 30 day target goal. As a result, the majority of vendors are receiving payments more quickly.

Typical internal and external factors that impact full achievement of the statewide target goal include:

• Staff vacancies and long-term absences and/or insufficient staff resources to process the volume of invoices received by the district.

• The complexity, accuracy, timeliness, and or completeness of the vendor invoices received.

• Delays in obtaining proper confirmation from vendors and/or consumers to verify the goods and services were received.

• Considerable learning curve required for staff to become proficient on invoice processing.

A monthly report is distributed to District managers to monitor timelines and promptly address any increases as needed. A majority of vendors provided positive feedback on the Centralized Invoicing Process, citing a smoother, more consistent process; increased responsiveness to vendor questions; faster payments; and the ability to email invoices and reports which saves time and money. Working collaboratively with our vendors, CDOR continues to identify innovative opportunities and solutions to further enhance the invoicing process. For example, in October 2015, CDOR released vendor invoicing guidelines on its website to provide vendors with helpful, easy-to-navigate information and resources that facilitate timely invoice processing and payment. The Centralized Invoicing Process has positioned CDOR and its vendors to provide timely vocational rehabilitation services to Californians with disabilities on their path to meaningful employment and greater independence.

### Factors Limiting the Successful Passing of Performance Indicators

In FFY 2014, CDOR was unable to pass 1.5. The State of California's Average Hourly Wage is \$26.91. For consumers exiting CDOR, it was \$11.81. Refer to the limiting factors outlined under FFY 2014 – Goal 1, Objective 1.3 for additional details.

In FFY 2015, CDOR was unable to pass 1.2 (Percent Employed) and 1.5 (Earnings Ratio). Based on preliminary data, CDOR did not pass Indicator 1.2. For consumers exiting CDOR after receiving services, 49.9% were assisted with achievement of a successful employment outcome. The CDOR continues to employ strategies leveraged through the Vocational Rehabilitation Service Delivery team model to keep consumers engaged in the VR process and thus, increase the percentage of consumers exiting the CDOR program with successful employment outcomes. Additionally, CDOR is developing training curricula specifically for Employment Coordinators with the goal of increasing employment outcomes and thus, 1.2 percentage.

In regards to Indicator 1.5 for FFY 2015, CDOR achieved a ratio of 0.453 due to the very high average hourly in California. Based on data from the California Department of Labor, the average hourly wage in California for 2015 was \$27.53. The average hourly wage of CDOR consumers increased from \$11.76 in 2013 to \$12.46 (6.0%) in 2015. Progress in this area continues to be made, but it is notable that a large percentage of CDOR's consumers attain employment in entry–level or first–job positions making at or near the California Minimum Wage (\$9 per hour in FFY 2015). This will continue to be the case, at least in the foreseeable future, as CDOR's continued focus remains on serving youth and students with disabilities. However, CDOR is and will continue emphasize supporting consumers in Science, Technology, Engineering and Math occupations, consistent with the WIOA. These positions, even at entry–level, could pay at or near the California average wage improving the overall earnings rate of CDOR consumers achieving an employment outcome.

## 2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:

### A. Identify the strategies that contributed to the achievement of the goals.

The Supported Employment goals are included within the VR goals – refer to the response for description (p)(1)(A).

### B. Describe the factors that impeded the achievement of the goals and priorities.

The Supported Employment goals are included within the VR goals – refer to the response for description (p)(1)(B).

### 3. The VR program's performance on the performance accountability indicators under section 116 of WIOA.

This information is not yet available – the performance indicators go into effect in July 2016.

Per WIOA, CDOR will report on the following new data requirements:

• The number of applicants and the number of individuals determined to be eligible or ineligible for the program carried out under this title, including the number of individuals determined to be ineligible (disaggregated by type of disability and age).

• The number of individuals with open cases (disaggregated by those who are receiving training and those who are in post-secondary education), and the type of services the individuals are receiving (including Supported Employment).

• The number of students with disabilities who are receiving Pre– Employment Transition Services under this title.

• The number of individuals referred to CDOR by America's Job Center of California operators and the number of individuals referred to such America's Job Center of California operators by CDOR.

• The number who ended their participation in the program carried out under this title and the number who achieved employment outcomes after receiving VR services and, for those who achieved employment outcomes, the average length of time to obtain employment.

In addition, per WIOA, CDOR will report on the following information to the Administration of the Wage and Hour Division of the U.S. Department of Labor for each fiscal year:

• Semiannual review of the status of each individual with a disability served who is employed for 2 years after the beginning of such employment, and annually thereafter.

• Signed acknowledgement by the individual that the review took place.

• Maximum efforts to assist individuals in attaining competitive integrated employment.

Note – For Program Year 2016 (per federal guidance), CDOR will submit baseline indicators in the Unified State Plan online portal (under "Performance Goals for the Core Programs") at the end of year two of the plan.

### 4. How the funds reserved for innovation and expansion (I&E) activities were utilized.

During FFY 2014, innovation and expansion funds were used to support the development and implementation of the Accessible Web–based Activity Reporting Environment releases which expanded and improved the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities, consistent with the findings of the Comprehensive Statewide Needs Assessment and the state's program priorities and goals. Between July 2014 and July 2015, CDOR released Accessible Web–based Activity Reporting Environment version updates.

Innovation and expansion funds were also used to support the activities of the SRC including their travel costs. The SRC meets at least quarterly in person and teleconferences between full council meetings. In addition to direct participation in the development of the State Plan, the SRC partners with CDOR in major programs, policies, and projects including the Comprehensive Statewide Needs Assessment and the Consumer Satisfaction Survey.

### q. Quality, Scope, and Extent of Supported Employment Services.

Include the following:

1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.

#### CDOR Response: Quality, Scope and Extent of Supported

**Employment Services.** CDOR provides Supported Employment services to eligible consumers with the most significant disabilities to ensure they are engaged in competitive integrated employment, or in an integrated work setting in which they are working on a short-term basis toward competitive integrated employment. The following information outlines how CDOR monitors the quality of the services consumers receive, scope of services provided, extent of Supported Employment services, and timing of transition to extended services. Additional information on extended services for Supported Employment is identified in the response for Description (f) – Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.

#### **Quality of Supported Employment Services**

Supported Employment services are mostly provided to consumers by CRP and partner agencies. In areas where CRP vendors are not available, or an individual has needs beyond those that can be met by a CRP, CDOR may authorize approved individual service providers to provide job coaching services.

CRP vendors providing Supported Employment services follow guidelines provided by CDOR's Community Resources Development Section. These guidelines include submitting timely reports to VR Counselors as well as providing efficient services to consumers. Located at CDOR's Central Office is a statewide liaison to assist local CDOR Districts and CRPs with technical assistance and identify training needs. Locally, each district has nominated two district Supported Employment liaisons to assist in sharing information and training district staff. Additionally, Community Resources Development Specialists conduct on–site reviews, monitor CDOR certifications, review Commission on Accreditation of Rehabilitation Facilities accreditation of CRPs, and conduct ongoing assessment and evaluation of consumer services.

### **Scope of Supported Employment Services**

The VR process for Supported Employment is the same used for all consumers when establishing eligibility, and an eligible individual's Priority Category, when CDOR is under an Order of Selection. The difference applies once the consumer and VR Counselor has identified Supported Employment services are required to reach an employment outcome. Supported Employment services for a consumer begins with a comprehensive assessment to identify strengths for employment, resources, priorities, concerns, abilities, capabilities, interests, and informed choice. CDOR provides the full scope of Supported Employment services to individuals who:

• Are determined eligible with the most significant disabilities;

• Have not achieved competitive integrated employment, or it has been interrupted or intermittent;

• Require transitional employment due to mental illness;

• Are working on a short-term basis toward competitive integrated employment so long as they can reasonably anticipate achieving competitive integrated employment within six months of achieving an employment outcome of Supported Employment.

• Require intensive Supported Employment services and extended services to maintain employment; and

• Have at least a reasonable expectation that a source of extended services will be available at the time of transition to extended services.

As consumers' needs vary, CDOR provides additional options for Supported Employment programs, including Transitional Employment for consumers with mental health disabilities. Supported Employment services are provided to consumers with varying disabilities including, but not limited to, consumers with acquired brain injury, Autism Spectrum Disorder, intellectual disabilities, metal health disabilities, and Traumatic Brain Injury. The Supported Employment services provided meet the specialized needs of each consumer and include:

• A general meeting to review the Supported Employment job placement parameters used in developing a plan for employment.

• An evaluation of labor market and identification of suitable employment sites; employer contacts; job seeking skills training; work site assessment; task analysis; evaluation and recommendation for a job coaching plan.

• If necessary, external situational assessments to assess the consumer's interests and abilities and allow the individual to consider different jobs, environments, settings, and tasks to maximize his or her potential. Situational assessments are also used to determine the techniques best suited to assist the consumer to learn the work skills and behaviors necessary for employment.

• On-site job coaching support services in a group or individual placement at the work place, and off-site services in an individual placement if they are needed to maintain the consumer's employment, including training, destination training, advocacy, and job loss intervention.

• As needed, coordinated benefits planning discussions with the consumer, CDOR Work Incentives Planners, and, or, other third parties to identify appropriate work incentive programs as well as potential sources for ongoing support.

• Post–employment services, if needed to support and maintain employment and are not available through extended services, are available for Closed–Rehabilitated Supported Employment consumers in integrated settings.

• As appropriate, career counseling and information and referral to opportunities for competitive integrated employment.

With the passage of WIOA, CDOR will coordinate new Pre–Employment Transition Services with Local Education Agencies under the Individuals with Disabilities Education Improvement Act. New or enhanced services that may be provided to eligible youth receiving Supported Employment services may include:

• Counseling on opportunities for enrollment in comprehensive vocational training and postsecondary educational programs.

- Instruction in self-advocacy, including peer mentoring.
- Job exploration counseling.

• Summer programs that provide work–based learning experiences and workplace readiness training.

• Work-based learning experiences, including in-school or after school work experience and internship opportunities provided in an integrated environment.

• Workplace readiness training to develop social skills and Independent Living.

### Extent of Supported Employment Services

Supported Employment services are ongoing support services needed to support and maintain an individual with a most significant disability, including youth. Supported Employment services are:

• Organized and made available, singly or in combination, in such a way as to assist an eligible individual to achieve competitive integrated employment;

• Based on a determination of the needs of an eligible individual, as specified in an Individualized Plan for Employment;

• Provided by CDOR for a period of time not to exceed 24 months, unless under special circumstances the eligible individual and the VR Counselor jointly agree to extend the time to achieve the employment outcome identified in the Individualized Plan for Employment; and • Following transition, as post–employment services that are unavailable from an extended services provider and that are necessary to maintain or regain the job placement or advance in employment.

#### Use of the Required 50% Reserve of Supported Employment Funds to Provide Extended Services to Youth with the Most Significant Disabilities

The Lanterman Developmental Disabilities Services Act (Welf. & Inst. Code, § 4500 et seq.) funding is a primary source of extended services for youth with developmental and intellectual disabilities in California. Per Title 29, USC section 795h, CDOR will use the 50% reserve of Supported Employment funds for Supported Employment services for youth with the most significant disabilities. When these funds are exhausted, CDOR will utilize Title I funds as necessary to meet the needs of consumers eligible for Supported Employment services.

#### 2. The timing of transition to extended services.

#### **Timing of Transition to Extended Services**

Once a consumer has maintained stability on the job for at least 60 days, the funding for and provision of job coaching transitions to an extended services provider. The VR Counselor continues to track the consumer's progress and job stability during the transition period. If the consumer maintains stabilization for 60 days after transition to extended services, the case is Closed–Rehabilitated.

Transition to extended service providers is essential to maintain consistency and support for consumers receiving Supported Employment services. CDOR works to identify funding sources for extended services, collaborates with extended service providers, and identifies sources of extended services, including natural supports which are vital for the long– term success of the consumer. Sources of extended services for a consumer eligible for Supported Employment services include: public resources such as the California Department of Developmental Services, Ticket to Work Programs; private resources such as trust funds, private non–profits, religious or community organizations, and family; and, natural supports to ensure the consumer receiving Supported Employment services has greater success in the work environment. Through outreach efforts, CDOR works closely with the Cooperative Programs identified in the response for Description (b) – Request for Waiver of Statewideness for transition–aged youth and eligible individuals with mental health disabilities to identify those in need of Supported Employment services. Also, CDOR works directly with the California Traumatic Brain Injury Program to identify consumers with Traumatic Brain Injury who could benefit from Supported Employment services.

#### Youth with the Most Significant Disabilities

In California, activities are conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities. Under the Lanterman Developmental Disabilities Services Act (Welf. & Inst. Code, § 4500 et seq.), California established a commitment to provide services and supports to individuals with developmental disabilities throughout their lifetime. Services and supports are provided through a combination of federal, state, county and local government services, private businesses, support groups and volunteers. CDOR works closely with the California Department of Developmental Services to leverage Medicaid funds for habilitation services for persons with intellectual and developmental disabilities, including the provision of "extended services" to help an individual with a most significant disability maintain employment after the CDOR case is closed.

Toward this end, CDOR will continue to refer youth with the most significant disabilities to extended services currently funded by the California Department of Developmental Services regional centers upon CDOR closure or when placed on a wait list. CDOR will continue to review the impacts of providing extended services to youth with the most significant disabilities who do not qualify or are unable to receive extended services funded by the California Department of Developmental Services or another funding source. Additional information on CDOR's services for youth is provided in Description (o) – State's Strategies under the youth goals, objectives and strategies.

### Certifications

Name of designated State agency or designated State unit, as appropriate: **California Department of Rehabilitation** 

Name of designated State agency: California Department of Rehabilitation

Full Name of Authorized Representative: Joe Xavier

Title of Authorized Representative: **Director** 

### States must provide written and signed certifications that:

1. The **designated State agency or designated State unit (as appropriate) listed above** is authorized to submit the VR services portion of the Unified or Combined State Plan under title 1 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA\*, and its supplement under title VI of the Rehabilitation Act.\*\* **Yes** 

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the **designated State agency listed above** agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; **Yes** 

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan\*, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the VR services Program in Secretary of Education.

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; **Yes** 

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. **Yes** 

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. **Yes** 

7. The **Authorized Representative listed above** has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement; **Yes** 

8. The **Authorized Representative listed above** has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; **Yes** 

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

#### Footnotes

**Certification 1 Footnotes** 

\* Public Law 113-128.

\*\* Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

#### **Certification 2 Footnotes**

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

\*\* No funds under title 1 of the Rehabilitation Act may be awarded without

an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

\*\*\* Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

#### **Certification 3 Footnotes**

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

\*\* Applicable regulations, in part, include the citations in \*\*\* under Certification 2 footnotes

# Certification Regarding Lobbying — Vocational Rehabilitation

Certification for Contracts, Grants, Loans, and Cooperative Agreements the undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### **Statement for Loan Guarantees and Loan Insurance**

The undersigned states, to the best of his or her knowledge and belief, that: If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### Applicant's Organization: California Department of Rehabilitation

Full Name of Authorized Representative: Joe Xavier

Title of Authorized Representative: Director

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html). If applicable, please print, sign, and email to MAT\_OCTAE@ed.gov

## **Certification Regarding Lobbying — Supported Employment**

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### **Statement for Loan Guarantees and Loan Insurance**

The undersigned states, to the best of his or her knowledge and belief, that: If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### Applicant's Organization: California Department of Rehabilitation

Full Name of Authorized Representative: Joe Xavier

Title of Authorized Representative: Director

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html).

### Assurances

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

#### The State Plan must provide assurances that:

#### **1. Public Comment on Policies and Procedures:**

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

# 2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

# 3. Administration of the VR services portion of the Unified or Combined State Plan:

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.

b. the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.

The designated State agency or designated State unit, as applicable (B) has established a State Rehabilitation Council

c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.

d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).

e. the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.

The designated State agency allows for the local administration of VR funds: **No** 

f. the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.

The designated State agency allows for the shared funding and administration of joint programs: **No** 

g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan. **Yes** 

h. the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.

i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act .

j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.

k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.

I. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities.

m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.

#### 4. Administration of the Provision of VR Services:

The designated State agency, or designated State unit, as appropriate, assures that it will:

a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act.

b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act.

c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act?

Agency will provide the full range of services described above. No

d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.

e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.

f. comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act.

g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.

h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14)of the Rehabilitation Act.

i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs

j. with respect to students with disabilities, the State,

- i. has developed and will implement,
  - A. strategies to address the needs identified in the assessments; and
  - B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
- ii. has developed and will implement strategies to provide preemployment transition services (sections 101(a)(15) and 101(a)(25)).

# 5. Program Administration for the Supported Employment Title VI Supplement:

a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.

b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.

c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act.

#### 6. Financial Administration of the Supported Employment Program:

a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act.

b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.

#### 7. Provision of Supported Employment Services:

a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.

b. The designated State agency assures that:

- the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act
- an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.