# VR Portion of WIOA State Plan for Massachusetts Rehabilitation Commission FY-2018

# **Program-Specific Requirements for Vocational Rehabilitation** (General)

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;

The Massachusetts Rehabilitation Commission has an active and productive State Rehabilitation Council (SRC). SRC members through their area consumer advisory councils, SRC subcommittees, task forces, quarterly meetings, and consumer meetings. With MRC, the SRC has conducted surveys and needs assessments that have provided input to more effectively address the needs of individuals with the most significant disabilities.

The SRC, through the SRC State Plan subcommittee, made the following recommendations to the Commission:

**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 consumers 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

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; assisting a consumer 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.

3. Continue to promote on-the-job training and job driven training's 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 areas.

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.

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.

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

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.

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 consumers 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.

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.

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.

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

The Massachusetts Rehabilitation Commission has responded to the Statewide Rehabilitation Council's input and recommendations as follows:

1. Respose to Recommendation on "Gig" Economy Jobs:

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 the Rehabilitation Services Administration as it relates to the 'Gig economy' and WIOA. This would include the impact of these jobs as they relate to the WIOA common measures. Upon consultation with the RSA, and after obtaining guidance, and if encouraged to pursue, MRC will develop best practice guidelines for the fast approaching 'gig' economy.

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

For consumers who have little or no work experience, "gig economy" jobs may be an opportunity for the individual to gain skills, and to assess the consumer's ability to engage in work activities. This may also allow for training opportunities within various market sectors. This type of employment may also be utilized in the same manner that we utilize an internship opportunity. Though short term jobs may not lead to career advancement, they may provide an opportunity for consumers to test their readiness for work and/or provide work experience that can be added to a resume, assisting them towards obtaining and maintaining competitive integrated employment. Such as On-The-Job training, perhaps "gig economy" assignments could present consumers with opportunities to gain a work experience, and demonstrate the ability to work. MRC's statistics show on average, approximately 60% of the time, when used appropriately, OJT leads to placement in competitive integrated employment. These types of positions could have significant value in developing employment experience. However, these types of jobs would most likely be a pathway to employment, and not necessarily a long term employment outcome. MRC will evaluate long-term results for consumers who participate in 'Gig economy' jobs and make a recommendation to the leadership.

#### 2. Response to Recommendation on Transportation:

MRC acknowledges that transportation is a significant challenge to many of its consumers. MRC hired a Transportation Coordinator through its RSA Transition Pathway Services grant during calendar year 2017. In addition to working on this grant, the Coordinator has used their expertise to assist in disseminating information on Transportation and has helped towards creating an agreement where most Regional Transit Authorities in the state are now allowing MRC counselors to approve applications for discount transit programs (TAP). This automatic eligibility advancement is a major time and cost saving, and support for our consumers.

MRC will continue to utilize the expertise of the transportation coordinator and will document lessons learned at the end of the 5 year Transition Pathway Services 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 has used the knowledge of our transportation coordinator and has updated its transportation fact sheets on our website and will continue to identify creative solutions to assist our consumers to identify transportation options for employment. Transportation is a systemic issue which requires collaboration and action on the state, federal, and local level, and is much larger than MRC and its Vocational Rehabilitation Division. Solving transportation barriers requires comprehensive and ongoing discussions and strategic thinking amongst MassDOT, MRC, Independent Living Centers, Commissioners of State Agencies, the Executive Office of Health and Human Services, Governor Level committees, Workforce Investment Boards, MassRides, Uber, Lyft, and employers to devise strategies around transportation options. This would increase access to transportation options for individuals, addressing gaps across the state. Areas across the state that have a high need for transportation options include the Pittsfield and Greenfield regions, among others. MRC would like to work with the SRC to devise a strategy to recommend establishment of a think tank to address transportation issues to meet the needs of businesses and job seekers through innovative approach to getting people to job locations.

3. Response to Recommendation on Job Driven Training: The MRC through its Job Placement and Employment Service Specialists cultivate business and employer relationships and peer partnerships which reflect the intent of the Workforce Innovation and Opportunity Act (WIOA) of 2014 which calls for increased partnership and collaboration between public VR agencies and potential employers of VR consumers. MRC JPS/ESS staff use targeted workforce strategies through consumer assessments and training, targeted labor market information, and direct outreach to employers. This public—private partnership between MRC and employers creates private—industry job training opportunities for individuals with disabilities in high—growth industries, such as health care, transportation, manufacturing and customer services.

MRC continues to expand its Job Driven Trainings (JDT) opportunities for consumers. MRC has developed job-driven trainings with various employer partners including CVS Health, Advance Auto Parts, The Home Depot, Lowes, G4S Security Solutions, Allied Barton Security Services. Our most recent JDT experience is with MAPFRE Insurance Company for claims representatives and customer service positions. MRC has also operated a Human Service worker job driven training program. As funding allows, we will continue to expand our JDT programs as well as On-The-Job training initiatives.

MRC is required under WIOA to work closely with the Workforce Investment Boards and the Career Centers (American Job Centers). We will jointly analyze labor market statistics to determine which districts/areas within the state have high growth job opportunities, including those in bio-tech, the types of positions available, entrance requirements for these positions, and the viability of these positions for our consumers. Our findings will be shared with the SRC as we learn more about growth areas and bio-tech opportunities across the state.

Community colleges also have many training opportunities for individuals interested in bio-tech and other higher level fields. MRC will identify the programs available across the state and ensure that our counselors have this information so they can make it available to our consumers across the state. 4. Response to Recommendation on Outreach to the Asian Community:

MRC is working on strategies to reach out to underserved populations including the Asian community. The MRC Research, Development, and Performance Management Department will be creating focus groups in the Braintree and Lowell Areas to gather information regarding the needs of the Asian population as it relates to employment. These areas have high concentration of Asian consumers. Data and input received from these focus groups and available financial resources, will guide MRC programming for diverse populations and will be incorporated into the Comprehensive Statewide Needs Assessment to develop additional strategies for serving this population.

Currently, MRC has bilingual 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 bilingual and/or bi-cultural representation and we will continue to conduct 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.

These 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 continue to 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 Commonwealth's Multi Cultural Population Resource Directory. This directory offers culturally and linguistically appropriate services for many diverse populations.

5. Response to Recommendation on Partering with other New England States SRC's:

In response to the SRC's recommendation. MRC VR Assistant Commissioner requested the MRC/SRC Liason to attend the National Collation for State Rehabilitation Councils conference in November 2017 to obtain information regarding what other states are working on, and to meet representatives of the SRC's from across the country. The liaison will obtain names of New England counterparts and will work to develop meetings to share ideas and brainstorm around strengthening the Massachusetts SRC.

We will invite Vocational Rehabilitation and Community Living staff to the SRC meetings to better engage conversation. We hope to increase the visibility of the SRC with MRC's field staff and to ensure our 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 that MRC will be piloting across the Commonwealth.

6. Response to Recommendation on College Disability Offices:

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

MRC will seek to contact the Department of Elementary 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, known as C2C, which works 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 Services (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 and 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 could be integrated into Pre-Employment Transition Services curriculum for use by Pre-Employment Transition Services vendors and MRC counselors.

7. Response to Recommendationon on Peer Mentors:

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. Peer mentoring from the ILCs is a key part of two current grant projects, including the Transition Pathway Service grant and the Kessler Foundation Career Pathway Services grant. MRC will evaluate the results of these initiatives

MRC does not have the resources to develop this type of training program, but MRC 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 in the works with the Department of Mental Health, MRC will incorporate the Peer Specialist Model within our VR offices, thus adding a very different mentoring feature to Vocational Rehabilitation.

8. Response to Recommendation on Supplier Diversity Office:

MRC will recommend to the Massachusetts Office on Disabilities (MOD) and the Massachusetts Supplier Diversity Office (SDO) 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 guidelines before our consumers and counselors can become involved.

9. Response to Recommendation on Evaluating Technology-based Skills Trainings for Consumers:

MRC is using several web-based occupational tools. 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 utilizes 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.

10. Response to Recommendation on MRC Social Media Accounts:

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 as part of a statewide effort. Secondly, the Commissioner has assigned a training coordinator and the 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.

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

The Massachusetts Rehabilitation Commission reviewed and responded to all recommendations provided by the Statewide Rehabilitation Council.

## **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;

Not Applicable - MRC has not requested a waiver of Statewideness.

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

Not Applicable - MRC has not requested a waiver of Statewideness.

### 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.

Not Applicable - MRC has not requested a waiver of Statewideness.

## 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;

MRC does not have any formal cooperative agreements in place with State and Federal agencies outside of the statewide workforce development system.

The Massachusetts Rehabilitation Commission considers cooperation and collaboration with other agencies particularly human service agencies, to be essential and beneficial to most effectively serving people with disabilities and to providing the optimum opportunity for employment. Other agencies provide critical supports, necessary resources, and dedicated human service professionals all of which augment and enhance the Vocational Rehabilitation Program. For many years, the Massachusetts Rehabilitation Commission has worked closely and corporately with the staff of other agencies in serving mutual consumers. Collaboration often extends well beyond services to particular individuals. The Massachusetts Rehabilitation Commission works with other agencies to:

- Affect system change
- Increase resources, funding and service options
- Improve communication and mutual understanding among staff
- Change public attitude toward issues of disability
- Achieve common goals on behalf of those whom the agencies serve

Agencies with which such collaboration has occurred and has remained active locally and at the Statewide level include, the Executive Office of Health and Human Services, the Massachusetts Commission for the Blind, the Massachusetts Commission for the Deaf and Hard of Hearing, the Department of Mental Health, the Department of Developmental Services, the Social Security Administration, Medicaid/Mass Health, the Department of Transitional Assistance, the Executive Office of Labor and Workforce Development, and the Department of Elementary and Secondary Education, as well as the Department of Correction and Department of Youth Services through MRC's Supported Employment Programs.

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

The Massachusetts Rehabilitation Commission is the state operator of the programs funded under Section 4 of the Assistive Technology Act. The MRC VR program and MRC area office have excellent relationships with these programs operated by the agency. These include MassMatch, a program that provides comprehensive information about the availability and funding of assistive technology, the Assistive Technology Program, and the Assistive Technology Loan Program that provides low—interest loans to consumers when other resources are not available to purchase needed adaptive technology. These programs are available and are used by MRC VR consumers.

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

There are no programs in Massachusetts carried out by the Under Secretary for Rural Development of the U.S. Department of Agriculture.

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

MRC does not have any formal cooperative agreements in place with noneducational agencies serving out-of-school youth. The Massachusetts Rehabilitation Commission further collaborates with organizations that provide services, in whole or in part, to specific constituencies, including out of school youth. Among such organizations are the Massachusetts Association of Financial Aid Administrators, the Massachusetts Developmental Disabilities Council, the Arthritis Foundation, the Massachusetts Multiple Sclerosis Society, the Massachusetts Easter Seals, United Cerebral Palsy, the Massachusetts Head Injury Association, and the Epilepsy Association. These collaborations take the form of cooperative agreements and, sometimes, service contracts. The purpose, goals, and actions established in these agreements and contracts are very similar to the agendas set forth in interagency collaboration.

### 5. State use contracting programs.

The Commonwealth operates a Supplier Diversity Program including the following categories: Minority (MBE), Women (WBE), Service—Disabled Veteran (SDVOBE), Veteran (VBE), Lesbian, Gay, Bisexual and Transgender Business Enterprises (LGBTBE); and Disability— Owned Business Enterprises (DOBE). MRC participates in this program as part of statewide contracting as an equal opportunity initiative

# 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.

The Massachusetts Rehabilitation Commission (MRC) and the Massachusetts Department of Elementary and Secondary Education (DESE) has established interagency cooperation between public education and public vocational rehabilitation agency regarding vocational rehabilitation services pursuant to the Rehabilitation Act of 1973 as amended by the Workforce Innovation and Opportunity Act of 2014 (WIOA) to provide individualized transition services for students with disabilities that lead to successful post-school outcomes in competitive integrated employment, postsecondary education and training, independent living and community participation.

MRC continues to work to increase collaboration with educational officials, and has worked with DESE to outline interagency cooperation in a formal agreement entitled "Administrative Advisory on Pre-Employment Transition Services and Transition Services".

The Department of Elementary and Secondary Education (ESE) and Massachusetts Rehabilitation Commission (MRC) have developed this advisory to Local Educational Authorities (LEAs) as described below and in other sections of this documen<u>t</u> to:

1. define and describe Pre-Employment Transition Services (Pre-ETS) offered through MRC for students with disabilities, including which students may be appropriate for these services;

2. Establish collaborative practices between MRC vocational rehabilitation (VR) counselors and Local Educational Agency (LEA) personnel for the provision of Pre-ETS.

MRC provides two types of services for students with disabilities, Pre-Employment Transition Services (Pre-ETS), and transition services through an Individualized Plan for Employment

• All students with disabilities aged 14-21 (up to their 22nd birthday) may receive Pre-ETS, including but not limited to those receiving services through an Individualized Education Program (IEP) or a Section 504 plan, and are either eligible for MRC VR services or potentially eligible for MRC VR services. Pre-ETS are provided as generalized services to groups of students, or as individualized services.

MRC provides the five Pre-ETS services required under WIOA:

• Job exploration counseling.

• Work-based learning experiences, which may include in-school, after-school, or communitybased opportunities such as internships. Work-based learning experiences must be provided in an integrated setting in the community to the maximum extent possible.

• Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs.

- Workplace readiness training to develop social skills and independent living.
- Instruction in self-advocacy, including peer mentoring.

MRC will make Pre-ETS available to all students with disabilities statewide who are eligible or potentially eligible for MRC services. MRC will make every effort to provide or coordinate Pre-ETS services to ensure statewide availability.

MRC has counselors assigned to secondary institutions across the state. These counselors will review and discuss Pre-ETS service options with students and their families (if needed) to determine which services are most appropriate to meet to meet the student's transition needs. MRC will provide and coordinate Pre-ETS services in collaboration with local educational agencies.

• Students with disabilities aged 14-21 (up to their 22nd birthday) who are determined eligible for MRC Vocational Rehabilitation services can receive additional transition services that are not considered Pre-ETS (beyond the scope of the five Pre-ETS services) through an Individualized Plan for Employment (IPE) while they are still in high school and receiving special education services, and also afterwards when seeking employment, in employment, or in postsecondary education or training. Transition services delivered through an IPE might consist of vocational guidance, work evaluation, skills training at a

college or community rehabilitation program, assistive technology, adaptive equipment, and/or benefits counseling.

• The IPE must be developed within 90 days or with an extension that is documented in the MRCIS case management system and approved by the MRC counselor and the student or Parent/Guardian. The IPE goal and appropriate services should be coordinated with a student's Individualized Education Plan (IEP) or 504 plan and include the provision of Pre-ETS. High school attendance and completion should be listed as a service on the IPE... The IPE should be completed prior to high school exit for a student determined eligible for MRC services and not under an order of selection wait list.

The Administrative Advisory outlines the procedures in which MRC partners with LEAs to Provide Pre-ETS as follows:

- MRC and LEA's are expected to maintain open and frequent communication between each other. High schools designate staff to facilitate sharing of information between MRC and the LEA.
- LEAs seek consultation and technical assistance from MRC VR counselors for LEA staff, students, and families. Consultation and assistance may be provided in-person or by using alternative means for meeting participation (such as video conferences and conference calls).
- LEAs will provide MRC staff with resources necessary for MRC's work, such as access to meeting space, work space, and Internet connection as needed.
- LEAs will collaborate with VR counselors to identify students with IEPs or 504 plans who may be appropriate for Pre-ETS. MRC will cooperate with LEAs to reach out to identified students as early as possible during the transition planning process and will provide the student and family with information about the purpose of the VR program, eligibility requirements, application procedures, and scope of services that may be provided.
- LEAs will inform the student, parent/guardian, and other IEP Team members of the availability of Pre-ETS provided by MRC, and connect the student and family with the VR counselor.
- LEAs will invite VR counselors to participate in IEP and 504 planning meetings, as appropriate, and with the prior consent of the parent or student who has reached the age of majority. When invited to participate in these planning meetings, MRC counselors will make every effort to participate.
- LEAs will share information e.g., student and family contact and information, student assessment data, Transition Planning Forms, IEPs, and 504 plans, with MRC counselor, with the prior consent of the family or student who has reached the age of majority, and as consistent with applicable student records laws.
- LEAs and MRC are expected to collaborate to plan Pre-ETS for students with IEPs that are coordinated with each student's individualized secondary transition services provided by the LEA. IEP Teams are asked document any agreed-upon VR services in the Action Plan of the Transition Planning Form, and may also document VR services in the Additional Information section of the IEP. LEAs and MRCs will collaborate to coordinate and deliver training activities and opportunities for students and families, where needed and appropriate. IEP documentation practices may vary among LEAs. See

34 CFR 300.154 and 34 CFR 300.324 regarding the relative responsibilities of LEAs and VR agencies to provide 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;

The Administrative Advisory outlines ongoing communication and collaboration and technical assistance between the ESE and the MRC at the state and local level. Designated staff from the ESE and the MRC will communicate on a regular basis, to share information about legislative and regulatory changes and to review agency policy initiatives, resources, and other issues related to transition.

The following initiatives will foster local collaboration between the MRC's staff and LEAs:

Training and Guidance:

DESE and MRC staff will collaborate on transition training activities for students, families, educators, rehabilitation counselors, and other involved staff, where needed and appropriate. ESE and MRC staff at the state level will collaborate, as needed and appropriate, to produce joint guidance on WIOA, and local collaboration.

MRC and DESE have encouraged LEAs through the administrative advisory to provide MRC staff with resources necessary for MRC's work, such as access to meeting space, work space, and Internet connection as needed.

LEAs are asked to collaborate with VR counselors to identify all students with disabilities, including but not limited to those with IEPs or 504 plans who may be appropriate for Pre-ETS. MRC will cooperate with LEAs to identify students as early as possible during the transition planning process and will provide the student and family with information about the purpose of the VR program, eligibility requirements, application procedures, and scope of services that may be provided.

LEAs are asked to inform the student, parent/guardian, and other IEP Team members of the availability of Pre-ETS provided by MRC, and connect the student and family with the VR counselor.

LEAs are asked to invite VR counselors to participate in IEP and 504 planning meetings, and with the prior consent of the parent or student who has reached the age of majority. When invited to participate in these planning meetings, MRC counselors will make every effort to participate.

LEAs are asked will share information e.g., student and family contact and information, student assessment data, Transition Planning Forms, IEPs, and 504 plans, with MRC counselor, with the prior consent of the family or student who has reached the age of majority, and as consistent with applicable student records laws.

LEAs and MRC are expected to collaborate to plan Pre-ETS for students with IEPs that are coordinated with each student's individualized secondary transition services provided by the

LEA. IEP Teams are asked document any agreed-upon VR services in the Action Plan of the Transition Planning Form, and may also document VR services in the Additional Information section of the IEP. LEAs and MRCs will collaborate to coordinate and deliver training activities and opportunities for students and families, where needed and appropriate. IEP documentation practices may vary among LEAs. Any conversation regarding MRC Pre-ETS at the IEP meeting needs to be individualized to meet the student's needs.

The MRC has designated staff in Area Offices to work cooperatively with LEAs to coordinate Pre-ETS and transition planning and services, and to disseminate information to parents/legal guardians and students about the MRC transition process as early as the student's 14th birthday.

The MRC will provide consultation and technical assistance to LEAs, which may be provided using alternative means for meeting participation (such as video conference and conference calls), to assist LEAs in planning for the transition of students with disabilities from school to post-school activities and to coordinate Pre-ETS and other transition services. Pre-ETS can be provided to students who are eligible or potentially eligible for MRC VR services. If a student is determined eligible for vocational rehabilitation services, this consultation and technical assistance should result in the MRC's development of an Individualized Plan for Employment ("IPE") before the student leaves the school setting.

This consultation and technical assistance might include but is not limited to informational sessions with students, families/legal guardians, and school personnel regarding MRC Pre-ETS and VR services, including referral and eligibility information; and assigning a counselor point—of contact for each high school to provide information, receive referrals for Pre-ETS and VR services, and develop IPEs with students who are determined eligible for VR services.

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

The administrative agreement covers compliance with state and federal laws and regulation for transition planning at the local level.

#### Under the agreement:

The ESE will provide ongoing guidance to LEAs regarding the responsibility to provide a free and appropriate public education ("FAPE") to students eligible for special education and Section 504 accommodation plans, as mandated by federal and state law. Guidance will include the requirements that IEPs specify needed transition services; that special education transition services be provided for each eligible student beginning at age 14; that representatives of participating agencies be invited to the IEP team meeting with the prior consent of the parent/legal guardian or student who has reached the age of majority; and that IEP Teams discuss the transfer of parental rights to the student at least one year before the student turns 18. The ESE will also provide guidance to LEAs to facilitate referrals to the appropriate agency for eligible students who will require ongoing supports and services from the adult service system.

On a regular basis, the ESE will monitor LEAs' development and use of policies and procedures, including those regarding Section 504 and the transition requirements of IDEA. All monitoring reports will be made publicly available on the ESE's web site. The ESE has provided guidance to LEAs, in accordance with 34 CFR 397.31, entitled "Administrative Advisory SPED 2017-1:

Guidance Regarding the WIOA Prohibition on Contracting with Entities for the Purpose of Operating a Program Under Which a Youth with a Disability is Engaged in Subminimum Wage Employment" to inform LEAs that WIOA prohibits LEAs from entering into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which a youth with a disability is engaged in subminimum wage employment. The ESE assures that it will not enter such a contract or other arrangement.

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

The Massachusetts Department of Elementary and Secondary Education (ESE) and the Massachusetts Rehabilitation Commission (MRC) are mutually committed to promoting individualized transition services for students with disabilities that lead to successful post—school outcomes in competitive integrated employment, postsecondary education and training, independent living, and community participation.

MRC will contribute 15% of its financial resources towards providing pre-employment transition services (Pre-ETS) to students ages 14-22 with disabilities. The high schools will provide in-kind contributions of staff time, space, and transition services/resources. MRC will continue to work closely with ESE to ensure adequate financial resources are available in the schools for high school students.

Under the Individuals with Disabilities Education Act (IDEA), schools are responsible to provide secondary transition services in the areas of Postsecondary Education/Training, Competitive Employment, Independent Living, and Community Participation, as appropriate to the unique needs of each student. In many cases, schools provide employment skills development as part of secondary transition services. The goal of Pre-ETS is to prepare students with disabilities for successful competitive, integrated employment.

Pre-ETS planning does not relieve LEAs or MRC of the responsibility to provide or pay for any transition service that LEAs or MRC would otherwise provide to students with disabilities who are appropriate for Pre-ETS. For example, if the LEA ordinarily provides job exploration counseling to its students, that does not mean that the school should cease providing the service.

In cases where a question arises as to financial responsibility for services, MRC and the LEAs will work together to establish financial responsibilities, and have established a process for resolving disputes and for the coordination and timely delivery of services. MRC and LEAs will refer to state and federal laws, related regulations, and state and federal guidance to assist in resolving such issues in the best interest of the student.

In accordance with the Rehabilitation Act of 1973 as amended by WIOA, nothing in this agreement will be construed to reduce the obligation under the IDEA (20 U.S.C. 1400 et seq.) of a local educational agency (LEA) or any other agency to provide or pay for any transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education to students with disabilities. In accordance with IDEA, nothing in this agreement relieves the MRC of the responsibility to provide or pay for any transition service that the agency would otherwise provide to students with disabilities who meet the MRC's eligibility criteria.

MRC has assigned qualified vocational rehabilitation counselors to every public high school in the Commonwealth to coordinate the delivery of pre-employment transition services for potentially eligible or eligible students with disabilities aged 14 to 22 and transition services for students determined eligible for VR services delivered through an Individualized Plan for Employment. The LEAs assign qualified education staff to coordinate communication with MRC and to provide transition services under IDEA and 504. Applicable administrative staff are also involved in this process.

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

The MRC Area Offices will provide outreach to high schools to assist in informing all students with disabilities aged 14 to 22 of the availability of MRC Pre-ETS and Vocational Rehabilitation services. Outreach to these students occurs as early as possible in the transition process. MRC outreach information includes a description of the purpose of the vocational rehabilitation program, applicable eligibility requirements, referral and application procedures, and the scope of services that may be provided to eligible and potentially eligible individuals.

LEAs also collaborate with VR counselors to identify all students with disabilities who may be appropriate for Pre-ETS. MRC will cooperate with LEAs to identify students as early as possible during the transition planning process and will provide the student and family with information about the purpose of the VR and Pre-ETS programs, eligibility requirements, application procedures, and scope of services that may be provided.

# 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.

The Massachusetts Rehabilitation Commission does not have any formal cooperative agreements with private non-profit organizations. MRC does work closely with nonprofits across the Commonwealth.

MRC has for many years worked in partnership with private nonprofit Community Rehabilitation Providers (CRPs) to develop a wide array of programs and services to assist people with disabilities to achieve suitable employment outcomes. The MRC and CRPs have collaborated to develop programs including: Vocational Services; Competitive Integrated Employment Services (CIES), contracted Pre-Employment Transition Service programs (Pre-ETS), and a wide array of support services essential in vocational rehabilitation. This collaborative relationship has been achieved through open communication, sharing of ideas and resources, mutual support and understanding and inclusiveness of all partners in the development of and implementation of service design.

The MRC develops programs and services with the participation of providers in several forums as described below:

1. Statewide Rehabilitation Council that meets twice annually.

2. Quarterly meetings with representatives of the Executive Committee of the Massachusetts Council of Human Service Providers.

- 3. Periodic district wide meetings with community rehabilitation programs.
- 4. Interagency and cross-disability agency councils.
- 5. Task specific work teams.

MRC contracts with Qualified Community Rehabilitation Providers (CRPs) to deliver CIES services. The MRC/CIES program provides employment services for participants and through State funding the availability for extended ongoing supports after closure. CIES comprises six components, each associated with a specific service outcome. Through the component based service delivery system, consumers are able to receive the comprehensive individualized services and supports they need to achieve and maintain successful employment. CIES services may carry over from year to year, with approximately 30% of consumers completing their program each year.

CIES Components include: Assessment; Job—Targeted Educational and Skills Training activities; Job Development and Placement; Initial Employment Support services and Ongoing and Interim Support services.

Providers are paid on a performance basis during the initiation and completion phases of services. Using a data management and billing system called EIM (Enterprise Invoice Management), and internal tracking, the CIES team tracks program enrollment, expenditure and outcomes. CIES is often used to assist individuals with more complex disabilities or situations into integrated employment opportunities with competitive wages paid by an employer.

MRC will be putting the CIES procurement back out to bid for services beginning July 1, 2019. MRC will be making adjustments to the model based on lessons learned and input from its staff, CRP partners, and other stakeholders. MRC will also be adding peer support and flexible supports to the CIES procurement.

MRC also works with CRPs and other nonprofits such as the Independent Living Centers through its Pre-Employment Transition Service (Pre-ETS) contracts. These contracts provide work-based learning experiences, workplace readiness training, job exploration counseling, instruction in self advocacy/peer mentoring, and counseling on enrollment in post-secondary education. MRC is working with providers to evaluate individual models under this procurement to identify best practice models for providing Pre-ETS services.

### 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.

The MRC Supported Employment Program provides Supported Employment Services to consumers statewide through both its Statewide Employment Services (SES) office and local Area Offices and through a network of qualified community rehabilitation providers. MRC has developed links with the local school system for transitioning youth, and other state agencies

such as the Department of Developmental Services and the Department of Mental Health, through its clubhouse programs.

The Massachusetts Rehabilitation Commission continues to promote the collaboration with stakeholders regarding supported employment services and extended services. This is also evidenced in the number of joint funded programs that have been established. Some examples of these collaborative programs are joint funding of services for individuals with intellectual disabilities between the MRC and the Developmental Disability Services (DDS); for individuals with mental health needs between MRC and the Department of Mental Health (DMH); for individuals who have traumatic brain injuries between the Statewide Head Injury Program (SHIP) of the Massachusetts Rehabilitation Commission; and the Massachusetts Commission for the Blind.

MRC has Memorandum of Understandings (MOU) with DDS and the Department of Mental Health (DMH). These MOUs are designed to improve collaboration, coordination and utilization of joint agency resources in ensuring quality service delivery and long term supports that result in competitive/supported employment outcomes for mutual consumers. This collaboration is at the Regional and local levels. Through developing a process for conducting joint-service planning, local liaisons/training and joint service planning, all consumers and specifically transition aged individuals be better served and able to achieve successful employment outcomes.

Evidence of Collaboration regarding Supported Employment Services and Extended Services:

The MRC, Statewide Employment Services (SES) Department has been designated as the lead office for the Massachusetts Supported Employment Initiative. MRC also provides supported employment services through its local Area Offices.

The Massachusetts Rehabilitation Commission has developed a process to provide extended support services to assist individuals with disabilities in maintaining and advancing in their careers utilizing state funding, comparable benefits, and natural supports for long-term extended support services after federal funds can no longer be used. Paid extended supports are provided through a network of qualified community rehabilitation providers as well as partnering with other state agencies such as the Department of Mental Health and the Department of Developmental services.

Funding for extended long term support services is available from several sources depending on the nature of the consumer's disability and the resources available. Sources include:

- 1. Massachusetts Rehabilitation Commission State Ongoing Support Funding
- 2. IRS Section 44
- 3. Department of Mental Health
- 4. Department of Developmental Services
- 5. Private Sector Business Natural Supports
- 6. Massachusetts Rehabilitation Commission Statewide Head Injury Program
- 7. Social Security Work Incentives/PASS Plan

- 8. Impairment-Related Work Expenses
- 9. Natural Supports
- 10. Other Comparable Benefits

### 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

MRC's robust account management system is designed for us to hear first from employers regarding their specific labor market needs. MRC has several employer advisory boards strategically located across the Commonwealth through which we receive labor market information and to collaborate on strategies for hiring of people with disabilities. MRC's account management system involves numerous employers across the Commonwealth including those in STEM occupations such as Spaulding Rehabilitation Hospital, Mass General Hospital, Partners Health Care, among others. MRC produces a labor market summary for the Commonwealth of Massachusetts and analyzes placement and employment trends by Standard Occupational Code. MRC also tracks information on labor force participation and unemployment for people with disabilities in comparison to those without disabilities. MRC continues to strengthen agency use of labor market information and continues to strive to reduce the gap in labor force participation between people with and without disabilities. MRC will work with its workforce partners, including the Career Centers and Workforce Investment Boards to analyze labor market trends and statistics to identify job sectors to focus outreach efforts on. MRC also uses its Employer Advisory Board network and other marketing efforts such as advertisements on WBZ News Radio and utilization of materials developed with Buyer Advertising to promote MRC's employer services and the benefits of hiring people with disabilities.

Employer feedback has led MRC to operate an annual statewide hiring event to help address the needs of our consumers. MRC has regular local office briefings with employers on local labor needs. All of these enhance the agency's knowledge on local and statewide labor market needs. MRC utilizes job matching tools such as ResuMate to assist with job matching efforts to accommodate the needs of our consumers and employer partners.

MRC participates in a business strategy workgroup between key workforce partners as part of the Commonwealth's effort to coordinate services to employers amongst partner agencies. MRC subscribes to the established key principles to guide business services amongst key partner agencies and will work closely with WIOA core partners to expand services to employers.

MRC is continuing to target new employers and expand its employer account management system. Examples include job driven training programs with multiple employers, such as the MRC Pharmacy Technician Training Program in direct partnership with CVS Health, among others. MRC also is an active member of the Council of State Administrators of Vocational Rehabilitation (CSAVR)'s National Employment Team network, which strives to create a coordinated approach to serving business customers through a national VR team that specialized in employer development, business consulting and corporate relations.

MRC's Job Placement Unit operates an annual Federal Hiring Event in partnership with MCB, and other workforce partners, and the Office of Federal Contract Compliance Programs (OFCCP) to assist consumers with securing competitive employment comparable with their interests and abilities. MRC prepares consumers to interview for available jobs with employers participating in the event. This is a hiring event and focuses on direct job placement with participating employers and is not simply a career fair. Since 2013, Over 400 individuals have been employed through this annual one day event. MRC is looking to expand this model to other employers based on the success of the program

#### Job-Driven Trainings:

The WIOA legislation emphasizes the use of job-driven and industry-based training through employer engagement. MRC continues to develop and utilize Job-Driven Trainings and on-thejob (OJT) training and evaluations. MRC has found that many consumers who participate in an OJT or Job-Driven training obtain employment with the OJT or JDT and others are able to obtain employment elsewhere as a result of their participation in the OJT or JDT through which they gained a recent work experience and/or developed job-specific skills. Over the past 5 years, MRC has conducted close to 900 OJTs with employers and approximately 500 consumers have completed Job-Driven trainings with MRC employer partners. MRC has created job driven training programs to date with the Home Depot, CVS Health, Advance Auto Parts for Sales and Driver positions; Enterprise for Service Agent, Driver, and Lot Attendant, Lowes, G4S Security Solutions, the Kraft Group, MAPFRE Insurance, and Allied Barton Security Services. In addition, MRC held a job-driven training for human service jobs.

MRC has also held several employer conferences to strengthen relationships with existing employers and to develop new ones. The intent of these conferences is not only to promote MRC's employment services to employers, but also for employer partners of MRC to promote the hiring of people with disabilities to other employers and to reduce stigmas related to employment of people with disabilities.

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

MRC continues to work with employers to coordinate transition services, including preemployment transition services (Pre-ETS) for students and youths with disabilities across the Commonwealth of Massachusetts.

MRC operates a summer internship program for high school students with disabilities in partnership with employers across the Commonwealth as part of its Pre-ETS programming. This program provides paid work-based learning experiences and workplace readiness training, and provides valuable work experience and mentorship opportunities for participants. Employers are also involved as part of identifying work-based learning experiences for Pre-ETS and also as part of MRC's Transition Pathway Services demonstration grant. MRC also is working closely with the Institute for Community Inclusion (ICI) at the University of Massachusetts as part of this demonstration grant to evaluate progress and to develop and promote best practices for Pre-ETS and Work-Based learning. MRC will use lessons from this grant to incorporate best practices for coordinating pre-Employment Transition services and transition services to students and youths with disabilities.

MRC also provides OJT training specifically for youth and high school students with disabilities in vocational technical schools with CVS Health and Manpower that offer both short and long term work based learning experiences to develop both skills and job readiness.

# 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;

MRC and the Executive Office of Health and Human Services, Office of Medicaid, the state agency responsible for administering the state's Medicaid program have a well-established and long-standing relationship. MRC and the EOHHS' Office of Medicaid are committed to the promotion of independence and self-sufficiency through access to HCBS services for individuals with disabilities.

MRC and the Office of Medicaid have developed and signed a Cooperative Agreement to work collaboratively to promote the provision of services and long-term supports for individuals with disabilities who require such services to obtain and maintain competitive employment in accordance with WIOA. The Cooperative Agreement will be revised as needed in the future.

This Cooperative Agreement is in accordance with Section 412(a)(7)(H) of the Workforce Innovation and Opportunities Act, which requires a state's VR agency to have a formal cooperative agreement with the state's Medicaid agency with respect to the delivery of VR services for individuals who have been determined to be eligible for Home and Community— Based Services (HCBS) under a Medicaid HCBS waiver.

MRC and EOHHS' Office of Medicaid, through joint planning and sharing of information, will work collaboratively to promote access to competitive integrated employment and will work to increase the number of successful employment outcomes for individuals with disabilities needing, and eligible to receive, long—term supports in order to find and keep a job.

MRC provides the following services to individuals who apply for and are determined eligible for VR services, based on individual needs:

a. vocational assessment, b. vocational counseling and guidance, c. funds for training/education, job placement, d. follow-up supports after training.

EOHHS through its Office of Medicaid administers, and MRC serves as the Operating Agency for, certain HCBS Waivers through which individuals with disabilities may receive long term services and supports in the community. The availability of such supports works to enable individuals with disabilities to achieve independence and economic self-sufficiency in the community. Many individuals receiving VR services from MRC are also enrolled in Mass Health (the state Medicaid program) and through Mass Health are supported in their efforts to live and work as independently as possible in the community.

Through participation in one of MassHealth's HCBS waivers and/or utilization of MassHealth State Plan services, disabled Mass Health members may receive services that support their efforts to obtain competitive integrated employment. These services may include, as appropriate: 1. Community Living Supports: A range of MassHealth state plan and HCBS waiver services that enable an individual to live in the community as an alternative to institutional care and which may include such services as home health aide and homemaker services, individualized home supports, independent living supports, home/environmental accessibility modifications, and personal care.

2. Pre-vocational Services: A range of learning and experiential type activities that prepare an individual for paid or unpaid employment in an integrated, community setting. Services may include teaching such concepts as attendance, task completion, problem solving and safety as well as social skills training, improving attention span and developing or improving motor skills.

Additionally, the following services may be available to eligible individuals receiving VR services from MRC or who are enrolled in a MassHealth HCBS waiver, subject to the rules and regulations governing each program:

- 1. Vehicle Modification
- 2. Transportation
- 3. Home/environmental accessibility modification
- 4. Supported Employment Services

Designated MRC and EOHHS Office of Medicaid staff will communicate on an ongoing basis to share information about legislative and regulatory changes and to review agency policy initiatives, resources, and other issues related to long term supports for mutual consumers under a MassHealth HCBS waiver program. The cooperative agreement will be amended as needed.

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

MRC and the Department of Developmental Services (DDS) work collaboratively to assist individuals with developmental disabilities across the Commonwealth of Massachusetts. MRC and DDS have signed a Memorandum of Agreement (MOA) to work collaboratively through joint planning and sharing of resources to expand access to integrated employment services to increase the number of successful job placements for individuals with intellectual disabilities, especially those of transition age who have a goal of competitive employment. The MOA will be reviewed annually by the leadership of both agencies to identify areas for clarification, improvement, or additions to further promote collaboration and successful employment of individuals with intellectual disabilities eligible for services from both agencies.

The Massachusetts Rehabilitation Commission and the Department of Developmental Services through joint planning, and sharing of resources, are working to expand access to integrated employment services and increase the number of successful job placements for individuals with intellectual disabilities, in particular those individuals of transition age, who have a goal of competitive employment and are eligible for services from both agencies.

MRC and DDS are working to achieve the following outcomes through collaboration:

1. Increase the number of transition age individuals with intellectual disabilities who obtain and maintain competitive employment.

2. Improved collaboration, coordination and utilization of joint agency resources in ensuring quality service delivery and long term supports that result in competitive employment outcomes for our mutual consumers. This will include funding from MRC for the up front employment services and a commitment from DDS for funding of the long—term, ongoing employment support services to help individuals successfully maintain competitive job placements.

3. Adherence to the DDS Home and Community Based Waiver Program requirements for the delivery of supported employment services.

4. Improved outreach, communication and coordination with local schools, individuals with developmental disabilities, families, employers and other stake holders in serving our mutual consumers.

5. Enhanced communication between DDS and MRC.

Criteria for mutual MRC/DDS consumers:

a. Individuals who have been determined eligible for MRC Vocational Rehabilitation services by a MRC counselor who are also receiving services from the Department of Developmental Services

b. Individuals who have a goal of employment in an individual, competitive, integrated job working full—time or part—time. (Individuals would be hired by the business/employer, earning at least minimum wage and eligible for the benefits other employees in similar positions receive.)

c. Individuals who can benefit from the employment services provided by MRC to reach their employment goal. This includes individuals who may need long—term, ongoing, job supports from DDS to enable them to successfully maintain employment.

MRC and DDS are targeting individuals aged 18 to 22, who are moving from school to adult life, and individuals up to age 24, with a particular focus on assisting students/young adults who have had work experience while in school, to assist them to directly enter a job upon completion of school, and/or to maintain a job obtained during their last year of school, adults who are over the age of 24, are eligible for services from both DDS and MRC, and have a goal of working in a competitive job.

Referral Process from DDS to MRC:

a. For students, the DDS Area Office/Transition Coordinator will make a referral to the local MRC office at least one year before the student is scheduled to leave school.

b. MRC counselors may also identify individuals who have been referred to their agency for services to determine if they are also DDS eligible, and will contact the local DDS Area Office to confirm eligibility.

Services Provided:

a. Both the DDS Transition/Service Coordinator and MRC Counselor will be participating members of relevant individual planning team processes, (including IEP—Individual Education Plan; ITP—Individual Transition Plan; IEP— Individual Plan for Employment IPE; ISP— Individual Support Plan).

b. Individuals may be eligible for the full array of services available through MRC based on MRC policy and their needs.

c. Based on an individual's needs, it is expected that MRC will fund the upfront employment services which may include assessment, skills training, job placement, and initial job coaching and on-the-job supports.

d. For individuals who will require ongoing job coaching and employment supports to successfully maintain employment, DDS will provide funding for these long-term, ongoing employment services. These services will be provided by DDS following after the individuals exits MRC services, which will not occur prior to a period of 90 days retention on the job.

Communication and Coordination of Services between Agencies:

a. There will be regular communication between MRC and DDS local area staff to facilitate collaboration, joint planning for service delivery, cross-agency information sharing and training to ensure all parties have current information about agency policies and practices including those related to referrals, eligibility requirements, and other pertinent information.

b. Area Directors and/or other lead designated staff will identify a process for identifying referrals and for regular communication to monitor services and other collaborative initiatives.

c. MRC and DDS have worked to clarify the expected responsibilities and roles of staff in each agency to support local service planning and service delivery. This will be determined by DDS and MRC managers at the local level. It is expected that both the MRC counselor and DDS Service Coordinator will work closely together with individuals when joint services are being provided, communicating regularly, participating in planning meetings, etc., to ensure an integrated and responsive approach when working with individuals and their families/guardians. This will promote a strong partnership to assist in addressing problems or concerns that might arise both on-the-job and outside of work that may have an impact on performance, as well as facilitate planning for ongoing employment support.

d. MRC counselors and DDS staff will abide by agency practices regarding regular communication, participation in planning meetings and collaboration in ensuring an integrated and responsive approach to working with consumers, their families/guardians and other community resources.

#### Reporting/Data Collection:

A system for tracking the services provided to individuals jointly eligible for MRC and DDS services has been developed and implemented in order to assess the referrals, outcomes, impact and effectiveness of services provided to individuals who receive services as part of the MOA. Each MRC and DDS Area Office will be required to provide documentation on a regular basis.

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

MRC and the Department of Mental Health (DMH) are working collaborative to coordinate and improve services to shared consumers to assist them in their efforts to obtain employment and living independently in the community. MRC and DMH have developed a Memorandum of Understanding to guide efforts to work collaboratively to identify the individuals that they mutually serve through implementing an ongoing data collection system, to foster joint service

planning and interagency training to increase employment opportunities and positive employment outcomes for individuals with severe mental illness. The MOU will be revised as needed.

The Department of Mental Health (DMH) and the Massachusetts Rehabilitation (MRC) recognize that employment is essential to the independence, dignity, and recovery of persons with serious mental illness, seek to increase employment opportunities and positive employment outcomes for the individuals they mutually serve, by improving inter—agency communications throughout their organizational structure; engaging in joint service planning at the individual and program levels, and formalizing a plan for ongoing collaboration as listed below:

1. Through the MOU, MRC and DMH have developed a system for ongoing collaboration and communication at the local and state level.

2. MRC and DMH are also working to develop a system for regularly identifying the individuals they mutually serve

3. Develop and implement a process that will facilitate DMH and MRC timely referring to each other individual who could benefit from receiving both MRC and DMH services

4. Develop and implement a process for conducting joint—service planning for individuals mutually served by both agencies to enhance the individuals' employment opportunities.

5. Ensure that appropriate DMH and MRC staff are informed and trained on the services of the respective agencies provided to promote referrals, consultations regarding referrals and joint—service planning when appropriate;

6. MRC and DMH have implemented an ongoing data sharing agreement to track employment service delivery and the outcomes associated with of such mutually served individuals and to help the Agencies assess the effectiveness of their collaboration.

7. Develop a mechanism for exploring, developing and implementing joint initiatives beneficial to the individuals mutually served by the Agencies, including but not limited to the pursuit of new resources.

8. Consumer Input. MRC and DMH acknowledge the importance of consumer input and will incorporate such input in the evaluation of their collaborative efforts.

Local Liaisons/Training/Joint Service Planning:

1. Local Liaisons. Each DMH Site Office, DMH facility, MRC Area Office, and the MRC Statewide Employment Services Department (SES) will designate a liaison(s) to serve as a central—point of contact and resource for the other Agency.

The liason will:

A. provide their counterparts with information about and answer questions regarding their Agency's eligibility or referral process and the services they provide.

B. Provide guidance to and/or confer with their counterparts, or designees, about the appropriateness of referring a specific individual served by one of the Agencies to the other for additional services; and when appropriate, helping to facilitate the filing and processing of the required application or referral form

#### Referrals between agencies;

#### MRC and DMH have agreed:

Referrals to MRC from DMH shall be made in good faith with the reasonable expectation that the person referred is interested in competitive, integrated employment, has the potential to benefit from vocational rehabilitation services, including supported employment services, in order to achieve competitive employment.

Referrals to DMH from MRC shall be made in good faith with the reasonable expectation that the person referred is interested in, and in need of the services DMH offers, and is likely to meet criteria for DMH services.

MRC and DMH have agreed to mutually facilitate the coordination of employment related services provided by DMH, MRC or contracted providers to individuals mutually served by the Agencies, assist in resolving issues that may arises regarding an application for services, a referral for services and/or the coordination of care. Notify or ensure notification to their counterpart/and/or the referral source as to the outcome of an application or referral filed on behalf of an individual being served by the other agency, and ensure that the agencies MOU contact persons have updated contact information for them.

#### Training:

DMH and MRC, subject to available funding, have sponsored a statewide MRC/DMH Training and Collaboration Forum for employees of DMH and will hold further trainings as needed. The purpose of the forum is to further the goals of the MOU. DMH will provide a representative for planning and consultative purposes for MRC's Annual Mental Health Liaison Forum.

#### Joint Service Planning:

At the State Level - DMH and MRC will facilitate the creation of a workgroup staffed by both agencies and contracted providers, as applicable, to establish protocols for the Agencies that will ensure that the care of mutually served individuals in need of enhanced support to obtain or retain competitive employment will be coordinated to the extent practical and feasible.

At the Regional Level. Each DMH Area Director and MRC District Director or their designee, meet with their counterpart, and with and the Statewide SES Director, or his/her designee regularly to discuss communication or collaboration issues and to address opportunities for additional collaborations.

At the Local Level. DMH Site Directors and MRC Area Directors, or their designees, ensure that regular and as needed communications occur between themselves and their respective offices to facilitate collaboration, joint planning for service delivery, and cross agency information sharing.

MRC and DMH are also collaborating on a pilot project for shared consumers in 3 areas designed to develop and/or enhance service delivery strategies and services through a collaborative team model approach to improve the time it takes a consumer to move from program eligibility to receiving services; rapidly moving consumers into successful employment opportunities based on their abilities, skills, and interests. Competitive employment for participants is the objective in which consumers are matched to opportunities in demand in the

local job market. The teams will track both qualitative and quantitative results through this document to measure the effectiveness and the development of this model over time.

In addition, MRC and DMH are developing an employment initiative with state funding to assist consumers with mental health needs to obtain employment. MRC will develop a new employment model based on the Progressive Employment Model to assist consumers in obtaining employment using this new model. This new model is designed to rapidly engage individuals in the Vocational Rehabilitation process.

# 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; The MRC tracks and maintains staffing information by classification, vacancy rate and information to determine its staffing level based on the distribution of new referrals and active clients. This information is updated regularly.

The Commission currently employs 410 individuals in the VR Program. Of this number, 270 are VR counselors and first line supervisors, 23 are managers and 117 are program, technical, or administrative staff. All numbers represent full and part—time staff, not FTE. 24% of MRC staff is from minority backgrounds, 74% are women, 15% are persons with disabilities, and 3% are Veterans.

Most counselors carry "general caseloads" consisting of consumers representing all disability populations; a smaller number of counselors carry "specialty" caseloads consisting primarily of consumers with the same/similar disabilities (i.e., severe mobility impairments, psychiatric disabilities). The Commission actively served 27,028 consumers in SFY2017/PY2016

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

MRC will monitor the number of active consumers and its available resources and will set its staffing pattern based on these factors. The MRC will take action as needed to ensure sufficient staff to serve the caseload based on the projected number of consumers with active individualized employment plans (IPEs) based on available resources and review from the leadership team.

MRC projects it needs to maintain a staffing level of 407 individuals in the VR Program. Of this number, 252 are VR counselor, first line supervisors and placement unit staff, 22 are managers and 130 are program, technical, or administrative staff, and 3 benefits specialists funded through VR.

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.

Over the next 5 years, MRC will continue to monitor the number of active consumers and its available resources and will set its staffing pattern based on these factors. The MRC will take action as needed to ensure sufficient staff to serve the caseload based on the projected number of consumers with active individualized employment plans (IPEs) based on available resources and review from the leadership team.

MRC faces many personnel challenges in the next few years. MRC has been experiencing turnover as a result of retirements of counselors, supervisors, and managers. Based on a review of MRC's workforce data this trend appears as it will continue into the early 2020s. MRC is expecting approximately 50-60 counselors, supervisors, and administrative staff in the VR program to retire or leave the agency over the next five years. MRC has developed a workforce plan with strategies to backfill critical positions across the VR program.

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#### **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;

Universities in Massachusetts that have Rehabilitation Counseling programs at the bachelor and masters' level are: University of Massachusetts at Boston, Springfield College and Assumption College. Salve Regina is located in Rhode Island.

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

In a given academic year, upwards of 100 undergraduate students and 125 graduate students are enrolled in degree programs either full-time or part-time as rehabilitation "majors" at the colleges and universities referenced.

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

Each year, upwards of 50 undergraduate students are awarded the Bachelor's degree and upwards of 60 graduate-level students graduate with credentials to qualify for certification by the Commission on Rehabilitation Counselor Certification and/or licensure by the Commonwealth of Massachusetts in the institutions.

### 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.

The MRC's plan for recruitment includes meeting with representatives from the Commission's Staff Development Department will continue to communicate on a quarterly basis with officials of the CORE accredited rehabilitation departments and officials responsible for minority outreach at Assumption College, Springfield College, Salve Regina, and the University of Massachusetts at Boston regarding pertinent information on the preparation of rehabilitation professionals and for the specific purpose of recruiting graduates for employment in the federal/state VR Program. Special emphasis will be given to students with disabilities and students from minority backgrounds. Additionally, Commission staff also regularly addresses rehabilitation program. Internal job postings are automatically sent to these institutions informing them of job openings and procedures to apply. A number of rehabilitation students have completed their field placement and practicum experience within the Commission affording them a realistic view of work in the Commission.

The Commission also maintains relationships with nearly 40 minority referral sources and routinely forwards all job postings to them thereby encouraging application for employment at all job levels from persons from minority backgrounds. Position openings are routinely advertised in minority and alternative newspapers (i.e. Boston Globe, Bay State Banner, Worcester Telegram and Gazette) and posted internally and externally on the Internet (MASSCareers, Indeed, Monster, SimplyHired, and LinkedIn).

### 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

The Massachusetts Rehabilitation Commission is utilizing a state approved certified Human Resource Division classification standard, to recruit and employ qualified counseling staff as required by WIOA. There are three levels of classifications in the Qualified Vocational Rehabilitation Counselor (QVRC) series. Incumbents of classifications in this series administer functional, skills analysis and other vocational assessment tests; review and analyze diagnostic information through tests, records, interviews and observations; develop, implement and monitor Individualized Plans for Employment (IPE); and provide job placement assistance and job development skills.

The basic purpose of this work is to evaluate individuals with physical, emotional or other impairments or multi-impairments to determine eligibility for vocational rehabilitation services under the Workforce Investment Act. QVRC- I is an entry-level position. QVRC- II is the fully competent level classification in the series and QVRC III is a supervisory level position. The following is the state certified Human Resource Division classification standard to recruit and employ qualified counseling staff as required by WIOA:

#### 1. QUALIFIED VOCATIONAL REHABILITATION COUNSELOR I:

Distinguishing Characteristics: This is the entry-level classification in this series. Incumbents perform work under guidance and within a framework of defined policies, procedures and standards. Incumbents seek guidance and advice from more experienced colleagues and focus on gaining the knowledge and experience to perform more independently and participate in work of a higher complexity.

Supervision Received: Incumbents receive close supervision from employees of a higher grade who provide direction, training, instruction, work assignments and frequent reviews of performance through formal and informal verbal and written reports for effectiveness and conformance to laws, rules, regulations and agency policies.

Incumbents may receive general direction from other work units to ensure accuracy and compliance with funding requirements.

Supervision Exercised: Incumbents may provide functional guidance to new employees. Functions Performed: At this level, Incumbents are expected to perform one or more of the following:

Conduct intake interviews with consumers who have physical, emotional, psychiatric or other disabilities to determine eligibility for vocational rehabilitation services. Determine eligibility through review and analysis of records, tests, observations and interviews, to identify consumers' needs and occupational interests and abilities, and to provide assistance with securing competitive employment. Make recommendations on appropriate programs and treatment interventions based on evaluation of needs. Coordinate vocational rehabilitation services for consumers, including rehabilitation teaching, social rehabilitation orientation, physical and mental restoration, vocational and on-the-job training, educational services, and pre and postemployment services. Maintain accurate records using information technology resources. Develop and maintain working relationships with public and private organizations, including employers, service providers, career centers and community groups to exchange information and resolve problems, to promote agency services and to evaluate the suitability of educational programs and employment and other consumer placement resources. Represent the agency in dealing with community groups, public and private organizations, vendors and other public agencies. Conduct individual skills training sessions based on the IPE to ensure that the needs of the consumers are being met. Conduct group workshops for consumers to prepare for job opportunities, and coordinate the methods, materials and equipment used in training sessions. Monitor and evaluate consumer progress through individual meetings and on-site visits to ensure that the needs of the consumers are being met. Prepare and maintain case and progress notes for

general information and to document and monitor changes to an individual's overall progress. Explain and answer inquiries made by consumers and/or their families and other interested parties relating to agency programs, objectives and services. Monitor and evaluate the consumer's progress through individual meetings, on-site visits and review of reports to assist consumer adjustment to new situations and determine whether or not services, programs or job placement is meeting the needs of the consumer.

Key Accountabilities: Incumbents at this level have the decision-making authority to:

Recommend how to proceed with the job referral process. Determine accommodation and training needs that may be required in the workplace and determine if training or other employer intervention strategies are needed post- placement in order to maintain consumer placement. Recommend purchase of equipment and materials including Assistive Technology for job placement. Recommend consumers to employers for employment opportunities. Prioritize cases/work flow. Develop, implement and monitor IPE with the consumer.

Relationships with Others: Key contacts and relationships for incumbents include consumers and their families/legal guardians; supervisors and agency managers and staff; medical professionals; legal officials; vendors and contractors; and community members and/or organizations involved with consumers and/or their families/legal guardians.

Working Environment: While performing the duties of this classification, incumbents work both in an office and at employer sites. Incumbents may be exposed to moving mechanical parts, vibration causing tools or equipment, fumes, airborne particles or toxic or caustic chemicals, outside weather conditions and loud noises when visiting sites. Incumbents may also be exposed to verbal and/or physical confrontations. Incumbents are required to travel in the state and may be exposed to traffic and other road-way hazards

Physical Abilities: While performing the duties of this classification in an office setting, incumbents are regularly required to sit for long periods of time, communicate effectively and use information technology resources to process work assignments. Incumbents may be required to transport, move or install 25 pounds of office supplies or equipment (for example paper or case files) with or without assistance and with or without the use of devices or equipment to assist with the effort. Work assignments may be performed with or without reasonable accommodation to a known disability.

Knowledge, Education and Experience: Applicants must have a (A) Master's degree or higher in Rehabilitation Counseling from a Council on Rehabilitation Education (CORE) accredited university program, or a certification as a Certified Rehabilitation Counselor (CRC) by the Commission of Rehabilitation Counselor Certification or licensure as a Licensed Rehabilitation Counselor or (B) the substitution listed below.

Based on assignment, travel is required; incumbents who elect to use a motor vehicle for travel must have a current and valid motor vehicle driver's license at a class level specific to assignment.

Substitutions:

I. A Master's degree or higher in a related field such a Rehabilitation Administration/Services, Disability Studies, Vocational Assessment/Evaluation, Psychology, Developmental Psychology, Social Work, Human Services, Education, Special Education, Occupational Therapy, Counseling (Mental Health, Education, Psychology), or Substance Abuse Therapy and one (1) year of fulltime or equivalent part-time experience in vocational counseling, job placement, career counseling and guidance, assessment and vocational evaluation, job development and services for employers may be substituted for the required (A) education. Relevant internship experience will be considered.

Incumbents are required to have the following at the time of hire:

1. Knowledge of evaluation methods and techniques to determine individual interests, aptitudes, skills and occupational preferences. 2. Knowledge of the principles and practices of assisting people in coping with physical and/or mental disabilities to meet their vocational, social and independent living needs. 3. Ability to gather information through questioning and observing individuals and by examining records and documents to assess consumer needs. 4. Ability to use a computer to conduct research, manage databases and produce written documents. 5. Ability to communicate information and ideas so others will understand; ability to appropriately document case activities and represent the agency in a professional manner. 6. Ability to maintain a calm manner and interact appropriately with others in emotionally charged or stressful situations. 8. Ability to analyze and determine the applicability of data, draw conclusions and make appropriate recommendations. 9. Ability to exercise discretion in handling confidential information.

#### 2. QUALIFIED VOCATIONAL REHABILITATION COUNSELOR II:

Distinguishing Characteristics: This is the fully competent professional level classification in this series. Incumbents have thorough knowledge of policies, practices, and techniques and have mastered the technical job content, perform work of greater complexity, exercise greater independence in making decisions and receive less supervision and review. At this level incumbents have sign off authority for individual caseloads and handle complex cases or transferred cases requiring exceptional mastery.

Supervision Received: Incumbents receive general supervision from employees of a higher grade who provide work assignments and facilitate performance reviews through formal and informal verbal and written reports for effectiveness and conformance to laws, rules, regulations and agency policies.

Supervision Exercised: Incumbents may provide functional direction to Qualified Vocational Counselor Level I or other employees of a lower grade through advice, guidance and assistance with tasks and participate in the training and mentoring of new employees and interns.

Additional Functions Performed: Incumbents perform the following: Consult with Qualified Vocational Rehabilitation Counselors to ensure that the skills and abilities of the consumer are an effective employment match. Provide vocational rehabilitation counseling advice to consumers deemed to present particular difficult challenges, such as persons with multiple disabilities, persons who have been unsuccessful with other rehabilitation counselors and persons who have an extended history with the agency to ensure provision of appropriate services. Confer with agency staff, consumers' families, employers, professional specialists and others to exchange consumer information and determine the appropriateness of employment opportunities and resources for education, training and job placement assistance. Assist in maintaining a relationship with the local Career Centers for the purpose of providing consumers with

information about employment opportunities, job seeking and methods of applying for current employment opportunities.

Based on assignment, incumbents may perform one or more of the following: Participate in the development of at least at least one statewide or regional training program. Design, implement and conduct group workshops. Represent local offices at regional and statewide placement meetings and participate in local/regional/statewide initiatives. Monitor and evaluate employer satisfaction post-placement through on-site visits and telephone calls. Lead and organize office quality improvement projects. Provide technical assistance or act as an office liaison regarding specific populations to ensure outreach and appropriate service delivery to specific and underserved groups. Provide training and education to employers regarding the skills, abilities and limitations of consumers. Consult with employers to determine job expectations and market these employment expectations to employers for hiring consumers.

Additional Key Accountabilities: Incumbents at this level have the decision-making authority to:

Determine content of training materials for group workshops. Independently manage and decision making ability to sign off on individual case load.

Relationships with Others: Key contacts and relationships for incumbents include consumers and their families/legal guardians; supervisors and agency managers and staff; medical professionals; legal officials; vendors and contractors; and community members and/or organizations involved with consumers and/or their families/legal guardians.

Working Environment: While performing the duties of this classification, incumbents work both in an office setting and at employer sites. Incumbents may be exposed to moving mechanical parts, vibration causing tools or equipment, fumes, airborne particles or toxic or caustic chemicals, outside weather conditions and loud noises when visiting sites. Incumbents may also be exposed to verbal and/or physical confrontations. Incumbents are required to travel in the state and may be exposed to traffic and other road-way hazards.

Physical Ability: While performing the duties of this classification in an office setting, incumbents are regularly required to sit for long periods of time, communicate effectively and use information technology resources to process work assignments. Incumbents may be required to transport, move or install 25 pounds of office supplies or equipment (for example paper or case files) with or without assistance and with or without the use of devices or equipment to assist with the effort. Work assignments may be performed with or without reasonable accommodation to a known disability.

Knowledge, Education, and Experience: Applicants must have at least (A) Master's degree or higher in Rehabilitation Counseling from a Council on Rehabilitation Education (CORE) accredited university program, or a certification as a Certified Rehabilitation Counselor (CRC) by the Commission of Rehabilitation Counselor Certification or licensure as a Licensed Rehabilitation Counselor and (B) two (2) years of full-time or equivalent part-time experience in vocational counseling, job placement, career counseling and guidance, assessment and vocational evaluation, job development and services for employers, or (C) any equivalent combination of the required experience and the substitutions below.

Applicants working with deaf and hard of hearing consumers must be proficient in American Sign Language (ASL) and may be required to demonstrate ASL proficiency through assessment by agency staff.

Based on assignment, travel is required; incumbents who elect to use a motor vehicle for travel must have a current and valid motor vehicle driver's license at a class level specific to assignment.

#### Substitutions:

I. A Master's degree or higher in a related field such a Rehabilitation Administration/Services, Disability Studies, Vocational Assessment/Evaluation, Psychology, Developmental Psychology, Social Work, Human Services, Education, Special Education, Occupational Therapy, Counseling (Mental Health, Education, Psychology), or Substance Abuse Therapy and one (1) year of full-time or equivalent part-time experience in vocational counseling, job placement, career counseling and guidance, assessment and vocational evaluation, job development and services for employers may be substituted for the required (A) education. Relevant internship experience will be considered.

Incumbents must satisfy all the requirements of the Qualified Vocational Rehabilitation Counselor I level plus the following at the time of hire:

1. Knowledge of the types and availability of public and private community based organizations providing vocational rehabilitation services to consumers. 2. Knowledge of the characteristics and trends of the local labor market. 3. Knowledge of the principles and practices of vocational counseling. 4. Knowledge of agency rules, regulations, policies, procedures and guidelines governing assigned responsibilities. 5. Ability to act as a mentor and provide guidance to others.

#### 3. QUALIFIED VOCATIONAL REHABILITATION COUNSELOR III:

Distinguishing Characteristics: This is the supervisory classification in this series and based on assignment may be a non-supervisory contract coordinator. Incumbents provide supervision and guidance on complex or specialized casework to Qualified Vocational Rehabilitation Counselor Level I and II's within their work unit. At this level, incumbents may perform the duties for Qualified Vocational Rehabilitation Counselor Levels I and II's but the primary focus is to provide formal and informal supervision and act as the liaison between Qualified Vocational Rehabilitation Counselor Levels I and II's but the primary focus is to provide formal and informal supervision and act as the liaison between Qualified Vocational Rehabilitation Counselors and agency management.

Supervision Received: Incumbents receive general supervision from employees of a higher grade who provide guidance, statistical review of unit and performance reviews through both formal and informal reports for effectiveness and conformance to laws, regulations and agency policies.

Supervision Exercised: Incumbents may exercise direct supervision over, assign work to and review the performance of Qualified Vocational Rehabilitation Counselor Level I and II or other employees of a lower grade.

Incumbents may provide functional direction to Qualified Vocational Counselor Level I and Level II or other employees of a lower grade through advice, guidance and delegation of tasks and participate in the training and mentoring of new employees. Incumbents may participate in the interviewing process or may make recommendations for new hires.

Additional Functions Performed: Incumbents perform the following: Supervise and monitor unit activities such as consumer evaluations and case maintenance to ensure effective service delivery and compliance with agency policies and standards. Establish and maintain program and unit information systems. Prepare and monitor program and/or unit budget and allocation of funds. Develop and implement policies and procedures for assigned units and programs in accordance with agency regulations and applicable laws. Determine service delivery hours and caseloads to staff consistent with agency policies and consumer needs. Assist in the development and implementation of consumer needs assessment programs. Promote agency services to ensure appropriate referrals to the Vocational Rehabilitation Division. Coordinate state and federal compliance review audits; gather sample studies, conduct in-house reviews of cases for compliance and provide requested materials, information and evaluations to ensure agency compliance with federal, state and agency policies, procedures and regulations regarding vocational rehabilitation. Coordinate Supplemental Security Income (SSI) and/or Social Security Disability Insurance (SSDI) referrals; act as office liaison on all matters related to SSI/SSDI consumers receiving benefits from the Social Security Administration. Act as liaison regarding specific disabilities or special populations by attending meetings and providing information to counselors to ensure that the agency is reaching the specific populations, and to discuss current information on the target groups. Based on assignment, develop and negotiate contracts and grants with appropriate vendors; develop, negotiate and manage contract service budgets in order to assure program effectiveness and compliance with state and federal guidelines, policies and procedures.

Additional Key Accountabilities: Incumbents at this level have the decision-making authority to:

Evaluate job performance of subordinates, participate in the hiring and promotional process; notify management when corrective action may be appropriate; and provide support to enhance employee performance. Determine service delivery hours and caseloads to staff consistent with agency policies and consumer needs. Recommends contract and budget control actions by analyzing spending patterns and monthly and quarterly reports in order to maximize funds available for consumer services and to anticipate financial needs and assure appropriate transfer of funds. Review and sign off on case load for Qualified Vocational Rehabilitation Counselor I's and QVRC II's as appropriate.

Relationships with Others: In addition to the contacts listed for Qualified Vocational Rehabilitation Counselor Level I and II, key contacts and relationships for Qualified Vocational Rehabilitation Counselor Level III incumbents include regional directors, peers and advocates.

Working Environment: While performing the duties of this classification, incumbents work both in an office setting and at employer sites. Incumbents may be exposed to moving mechanical parts, vibration causing tools or equipment, fumes, airborne particles or toxic or caustic chemicals, outside weather conditions and loud noises when visiting sites. Incumbents may also be exposed to verbal and/or physical confrontations. Incumbents are required to travel in the state and may be exposed to traffic and other road-way hazards. Physical Abilities:

While performing the duties of this classification in an office setting, incumbents are regularly required to sit for long periods of time, communicate effectively and use information technology

resources to process work assignments. Incumbents may be required to transport, move or install 25 pounds of office supplies or equipment (for example paper or case files) with or without assistance and with or without the use of devices or equipment to assist with the effort. Work assignments may be performed with or without reasonable accommodation to a known disability.

Knowledge, Education, and Experience Applicants must have at least (A) Master's degree or higher in Rehabilitation Counseling from a Council on Rehabilitation Education (CORE) accredited university program, or a certification as a Certified Rehabilitation Counselor (CRC) by the Commission of Rehabilitation Counselor Certification or licensure as a Licensed Rehabilitation Counselor and (B) three (3) years of full-time or equivalent part-time experience in vocational counseling, job placement, career counseling and guidance, assessment and vocational evaluation, job development and services for employers, of which one (1) year must have been in a supervisory or leadership capacity or (C) any equivalent combination of the required experience and the substitutions below.

Based on assignment, travel is required; incumbents who elect to use a motor vehicle for travel must have a current and valid motor vehicle driver's license at a class level specific to assignment.

Applicants working with deaf and hard of hearing consumers must be proficient in American Sign Language (ASL) and may be required to demonstrate ASL proficiency through assessment by agency staff.

#### Substitutions:

I. A Master's degree or higher in a related field such a Rehabilitation Administration/Services, Disability Studies, Vocational Assessment/Evaluation, Psychology, Developmental Psychology, Social Work, Human Services, Education, Special Education, Occupational Therapy, Counseling (Mental Health, Education, Psychology), or Substance Abuse Therapy and one (1) year of fulltime or equivalent part-time experience in vocational counseling, job placement, career counseling and guidance, assessment and vocational evaluation, job development and services for employers may be substituted for the required (A) education. Relevant internship experience will be considered.

Incumbents are required to have all the requirements of the Qualified Vocational Rehabilitation Counselor I & II level plus the following at the time of hire:

1. Thorough knowledge of the types and availability of public and private community based organizations providing vocational rehabilitation services to consumers. 2. Thorough knowledge of the characteristics and trends of the local labor market. 3. Knowledge of the principles, practices and techniques of program budgeting. 4. Ability to supervise, including planning and assigning work according to the nature of the job to be accomplished, the capabilities of subordinates and available resources; controlling work through periodic reviews and/or evaluations; monitor and encourage subordinates to work effectively and efficiently; and determine the need for and wither recommend or initiate corrective action. 5. Ability to lead others and organize the efforts of others in accomplishing work objectives and performance standards. 6. Ability to communicate and work effectively with senior leaders

# 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.

All MRC vocational rehabilitation counselors are expected to meet at least the education and experience requirements of a QVRC. Promotional opportunities in the series would require more experience and/or a higher educational level.

### IN-SERVICE TRAINING AND CONTINUING EDUCATION:

The commission's Training Department supports a wide variety of training and development programs for all staff through a comprehensive training program. A series of workshops and seminars is planned in the following priority areas: rehabilitation practices, Pre-Employment Transition Services, WIOA implementation, employment outcomes, leadership development and succession training, transportation options, transitional planning, serving consumers with mental health needs, serving consumers on the autism spectrum (including competency to address behavioral, communication, including augmentative and alternative communication, sensory, social, and generalization needs), computer skills in Microsoft Office Suite (Excel, Access), and programs under Section 4 of the Assistive Technology Act of 1998 (operated by MRC).

The Commission is authorized to award Continuing Education Units from the Council on Rehabilitation Counselor Certification. The Commonwealth's Board of Allied Health and Human Service Professions to maintain licensure also accepts these credits. In-service programs carry the appropriate number of continuing education units and enable staffs who qualify to maintain their counselor certification and/or meet licensure requirements. The unit has offered a series of training for managers, supervisors, as well as aspiring supervisors. These trainings are ongoing.

In addition to these in service training programs, MRC provides trainings to staff on 21st century labor trends, high growth occupations skills that are in demand, trainings on job accommodations and employment tax credits.

MRC has also worked with the state HR Division to develop a certificate program for aspiring managers and supervisors where staff works to gain leadership and management skills guided by a supervisor or manager serving as a mentor. Finally, MRC has developed and has operated an annual new staff orientation since 2011 to also assist with educating and retaining staff.

MRC has the following procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

The Commission acquires and routinely disseminates rehabilitation materials to staff such as the latest publications from the Institute on Rehabilitation on Issues, training materials from the Research and training Centers, training guides and resource materials produced by recipients of RSA training grants, the National Rehabilitation Association Journal Of Rehabilitation Counseling, and products from the National Clearinghouse of Rehabilitation Training Materials. Additionally, MRC has equipped and trained staff to use notebook computers and have given them access to online tools to assist them in gaining further knowledge and to assist consumers to rapidly engage them in the process to obtain employment.

### 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

The Commission is authorized to award Continuing Education Units from the Council on Rehabilitation Counselor Certification. The Commonwealth's Board of Allied Health and Human Service Professions to maintain licensure also accepts these credits. In-service programs carry the appropriate number of continuing education units and enable staffs who qualify to maintain their counselor certification and/or meet licensure requirements. The unit has offered a series of training for managers, supervisors, as well as aspiring supervisors. These trainings are ongoing.

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#### 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.

MRC has the following procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

The Commission acquires and routinely disseminates rehabilitation materials and research to staff such as the latest publications from the Institute on Rehabilitation on Issues, training materials from the Research and training Centers, training guides and resource materials produced by recipients of RSA grants, and products from the National Clearinghouse of Rehabilitation Training Materials. MRC also disseminates materials and information from the National Rehabilitation Association, the Association of People Supporting Employment First, Explore VR, and other sources.

### 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.

MRC has dedicated VR counselors skilled in American Sign Language (ASL) and are qualified to work with consumers who are deaf or hard of hearing. In addition, MRC has counselors fluent in the following languages throughout the state: Spanish, Cantonese, Vietnamese, Portuguese, Khmer, French/Haitian Creole, Hindi and Tamil. Some area directors, head clerks and other clerical staff are fluent in American Sign Language, Spanish, Khmer, Cantonese, Mandarin, Haitian Creole, or Portuguese. Eleven full and part-time sign language interpreters are also on staff.

MRC also has a contract for foreign language translation and MRC has translated key agency documents and VR communication letters working closely with the Bilingual Committee and Diversity Committee. The Commission also maintains a statewide contract with the Massachusetts Commission for the Deaf and Hard of Hearing to secure additional ASL interpreters and CART reporters, as needed. Staff with specific language skills and interpreters is geographically placed so as to coincide with population and other demographics relating to target consumer groups. This strategy will continue to be applied and staff with specialized skills added, as appropriate, for the upcoming year and beyond.

## 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.

The information in the State plan pertaining to the RSA requirements for a Comprehensive System of Personnel Development is coordinated and shared with the appropriate State Department of Education unit consistent with the Individual with Disabilities Education Act to assure compliance and coordination of efforts.

### 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;

The MRC CSNA report can be found on MRC's website:

https://www.mass.gov/files/documents/2017/08/zr/2016-mrc-comprehensive-statewide-vrneeds-assessment.docx. The appendix can be found at: https://www.mass.gov/files/documents/2017/08/bae/2016-comprehensive-statewide-vrconsumer-needs-assessment-appendix.docx

The MRC 2016 Comprehensive Statewide VR Consumer Needs Assessment Survey was administered electronically via Survey Monkey in September and October 2016. A focus group of MRC consumers was also conducted at the Consumer Conference in June 2015. There were 1,691 consumers who responded to the survey out of a total of 7,247 recipients, for a response rate of 23.4%. The number of responses exceeded the amount required to make statistically significant conclusions at a 99% confidence level, according to the Raosoft.com sample size calculator, by a wide margin. There was a 2% increase in the number of consumer soffered the opportunity to participate in the survey compared to 2015. Those consumers aged 14 to 21 (up to their 22<sup>nd</sup> birthday) were sent a version of the survey which included additional questions on pre-employment transition services and other transition related questions. 281 responses were received (included in overall total)

The main findings of the 2016 Comprehensive Statewide VR Consumer Needs Assessment can be summarized as follows:

1. The 2016 CSNA confirms that the majority of consumers served by the MRC are people with the most significant disabilities. The findings indicate that a majority of MRC consumers require multiple Vocational Rehabilitation (VR) services and supports to assist them in their efforts to prepare for, choose, obtain, maintain, and advance in competitive employment. There is also a high need for transportation and Community Living (CL) services amongst many consumers, especially those with significant disabilities. The need for multiple VR services was found to be slightly greater amongst individuals of diverse ethnic and racial backgrounds (particularly African-Americans and Hispanics) and for individuals with cognitive or psychological disabilities. This finding was more pronounced than 2015. The findings suggest that many consumers also require supported employment and ongoing and extended employment supports. The need for multiple CL services was greatest among individuals with physical or sensory disabilities.

2. Overall, the majority of MRC consumers believe MRC services are addressing all or most of their needs and are satisfied with MRC services. 80% of consumers feel MRC services are at least somewhat effective in meeting their vocational service needs. 86% of MRC consumers are satisfied with the services they receive. Also, the majority of consumers (82%) are also somewhat or very satisfied with the development of their Individualized Plan for Employment. All of these are increases from 2015. Many of those who feel MRC services are not meeting their needs indicate they have difficulty maintaining contact with their counselor, have experienced changes in their assigned counselors due to high levels of staff turnover, feel they have not been provided consistent or adequate information on services, or are struggling with health issues, financial issues, and other difficulties.

3. Many consumers expressed strong praise and gratitude for the hard work and support provided by the MRC and its counseling staff. It is very evident that MRC and its staff make a significant positive impact on the lives of many of its consumers. The level of positive feedback from consumers this year is once again exceptionally notable. A need raised by consumers included better contact with their counselor and more information about available services and MRC procedures, including information and referral to other agencies. It also appears some consumers may not have a complete understanding of what the MRC can and cannot do for them. Many consumers also appear to be struggling with the high cost of living in Massachusetts.

4. The most important and needed VR services listed by consumers were job placement (89%), career counseling (87%), benefits planning (82%), supported employment (82%), work-readiness training (73%), vocational training (71%), ongoing supports to assist in retaining employment (71%), assistance with college education (70%), and On-the-Job Training and Job-Driven Trainings (68%).

5. The most important job characteristics that MRC consumers indicated they are looking for in a job include a friendly job environment (96%), job satisfaction and personal interests (95%), earning a living wage (94%), an adequate number of hours worked per week (94%), vacation and other leave benefits (90%), and promotional opportunities (89%).

6. The most common occupational areas of interest listed by MRC consumers included Community/Social/Human Services (38%), Self-Employment (28%), Administrative (28%), Customer Service (24%), Arts/Entertainment (21%), Arts/Entertainment/Media (21%), Computers/Information Technology (21%), and Education/Childcare (15%). All but Self-Employment are amongst the top 10 occupational goals by Standard Occupational Code (SOC) in consumer employment plans in the MRCIS Case Management System. A number of consumers also asked for additional information on self-employment supports.

7. Only 30% of consumers indicated that they are aware of the Independent Living Center in their area. Individuals with psychological disabilities, younger consumers, and those in the South and North District tended to be less aware of ILCs compared to consumers with other types of disabilities.

8. Transportation continues to be an area of need for some MRC consumers. The most important and needed transportation services and options listed by consumers are the Donated Vehicle Program (18%), public transportation (18%), driver's education and training (13%), the Transportation Access Pass (8%), The Ride/paratransit (8%), information on transportation options (8%), and car pool/ride sharing (5.5%).

9. Transportation can serve as a barrier to some consumers and 33% of consumers find transportation to be a potential barrier to obtaining employment (down 1% from 2015 and 3% from 2014). Common reasons for how transportation is a barrier include inability to access jobs in areas without transportation, the cost of transportation, the distance to available jobs, reliability and the time required to travel via public transit/paratransit, lack of a vehicle and/or driver's license, and health conditions or the nature of disability.

10. The most important and needed Community Living services indicated by responding consumers were affordable, accessible housing and the Mass Access Housing Registry (66%), accessible recreational services (53%), Home and Community-Based Waiver Services (46%), the Individual Consumer Consultant (ICC) program (45%), Assistive Technology (38%), Home Care (37%), Supported Living Services (35%), and Home Modification (34%).

11. When factoring out consumers who indicated they do not require Community Living services, 87% of MRC consumers indicated that MRC's services were somewhat or extremely useful in assisting them to maintain independence in the community. As with the section on VR, many consumers reflected on how the MRC's assistance has been tremendously valuable. Many consumers, however, were not aware of some or all of the CL services provided by the MRC. Others indicated they do not require CL services. There appears to be a higher need for CL services amongst women and minority consumers.

12. Finding affordable and accessible housing continues to remain a challenge for many consumers due to economic conditions and the high cost of living in Massachusetts. The Independent Living Centers may be able to assist consumers in this area, and counselors may be able to refer consumers to other resources to assist with housing needs.

13. A total of 19% of consumers feel they require additional services and supports. This number increased by about 1% from 2015 but is steady looking at the longer term trend. These services include job search assistance, job placement and job training, financial assistance, transportation, affordable and accessible housing, counseling and guidance, information on available services, assistive technology, education and training, services from IL centers, and services and supports from other agencies, and computer/technology skills training.

14. The most important single service consumers are receiving includes job placement and job search services, assistance with college education and job training, tuition waivers, vocational counseling and guidance, assistive technology, job readiness training, assistance with obtaining supplies for school and work, ongoing employment supports, job trainings, and transportation,

15. A majority of MRC counselors and supervisors (82% satisfied/very satisfied) are satisfied with their ability to assist individuals with disabilities in obtaining, maintaining, and advancing in competitive employment based on their skills, interests, needs, and choices. This satisfaction rate is up from 2015. The majority of MRC counselors are generally satisfied with most services provided to consumers, including internal job placement services, services from Community Rehabilitation Providers, and education and training provided to consumers by schools and colleges. One area of improvement identified by counselors was the need to improve communication with both consumers and providers. Counselors identified areas that would assist them in doing their job better, such as improved support and resources for job placement, more full time job placement specialists, increased information on job leads for consumers, additional on-the-job training and other training resources, continued enhancements to the MRCIS system, more resources for vocational assessment and vocational training for consumers, and training on WIOA implementation, amongst others.

16. Most consumers appear to be satisfied with services received from Community Rehabilitation Providers (CRPs). The majority of MRC staff also are somewhat or very satisfied with CRP services. Nearly 90% of CRPs indicated they are satisfied with services they provide to MRC consumers. Improved communication as well as information flow between CRPs and MRC staff may assist in improving service delivery to consumers and lead to more successful employment outcomes. Some CRPs have asked for MRC to provide additional information on client referrals for CRP services. Recent vendor expansion undertaken appears to have addressed CRP capacity needs, but there still may be a need for additional capacity in specific geographic areas, client population focus areas, and in particular service areas such as assessment based on counselor and provider feedback. MRC has also used CRPs to roll out new procurements to provide pre-employment transition services to students with disabilities aged 14 to 21 (up to their 22<sup>nd</sup> birthday).

17. A pilot survey of MRC employer partners through MRC's account management system and those employers participating in the MRC Annual Hiring Event indicate a very high level of satisfaction with MRC job placement services amongst employer partners (88% satisfied/very satisfied) including satisfaction with the job performance of employees hired through MRC (93% satisfied/very satisfied). Most responding employers indicated that MRC meets their recruitment needs and would recommend MRC to other businesses for employment and recruitment. These findings suggest that MRC's efforts to work with employers are effective towards accommodating the needs of our consumers and employer partners. It is recommended MRC expand these surveys to other employers.

18. There are areas where additional MRC staff training may assist in improving the quality and effectiveness of VR services to help address the needs of consumers identified in the CSNA. Specific areas include trainings on the MRCIS system, as well as on VR best practices, policies, and procedures, strategies for maintaining communication with consumers and time management, WIOA common measures and requirements, and on pre-employment transition services and transition services under WIOA.

19. The MRC has again identified Asian and Pacific Islanders as being slightly underserved by the MRC's Vocational Rehabilitation program compared to their proportion in the overall state population. MRC continues to see growth in minority populations served by the MRC VR program in general. Growth in the Asian population continues to be seen in the state's general population while it has remained steady amongst the MRC population. It is recommended that the MRC continue its outreach efforts to Asian communities. MRC has translated key agency marketing and information materials and recently completed a project to translate all MRCIS correspondence letters into several Asian languages common in Massachusetts including Mandarin Chinese, Vietnamese, and Khmer as part of its Language Access Plan.

#### B. who are minorities;

The CSNA report indicated the need for multiple VR services was found to be slightly greater amongst individuals of diverse ethnic and racial backgrounds. For example, minority consumers were more likely to find obtaining a high school diploma, transition from school to work, on-thejob training, job-driven training, work-readiness/soft skills training, and vocational training as important and needed service. This finding was more pronounced than prior years. The need for college education supports and transportation services were also higher amongst consumers of minority ethnic and racial background compared to white consumers.

Over the past ten years, MRC has seen an increase in African-American, Hispanic, and Asian consumers. There also has been a slight growth in the proportion of Native American consumers, reaching a 10 year high of 1% in FY2016. Numerically, the largest growth is in Hispanic and African-American consumers. Proportionally, the largest growth in MRC's consumer population over the past decade has been among Asian and Hispanic consumers, which is consistent with the 2010 Census figures for Massachusetts.

Hispanic consumers have been growing the fastest over the past 5 years (+2.6%), while African-Americans served has grown by 1.4% over the same period. African-Americans are served by the MRC at a much higher rate than their rate in the overall population and Hispanic consumers are served by MRC at a rate slightly above their rate in the general population. Since FY2012, MRC has seen a slight decrease in Asian consumers served (falling from 3.8% in FY2012 to 3.4% in FY2016 after seeing a major increase in Asians served between FY2006 and FY2012. It continues to appear that Asians are slightly underserved in comparison with their rate in the overall state population (3.2% of MRC consumers compared to 6.6% for all MA population)

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

The MRC has again identified Asian and Pacific Islanders as being slightly underserved by the MRC's Vocational Rehabilitation program compared to their proportion in the overall state population. MRC continues to see growth in minority populations served by the MRC VR program in general. Growth in the Asian population continues to be seen in the state's general population while it has remained steady amongst the MRC population. It is recommended that the MRC continue its outreach efforts to Asian communities. MRC has translated key agency marketing and information materials and recently completed a project to translate all MRCIS correspondence letters into several Asian languages common in Massachusetts including Mandarin Chinese, Vietnamese, and Khmer as part of its Language Access Plan. MRC will be conducting focus groups in two of its offices with higher concentrations of Asian consumers to gather further information on how MRC can better address the needs of this underserved population. MRC will also consult its Bilingual Committee and Diversity Committee as part of these efforts and also to develop appropriate training programs for staff.

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

In order to meet the needs of individuals served through other components of the Statewide Workforce Development System, MRC continues its efforts to collaborate with other core partners in the workforce investment system to reduce unemployment of individuals with disabilities and to provide effective services to employers throughout the state, to seek out collaborative opportunities including possible projects and grants that may assist individuals with disabilities across Massachusetts in obtaining competitive employment. MRC continues its efforts to work closely together on WIOA implementation including common performance measures, and developing methods to track shared consumers across the workforce system, among others. MRC participates in numerous workgroups such as the WIOA Steering Committee, WIOA Systems Integration Workgroup, and other committees who are working on the alignment of services under the workforce system. MRC is increasing its collaboration with other core partners under WIOA to survey and further identify the needs of individuals working with other components of the Workforce system. Some of the identified needs include: interviewing skills, resume development, job specific skills (CVS Pharmacy Technician training, Certified Nursing Assistant (CNA) Program, Advance Auto Parts, Lowes, Home Depot retail training, customer service jobs skills training, food service training, and human service training). MRC will continue to consult with core partners on the identified needs of their consumers as it relates to accessibility and access to employment opportunities, employment training, and provide employer trainings on disability awareness and job accommodations. MRC is reaching out to its core partners as part of its next needs assessment to gather additional data on the needs of individuals in the overall workforce system to complement and further enhance the CSNA process going forward.

Finally, the Massachusetts Rehabilitation Commission VR Program has a growing presence at the Massachusetts Career Centers (American Job Centers); the MRC Commissioner serves on the State Workforce Investment Board (SWIB), and each area director has a formal relationship with at least one career center. In addition, area directors or other MRC staff are on local workforce investment boards. MRC is working on aligning its services and increasing its presence at the career centers as MRC is a required partner in the Career Center network. MRC VR counseling staff make frequent visits and often conduct interviews at the local career centers and will be leasing space at all career centers to further increase MRC's presence. MRC has finalized its MOUs and infrastructure funding agreements with local areas and the Career Centers. Finally, the MRC's job placement specialists and other assigned MRC staff work closely with local career centers to provide high quality vocational rehabilitation services to persons with disabilities seeking expanded employment opportunities and to make the career centers more responsive to the needs of individuals with disabilities including providing disability sensitivity training for career center staff, and ensuring the career centers are accessible to all job seekers.

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

Among individuals with less than a high school education at application, according to the most recent CNSA, 94% indicate that transition services to assist in transitioning from high school to college and employment and 90% find pre-employment transition services for students with disabilities as important service needs. Obtaining a high school diploma and college education were also rated as important services by youth.

The most important and needed pre-employment transition services listed by MRC consumers of transition age (14-21 - up to their 22<sup>nd</sup> birthday) included internships/work-based learning experiences (87%), assistance in enrolling in post-secondary education or training (85%), work readiness training (83%), career counseling (81%), and advocacy/mentorship/peer counseling (72%). 77% of consumers of transition age indicate they have received some pre-employment transition services from MRC. Some consumers report they receive pre-employment transition services from schools outside of MRC, the frequency of the responses range from 16% for advocacy/peer counseling to 37% for assistance with enrollment in college education or trainings.

The majority of transition age consumers indicate they are satisfied with pre-employment transition services provided by MRC and their partners in meeting their needs towards future

education and employment (72% satisfied/very satisfied, and 91% somewhat satisfied/satisfied/very satisfied), and the majority who are receiving these services (72%) indicate these services are effective in preparing them for their future career.

Results throughout the CSNA demonstrate a high need for pre-employment transition services (Pre-ETS) among high school students with disabilities and youth consumers of transition age and MRC is working to address this need through its various transition initiatives.

MRC is working closely with local school districts on transition and pre-employment transition services, including those provided under the Individuals with Disabilities Education Act (IDEA). MRC has a counselor assigned to every public high school in the Commonwealth and has developed strong working relationships with the Department of Elementary and Secondary Education (DESE). MRC is also working to coordinate its transition services with local schools and DESE with those transition services by these provided under the Individuals with Disabilities Education Act. MRC is involved in several initiatives in this area, including the B-SET project, and has hired a Transition Manager to oversee transition and coordination with educational authorities. MRC has also been awarded a 5 year, \$5 million demonstration grant on work-based learning experiences by RSA for students with disabilities entitled Transition Pathway Services which will also assist with needs in this area.

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

In terms of the need to establish, develop, or improve community rehabilitation programs within the State. Most consumers appear to be satisfied with services received from Community Rehabilitation Providers (CRPs). The majority (79%) of MRC staff also are somewhat or very satisfied with CRP services. Improved communication and information flow between CRPs and MRC staff may assist in improving service delivery to consumers and lead to more successful employment outcomes. Recent vendor expansion efforts appear to have addressed CRP capacity needs, but there still appears to be additional capacity needed in certain geographic areas and for certain populations.

# **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 .

The most recent CSNA confirms that transition career services and Pre-Employment Transition Services for youth and high school students with disabilities are important and needed services across the Commonwealth. Results throughout the CSNA demonstrate a high need for these services, including pre-employment transition services among high school students with disabilities and youth consumers of transition age and MRC is working to address this need in coordination with schools.

Among individuals with less than a high school education at application, according to the most recent CNSA, 94% indicate that transition services to assist in transitioning from high school to college and employment and 90% find pre-employment transition services for students with disabilities as important service needs. Obtaining a high school diploma and college education were also rated as important services by youth.

The most important and needed pre-employment transition services listed by MRC consumers of transition age 14-21 (up to their 22nd birthday) included internships/work-based learning experiences (87%), assistance in enrolling in post-secondary education or training (85%), work readiness training (83%), career counseling (81%), and advocacy/mentorship/peer counseling (72%). 77% of consumers of transition age indicate they have received some pre-employment transition services from MRC. Some consumers report they receive pre-employment transition services from schools outside of MRC, the frequency of the responses range from 16% for advocacy/peer counseling to 37% for assistance with enrollment in college education or trainings.

MRC is working closely with local school districts on transition and pre-employment transition services, including coordinating services with those provided under the Individuals with Disabilities Education Act (IDEA). MRC has a counselor assigned to every public high school in the Commonwealth and has developed strong working relationships with the Department of Elementary and Secondary Education (DESE). MRC is also working to coordinate its transition services with local schools and DESE with those transition services by these provided under the Individuals with Disabilities Education Act. MRC is amending its MOU with DESE to further coordinate service efforts and DESE has produced guidance for local school districts on working with MRC to coordinate transition services.

MRC is involved in several initiatives in this area, including the B-SET project, and has hired a Transition Manager to oversee transition and coordination with educational authorities. MRC has also been awarded a 5 year demonstration grant on work-based learning experiences by RSA for students with disabilities entitled Transition Pathway Services which will also assist with needs in this area.

Based on an analysis of data from the Massachusetts Department of Elementary and Secondary Education (DESE) (http://profiles.doe.mass.edu/state\_report/selectedpopulations.aspx), there are 167,530 students with disabilities enrolled in public high schools in Massachusetts as of October 1, 2016. Based on this data and the high need for Pre-ETS services demonstrated throughout the CSNA, MRC forecasts that it needs to utilize all of its 15% reservation of VR funding provide the five required Pre-ETS services to students with disabilities across Massachusetts and that no funding will remain to provide authorized pre-employment transition services beyond the five required services due to the high need for Pre-ETS services as demonstrated in this year's CSNA findings and the DESE data.

### k. Annual Estimates

Describe:

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

The 2016 U.S. Census Bureau American Community Survey determined that the population of Massachusetts was 6,811,779,

The U.S. Census Bureau estimates for 2015 reported the following demographic profile for the residents of the state:

82.1% were White; • 8.4% were Black or African American; • 11.2% were Hispanic (any race);
6.6% were Asian; • 2.3% were multi-racial; • 0.5% were American Indian and Alaska Native; • 0.1% were Native Hawaiian and Other Pacific Islander.

Based on an analysis of data from the Massachusetts Department of Elementary and Secondary Education (DESE) (http://profiles.doe.mass.edu/state\_report/selectedpopulations.aspx), there are 167,530 students with Disabilities enrolled in Public High Schools in Massachusetts as of October 1, 2016

In 2016, there were 6,736,017 individuals living in the community in Massachusetts, of which 786,595 were persons with disabilities; a prevalence rate of 11.7%. Of these, 390,725 individuals with disabilities are aged 18 to 64 and living in the community. This is a projection based on available data from the Disability Statistics Compendium. Thus, our projection is that 786,585 individuals who may be eligible for MRC VR services.

https://disabilitycompendium.org/sites/default/files/user-uploads/Compendium\_2017\_Final.pdf.

Please note that this is the most up to date information available as of when the State Plan was developed.

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

### A. The VR Program;

FFY2019 Annual Estimates:

It is estimated that the Massachusetts Rehabilitation Commission will provide services with funds provided under part B of Title I of the Act as follows during FFY2019:

A. New individuals to be provided services to determine eligibility (new applicants): Projection 9,000

b. New individuals to be provided services to determine order of selection priority assignment and vocational rehabilitation needs (new individuals determined eligible: Projection 8,100

c. New Individuals to be provided vocational rehabilitation services necessary to render them employable consistent with an approved Individual Plan for Employment (IPE) and subsequent amendments (New IPEs): Projection: 6,000

d. New Individuals with most significant disabilities to be provided vocational rehabilitation services necessary to render them employable consistent with an approved Individual Plan for Employment (IPE) and subsequent amendments (New IPEs, Most Significantly Disabled: Projection: 5,500

#### **FFY2020** Annual Estimates:

a. New individuals to be provided services to determine eligibility (new applicants): Projection 9,000

b. New individuals to be provided services to determine order of selection priority assignment and vocational rehabilitation needs (new individuals determined eligible: Projection 8,100 c. New Individuals to be provided vocational rehabilitation services necessary to render them employable consistent with an approved Individual Plan for Employment (IPE) and subsequent amendments (New IPEs): Projection: 6,000

d. New Individuals with most significant disabilities to be provided vocational rehabilitation services necessary to render them employable consistent with an approved Individual Plan for Employment (IPE) and subsequent amendments (New IPEs, Most Significantly Disabled: Projection: 5,500

### B. The Supported Employment Program; and

MRC will be utilizing Title I and Title VI B funds to provide Supported Employment services. It is estimated that the Massachusetts Rehabilitation Commission will provide Supported Employment services with Title I funds to 450 individuals

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

MRC is not currently under an order of selection, so this is not applicable at this point in time. MRC has developed a planning process to forecast out the need for order of selection based on the amount of resources available and the number of new and active consumers. MRC's leadership team is in the process of developing a future OOS policy based on funding allotments, inflation, and the projected provision of consumer services.

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

MRC is not currently under an order of selection — not applicable.

## 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.

### **FFY2019 Estimates:**

Based upon current forecasting, it is estimated that the costs of services with VR funds will be approximately \$56 million dollars in FFY2019.

MRC estimates it will serve 21,485 eligible individuals in the VR program in FFY2019, broken down as follows:

Disability Priority Category 1 (Most Significantly Disabled): 17,620 consumers, total cost of service \$41,500,000, average cost per individual in category: \$2,355.

Disability Priority Category 2 (Significantly Disabled): 3,612 consumers, total cost of service, \$8,000,000, average cost per individual in category: \$2,214

Disability Priority Category 3 (Disabled): 253 consumers, total cost of service, \$500,000, average cost per individual in category \$1,976.

Potentially Eligible Consumers receiving Pre-ETS: 4,500 students, cost of service \$6,200,000, average cost \$1,363

### **FFY2020 Estimates:**

Based upon current forecasting, it is estimated that the costs of services with VR funds will be approximately \$56 million dollars in FFY2019.

MRC estimates it will serve 20,200 eligible individuals in the VR program in FFY2019, broken down as follows:

Disability Priority Category 1 (Most Significantly Disabled): 16,500 consumers, total cost of service \$41,700,000, average cost per individual in category: \$2,497.

Disability Priority Category 2 (Significantly Disabled): 3,500 consumers, total cost of service, \$8,000,000, average cost per individual in category: \$2,429

Disability Priority Category 3 (Disabled): 200 consumers, total cost of service, \$300,000, average cost per individual in category \$1,500.

Potentially Eligible Consumers receiving Pre-ETS: 4,500 students, cost of service \$6,200,000, average cost \$1,363

MRC is not presently operating under an order of selection. MRC's leadership team is developing plans to research the need for order of selection and to forecast out costs based on available resources, and the projected amount of consumers to be served.

### **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.

The Massachusetts Rehabilitation Commission has developed the following goals and priorities for the Vocational Rehabilitation and Supported Employment Programs. These have been identified based on the most recent Comprehensive Statewide Needs Assessment conducted in collaboration with the Statewide Rehabilitation Council (SRC) during fiscal year 2017 to survey the rehabilitation needs of individuals with disabilities. They are also based on recommendations and input from the SRC, and input from MRC Senior Management. Additionally, these goals include the new WIOA Common Performance Measures. MRC will review progress on these goals on a regular basis with senior management. The SRC has agreed to these goals.

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

MRC has based its goals and priorities on the most recent Comprehensive Statewide Needs Assessment conducted in collaboration with the Statewide Rehabilitation Council (SRC) during fiscal year 2017 to survey the rehabilitation needs of individuals with disabilities. They are also based on recommendations and input from the SRC, and input from MRC Senior Management. Additionally, these goals include the new WIOA Common Performance Measures.

Goal 1: Continue to Increase Employment Outcomes through placement, training, and Job Driven Trainings provided through MRC's Job Placement Team, Employer Account

Management System, and Annual Statewide Hiring Event. Measurement: Total Number of Successful Employment Outcomes achieved through the involvement of the MRC Job Placement Team in the current fiscal year, Total Number of Successful Employment Outcomes (Status 26 closures) with Employers participating in MRC's Account Management System in the current fiscal year, Total number of Successful Employment Outcomes (Status 26 Closures) from Consumers Participating in MRC's annual Statewide Hiring Event in the current fiscal year. Target: Exceed 400 Successful Employment Outcomes for MRC's Job Placement Team, exceed 65 Successful Employment Outcomes for Consumers Participating in the Statewide Hiring Event, and exceed 200 Employment Outcomes from Employer Account Management System. Data Source: MRCIS Case Management System, MRCIS Job Placement Module Frequency: Annually

Goal 2: Develop a joint employment initiative and complete pilot projects with the Department of Mental Health (DMH) to increase employment outcomes to better meet the needs of individuals with mental health disabilities. Measurement: Complete planning of MRC-DMH employment initiative and complete and evaluate 3 MRC-DMH pilot projects. Target: Complete planning of MRC-DMH employment initiative and complete and evaluate 3 MRC-DMH pilot projects by the end of the program year PY18. MRC is currently in the process of developing multi-year annual targets and will update as required. Data Source: N/A Frequency: Annually.

Goal 3: Develop a pilot project with the Department of Transitional Assistance (DTA) to collaboratively work to improve services and outcomes for individuals with disabilities receiving TANF support. MRC is currently in the process of developing multi-year annual targets and will update as required. Measurement: Completion of ISA and hire staff for MRC-DTA Individual Planning and Support Pilot Project. Target: Completion of ISA, hiring of staff, and commence services for MRC-DTA Individual Planning and Support Pilot Project by the end of the program year. Data Source: N/A Frequency: Annually

Goal 4: Maximize Employment Retention for MRC Consumers Successfully Employed at Exit from Vocational Rehabilitation at the Second Quarter after Exit. Measurement: Employment Rate at the 2nd Quarter after Exit for MRC Consumers closed during the Current Program Year (Successful and Unsuccessful closures) based on Unemployment Insurance Wage Earnings Target: Continue to establish baseline data over the next 2 program years Data Source: Closure Data from MRCIS Case Management System, RSA—911 Report, Unemployment Insurance Quarterly Wage Data Frequency: Annually

Goal 5: Maximize Employment Retention for MRC Consumers Successfully Employed at Exit from Vocational Rehabilitation at the Fourth Quarter after Exit Measurement: Employment Rate at the 4th Quarter after Exit for MRC Consumers closed during the Current Program Year (Successful and Unsuccessful closures) based on Unemployment Insurance Wage Earnings Target: Continue to establish baseline data over the next 2 program years Data Source: Closure Data from MRCIS Case Management System, RSA—911 Report, Unemployment Insurance Quarterly Wage Data Frequency: Annually

Goal 6: Increase Median Quarterly Earnings for MRC Consumers Employed at Exit from Vocational Rehabilitation at the Second Quarter after Exit Measurement: Median Quarterly Earnings at the 2nd Quarter after Exit for MRC Consumers closed during the Current Program Year (Successful and Unsuccessful closures) based on Unemployment Insurance Wage Earnings Target: Continue to establish baseline data over the next 2 program years. Data Source Closure Data from MRCIS Case Management System, RSA—911 Report, Unemployment Insurance Quarterly Wage Data Frequency: Annually

Goal 7: Maximize the Number and Proportion of MRC Consumers with Recognized Secondary and/or Post—Secondary Credential Attainment during Participation in the MRC VR Program Measurement: Number of MRC Consumers obtaining post—secondary education credentials and/or obtaining a secondary school diploma or equivalent during participation in the MRC VR Program (or up to 1 year after exit from program. For proportion, previous number divided by the total number of consumers served during the program year Target: Continue to Establish baseline data for the next two program years Data Source: Level of Education Data from MRCIS Case Management System, RSA—911 quarterly reporting Frequency: Annually

Goal 8: Maximize the Percentage of MRC Consumers Enrolled in Education and Training Programs leading to a recognized credential or employment achieving measurable skills gains during the Program Year Measurement: Number of MRC Consumers enrolled in education and training programs leading to employment or a recognized post—secondary credential achieving measurable skills gains during the program year with documented progress divided by total number of consumers receiving services through an IPE in the program year (Status 12—22) Target: Continue to Establish baseline data for the next two program years. Data Source: Level of Education Data from MRCIS Case Management System, RSA—911 quarterly reporting Frequency: Annually

Goal 9: Provide Effective Services to Employers in the Commonwealth of Massachusetts Measurement: Employment Retention Rate with the Same Employer at 2nd and 4th Quarter after Exit for MRC Consumers closed during the Current Program Year (Status 26 Closures) based on Employer Tax ID (EIN) in Unemployment Insurance Wage Data Target: Continue to Establish baseline data for the next two program years. Data Source: Status 26 Closure Data from MRCIS Case Management System, RSA—911 Report, Unemployment Insurance Quarterly Wage Data Frequency: Quarterly, Annually

Goal 10: Maximize Successful Employment Outcomes for 90 Days or Greater to exceed last year's Program Year Outcome Measurement: Total Sum of Successful Employment Outcomes for MRC Consumers for the Current Program Year (Status 26 Closures) Target: 4,000 Data Source: Status 26 Closure Data from MRCIS Case Management System, Monthly Standards and Indicators Tracking Report Frequency: Monthly, Annually

Goal 11: Maximize the number of Consumers Exiting the MRC VR Program whose Primary Source of Economic Support is from their own Employment Earnings Measurement: Proportion of Individuals Successfully Closed in Status 26 in the current fiscal year with a RSA—911 Employment Status Code of Competitive Employment in MRCIS with hourly wages at or above minimum wage (the higher of either State or Federal Minimum Wage, currently is \$11.00 in Massachusetts) whose Primary Source of Support at Closure is Personal Income (Code 1) minus the proportion of those consumers whose primary source of support at application was personal income (Code 1). Target: At or above 58% Data Source: MRCIS Case Management System, Monthly Standards and Indicators Tracking Report Frequency: Monthly, Annually

Goal 12: Maximize the Number and Percentage of youth consumers served by MRC completing education and training programs, including post—secondary education. Measurement: Number and Percent of Youth Age 14 to 24 Completing Education and Training Programs. Measured by

the flow of Youth Consumers moving from Status 18 Training and Education into Status 20 Job Ready or Status 22 Job Placement during the month/fiscal year divided by the total number of youth consumers served in Status 18 Training and Education during the month/fiscal year Target: At or above 225 or 3% of youth consumers per month completing training or education, annual total of 2750 or 16%. Data Source: Data from MRCIS Case Management System Frequency: Monthly, Annually

Goal 13: Maximize the Number and Percentage of high school students receiving preemployment transition services from MRC, either eligible or potentially eligible. Measurement: Number of High School Student Consumers Served by MRC receiving Pre-Employment Transition Services (Pre-ETS) Target: 4,100 Data Source: Data from MRCIS Case Management System Frequency: Monthly, Annually

Goal 14: Maximizing the Number of Successful Competitive Employment outcomes and the percent of Placements leading to Successful Employment Outcomes through MRC's Competitive Integrated Employment Services (CIES) programs in partnership with Community Rehabilitation Providers Measurement: Total Number of 90 Day Successful Employment Outcomes from CIES Program; Total Number of CIES Successful Employment Outcomes divided by the total number of 30 Day Placements for the CIES Program. Target: Exceed 850 Successful Employment Outcomes for CIES for the fiscal year and greater than 75% of CIES placements result in successful employment outcomes Data Source: MRC CIES Quarterly Cumulative Utilization Report and Analysis Report Frequency: Quarterly, Annually

Goal 15: Continue to provide consumers with an avenue to access employment and training opportunities through participation in the Donated Vehicle Program in partnership with Good News Garage, Measurement: Number of Consumers Participating in the Donated Vehicle Program who obtain a successful employment outcome or who enter training and education (Status 18) divided by the number of consumers participating in the Donated Vehicle Program during the current fiscal year. Target: Greater than 80% of Consumers participating in the Donated Vehicle Program during the current fiscal year result in successful employment outcomes or enrollment in training or education (Status 18) Data Source: MRCIS Quarterly, Annually

Goal 16: Provide Quality Vocational Rehabilitation Services leading to increased successful employment outcomes to individuals with Autism. Measurement: Number of successful employment outcomes as defined by Status 26 closures for MRC consumers with a Primary and/or Secondary RSA Disability Cause Code of 08. Target: Equal or greater to 175. Data Source: MRCIS Case Management System Frequency: Quarterly, Annually

Goal 17: Continued Outreach to the Asian community to identify strategies for serving this underserved population. Measurement: Completion of Focus Groups to MRC regions with high concentrations of Asian community. Target: Completion of Focus Groups to MRC regions with high concentrations of Asian community.by the end of the program year, with consultation of the diversity and bilingual committees to review results and to develop strategies for increasing outreach efforts and services to the Asian community, to present to agency leadership. Data Source: N/A Frequency: Annually

Goal 18: Research Best Practices Models to Increase Employment of Individuals with Disabilities. Measurement: Completion of research of best practice employment models such as

the Progressive Employment Model, Missouri's Pre-ETS potentially eligible model, and development and completion of a presentation to MRC's Leadership Team. Target: Completion of Research by the end of the program year. Data Source: N/A Frequency: Annually

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

MRC has based its goals and priorities on the most recent Comprehensive Statewide Needs Assessment conducted in collaboration with the Statewide Rehabilitation Council (SRC) during fiscal year 2017 to survey the rehabilitation needs of individuals with disabilities. They are also based on recommendations and input from the SRC, and input from MRC Senior Management. Additionally, these goals include the new WIOA Common Performance Measures.

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

The Massachusetts Rehabilitation Commission (MRC) in conjunction with the Statewide Rehabilitation Council (SRC) conducted its most recent annual Comprehensive Statewide VR Consumer Needs Assessment (CSNA) in the Fall of 2016. The Rehabilitation Services Administration (RSA) requires the MRC to conduct a Comprehensive Statewide VR Consumer Needs Assessment at least every three years, but the MRC administers it on an annual basis with the information and findings incorporated into the MRC's section of the Massachusetts WIOA Combined State Plan, as well as in MRC's Strategic Planning, and Quality Assurance activities. The findings on consumer needs listed in the CSNA are presented and shared with MRC Senior Management and VR staff, the entire body of the SRC, and other key stakeholders as part of the MRC's State Plan and continuous quality improvement processes. It is also publicly distributed via the MRC website. The 2016 CSNA process constituted a number of areas, including: a consumer survey which also included additional content for students with disabilities on preemployment transition services; focus groups; analysis of key statistical and demographic information and facts; findings from other reports and surveys including the Consumer, Provider, and Counselor Satisfaction surveys; pilot youth and employer surveys; and collaboration and discussion with the SRC and other key stakeholders.

The MRC CSNA report can be found on MRC's website:

https://www.mass.gov/files/documents/2017/08/zr/2016-mrc-comprehensive-statewide-vr-needs-assessment.docx. The appendix can be found at:

https://www.mass.gov/files/documents/2017/08/bae/2016-comprehensive-statewide-vr-consumer-needs-assessment-appendix.docx

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

MRC included the new WIOA common performance accountability measures under Section 116 of WIOA in its goals and priorities. MRC will continue to report baseline data to RSA on these measures for the next two program years as specified in the final requirements for the WIOA Combined/Unified State Plan. As the VR program only began reporting data for the common measures as of July 1, 2017, MRC will not have any substantial data on the common measures to evaluate performance against until after the completion of Program Year 2017 (July 1, 2017 to June 30, 2018). Once a full year's worth of data becomes available, MRC's Research, Development, and Performance Management Department will begin to analyze the data and

create a report for management on the common measures. In the interim, MRC is continuing to track progress on the prior Standards and Indicators until a full year's worth of Common Performance Measures data is available.

## C. other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

The Massachusetts Rehabilitation Commission has an active and productive State Rehabilitation Council (SRC). SRC members through their area consumer advisory councils, SRC subcommittees, task forces, quarterly meetings, and other consumer meetings and trainings, have conducted surveys and needs assessments that have provided input to more effectively address the needs of individuals with the most significant disabilities. The agency and the SRC used the results of their review of consumer satisfaction studies and reports of the effectiveness of the VR program and the agency's performance on the former RSA Standards and Indicators in their development of the goals and priorities.

Additionally, finding and recommendations from RSA monitoring activities conducted under section 107 is also incorporated in MRC's goals.

### 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.

MRC is not currently under an order of selection, so this is not applicable at this point in time. MRC has developed a planning process to forecast out the need for order of selection based on the amount of resources available and the number of new and active consumers. MRC's leadership team is in the process of developing a future OOS policy based on funding allotments, inflation, and the projected provision of consumer services.

**B.** The justification for the order.

MRC is not operating under an order of selection at this time.

C. The service and outcome goals.

MRC is not operating under an order of selection at this time.

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

MRC is not operating under an order of selection at this time.

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

MRC is not operating under an order of selection at this time.

## 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.

MRC is not operating under an order of selection at this time.

### 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.

MRC will be utilizing Title I funds and Title VI B funds to provide Supported Employment services. MRC has developed a contingency plan to use Title I funds to provide Supported Employment Services if Title VI B are not appropriated in the federal budget. MRC's supported employment services are provided under the notation that rates, fees, and expenditures are subject to applicable Commonwealth of Massachusetts statutory, regulatory, and related requirements governing purchases of services and goods. Such parameters of the Commonwealth of Massachusetts govern. Further, all providers of supported employment services need to qualify through the Commonwealth of Massachusetts' interagency contractual process. The Commission and the Commonwealth utilizes procurement methods, which, to the maximum extent possible, facilitate the provision of services, and affords individuals meaningful choices among the entities (providers) that provide the services.

MRC establishes consumer need for this service on a fiscal year basis and then funds Supported Employment services for those consumers in that specific geographic location. In FY'18 MRC projects to provide Supported Employment Services to 450 consumers across the state. MRC will prioritize Supported Employment services to consumers with Mental Health needs, Developmental Disabilities, Traumatic Brain Injuries, Autism, and severe learning disabilities

## 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

MRC will reserve and use 50% of Title VI B funds as represented by the Supported Employment-B award to provide supported employment services to youth based on their needs and services outlined in their individualized plan for employment. Services will be provided to assist youths with the most significant disabilities in choosing, obtaining, and maintaining competitive employment based on their interest, abilities, and skills.

These funds will also be used to provide extended services to up to 4 years for youths with the most significant disabilities to assist them in maintaining and advancing in competitive employment. As a contingency plan if Title VI B Supported Employment funds are not appropriated, MRC will also use Title I funds and State funding to provide supported employment services to youths with disabilities based on their needs.

## 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.

The Massachusetts Rehabilitation Commission works with other human service agencies to identify and secure funding and comparable benefits for extended supports for individuals in supported employment, including youth with the most significant disabilities. Funding for extended services is available from several sources contingent upon the consumer's disability, eligibility and the resources available to each state agency. This service delivery system is currently in place enabling state agencies to cost share the appropriate services needed for consumers to choose, find and maintain meaningful competitive supported employment. With the implementation of this initiative we have seen an increase in the availability of resources for extended services. However, the available funding is administered at local levels and each situation handled individually. Sources include:

Massachusetts Rehabilitation Commission (State Revenue), Department of Developmental Services, Department of Mental Health, MRC Statewide Head Injury Program, Massachusetts Commission for the Deaf and Hard of Hearing, Social Security Administration Work Incentives, as well as Private Sector Natural Supports and other comparable benefits.

The Massachusetts Rehabilitation Commission continues to promote the collaboration with stakeholders regarding supported employment services and extended services. This is also evidenced in the number of joint funded programs that have developed. Some examples of these collaborative programs are joint funding of services for individuals with intellectual disabilities between the MRC and the Developmental Disability Services (DDS); for individuals who are psychiatrically disabled between MRC and the Department of Mental Health (DMH); for individuals who have traumatic brain injuries between the Statewide Head Injury Program (SHIP) of the Massachusetts Rehabilitation Commission; and the Massachusetts Commission for the Blind.

### 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.

The Massachusetts Rehabilitation Commission, in cooperation with the State Rehabilitation Council (SRC), conducted a needs assessment (CSNA) during fiscal year 2017 to survey the rehabilitation needs of individuals with disabilities residing within the state. Strategies of the Vocational Rehabilitation and Supported Employment programs are established consistent with the needs and trends to achieve its goals and priorities, support innovation and expansion activities. These strategies are designed to overcome any barriers to accessing the VR and the Supported Employment programs, and also promoting the abilities of people with disabilities to reduce stigmas. Strategies are developed with consultation of the SRC and other stakeholders.

Some strategies developed through this process, as described in the sections below, include development and refinement of MRC's pre-employment transition service (Pre-ETS) contract programs, the development of a new employment model with the Department of Mental Health

to assist consumers with mental health needs to obtain employment. This new model is designed to rapidly engage individuals in the Vocational Rehabilitation process, a pilot project with the Department of Transitional Assistance to use the concepts of the Individualized Placement and Support (IPS) model to engage and employ individuals with disabilities receiving TANF benefits, among other strategies MRC has also been awarded a 5 year, \$5 million demonstration grant on work-based learning experiences by RSA for students with disabilities entitled Transition Pathway Services which will be used to identify and evaluate best practices for improving services to students across the Commonwealth of Massachusetts. Additional details on these and other strategies can be found in the following sections.

### 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.

MRC provides an array of assistive technology services and devices to individuals with disabilities through all parts of the VR program and with partners.

The Massachusetts Rehabilitation Commission is the state operator of the programs funded under Section 4 of the Assistive Technology Act. These include MassMatch, a program that provides comprehensive information about the availability and funding of assistive technology, the Assistive Technology Program, and the Assistive Technology Loan Program that provides lowinterest loans to consumers when other resources are not available to purchase needed adaptive technology.

#### MRC participates in the REquipment program in collaboration with the Department of Developmental Services. REquipment is a durable medical equipment (DME) re-use program offering free refurbished wheelchairs, scooters, shower chairs and more to adults, children and elders living across Massachusetts. This assistive technology service helps people with disabilities in addressing needs in this area to assist them in meet their employment goals and live independently in the community.

Another program is the Easter Seals Program of Adaptive Assistance. For the purposes of this program adaptive assistance is defined to be devices, aids, and enhancements for the elimination of barriers encountered by individuals with disabilities, primarily individuals with the most significant disabilities. Adaptive assistance is defined as services that either:

1) supplement or enhance functions of the individual or

2) that impact on the environment through environmental changes, e.g., workshop modifications. Rehabilitation technology specialists may prescribe both types of rehabilitation technology services in order to create and/or maximize employment opportunities for the individual with a disability. The rehabilitation technology services are provided to lead to and/or expand vocational rehabilitation and employment opportunities.

MRC also provides vehicle modification and home modification services to Vocational Rehabilitation consumers with disabilities. These services are available to MRC consumers who need these services in their Individualized Plans for Employment. MRC also works with employers to help facilitate accommodations and to facilitate the provision of on-the-job assistive technology devices to individuals with disabilities employed through the MRC Vocational Rehabilitation program.

Persons served under MRC's Assistive Technology programs described above are applicants or consumers of the Massachusetts Rehabilitation Commission Vocational Rehabilitation Program. Target population is individuals with the most significant disabilities for whom rehabilitation technology services are being considered as potentially eliminating barriers to vocational rehabilitation and/or enhancing vocational rehabilitation and employment opportunities. These services are available statewide.

Population includes:

1. Applicants undergoing evaluation of vocational rehabilitation potential, especially when the disabling condition of the individual is of such a nature and severity that rehabilitation technology services could result in a determination of ineligibility

2. Eligible vocational rehabilitation consumers for whom rehabilitation technology is being considered to assist the consumer to attain intermediate objectives and long—range rehabilitation goals

3. Eligible employed individuals to eliminate barriers to and/or enhance capacities for successful job performance.

Adaptive assistance evaluations, training, and consultations for individuals with disabilities served by the vocational rehabilitation program were:

1. Assessments of functional capacities of individuals with disabilities to include determinations of if and how the provision of rehabilitation technology services is likely to affect the capacity of the individual to perform successfully in competitive employment and/or enhance opportunities for the development of capacities for competitive employment;

2. Recommendations of specific rehabilitation technology for individuals with disabilities to include descriptions of related barriers to be eliminated and descriptions of functional capacities to be attained;

3. Rehabilitation technology training to affect the capacity of the individual with a disability to utilize specific assistive technology devices (equipment, or product system that is used to increase, maintain, or improve functional capabilities of individuals with disabilities) and thus perform successfully in competitive employment and/or enhance opportunities for the development of capacities for competitive employment; and

4. Consultations to be provided to Commission staff to address the elimination of disability—related barriers, improvement of opportunities for competitive employment, and the development of functional capacities of individuals.

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.

MRC has made a commitment to outreach to individuals with the most significant disabilities who are also ethnic and cultural minorities, especially to Asian communities who have been identified as undeserved, by hiring bilingual staff to more effectively reach those communities and by the expectation that directors from local area offices are involved in outreach to local community agencies and organizations, especially those that serve ethnic and culturally minorities.

MRC also has an ongoing statewide Bilingual/Bicultural vocational rehabilitation counselor group who meet on a regular basis to: discuss and share resources on how to outreach to and serve cultural and ethnic minorities, develop new or translate existing agency forms and brochures, and develop and conduct, in collaboration with the Commission's staff development unit, training programs for local and district offices. These 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 continue to track long term trends and have discuss plans to build additional bi-lingual caseloads as appropriate

MRC has translated key forms and informational materials into Spanish, Portuguese, Russian, French Creole, Khmer, Vietnamese, and Mandarin Chinese as outlined in MRC's Language Access Plan. MRC has also translated all correspondence letters in its electronic case management system into Asian languages which are spoken by MRC staff include: Cantonese and Mandarin Chinese, Khmer and Vietnamese. A foreign language translation service MRC will also be conducting focus groups in two of its offices with higher concentrations of Asian consumers to gather further information on how MRC can better address the needs of this underserved population. MRC will also consult its Bilingual Committee and Diversity Committee as part of these efforts and also to develop appropriate training programs for staff. MRC will also continue to explore with the SRC unserved/underserved committee ways of expanding MRC's efforts in this area.

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

# 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).

Based on the findings of the Comprehensive Statewide Needs Assessment, MRC continues to implement strategies to address the needs of students with disabilities, including pre-employment transition services, through many efforts, including a multi-million dollar procurement to provide Pre-ETS services. MRC has revised its policies and is enhancing its case management system to allow for the provision of Pre-Employment Transition Services to potentially eligible consumers. For eligible consumers, specific services are addressed in consumers' individualized plan for employment based on their interests, choice, and needs. MRC continues its efforts to closely coordinate transition services and pre-employment transition services with local educational agencies.

Through its MOU with the Department of Elementary and Secondary Education (DESE), MRC has established a working group to identify needs and best practices to improve and expand services for students with disabilities, including pre-employment transition services. MRC is amending its MOU with DESE to further coordinate service efforts and DESE has produced guidance for local school districts on working with MRC to coordinate transition services. This is incorporated as part of MRC's strategic planning process

MRC has also hired a Transition Manager to oversee transition, coordination with educational authorities, and implementation of strategies to improve and expand services to students with disabilities. MRC has also been awarded a 5 year, \$5 million demonstration grant on work-based learning experiences by RSA for students with disabilities entitled Transition Pathway Services which will be used to identify and evaluate best practices for improving services to students across the Commonwealth of Massachusetts.

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

Over the past several years, MRC and community rehabilitation providers have worked in partnership to develop and operate a variety of programs and services to assist individuals with disabilities to achieve suitable employment outcomes. These programs include: Vocational Services; Competitive Integrated Employment Services (CIES), a new Pre-Employment Transition Services procurement, MRC's Transition Pathway Services grant program, the Kessler Foundation Career Pathway Services grant, and many other support services that are essential in vocational rehabilitation.

In addition, MRC and DMH are developing an employment initiative with state funding to assist consumers with mental health needs to obtain employment. MRC will develop a new employment model based on the Progressive Employment Model to assist consumers in obtaining employment using this new model. This new model is designed to rapidly engage individuals in the Vocational Rehabilitation process and will involve CRPs.

MRC and community providers collaborate in developing programs and services in such forums as: Statewide Rehabilitation Council that meets quarterly; quarterly meetings with representatives of the Executive Committee of the Massachusetts Council of Human Service Providers; periodic district wide meetings with community rehabilitation programs, interagency and cross disability agency councils; task specific work teams, the Massachusetts Association of People Supporting Employment First (MAAPSE), the Massachusetts Rehabilitation Association (MRA), and other provider trade groups across the Commonwealth. In addition, MRC District Contract Supervisors also conduct quarterly on-site review meetings to assess performance and provide feedback to assist CRPs providing services for MRC.

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

MRC has established an electronic reporting and performance measurement system to monitor, analyze, and report on the effectiveness and efficiency of the programs. This system will allow the agency to make improvements to ensure performance on the WIOA common performance measures. MRC continues to establish baseline data on these measures and just began reporting data to RSA in the fall of 2017. MRC has also developed a training on the Common Performance

Measures which has been delivered to MRC managers, staff, and the SRC. MRC also participates in a cross-agency workgroup with workforce partners on performance measurement under the Common Measures.

MRC is developing strategies designed to improve MRC's performance on the WIOA Common Performance Measures. MRC will conduct a focus group on development of strategies to promote the placement of consumers into high quality careers with higher wages and benefits. MRC will also be developing training strategies for staff and its provider network to focus on high quality employment outcomes and seek ways to increase the median wage by focusing on more full-time jobs rather than part-time jobs. As part of this effort, MRC will be providing benefits planning on the front end of the placement process to ensure consumers understand work benefits that are available for them to obtain high paying and self-sustainable employment.

MRC is also conducting ongoing training on the Common Performance Measures with counselors, managers, supervisors, the SRC, and providers to ensure team-orientated outcomes that will improve performance on the Common Performance Measures. MRC will also develop internal performance reports to track performance on the caseload, office, district, and statewide level to assist in these efforts using data from its Case Management System.

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

As a key partner in the statewide Workforce Investment system, MRC will continue to strengthen the alignment of the VR program with the other core programs of the workforce development system. MRC subscribes to the overall vision for the Massachusetts Workforce Investment system as described below.

All Massachusetts residents, including individuals with disabilities, will benefit from a seamless system of education and workforce services that supports career pathways for individuals and leads to a more informed, educated, and skilled workforce, which meets the Commonwealth's businesses' demands and sustains a thriving economy. To achieve this vision, Massachusetts will engage businesses to understand their needs and develop an integrated education and workforce system that supports career pathways to prepare residents with foundation, technical, professional skills and information and connections to postsecondary education and training. MRC will work with its core workforce partners to:

1. Design career pathways across partners aligned with business demand

2. Improve foundation skills and transition to postsecondary education and training for individuals with barriers to employment

3. Assist individuals to achieve economic self—sufficiency through support services, labor—market driven credentialing, and employment

4. Meet the needs of job seekers and businesses who engage in the public workforce system (including partner programs)

As part of implementing strategies to meet this common vision, MRC is collaborating with other core partners in the workforce investment system to reduce unemployment of individuals with disabilities, to provide effective services to employers throughout the state, and to seek out

collaborative opportunities including possible projects and grants that may assist individuals with disabilities across Massachusetts in obtaining competitive employment.

MRC continues its efforts to work closely together with other partners in the workforce development system, including assessment of performance, and developing methods to track shared consumers across the workforce system, among others. MRC participates in numerous workgroups such as the WIOA Steering Committee, WIOA Systems Integration Workgroup, and other committees who are working on the alignment of services under the workforce system, and to improve services, including those to individuals with disabilities.

MRC is working on aligning its services and increasing its presence at the career centers as MRC is a required partner in the Career Center network. The MRC Commissioner serves on the State Workforce Investment Board (SWIB), and each area director has a formal relationship with at least one career center. In addition, area directors or other MRC staff are on local workforce investment boards. MRC has counselors assigned to each career center who are scheduling hours at the local career centers to provide an array of vocational rehabilitation services. MRC will be leasing space at all career centers to further increase MRC's presence. MRC has finalized its MOUs and infrastructure and shared cost funding agreements with local areas and the Career Centers. MRC's assigned counselors and job placement staff continue to work closely with local career centers to provide high quality vocational rehabilitation services to persons with disabilities seeking expanded employment opportunities and to make the career centers more responsive to the needs of individuals with disabilities including providing disability sensitivity training for career center staff, and ensuring the career centers are accessible to all job seekers.

### 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 Massachusetts Rehabilitation Commission, in cooperation with the State Rehabilitation Council (SRC), conducted a needs assessment during fiscal year 2017 to survey the rehabilitation needs of individuals with disabilities residing within the state. The strategies of the Vocational Rehabilitation and Supported Employment programs are established by the Senior Leadership Team, consistent with the needs and trends identified in the needs assessment, in order to achieve its goals and priorities, and support innovation and expansion activities. These strategies are designed to overcome any barriers to accessing the VR and the Supported Employment programs. MRC will utilize the following strategies to achieve each of its stated goals and priorities, consistent with the comprehensive needs assessment.

1. MRC will provide outreach activities to identify and serve individuals with the most significant disabilities which includes staff outreach to community and state agencies, schools, other public institutions, and the general public by contact and presentation by MRC local office, district and administrative staff, printed brochures, and consumer meetings and trainings.

2. The MRC Supported Employment Program provides Supported Employment Services to consumers through its Statewide Employment Services office as well as through its local Area Offices', working with community rehabilitation providers, links with the local school system for transitioning youth and other state agencies such as the Department of Developmental Services and the Department of Mental Health especially through its clubhouse programs.

3. MRC provides an array of assistive technology services and devices to individuals with disabilities through the VR program and with partners. The Massachusetts Rehabilitation Commission is the state operator of the programs funded under Section 4 of the Assistive Technology Act. These include MassMatch, a program that provides comprehensive information about the availability and funding of assistive technology, the Assistive Technology Program, and the Assistive Technology Loan Program that provides low-interest loans to consumers when other resources are not available to purchase needed adaptive technology. MRC has identified 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 has described how assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process; and has described how assistive technology services and devices will be provided to individuals with disabilities.

4. MRC Research and Development Department staff also conducts training with agency managers from the VR and Supported Employment Programs at agency management conferences and at district and local area offices with unit supervisors on the Common Performance Measures and overall agency performance, what they mean, how they are derived from agency statistics and how they impact agency performance. The Research and Development department also presents on Common Performance Measures and Needs Assessment results to new counseling staff as part of their initial training. The Commission also provides automated reports on line for managers for use to educate staff and develop strategies for correcting performance in these areas.

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

The Massachusetts Rehabilitation Commission reserves and uses a portion of the funds allotted to the Commission under section 110 of the Act for the development and implementation of innovative approaches to expand and improve the provision of vocational rehabilitation services to individuals with disabilities under this State Plan, particularly individuals with the most significant disabilities. Consistent with the findings of the Comprehensive Statewide Needs Assessment and goals and priorities identified in conjunction with the State Rehabilitation Council, the Commission uses funds to support innovation and expansion activities to address the needs of individuals with disabilities, primarily individuals with the most significant disabilities. Activities include:

1. On-The-Job Trainings and Job-Driven Trainings with Employer Partners: MRC continues to expand Job-Driven Trainings (JDT) and on-the-job (OJT) training and evaluations. MRC has found that many consumers who participate in an OJT or Job-Driven training obtain employment with the OJT or JDT and others are able to obtain employment elsewhere as a result of their participation in the OJT or JDT through which they gained a recent work experience and/or developed job-specific skills. MRC has created job driven training programs to date with the Home Depot, CVS Health, Advance Auto Parts for Sales and Driver positions; Enterprise for Service Agent, Driver, and Lot Attendant, Lowes, G4S Security Solutions, the Kraft Group, MAPFRE Insurance, and Allied Barton Security Services. In addition, MRC held a job-driven training for human service jobs

2. MRC - Department of Transitional Assistance Individual Placement and Support Pilot Project: MRC and the Department of Transitional Assistance are developing a pilot project known as Individual Placement and Support designed to increase employment outcomes for individuals with disabilities receiving TANF benefits. This project will be funded by DTA using state resources in collaboration with MRC. This project will be using a model focused on systematic job development using a rapid job search approach utilizing a team approach between MRC and DTA staff, in collaboration with employers and providers,to ensure effective and efficient consumer-focused delivery of services by braiding and blending MRC Services with DTA Services and other comparable and wrap around services

3. DMH Pilot Project and Employment Initiative: MRC and the Department of Mental Health are collaborating on a pilot project for shared consumers in 3 areas designed to develop and/or enhance service delivery strategies and services through a collaborative team model approach to improve the time it takes a consumer to move from program eligibility to receiving services; rapidly moving consumers into successful employment opportunities based on their abilities, skills, and interests. Competitive employment for participants is the objective in which consumers are matched to opportunities in demand in the local job market. The teams will track both qualitative and quantitative results through this document to measure the effectiveness and the development of this model over time.

In addition, as part of this effort, MRC and DMH are developing a new employment initiative to be supplemented with additional state funds from DMH to assist consumers with mental health needs to obtain employment. This project will use a new employment model based on the Vermont Progressive Employment Model to assist consumers in obtaining employment using a rapid engagement process.

4. Transition Pathway Services Demonstration Grant Project: MRC has been awarded a 5 year demonstration grant from the Rehabilitation Services Administration (RSA) known as the Transition Pathway Services Grant. This project will evaluate best practices for provision of work-based learning experiences to students with disabilities through a coordinated model of services provided by community partners including MRC, career centers, independent living centers, pre-employment transition vendors and local educational authorities to increase employment and/or post-secondary education opportunity for students with disabilities based on their abilities, skills, needs and employment opportunities in the local economy

5. Kessler Foundation Career Pathway Services Employment Grant: MRC was awarded a two year grant from the Kessler Foundation to determine what the best practices are in assisting individuals in physical and mental restoration to obtain employment and reduce their reliance on public benefits. Known as Career Pathway Services, this project will utilize a client-centered, customized service model providing comprehensive benefits planning services, customized client-centered employment planning, peer supports from Independent Living Centers, and job matching tools

6. IT web-based MRCIS system enhancements to track provision of Pre-ETS services to potentially eligible consumers, to enhance tracking and reporting on internal job placement services, and to develop MRCIS into a paperless system using Electronic Data Management

7. Transportation: MRC is working diligently to address transportation barriers faced by its consumers. MRC has updated transportation resource fact sheets on its website and makes them available to consumers at its Area Office. MRC has also hired a transportation coordinator through its Transition Pathway Services (TPS) grant and MRC will document lessons learned and best practices at the end of the grant period. MRC also works with the Executive Office of Health and Human Service Transportation office on transportation for consumers and operates an

innovative car donation program to assist individuals in accessing worksites. MRC will continue to work with transportation agencies to explore other creative transportation options for consumers.

8. Employment of Individuals with Disabilities in State Jobs: MRC places numerous individuals with disabilities into state government jobs each year, including at MRC. MRC has a diverse workforce with a high percentage of individuals with disabilities in the workforce. We have a key contact with the state's Human Resources Division to facilitate employment for consumers in state jobs.

9. Research Best Practices Models to Increase Employment of Individuals with Disabilities: Based on public comments regarding innovative employment programs, MRC will research best practice models designed to increase the employment rate of individuals with disabilities in Massachusetts. MRC will find out more about the suggested models including: the practices of North Dakota, South Dakota, Alaska, and Wyoming, which have achieved increased results of 50% employment rates of individuals with disabilities; Innovative youth employment models from Georgia, Nevada, Kentucky; and the RespectAbility Disability Employment First Planning Tool, among others. MRC staff are also reviewing and researching the Vermont Progressive Employment model as part of MRC's efforts to develop a new innovative initiative with the Department of Mental Health using state funding as described above. MRC has reviewed Project Search and has a similar program in place meeting similar goals through its Community Rehabilitation Provider network. Based on the results of this program, approximately 80% of individuals placed retain employment, and 84% of the individuals participating in the program are satisfied with services based on MRC's Consumer Satisfaction Survey

10. CareerAccess Initiative: MRC will closely follow the CareerAccess initiative. CareerAccess is a community—driven proposed program to reform the current Social Security Administration's Supplemental Security Income Program (SSI) rules so that young adults with disabilities can work and achieve their full potential without risking losing their disability benefits. If the proposal is adopted by the Social Security Administration, MRC will help its consumers take full advantage of the program as part of their individual plans for employment.

11. Summer Work Based Learning Experiences for Students with Disabilities

12. Apprenticeships: MRC will utilize available apprenticeship resources, including the ODEP guide to expand apprenticeship, to provide apprenticeship opportunities for individuals with disabilities across the Commonwealth. As an example, MRC participates in the Merit Apprenticeship Program. Additionally, MRC has obtained a copy of the ODEP guide on apprenticeships. MRC will also work with the Career Centers on providing apprenticeship opportunities for consumers. MRC has leased space at the career centers and has staff dedicated to the career centers to make available the range of career services from Career Centers for MRC consumers.

## 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.

MRC strategies to overcome barriers relating to access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program include the following:

1. Outreach activities to identify and serve individuals with the most significant disabilities. Commission activities include outreach to community and state agencies, schools, other public institutions, and the general public by contact and presentation by MRC local office, district and administrative staff, printed brochures and agency consumer conferences.

2. The MRC Supported Employment Program provides Supported Employment Services to consumers through both its Statewide Employment Services office and its local Area Offices. Services are coordinated by MRC counselors using a network of community rehabilitation providers, links with the local school system for transitioning youth and other state agencies such as the Department of Developmental Services and the Department of Mental Health especially through its clubhouse programs.

3. MRC has an ongoing statewide Bilingual/Bicultural vocational rehabilitation counselor group who meet on a regular basis to: discuss and share resources on how to outreach to and serve cultural and ethnic minorities, develop new or translate existing agency forms and brochures, and develop and conduct, in collaboration with the Commission's staff development unit, training programs for local and district offices. MRC has twelve VR counselors skilled in American Sign Language (ASL) and are qualified to work with consumers who are deaf or hard of hearing; thirty are fluent in Spanish and work with Hispanic consumers; four are able to communicate in Cantonese; two in Vietnamese, three are fluent in Portuguese; three are fluent in Khmer, three are fluent in French/Haitian Creole, and one counselor is fluent in Hindi and Tamil. A smaller number of area directors, head clerks and other clerical staff are fluent in American Sign Language, Spanish, Khmer, Cantonese, Mandarin, Haitian Creole, or Portuguese. Eleven fulland part-time sign language interpreters are also on staff. The Commission also maintains a statewide contract with the Massachusetts Commission for the Deaf and Hard of Hearing to secure additional ASL interpreters and CART reporters, as needed. Staff with specific language skills and interpreters is geographically placed so as to coincide with population and other demographics relating to target consumer groups

4. MRC has translated key forms and informational materials into Spanish, Portuguese, Russian, French Creole, Khmer, Vietnamese, and Mandarin Chinese as outlined in MRC's Language Access Plan. MRC recently completed a project to translate all correspondence letters in its electronic case management system into Asian languages which are spoken by MRC staff including Cantonese and Mandarin Chinese, Khmer and Vietnamese. MRC will also be conducting focus groups in two of its offices with higher concentrations of Asian consumers to gather further information on how MRC can better address the needs of this underserved population. MRC will also consult its Bilingual Committee and Diversity Committee as part of these efforts and also to develop appropriate training programs for staff.

5. MRC is working to ensure equitable access to services for consumers with Autism. MRC will work with our training department to provide training to staff on the needs of individuals with autism, including competency to address behavioral, communication (including AAC), sensory, social, and generalization needs. This will assist MRC staff in developing the capacity to address behavioral, communication (including AAC), sensory, social, and generalization needs for consumers. MRC is also working with the Asperger/Autism Network to provide services to individuals on the Autism spectrum to ensure equitable access.

## 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.

The Massachusetts Rehabilitation Commission developed the following goals and priorities for the Vocational Rehabilitation and Supported Employment Programs for the previous Program Year as submitted in the approved VR services portion of the Massachusetts PY2016-PY2020 Combined State Plan. These goals were identified based on the Comprehensive Statewide Needs Assessment conducted in collaboration with the Statewide Rehabilitation Council (SRC) to survey the rehabilitation needs of individuals with disabilities. Additionally, these goals are based upon agency performance on the former RSA Standards and Indicators, recommendations and input from the SRC, and input from MRC Senior Management. MRC will review progress on these goals on a regular basis with senior management. This is a report on progress on these goals based on PY2016 (FY2017) outcomes.

MRC's strategies are to work with the senior management team to evaluate and assess progress towards the achievement of these goals, to identify lessons learned, and any corrective actions. Progress towards goals is distributed to local managers, supervisors, and counseling staff.

Progress on Goals 1 through 6: (Common Performance Measures) As the VR program only began reporting data for the common measures as of July 1, 2017, MRC will not have any substantial data on the common measures to evaluate performance against goals 1 to 6 until after the completion of Program Year 2017 (July 1, 2017 to June 30, 2018). Once a full year's worth of data becomes available, MRC's Research, Development, and Performance Management Department will begin to analyze the data and create a report for management on the common measures.

Goal 7: Maximize Successful Employment Outcomes for 90 Days or Greater to exceed last year's Program Year Outcome Measurement: Total Sum of Successful Employment Outcomes for MRC Consumers for the Current Program Year (Status 26 Closures) Target: 3,790 Data Source: Status 26 Closure Data from MRCIS Case Management System, Monthly Standards and Indicators Tracking Report Frequency: Monthly, Annually

Evaluation of Progress: Consumers Obtaining Successful Employment Outcomes in PY2016 (FY2017): Goal: 3,790. Actual: 3,973 Variance: +203

MRC successfully achieved its goal for the most recent program year (PY2016) as 3,973 consumers achieved successful employment outcomes of 90 days or greater, exceeding the target in the state plan by 203.

Goal 8: Maximize the number of Consumers Exiting the MRC VR Program whose Primary Source of Economic Support is from their own Employment Earnings Measurement: Proportion of Individuals Successfully Closed in Status 26 in the current fiscal year with a RSA—911 Employment Status Code of Competitive Employment in MRCIS with hourly wages at or above minimum wage (the higher of either State or Federal Minimum Wage, currently is \$10.00 in Massachusetts) whose Primary Source of Support at Closure is Personal Income (Code 1) minus the proportion of those consumers whose primary source of support at application was personal income (Code 1). Target: At or above 53% Data Source: MRCIS Case Management System, Monthly Standards and Indicators Tracking Report Frequency: Monthly, Annually

Evaluation of Progress: PY2016 (FY2017): Target: 53% Actual: 61.17% Variance: +8.17%

MRC successfully achieved its goal for the most recent program year (PY2016) as MRC saw a 61.17% increase in consumers exiting MRC's vocational rehabilitation program with successful employment outcomes with personal incomes as their primary source of financial support compared to their primary source of financial support at the time of entry into the VR program.

Goal 9: Maximize the Number and Percentage of youth consumers served by MRC completing education and training programs, including post—secondary education. Measurement: Number and Percent of Youth Age 14 to 24 Completing Education and Training Programs. Measured by the flow of Youth Consumers moving from Status 18 Training and Education into Status 20 Job Ready or Status 22 Job Placement during the month/fiscal year divided by the total number of youth consumers served in Status 18 Training and Education during the month/fiscal year Target: At or above 120 or 2% of youth consumers per month completing training or education, annual total of 1,440 or 14%. Data Source: Data from MRCIS Case Management System Frequency: Monthly, Annually

Evaluation of Progress: Consumers of Transition Age Completing Education and Training Programs PY2016 (FY2017): Goal: 1,440/12% Actual: 1,393/14%

In PY2016, MRC was close to its target for the number and met its target for percent of consumers of transition age (14 to 24 going forward) completing training and education programs. Serving transition-age consumers effectively is a priority of MRC.

Goal 10: Maximize the Number and Percentage of high school students receiving preemployment transition services from MRC. Measurement: Number of High School Student Consumers Served by MRC receiving Pre—Employment Transition Services (Pre-ETS) Target: 1,250 Data Source: Data from MRCIS Case Management System Frequency: Monthly, Annually

Evaluation of Progress: Students Receiving Pre-Employment Transition Services from MRC: PY2016 (FY2017): Goal: 1,250 Actual: 5,221

In PY2016, MRC successfully exceeded its target for students receiving Pre-Employment Transition Services from MRC by a wide margin.

Goal 11: Maximizing the Number of Successful Competitive Employment outcomes and the percent of Placements leading to Successful Employment Outcomes through MRC's Competitive Integrated Employment Services (CIES) programs in partnership with Community Rehabilitation Providers Measurement: Total Number of 90 Day Successful Employment Outcomes from CIES Program; Total Number of CIES Successful Employment Outcomes divided by the total number of 30 Day Placements for the CIES Program. Target: Exceed 850 Successful Employment Outcomes for CIES for the fiscal year and greater than 75% of CIES placements result in successful employment outcomes Data Source: MRC CIES Quarterly Cumulative Utilization Report and Analysis Report Frequency: Quarterly, Annually

Evaluation of Progress: Competitive Employment Outcomes through MRC's Competitive Integrated Employment Services Program (CIES) PY2016 (FY2017)

of CIES Successful Employment Outcomes Goal: 850 Actual: 928 Variance: +78

% of CIES Placements Leading to Successful Employment Outcomes: Goal: 75% Actual: 84% Variance: +9%

Through its Competitive Integrated Employment Services (CIES) program in partnership with Community Rehabilitation Providers, MRC achieved both state plan targets under this goal in PY2016 by achieving 928 Successful Employment Outcomes through CIES, exceeding the goal by 78, and achieving a 84% rate of successful employment outcomes for consumers placed through CIES.

Goal 12: Continue to Increase Employment Outcomes through MRC's Employment Service Specialists, Employer Account Management System, and Annual Statewide Hiring Event. Measurement: Total Number of Successful Employment Outcomes achieved through the involvement of a MRC Employment Service Specialist in the current fiscal year, Total Number of Successful Employment Outcomes (Status 26 closures) with Employers participating in MRC's Account Management System in the current fiscal year, Total number of Successful Employment Outcomes (Status 26 Closures) from Consumers Participating in MRC's annual Statewide Hiring Event in the current fiscal year. Target: Exceed 300 Successful Employment Outcomes for Employment Service Specialists, exceed 65 Successful Employment Outcomes for Consumers Participating in the Statewide Hiring Event. Data Source: MRCIS Case Management System, MRCIS Job Placement Module Frequency: Annually

Evaluation of Progress: PY2016 (FY2017) Competitive Employment Outcomes through MRC's Employer Engagement Efforts (Employment Service Specialists, Annual Hiring Event)

ESS Outcomes: Goal: 300 Actual: 577

Hiring Event Outcomes: Goal: 60 Actual: 81

MRC continues to focus on reaching out to employers and develop partnerships designed to lead to competitive employment outcomes for individuals with disabilities. This is tied into the emphasis of employer engagement under WIOA. MRC's Employment Service Specialists in coordination with the Job Placement Specialists continue to outreach to employers especially to those in high growth industries, including employer accounts.

MRC operated its 5th Annual Statewide Hiring Event in 2017 in partnership with the US Office of Contract Compliance Program (OFCCP) with Federal Contractors, leading to 81 placements and 47 Successful employment outcomes to date.

Goal 13: Continue to provide consumers with an avenue to access employment and training opportunities through participation in the Donated Vehicle Program in partnership with Good News Garage, Measurement: Number of Consumers Participating in the Donated Vehicle Program who obtain a successful employment outcome or who enter training and education (Status 18) divided by the number of consumers participating in the Donated Vehicle Program during the current fiscal year. Target: Greater than 80% of Consumers participating in the Donated Vehicle Program during the current fiscal year result in successful employment

outcomes or enrollment in training or education (Status 18) Data Source: MRCIS Frequency: Quarterly, Annually

Evaluation of Progress: Competitive Employmeutcomes and/or Enrollment in Training and Education as a result of MRC's Donated Vehicle Program, PY2016 (FY2017)

Goal: 80% Actual; 100%

In PY2016, MRC met its state plan targets under this goal as 100% of consumers participating in MRC's Donated Vehicle Program respectively achieved a successful employment outcomes or enrolled in training and education programs, exceeding the goal of 80% by 20%.

Goal 14: Maximize recruitment of Qualified Vocational Rehabilitation Counselors to address attrition from retirement through utilizing paid internships with Vocational Rehabilitation Counseling Graduate students. Measurement: Total number of internships provided to VR graduate students during the fiscal year, total number of former interns hired as VR counselors during the fiscal year. Target: Provide 10 or more internships annually, leading to 3 or more interns hired as QVRCs upon completion of their internship and degree program. Data Source: Intern Tracking Reports, Human Resource Data from Staffing Reports Frequency: Annually

Annual Evaluation of Progress: Workforce Recruitment through Paid Internships for VR Counseling Graduate Students PY2016 (FY2017): 10 internships provided, 6 hired

Goal 15: Provide Quality Vocational Rehabilitation Services leading to increased successful employment outcomes to individuals with Autism. Measurement: Number of successful employment outcomes as defined by Status 26 closures for MRC consumers with a Primary and/or Secondary RSA Disability Cause Code of 08. Target: Equal or greater to 100 Data Source: MRCIS Case Management System Frequency: Quarterly, Annually

Evaluation of Progress: Competitive Employment Outcomes for Individuals with Autism PY2016 (FY2017): Goal: 100 Actual: 234 Variance +134

In PY2016 MRC met its goal for Successful Employment Outcomes for consumers identified in the MRCIS Case Management System as having Autism as a primary or secondary disability by achieving 234 employment outcomes for these consumers, exceeding the goal by 134.

Goal 16: Outreach to the Asian community through translation of key MRC documents and materials into Khmer, Vietnamese, and Mandarin Chinese as outlined in MRC's Language Access Plan. Measurement: Completion of translation of key materials into Khmer, Vietnamese, and Mandarin Chinese Target: Completion of MRCIS Letter Translation into Khmer.

Evaluation of Progress: MRC has completed a project to translate all consumer correspondence letters from the MRCIS web-based case management system into seven commonly used foreign languages in Massachusetts, including Khmer, Vietnamese, and Traditional Chinese (Mandarin). This will help to enhance services and accessibility to consumers in the Asian community. The letters have been posted to MRC's intranet for counselors to use and have been directly incorporated into MRCIS.

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graduate students during the fiscal year, total number of former interns hired as VR counselors during the fiscal year. Target: Provide 10 or more internships annually, leading to 3 or more interns hired as QVRCs upon completion of their internship and degree program. Data Source: Intern Tracking Reports, Human Resource Data from Staffing Reports Frequency: Annually

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Evaluation of Progress: MRC has completed a project to translate all consumer correspondence letters from the MRCIS web-based case management system into seven commonly used foreign languages in Massachusetts, including Khmer, Vietnamese, and Traditional Chinese (Mandarin). This will help to enhance services and accessibility to consumers in the Asian community. The letters have been posted to MRC's intranet for counselors to use and have been directly incorporated into MRCIS.

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

The following is an evaluation of the extent to which the MRC program goals described in the previously approved VR services portion of the Unified State Plan for the most recently completed program year, were not achieved.

MRC achieved all of its goals and priorities as stated in the approved VR services section of the Massachusetts Combined State Plan for PY2016, therefore there are no notable factors impeding the achievement of the goals and priorities. As noted above, for Goals 1 through 6: (Common Performance Measures) As the VR program only began reporting data for the common measures as of July 1, 2017, MRC will not have any substantial data on the common measures to evaluate performance against goals 1 to 6 until after the completion of Program Year 2017 (July 1, 2017 to June 30, 2018). Once a full year's worth of data becomes available, MRC's Research, Development, and Performance Management Department will begin to analyze the data and create a report for management on the common measures.

## 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.

Supported Employment Program FY2017/PY2016 Goal Achievement:

Consumers Served: Goal: 119, Actual: 486

Employment Outcomes: Goal: 88, Actual: 96

MRC's strategy for provision and delivery of Supported Employment Services utilizes a network of community providers. MRC reviews progress on supported employment cases with staff and providers on a quarterly basis to assess progress and make any necessary corrective actions to ensure consumers are receiving quality services.

MRC achieved its goals for the Supported Employment Program for FY2017/PY2016 as stated in the approved VR section of the Massachusetts Combined State Plan. MRC saw a steady number of consumers successfully employed and served through MRC's Supported Employment Program. These consumers were served using a combination of Title I and Title VI B funds.

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

MRC achieved its supported employment goals for PY2016/FY2017, therefore there are no factors impeding the achievement of the goals and priorities. MRC monitors economic and labor market trends to forecast the potential impact on MRC's ability to achieve our employment goals and priorities. MRC's leadership team works closely with our fiscal staff to project available resources to provide services and the potential impact on achievement of our goals and priorities.

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

During PY2016 and PY2017, MRC is reporting baseline data to RSA for the WIOA common performance measures as specified in the state plan requirements. As required by RSA, MRC began collecting data for the Common Performance measures as of July 1, 2017. As the VR program only began reporting data in the fall of 2017, MRC will not have any substantial data on the common measures to evaluate performance against until after the completion of Program Year 2017 (July 1, 2017 to June 30, 2018). Once a full year's worth of data becomes available, MRC's Research, Development, and Performance Management Department will begin to analyze the data and create a report for management on the common measures, and MRC will work with its workforce partners to complete the Statewide Performance Report for the Common Measures. In the interim, MRC is continuing to track progress on the prior Standards and Indicators until a full year's worth of Common Performance Measures data is available.

Attached is performance on the prior standards and indicators for the 9 month period from October 1, 2016 to June 30, 2017. In the 9 month transition period of FFY 2017, MRC was successful in passing the Standards and Indicators for a 5th consecutive year. MRC exceeded the standards for 4 out of the 6 overall indicators and for 2 out of the 3 primary indicators.

Summary:

MRC passed 2 of 3 of the Primary Indicators and passed 4 of 6 Indicators overall. Therefore MRC passed the RSA Standards and Indicators performance measures for the 5th consecutive year during the 9 month transition reporting period in FFY2017: Furthermore:

Standard and Indicator 1.1 (Employment Outcomes):

In the 9 month reporting period of FFY2017, MRC had an outstanding 9 months in terms of successful employment outcomes, as 2,620 consumers achieved successful employment outcomes. These outcomes were made possible by the combined hard work and effort of MRC counselors, job placement specialists, employment service specialists, other staff, and contracted vendors. As a result, MRC was able to continue to improve its performance and increase the number of successful employment outcomes, exceeding prior year results in the same 9 month period by 49. This marked the 7th straight year MRC passed this measure and increased its number of successful outcomes from the prior period.

Standard and Indicator 1.2 (Rehabilitation Rate):

MRC's performance on the Rehabilitation Rate during the 9 month period of FFY2017 improved from FFY2016 (increasing from 54.9% to 55.6%), however the agency fell just 0.2% short of the rate required to pass this indicator (55.8%).

MRC will continue to monitor and evaluate Status 28 closures and focus on Status 26 closures on an ongoing basis to maintain and improve our level of performance as we move into the Common Measures. It is important to note that Status 28 closures will be included in the calculations for the WIOA Common Measures for 2nd and 4th quarter employment rates after exit from the VR program. Therefore, Status 28 closures will impact MRC performance on the Common Measures going forward. Therefore, the Rehabilitation Rate remains an important quality measure for the agency to use.

Standard and Indicators 1.3 and 1.4 (Competitive Employment outcomes overall and for Significant Disabilities):

MRC passed these Indicators as MRC continues to focus on employment of consumers with significant disabilities in competitive, integrated employment and is phasing out Homemaker Closures as required by WIOA.

Standard and Indicator 1.5 (Ratio of consumer wage to overall state wage:

Historically, MRC struggled to pass this indicator in a large part due to the fact that Massachusetts has a very high state average wage. Given that MRC serves many consumers who have no or limited work histories, and may not be able to work full time due to their needs, it continues to be difficult for MRC to change this historical pattern. However, MRC can improve its performance in this area by ensuring that wages are accurately coded in the MRCIS system, focusing on employment outcomes in high growth industries, and through initiatives such as the Employer Account Management System, the Federal Contractor Hiring Event and job-driven trainings such as the CVS Pharmacy Technician Training Program. MRC has continued to integrate greater amounts of information on labor market conditions and employment desired by consumers into our decision making. These continued efforts will assist towards the WIOA common measure on median wages at second quarter after exit from the VR program. MRC did see an increase in consumer wages in the 9 months of FFY2017, achieving the highest average hourly wage in 15 years, and performance on this indicator during the period increased from the prior year (increasing from .424 to .439).

Standard and Indicator 1.6 (Primary source of support - income):

MRC successfully passed this indicator in the 9 month FFY2017 period. MRC's efforts to ensure the accurate coding of the primary source of income of employed consumers both in and without the presence of other income such as SSA or other public benefits have assisted MRC in continually improving performance under this indicator. MRC has conducted staff in this area and have added validations in the MRCIS case management system to avoid potential coding errors.

Standard and Indicator 2.1 (Minority Service Rate:

During the 9 month FFY2017 period, MRC passed this indicator with a strong score. MRC continues to make a strong commitment to achieve equality in service delivery and serves a diverse base of consumers that is generally reflective of the overall state population. MRC counselors should be commended for their good work in dealing with the challenges and needs associated with diversity, and keeping it a priority.

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

The Massachusetts Rehabilitation Commission reserves and uses a portion of the funds allotted to the Commission under section 110 of the Act for the development and implementation of innovative approaches to expand and improve the provision of vocational rehabilitation services to individuals with disabilities under this State Plan, particularly individuals with the most significant disabilities. Consistent with the findings of the Comprehensive Statewide Needs Assessment and goals and priorities identified in conjunction with the State Rehabilitation Council, the Commission uses funds to support innovation and expansion activities to address the needs of individuals with disabilities, primarily individuals with the most significant disabilities, and to promote increased employment rates and labor force participation rates for people with disabilities across Massachusetts. Activities include:

- On-The-Job Trainings and Job-Driven Trainings with Employer Partners: MRC continues to expand Job-Driven Trainings (JDT) and on-the-job (OJT) training and evaluations. MRC has found that many consumers who participate in an OJT or Job-Driven training obtain employment with the OJT or JDT and others are able to obtain employment elsewhere as a result of their participation in the OJT or JDT through which they gained a recent work experience and/or developed job-specific skills. MRC has created job driven training programs to date with the Home Depot, CVS Health, Advance Auto Parts for Sales and Driver positions; Enterprise for Service Agent, Driver, and Lot Attendant, Lowes, G4S Security Solutions, the Kraft Group, MAPFRE Insurance, and Allied Barton Security Services. In addition, MRC held a job-driven training for human service jobs.
- 2. MRC Department of Transitional Assistance Individual Placement and Support Pilot Project: MRC and the Department of Transitional Assistance are developing a pilot project known as Individual Placement and Support designed to increase employment outcomes for individuals with disabilities receiving TANF benefits. This project will be

funded by DTA using state resources in collaboration with MRC. This project will be using a model focused on systematic job development using a rapid job search approach utilizing a team approach between MRC and DTA staff, in collaboration with employers and providers, to ensure effective and efficient consumer-focused delivery of services by braiding and blending MRC Services with DTA Services and other comparable and wrap around services.

3. DMH Pilot Project and Employment Initiative: MRC and the Department of Mental Health are collaborating on a pilot project for shared consumers in 3 areas designed to develop and/or enhance service delivery strategies and services through a collaborative team model approach to improve the time it takes a consumer to move from program eligibility to receiving services; rapidly moving consumers into successful employment opportunities based on their abilities, skills, and interests. Competitive employment for participants is the objective in which consumers are matched to opportunities in demand in the local job market. The teams will track both qualitative and quantitative results through this document to measure the effectiveness and the development of this model over time.

In addition, as part of this effort, MRC and DMH are developing a new employment initiative to be supplemented with additional state funds from DMH to assist consumers with mental health needs to obtain employment. This project will use a new employment model based on the Vermont Progressive Employment Model to assist consumers in obtaining employment using a rapid engagement process.

4. Transition Pathway Services Demonstration Grant Project: MRC has been awarded a 5 year demonstration grant from the Rehabilitation Services Administration (RSA) known as the Transition Pathway Services Grant. This project will evaluate best practices for provision of work-based learning experiences to students with disabilities through a coordinated model of services provided by community partners including MRC, career centers, independent living centers, pre-employment transition vendors and local educational authorities to increase employment and/or post-secondary education opportunity for students with disabilities based on their abilities, skills, needs and employment opportunities in the local economy.

5. Kessler Foundation Career Pathway Services Employment Grant: MRC was awarded a two year grant from the Kessler Foundation to determine what the best practices are in assisting individuals in physical and mental restoration to obtain employment and reduce their reliance on public benefits. Known as Career Pathway Services, this project will utilize a client-centered, customized service model providing comprehensive benefits planning services, customized client-centered employment planning, peer supports from Independent Living Centers, and job matching tools

6. IT web-based MRCIS system enhancements to track provision of Pre-ETS services to potentially eligible consumers, to enhance tracking and reporting on internal job placement services, and to develop MRCIS into a paperless system using Electronic Data Management

7. Transportation: MRC is working diligently to address transportation barriers faced by its consumers. MRC has updated transportation resource fact sheets on its website and makes them available to consumers at its Area Office. MRC has also hired a transportation coordinator through its Transition Pathway Services (TPS) grant and MRC will document lessons learned

and best practices at the end of the grant period. MRC also works with the Executive Office of Health and Human Service Transportation office on transportation for consumers and operates an innovative car donation program to assist individuals in accessing worksites. MRC will continue to work with transportation agencies to explore other creative transportation options for consumers

8. Employment of Individuals with Disabilities in State Jobs: MRC places numerous individuals with disabilities into state government jobs each year, including at MRC. MRC has a diverse workforce with a high percentage of individuals with disabilities in the workforce. We have a key contact with the state's Human Resources Division to facilitate employment for consumers in state jobs

9. Research Best Practices Models to Increase Employment of Individuals with Disabilities: Based on public comments regarding innovative employment programs, MRC will research best practice models designed to increase the employment rate of individuals with disabilities in Massachusetts. MRC will find out more about the suggested models including: the practices of North Dakota, South Dakota, Alaska, and Wyoming, which have achieved increased results of 50% employment rates of individuals with disabilities; Innovative youth employment models from Georgia, Nevada, Kentucky; and the RespectAbility Disability Employment First Planning Tool, among others. MRC staff are also reviewing and researching the Vermont Progressive Employment model as part of MRC's efforts to develop a new innovative initiative with the Department of Mental Health as described above

10. CareerAccess Initiative: MRC will closely follow the CareerAccess initiative. CareerAccess is a community—driven proposed program to reform the current Social Security Administration's Supplemental Security Income Program (SSI) rules so that young adults with disabilities can work and achieve their full potential without risking losing their disability benefits. If the proposal is adopted by the Social Security Administration, MRC will help its consumers take full advantage of the program as part of their individual plans for employment.

11. Summer Work Based Learning Experiences for Students with Disabilities

12. Apprenticeships: MRC will utilize available apprenticeship resources, including the ODEP guide to expand apprenticeship, to provide apprenticeship opportunities for individuals with disabilities across the Commonwealth. As an example, MRC participates in the Merit Apprenticeship Program. Additionally, MRC has obtained a copy of the ODEP guide on apprenticeships. MRC will also work with the Career Centers on providing apprenticeship opportunities for consumers.

## 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.

The Massachusetts Rehabilitation Commission has established a process to provide quality statewide Supported Employment services to individuals with the most significant disabilities, for adults and youth. MRC will be utilizing Title I funds and Title VI B funds to provide

Supported Employment services. MRC has developed a contingency plan to use Title I funds to provide Supported Employment Services if Title VI B are not appropriated in the federal budget MRC provides a range of supported employment services to assist consumers in their efforts to choose, obtain and maintain completive employment opportunities based on their abilities, skills, interests and needs as outlined in their Individualized Plan for Employment. MRC provides Supported Employment services through both its Statewide Employment Services office and its local area offices.. MRC provides supported employment services to youths and adults with disabilities based on their needs and services outlined in their individualized plan for employment.

MRC utilizes a network of Qualified Community Rehabilitation Providers to purchase and provide Supported Employment services to consumers. These programs, located throughout the state, serve persons with an array of significant disabilities including mental health, autism, deaf/severely hearing impaired, severally physically disabled, traumatic brain injured and dual diagnosed persons with intellectual disabilities and mental health, and other individuals with disabilities.

In addition, MRC works with its Workforce Partners and other state agencies such as the Department of Developmental Services and the Department of Mental Health to provide wraparound supports and comparable benefits to assist individuals receiving supported employment services in obtaining and maintaining employment.

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

The Massachusetts Rehabilitation Commission has developed a process to provide extended support services to assist individuals with disabilities in maintaining and advancing in their careers utilizing state funding, comparable benefits, and natural supports for long-term extended support services after federal funds can no longer be used. Paid extended supports are provided through a network of qualified community rehabilitation providers as well as partnering with other state agencies such as the Department of Mental Health and the Department of Developmental services.

Funding for extended long term support services is available from several sources depending on the nature of the consumer's disability and the resources available. Sources include:

- 1. Massachusetts Rehabilitation Commission State Ongoing Support Funding
- 2. IRS Section 44
- 3. Department of Mental Health
- 4. Department of Developmental Services
- 5. Private Sector Business Natural Supports
- 6. Massachusetts Rehabilitation Commission Statewide Head Injury Program
- 7. Social Security Work Incentives/PASS Plan
- 8. Impairment-Related Work Expenses
- 9. Natural Supports

#### 10. Other Comparable Benefits

## Certifications

Name of designated State agency or designated State unit, as appropriate Massachusetts Rehabilitation Commission

Name of designated State agency Massachusetts Rehabilitation Commission

Full Name of Authorized Representative: Toni A. Wolf

Title of Authorized Representative: Commissioner

#### 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 I 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 Unified or Combined State Plan\*. Yes

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

## Additional Comments on the Certifications from the State

## **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 Massachusetts Rehabilitation Commission

Full Name of Authorized Representative: Toni A. Wolf

Title of Authorized Representative: Commissioner

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 Massachusetts Rehabilitation Commission

Full Name of Authorized Representative: Toni A. Wolf

Title of Authorized Representative: Commissioner

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. **No** 

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.

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

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 Yes

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 pre-employment 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:

- i. 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.

## Additional Comments on the Assurances from the State