

State Rehabilitation Council Recommendations for Fiscal Year 2018 with Massachusetts Rehabilitation Commission Responses

Order of Selection Recommendation:

The council provided the following recommendation to MRC and was passed unanimously by gubernatorial members of the council.

Whereas federal regulations require an Order of Selection policy be implemented when the VR Program does not have sufficient funds to serve all eligible consumers, and whereas the Massachusetts Rehabilitation Commission is projecting a deficit in the VR Program for the 2019, it is recommended that the State Rehabilitation Council hereby grant authority to the Commissioner of the Massachusetts Rehabilitation Commission to develop and implement an Order of Selection policy and procedures for use in the VR Program and until such time as the process is no longer needed.

The council passed a motion to continue to monitor the previous year's recommendation as the order of selection recommendation took precedence over the recommendations.

March 2019 MRC Response: Order of Selection (or Priority for Services as we are calling it in the Commonwealth) was not implemented in January 2019. There were a variety of factors that informed this decision, including a proposed MRC budget increase for FY20, and the need to collect more detailed data on MRC VR consumers to more accurately assess priority category determination. MRC is using a new functional limitations and capacities tool to support more robust data collection, and the processing list has been eliminated.

June 2019 MRC Response: MRC has information on its website stating we are not in Order of Selection (Priority for Services). MRC continues to use the new functional limitations and capacities tool to have more robust data on the consumers we serve.

Recommendation 1: 'Gig Economy' jobs grow across our Commonwealth, the MA State Rehabilitation Council (SRC) recommends that the MA Rehabilitation Commission create a career pathway and provide support for MRC clients to enter these types of businesses. The gig economy is defined as a labor market characterized by the prevalence of short-term contracts or freelance work as opposed to permanent jobs. One of the steps that could be taken to provide information to consumers about this type of work is by updating and marketing the "Self-Employment Guide" that was created as a recommendation from the SRC to include this information. The SRC

would also like to see trainings or literature distributed to the vocational rehabilitation division on types of jobs that fall into the ‘gig’ economy category.

RESPONSE to Recommendation: The goal of the Vocational Rehabilitation program is to assist individuals with disabilities to obtain competitive integrated employment. To satisfy the definition of “competitive integrated employment,” the employment must satisfy the requirements for all three components of the definition as outlined in the Workforce Innovation and Opportunity Act (WIOA). Those criteria are:

- Competitive earnings;
- Integrated Location; and
- Opportunities for advancement.

Meaning if an individual’s employment fails to satisfy any one of the above components, the employment will not meet the definition of “competitive integrated employment.”

The question becomes does a ‘Gig economy’ qualify as competitive integrated employment? The answer is both interesting and multifaceted.

The Vocational Rehabilitation Division finds value in the ‘Gig economy’ as an informed choice work option for consumers. However, we feel that we need to get more guidance from Rehabilitation Services Administration as it relates to the ‘Gig economy’ and WIOA. This would include the WIOA common measures. Upon consulting the RSA, obtaining guidance, and if encouraged to pursue, MRC will develop best practice guidelines for the fast approaching ‘gig’ economy.

Furthermore, if the assignment long term, with an opportunity to advance then we believe it meets the definition. If the assignment is short term it might not meet the definition, even if the labor market is moving in that direction.

Consumers who have no work experience this might be an opportunity for the individual to gain skills or to assess consumers’ ability to engage in work activities. This might then present as an opportunity for a training within various market sectors. Though the short term jobs might not lead to career advancement, it might provide an opportunity for consumers to test their readiness for work and/or provide work experience that can be added to a resume. Eventually leading to competitive integrated employment. Like the ‘On the Job Training’, (OJT), perhaps this work would be an opportunity to try out a job and demonstrate the ability to work. MRC’s statistics show that 60% of the time, when used appropriately, OJT leads to competitive integrated employment. MRC would evaluate whether same or better outcomes are achieved through ‘Gig economy’ jobs.

This type of employment might also be utilized in the same manner we utilize an internship opportunity.

March 2019 MRC Response: MRC first needs to better understand how ‘gig economy’ jobs fit within what is an allowable definition of competitive integrated employment, the standard put forth by our funder, the Rehabilitation Services Administration (RSA). The Commissioner, Deputy Commissioner, and Assistant Commissioner of Vocational Rehabilitation are attending the spring Council of State Administrators of Vocational Rehabilitation (CSAVR) conference in early April 2019, and will speak with other VR colleagues to become more informed as to if/how we could work more within the gig economy while still meeting RSA requirements.

June 2019 MRC Response: Discussion at CSAVR did not shed light on strategies to work with the gig economy specific to RSA requirements. MRC will continue conversations with national colleagues to determine if there are strategies available to support this moving forward. MRC will work with RSA to further define if a gig economy position is consider an employment outcome.

Recommendation 2: Increase consumer awareness of transportation options and explore other options for consumer transportation. This includes looking at innovative approaches to using ride share programs such as Uber and Lyft for transportation of consumers. We also recommend MRC develop partnerships with the State and Federal Departments of Transportation. The council also feels that this partnership with the ride share programs could additionally provide employment options for consumers who are looking to find employment with flexible time requirements. This could include education on being self-employed; accessing an eligible vehicle; obtaining the proper assistive technology for the job functions; helping a client start a wheelchair accessible ride sharing entity, etc. This year's Needs Assessment demonstrates that transportation remains a significant need for many MRC consumers. MRC should refine and update its transportation fact sheets on MRC's website and incorporate these into training's and informational materials. Development of other informational materials and training should be considered to assist consumers in learning about other available resources including local Councils on Aging and the EOHHS Human Service Transportation (HST) Office. In addition, MRC should research collaboration with MassRides, the Massachusetts Department of Transportation, Career Centers, the HST office and other organizations on projects or programs that might be able to assist consumers with transportation, given that transportation is a systemic issue requiring collaboration on multiple levels.

RESPONSE: With the assistance of the new MRC Transportation Coordinator hired during calendar year 2017, most Regional Transit Authorities in the state are now allowing MRC counselors to approve applications for discount transit

programs (TAP). This advancement is a major time, cost savings, and support for our consumers.

MRC will continue to utilize the expertise of the transition coordinator and will document lessons learned at the end of the 5 year grant period. In addition, MRC would like to work with the SRC to host council meetings with transportation experts from MassDOT to gain further insight in service demands.

MRC will update its transportation fact sheet on our website and will continue to be creative in assisting our consumers to identify transportation options for employment.

In addition to the above, we believe that the issue of transportation, is much larger than MRC and its Vocational Rehabilitation Division. This issue needs comprehensive and ongoing discussions and strategic thinking perhaps among Independent Living Centers, Commissioners of State Agencies, Executive Office of Health and Human Services Secretary, Governor level committees, Workforce Investment Boards and employers to devise strategies around transportation options. This would increase access to diverse talent addressing the skills gaps across the state. Areas across the state that have a high need for transportation related issues are the Pittsfield and Greenfield regions. Perhaps the SRC can work with the MRC offices in those areas to devise a strategy to outreach to the Governor's Office to establish a think tank to address transportation issues specifically to meet employment needs of business through an innovative approach to getting people to job locations.

March 2019 MRC Response: MRC is researching a pilot project with 2 western Massachusetts Regional Transportation Authorities (RTAs) to use alternative transportation (e.g., Uber and Lyft) to provide transportation to VR consumers.

June 2019 MRC Response: While the MetroWest RTA was appreciative of pursuing this pilot project, they felt unable to take it on at this time.

Recommendation 3: Continue to promote on-the-job training and job driven trainings to increase employment opportunities for individuals with disabilities: MRC has demonstrated over the past several years that On-The-Job Training (OJT) and Job Driven Training's, are important and effective tools for training and employing consumers in competitive jobs in many industries and occupations. These are also effective tools to assist in eliminating stigma against consumers with disabilities by demonstrating the abilities and skills of individuals with disabilities directly to employers in their workplace. OJT and Job Driven Training's were identified as important services by 70% of consumers in the Needs Assessment survey and counselors have also identified the need for additional OJTs and Job-Driven Training's. MRC should also continue to evaluate the outcomes of its Job Driven

Training programs with CVS Health, Advance Auto Parts, and other employer partners. MRC should continue to build off of these collaboration as a model to use with other companies to establish similar programs with the goal of increased employment outcomes for consumers and as a way to market the skills and abilities of individuals with disabilities to the private sector and to meet employer needs. MRC should also begin to look at trainings within the bio-tech industry in the state of MA, as this is an increasing field for potential jobs within MA. According to the Massachusetts Biotechnology Education foundation, an increase of 6.1% in open jobs in the bio-technology industry. As many additional consumers are receiving higher degrees, a connection should be made to assist consumers with finding jobs in these area.

RESPONSE: MRC continues to expand its Job Driven Trainings (JDT) opportunities for consumers. Our most recent experience is with MAPFRE Insurance Company for claims representatives and customer service positions. As funding allows we will continue to expand our JDT and OJT initiatives.

MRC is now required, under WIOA, to work closely with the Workforce Investment Board's and Career Centers. We will work jointly to look into labor market statistics to determine which districts/areas within the state have bio-tech opportunities, the types of positions available, entrance requirements for these positions and the viability for our consumers. Our findings will be shared with the SRC as we learn more about the bio-tech opportunities across the state.

Community colleges also have many training opportunities for individuals interested in this field. We will identify the programs available across the state and ensure that our counselors have this information and make it available to our consumers across the state.

March 2019 MRC Response: We have developed and implemented a Human Services Job Driven Training (JDT) series, and are starting a Technology JDT series soon. We are developing relationships with Verizon and Dell, and will continue to work with companies in the technology industry. We are collaborating with the Fall River Career Center to place MRC consumers at a local medical device company.

June 2019 MRC Response: In the 4th quarter of FY19 we began a contractual relationship with the Career Centers to increase access of our consumers to a range of career center vendors for training opportunities. Initial data is extremely encouraging, with 94 consumers to date placed in these. We are excited to continue this relationship moving into FY20, and have started discussions re: data collection to identify trends and potential Return on Investment with this innovative partnership. This also helps MRC with the

WIOA requirements of increased collaboration between VR and the Career Centers.

In addition, MRC is proud to announce that on June 25, 2019, 120 consumers graduated from MRC Job Driven Trainings as follows: CVS Health Total Store Training including Pharmacy Technician; Security Training; Human Service Trainings; Customer Service Training and Technology Training. We are pleased to announce that we are in the process of discussing a potential CISCO training in collaboration with a Community College and an Employer Partner (more to come).

Recommendation 4: Additional focus should be made to connect and refer the underserved populations of MA, with specific efforts put towards Asian communities. Over the past Comprehensive Needs Assessment Surveys of MRC consumers, the data has shown a need for outreach to the Asian Population. The SRC would like the MRC to plan and achieve a 3% increase in the number of Asian consumer referrals.

RESONSE: MRC Research and Development is creating focus groups in the Braintree Area to gather information regarding the needs of the Asian population as it relates to employment. Data received from this focus group and available financial resources, will guide MRC programming for diverse populations.

Currently, MRC has bi-lingual counselors working in areas where there is a growing population. We will continue to monitor the growth and outcomes of this population. MRC will work with the SRC to conduct outreach to ensure representation from the Asian Community on the SRC.

The MRC Offices have bi-lingual and/or bi-cultural representation and we will continue to do outreach to diverse communities to increase the representation in the VR program.

Offices with staff representing the Asian community include the following:

- The Lowell and Salem offices have bi-lingual Khmer clerks and counselors to assist with the walk-ins, calls, and employment services.
- The Salem office has a bi-lingual Japanese counselor.
- The Braintree Office has two bi-lingual counselors in Vietnamese and Chinese dialects;
- The Fall River Office has a bi-lingual Khmer Counselor
- Downtown has a bi-lingual Chinese Counselor.

The counselors will continue to reach out to these populations and work to break down barriers to seeking and enrolling in vocational rehabilitation services.

In addition, as populations grow MRC will track long term trends and have discuss plans to build additional bi-lingual caseloads as appropriate.

Lastly, we will work with MRC's Diversity Committee to review and revise the Commonwealths Multi Cultural Population Resource Directory. This directory offers culturally and linguistically appropriate services for many diverse populations.

March 2019 MRC Response: MRC has incorporated language regarding having an expertise to serve underserved populations into recent MRC re-procurement efforts. Specifically, this includes Pre-Employment Transition Services (Pre-ETS) – serving youth and young adults aged 14-22 with disabilities, and Competitive Integrated Employment Services (CIES). This is the first procurement for Pre-ETS, and CIES has not been procured in 10 years. These services and impending contracts are a foundational component of the employment support services MRC provides, and as such we ensured language and expectations concerning diversity and underserved populations was included.

June 2019 MRC Response: The new Pre-ETS and CIES contracts are being finalized for July 1, 2019 start dates, which include language re: having expertise to serve underserved populations. MRC is also discussing diversity at an agency-wide level, to think more about how we as an agency should be considering diversity. The Research and Development team will convene a focus group to assess the needs in this area. In addition, MRC is updating some VR materials into different languages.

Recommendation 5: MRC should create a partnership with other New England states' State Rehabilitation Councils to gather new ideas surrounding the vocational rehabilitation programs and share best practices for the council and employment opportunities that could be used by other states. This recommendation also includes the MRC providing support for the MA SRC becoming a participating member in the National Coalition of State Rehabilitation Councils.

RESPONSE: Assistant Commissioner Phillips requested Josh Boardman, MRC/SRC Liaison, to attend the National Coalition for State Rehabilitation Councils conference in November 2017 to get information regarding what other states are doing and to meet reps of the SRC's from across the country. Josh

can obtain names of New England counterparts and begin to meet regularly to share ideas and brainstorm around strengthening the Massachusetts SRC.

We will invite vocational rehabilitation and community living staff to the meetings of the SRC meetings to better engage conversation. We hope to increase the visibility of the SRC with field staff and to ensure staff is aware of the SRC. Staff will actively work to recruit consumers to support SRC activities.

Lastly, we will share best practices across the country with the SRC through our working relationship with the Institute of Community Inclusion and new “pilot projects”. If the SRC is interested, we can invite researchers of the Institute of Community Inclusion with MRC staff to an SRC meeting and together share insights regarding future interventions, MRC will be piloting across the MRC areas.

March 2019 MRC Response: Under the previous MRC administration, funding was not approved for Josh Boardman to attend the National Coalition for State Rehabilitation Councils. We are attempting to see if MRC can facilitate current SRC voting members attendance at the Spring CSAVR conference, which includes training by the National Coalition for State Rehabilitation Councils. It is not clear if we can make this happen within the allotted timeframe.

June 2019 MRC Response: We were not able to facilitate SRC voting members attending the national conference in April. We will work on this for next year, if there are funds available.

Recommendation 6: The SRC/ MRC to develop a document (To include Braille, Video, Audio, etc. as needed), on how to use the College Disability Services Programs for use by VR Consumers that are or will be attending College. This could include a handout that is given to anyone attending colleges on what is expected from the MRC and what the Disability Services Programs at colleges offer and requiring all counselors to provide general information about the disability services office for consumer who are attending any college programs.

RESPONSE: Although this is a good idea, MRC does not currently have the financial resources for extensive marketing materials. Colleges have materials and information available on their websites that SRC/MRC can review, and as appropriate direct consumers to access.

MRC can also contact the Department Education and Secondary Education to determine if they already have this information in a format that can be utilized by MRC and shared with our consumers.

However, MRC with the support of the SRC would like to collaborate with other entities who are focusing on college bound opportunities for individuals with disabilities. For example, we have met with Work Without Limits who is starting a new pilot program, C2C, working with colleges to identify students with disabilities and connect them to employers to hire as interns. Other potential partners are the Autism Commission, Easter Seals, and Department of Developmental Disabilities (DDS). We have recently met with these partners to focus on a collaborative resource sharing project with DDS to engage college navigators supporting individuals on the autism spectrum. We would like to engage the SRC with these projects.

MRC recommends the SRC assist by contacting public colleges across the state and collecting/documenting information found for each school. A resource to utilize is “Think College.” The information would be made available to VR staff via our internal website. This information would be a great resource for transition students and possibly be integrated into Pre-Employment Transition Services curriculum for use by Pre-Employment Transition Services vendors and MRC counselors.

March 2019 MRC Response: MRC has not addressed this recommendation.

June 2019 MRC Response: MRC requested assistance from the SRC to contact public colleges to document “Think College” strategies operations at each college that could be developed into an electronic resources for consumers and counselors.

Recommendation 7: The SRC would like the MRC to make an internal VR Peer Mentoring program, where another VR Consumer who has had positive employment and/or educational outcomes, and mentors other MRC Consumers and provide the resources, a helping hand, support, encouragement and information to new or existing VR Consumers. This would include, but not limited to, MRC developing a training program for VR Peer Mentors.

RESPONSE: The VR program offers peer mentoring programs through collaboration with the Independent Living Centers (ILCs). MRC will continue to ensure consumers are appropriately referred to the ILC’s for Peer mentoring services including mentoring around employment.

MRC does not have the resources to develop a training program, but can have discussions with the ILCs to determine if this type of mentoring happens, and if not, how we can ensure a structure is put in place. With future collaborative projects with the Department of Mental Health, we would like to utilize the Peer Specialist Model within our VR offices, thus adding a very different mentoring feature to Vocational Rehabilitation.

March 2019 MRC Response: The new MRC procurements – specifically Pre-Employment Transition Services (Pre-ETS) and Competitive Integrated Employment Services (CIES) – both include a prioritization on peer-delivered services. Pre-ETS providers have been encouraged to use peer services to support youth and young adults as they are being exposed to and interacting with the world of work. With CIES, we have modified the delivery system model to include, for the first time, an emphasis on peer support. The “Interim Flexible Supports” services allows for the provision of hourly interim flexible supports, including Peer Supports, necessary to assist a job seeker who does not require full participation in another service to achieve employment. CIES services can be a part of any VR consumer’s array of employment supports. In addition, we have partnered with Boston University and the University of Massachusetts Medical School on two separate federal grant opportunities, both of which include elements of incorporating peers to support young adults with achieving employment goals.

June 2019 MRC Response: As noted in the response to recommendation #4, the new CIES and Pre-ETS contracts will begin on July 1, 2019. Moving forward, we should be able to analyze trends in usage of “Interim Flexible Supports” as well as collect anecdotal data re: use of Peer Supports. Regarding the grant submissions, Boston University did not submit their grant at the last minute, but suggest they will re-submit moving forward. The Umass Medical School has a site visit scheduled for July 1 from the funder, which is a positive sign re: award. Deputy Commissioner Kate Biebel will represent MRC at the site visit. In addition, the VR/IL contracts and ILC programs provide peer supports services to consumers at MRC.

Recommendation 8: It has been a year since The Commonwealth of MA passed an 'employment bill' that requires the Supplier Diversity Office (SDO) to consult with the MA Office on Disability (MOD) to establish goals for participation of individuals with disabilities in all areas of state procurement contracting. There have been no goals published by the MOD. The MA State Rehabilitation Council (SRC) recommends that the MA Rehabilitation Commission no longer just wait for goals to be published, but to take a proactive approach and offer to assist MOD and SDO with

this process. This could be a wonderful opportunity to engage MRC clients and counselors in providing input to these state entities in regards to the state's application, hiring, marketing and other processes as it relates to this legislation.

RESPONSE: MRC will recommend to MA Office on Disabilities and MA Supplier Diversity Office to follow the same guidelines/criteria as the Office of Federal Contract Compliance Programs (OFCCP). MRC understands we need to wait for MOD and SDO to establish the guidelines before our consumers and counselors can become involved.

March 2019 MRC Response: The expectation about using SDOs is built into the Pre-ETS and CIES RFRs. This issue has not been identified in recent conversations with MOD as a priority issue for our partnership, which is critical as MOD would need to be the lead on any activity with SDOs.

June 2019 MRC Response: Representative Cutler is heading a Workforce Development Committee and has reached out to the MRC regarding our employment services. Eric Nordhal and Joan Phillips will be involved in discussions with this subcommittee and will provide updates should the SDO and MOD issue surface in the discussions.

Recommendation 9: Continue to evaluate and research computer and technology skills training's, or web-based training's and assessments for consumers to assist in obtaining employment. As the world becomes more mobile and electronic, it becomes increasingly important the MRC assist consumers in preparing for employment by developing and refining skills in using technology. A number of consumers indicated the desire for training's and workshops on computer skills and other technology. The MRC should continue to evaluate results of its efforts in terms of employment outcomes and its overall benefit to consumers, and continue to research computer and technology skills training's, and web-based assessment, training, and evaluation solutions to assist consumers with preparing for and obtaining employment.

RESPONSE: The ManPower Training and Development Center and the INFOR Talent Science Instrument are on-line tools developed to allow for competitively based assessments and trainings for consumers. MRC accesses both of these tools regularly to evaluate needs of the consumers. Unfortunately due to funding restraints, MRC is not currently able to provide additional resources in this area.

March 2019 MRC Response: MRC has dedicated funding in FY19 to having a variety of tools available, including Copes cops online and Career scope

online (both aptitude assessments), and Skills Tran (online transferable skills analysis and labor market information). As identified in response to Recommendation #3, we are starting a Technology JDT series soon, are developing relationships with Verizon and Dell, and will continue to work with companies in the technology industry.

June 2019 MRC Response: MRC is in the discussion phases regarding a CISCO cyber security training in collaboration with a community college and a major employer. We will provide updates as they become available.

Recommendation 10: MRC should increase their usage of their social media accounts for consumer use. This would also include revisiting the MRC Mass.gov website, so it is user-friendly and accessible to all disabilities.

RESPONSE: Several activities are currently in play to address this recommendation. First, the MRC website is being updated to be more user friendly and have improved readability. Secondly, the Commissioner has just assigned Joy McMahon, training coordinator, and Josh Boardman, MRC/SRC Liaison, to lead all communications in the organization including social media. The VR division will look to them for leadership and guidance in this area. The third way we are addressing this is our Commissioner has done a phenomenal job with her monthly YouTube video for staff. We can investigate the feasibility of expanding this to the broader MRC audience in the near future. Though the VR division does not currently have staff assigned to marketing, we will provide information to support any and all social media endeavors.

March 2019 MRC Response: MRC recently completed a Business Process Redesign process, where a set of priority goals and initiatives for the agency were identified. Among these was a focus on consumer experience as well as communications, both internal and external to MRC. As MRC pursues these initiatives over the next 36 months, issues specific to social media and accessibility will be included and addressed.

June 2019 MRC Response: MRC has begun implementation of a “Roadmap” that takes the recommendations from the Business Process Redesign and maps them into 3 phases of work for the agency. External communication re: MRC is part of this work to be prioritized in Phase 2 of the Roadmap.

The Following recommendations have been assigned or reassigned to the appropriate committees:

Order Of Selection (OOS) - SRC Executive Committee; Nomination and Policy Committees

- #1) Business and Employment Opportunity Committee**
- #2) Unserved Underserved Committee**
- #3) Statewide Comprehensive Needs Committee**
- #4) Statewide Comprehensive Needs Committee**
- #5) Business and Employment Opportunity Committee**
- #6) Unserved Underserved Committee**
- #7) Unserved Underserved Committee**
- #8) Business and Employment Opportunity Committee**
- #9) Statewide Comprehensive Needs Committee**
- #10) Business and Employment Opportunity Committee**