

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

a. Input of State Rehabilitation Council (Blind)

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

1. Input Provided by the State Rehabilitation Council

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 State Rehabilitation Council (SRC) for the Division for the Visually Impaired (DVI) is pleased to share our thoughts and recommendations concerning the State Plan for Vocational Rehabilitation (VR) for the state of Delaware. The council, also referred to as the Vocational Rehabilitation Advisory Council (VRAC), is charged with providing advocacy to the division in a collaborative, engaging, and thought-provoking manner to remove barriers and facilitate increased outcomes and service delivery for consumers through the agency and specific to VR and adjacent services which influence and directly impact VR consumers. Unfortunately, while the aims, goals, and objectives of the council are clear with regard to interaction with DVI, the realistic experience has been frustrating, disappointing, and contrary to providing effective outcomes to consumers. Please allow this council to provide a narrative of events, while commenting on recommendations which DVI should strongly consider in order to begin providing innovative solutions to consumers through this embattled agency.

We are extremely concerned that DVI irresponsibly chose to post an incomplete and vague state plan for consumer response. With this negligent action, the agency unilaterally chose to interfere with the consumer's right to review a complete state plan for VR, showing transparency and informing the consumer of a full and clear picture of all aspects of the state plan. To provide more granularity we offer the following chronology:

- January 13, 2020---During the monthly SRC meeting, council members raised numerous concerns about the agency's intention to post an incomplete state plan which had not been reviewed by or collaborated with the SRC nor provided proactive input from consumers via a town hall or other public meeting forums;
- January 24, 2020—DVI and SRC members met again and as a part of the discussion, spoke about the state plan. SRC members again cautioned the new leadership not to post a state plan for which the council had not reviewed, was not complete, nor was discussed in a town hall or public meeting to obtain consumer input;
- January 27, 2020—SRC members receive state plan draft for review through electronic communication; and
- January 29, 2020—DVI posts incomplete draft state plan for public comment

Despite continuous engagement from the council, DVI ill-advisedly chose to move forward with the posting of their portion of the state plan. Ultimately, the agency disregarded direct feedback from the council and failed to obtain needed feedback from the community.

Similar negligent actions and lack of transparency have riddled this agency and adversely affected its ability to provide adequate, appropriate, and equitable services to the community. As a council, we have made numerous yet failed attempts to provide an “olive branch” to the agency to discuss barriers which would positively impact the consumer base. For example, we have requested town hall public meetings to discuss DVI VR services in 2019. All attempts to collaborate have been denied, which is also contrary and in direct opposition to SRC by-laws and national agency best practices. Moreover, this input is essential to obtaining direct feedback from consumers which can then be translated back to strategic planning, appropriate resource allocation, and improved service delivery to the consumer via the state plan. On at least 3 occasions, the council engaged the agency to convene and collaborate on a joint retreat to advance council training, create strategic planning goals and objectives, such as the state plan and annual report, and discuss service delivery opportunities and other advancements in VR. The council observed, commented, and documented to the agency and other DHSS leadership about our extreme disappointment and concern that the agency-imposed roadblocks to these requests from multiple angles. The opportunity to strengthen advocacy and collaboration were lost due to a myopic stance taken by DVI and a heightened and inexplicable resistance to improving conditions. We sincerely hope this behavior does not continue.

Data is an essential part of successful service delivery for this agency. Yet, the agency continues to face challenges with providing the level of data transparency and understanding required to evaluate current state and make substantive and reasonable improvement goals and stretch goals which will positively impact the consumer. We continue to challenge this agency to provide foundational understanding of and clear transparency in consumer data. To date, our requests have been met with opposition. Yet, when the agency seeks to support its assertion that it benefits the community, it produces unvetted consumer surveys and other self-produced data that fails to identify outcomes and service delivery gaps. Without the benefit of meaningful data, we cannot work collaboratively with the agency to find outcomes-based solutions.

Regarding the goals and priorities of the state plan for DVI’s VR unit, despite numerous requests to the agency from the council, there was absolutely no joint collaboration between the council and DVI to create, discuss, or give proactive feedback to this section. We further assert and feel that no one from the current VR unit was engaged in the creation of these goals and priorities, which would give credibility to the appropriateness of stated goals. Upon review of submitted goals and priorities, the council is concerned that these statements are vague and do not use S.M.A.R.T. methodology to set the stage for success. S.M.A.R.T. goals are Specific, Measurable, Attainable, Reasonable (or Relevant or Reachable), and Time-Sensitive. The stated goals and priorities are general, do not clearly state where the agency is currently operating, and while there are improvement goals stated (i.e. 5% increase, in some instances), it is unknown whether these improvement goals are reasonable based on current status in service delivery. Furthermore, there are instances of word misuse in a few goals which may impede clear articulation of stated performance measures (i.e. median income is used where mean income would be the appropriate word choice). And while this comment is not meant to be critical, it

does represent the level of specificity and appropriate goal setting which is imperative to an impactful state plan. Lastly, there are a number of goals which have been inserted into the 2020 goals and priorities which are copied directly from the previous state plan. There is no context to understand if the previous goals were addressed, reached, or remain relevant to the needs of the community. This action questions the relevance or appropriateness of a strategic goal or priority.

The council now takes the opportunity to comment on each specific goal and priority from the draft state plan and regarding the performance objectives and measures:

Goal 1: Provide quality employment outcomes for individuals with visual impairments

- Recommend the S.M.A.R.T. goal writing methodology be employed to identify timing
- Goal does not outline where the agency currently stands versus stated improvement goal of 5%
- The parameters used to define “quality” employment outcomes should be clearly outlined Recommend using SCOR metrics (“Supply-Chain Operations Reference model”) for key performance indicators
- DVI should consider a stretch goal for percentage of employment which is past the 4Q mark for consumers
- Review outcome surrounding goal hourly rate to ensure appropriateness of wording and performance metric

Goal 2: Provide quality Pre-employment Transition Services (Pre-ETS) to students with visual impairments

- Recommend using S.M.A.R.T. methodology to enhance goal setting
- SRC received confirmation from the VR unit on February 10, 2020 that there were currently no pre-employment activities occurring with students; therefore, it would be impossible to improve this goal by 10%, if the starting number is 0. Consider an absolute number as a goal and not a percentage.
- How will pre-employment service providers be identified and evaluated? Recommend using SCOR card evaluation tools.
- What is the current number/percentage of DVI students who have at least one internship to determine if 100% is attainable for DVI and include a time horizon in order to achieve stated goal?
- Identify the total number of eligible students to whom pre-employment services must be offered and engage with each to determine appropriate plans for preparation and implementation of such services.

Goal 3: Enhance employer and community partnerships that lead to competitive, integrated employment for individuals with visual impairments

- S.M.A.R.T. methodology should be employed to ensure impactful goal setting

- Prior to setting an improvement goal of adding 5 additional partnerships, DVI should determine how many partnerships are currently established and adequately working. Only after completion of that assessment should the agency determine whether and to what extent an increase of 5 is reasonable, attainable, and sustainable with current personnel capacity
- Considering concerns with current tracking and data software, identify the system that will be used to track and monitor employer engagement
- DVI should ensure that employer partnerships support the Goal 1 performance measure to improve the mean hourly wage objective. This may direct and prioritize partnership selection

Goal 4: Increase awareness and improve access to DVI services

- DVI should clearly define what tracking system will be employed to house data
- The goal to increase outreach to underserved communities is a goal which has been on numerous state plans. What is the current status of this work? What constitutes an underserved community of individuals with visual impairments in Delaware? DVI should identify specific and measurable improvement goals based on the current status of service delivery and the identification of underserved communities, and desired and measurable outcomes
- Native Americans should be considered in this underserved and targeted list as it was previously identified as a target population for services

Goal 5: Provide quality entrepreneurial opportunities in the Business Enterprise Program

- DVI should consider a process mapping review to understand the consumer experience and journey to become an eligible and successful BEP operator
- The council is concerned that the number of opportunities for interested and eligible BEP operators is constrained and unattainable given the current BEP landscape. This makes the program unattractive and cumbersome as a potential employment outcome
- BEP currently has no governing rules on how potential new opportunities will be assigned and bid for in an equitable and fair process
- DVI must review all previous applicants for inclusion in the BEP program to determine whether decisions align with equitable principles and regulatory guidelines. All unfair or improper decisions must be referred for proper review and handling.
- BEP policies and procedures should be reviewed and critically compared against best in class national BEP programs (i.e. Florida)
- DVI should consider a full and comprehensive understanding of BEP prior to introducing consumers to this complex process

With regard to the Strategic Analysis section, heading A, focusing on the most recent Comprehensive Statewide Needs Assessment (CSNA), it should be noted that the amended charter named both DVI and the SRC as implementing the CSNA. However, the SRC identified

irregularities with regard to data collection and analysis and transmitted those assessments and concerns to DVI prior to completion of the CSNA. A concern was raised and documented with the agency director that the VR unit leader assigned to represent DVI in the CSNA did not possess the foundational skill set or knowledge to conduct a scientifically significant survey, data collection, or analysis nor did this person engage the SRC in focus groups or survey analysis. Ultimately, the data collected was unreliable, tainted, and skewed and did not serve as credible data to draw conclusions surrounding the CSNA. The SRC previously recommended and again notes that the CSNA should be repeated in a collaborative partnership between DVI and the SRC with representatives or support staff who have experience in focus groups, surveys, data collection and analysis to offer priority focus areas based on credible data.

With regard to the Strategic Analysis section, heading C, DVI documents that the agency has shared status updates with RSA addressing findings and improvements from the latest monitoring activities in 2013. However, it should be noted that none of these updates from the RSA monitoring were shared with the council in an effort to utilize the advocacy strength of the council to improve on these outcomes and support the agency in positioning itself for the greatest possible outcomes and improvement efforts. This again illustrates a lack of forethought to optimize collaboration, leverage diversity of thought, and provide additional transparency in affecting positive outcomes for the consumer.

The council's ultimate stance is that we cannot support the current VR state plan, including goals and priorities submitted by DVI. The current plan as written is not positioned to monitor or achieve key performance standards for consumers. Moreover, it does not clearly nor objectively outline true and current priorities of the community or the consumer. More work is needed on this draft state plan before the endorsement of the council can be reevaluated. Lastly, we strongly recommend that DVI repost the draft state plan for an additional 30 days after said collaboration and other edits are completed.

2. Designated State Unit Response to Council Input

DVI recognizes that the collaboration between the Division and the State Rehabilitation Council has been fractured for a number of years and openly addressed the issue in the proposed state plan. Section B.o.8.B of the plan was designed as a step towards repairing the relationship. It states "DVI and the Vocational Rehabilitation Advisory Council will jointly develop a work plan that identifies key priorities and activities to be carried out in the upcoming year. DVI will identify funding to support the council's efforts consistent with the agreed upon work plan and will collaborate with the council to assist in the achievement of the priorities.

In addition, DVI has been under review by the Delaware Joint Legislative Oversight Sunset Committee (JLOSC). It is important to note that a JLOSC task force, led by legislative staff and legal counsel, was convened to provide a thorough review of DVI. The JLOSC voted for an additional hold over year so the division can accomplish thirteen recommendations designed to improve organizational structure, one of which is directly related to the SRC. Recommendation number eleven of the JLOSC recommendations calls for DVI to complete a thorough review of all councils and commissions including those that are currently associated with DVI and others

within the state of which DVI inclusion would benefit the blind community. In addition to board title, mission statement or purpose, statutory authority, and frequency of meetings, the report is to include a summary of DVI's current level of involvement with each board identified and any areas of improvement identified. The new DVI administration believes the state plan commitment to the SRC, coupled with the JLOSC recommendations are opportunities that will result in a stronger partnership that maximizes expertise and promotes continual improvement to services for Delawareans who are blind or visually impaired.

3. Explanation for Any Rejected Input

DVI would like to address some of the extremely critical statements made by the SRC. The statements are unedited and are taken from the SRC input section.

SRC statement: DVI irresponsibly chose to post an incomplete and vague state plan for consumer response. With this negligent action, the agency unilaterally chose to interfere with the consumer's right to review a complete state plan for VR, showing transparency and informing the consumer of a full and clear picture of all aspects of the state plan." and "Despite continuous engagement from the council, DVI ill-advisedly chose to move forward with the posting of their portion of the state plan. Ultimately, the agency disregarded direct feedback from the council and failed to obtain needed feedback from the community.

DVI response: It is important to explain the methodology that led to the decision to release the state plan for public comment without having input from the SRC. Toward the end of calendar year 2019, DVI underwent significant administrative changes which led to a newly appointed Division Director. With impending state plan timelines, no collaboration between the SRC and DVI, and unanswered requests for coordinating input made from DVI to the SRC Chair and Vice Chair, DVI requested technical assistance from the Workforce Innovation Technical Assistance Center (WINTAC). As such, DVI chose to post the draft state plan for public comment while the SRC reviewed and provided their input. The state plan was posted on the DVI website from January 28, 2020 through February 28, 2020. It was also sent electronically to individuals and networks; notification was sent via automated phone call to the entire DVI blind registry with over 3500 people; and sent through DVI social networks.

SRC statement: Similar negligent actions and lack of transparency have riddled this agency and adversely affected its ability to provide adequate, appropriate, and equitable services to the community.

DVI response: As mentioned previously, DVI has been under review by the JLOSC. A JLOSC task force, led by the JLOSC legislative staff and legal counsel, was convened to provide a thorough review of DVI. The task force revealed no evidence of negligence or lack of transparency.

SRC statement: We have requested town hall public meetings to discuss DVI VR services in 2019. All attempts to collaborate have been denied, which is also contrary and in direct opposition to SRC by-laws and national agency best practices. Moreover, this input is essential to obtaining direct feedback from consumers which can then be translated back to strategic planning, appropriate resource allocation, and improved service delivery to the consumer via the

state plan. On at least 3 occasions, the council engaged the agency to convene and collaborate on a joint retreat to advance council training, create strategic planning goals and objectives, such as the state plan and annual report, and discuss service delivery opportunities and other advancements in VR.

DVI response: DVI agrees that public town halls and SRC retreats are necessary for gathering input and collectively working on plans. DVI is committed to coordinating these events with the SRC, in a fiscally responsible manner, that is consistent with RSA regulations.

SRC statement: Without the benefit of meaningful data, we cannot work collaboratively with the agency to find outcomes-based solutions.

DVI response: DVI agrees that meaningful data is essential. The SRC and DVI will work together to identify available data elements to share with the SRC. In addition, as noted in the state plan, DVI did not have adequate data to effectively report on all of the prior state plan goals. Also noted in the proposed state plan, DVI will work with the Information Resource Management Team to update the case management system to allow for data gap solutions and ensure compliance with reporting requirements. In addition, DVI will continue to work with WINTAC to review data dashboards to monitor progress, identify errors and make data-driven decisions.

SRC statement: Upon review of submitted goals and priorities, the council is concerned that these statements are vague and do not use S.M.A.R.T. methodology to set the stage for success.

DVI response: The proposed state plan goals are written appropriately and have clearly defined performance measures.

SRC statement: There is no context to understand if the previous goals were addressed, reached, or remain relevant to the needs of the community. This action questions the relevance or appropriateness of a strategic goal or priority.

DVI response: In addition to planning for the next three years, the proposed state plan contains status updates on all previous goal and performance measures.

SRC statement: There are instances of word misuse in a few goals which may impede clear articulation of stated performance measures (i.e. median income is used where mean income would be the appropriate word choice). And while this comment is not meant to be critical, it does represent the level of specificity and appropriate goal setting which is imperative to an impactful state plan.

DVI response: DVI will continue to report the median income to remain consistent with RSA and WIOA performance measures.

SRC statement: The council now takes the opportunity to comment on each specific goal and priority from the draft state plan and regarding the performance objectives and measures:

DVI response: DVI neither accepts nor rejects the SRC input for the plan goals. DVI agrees that some basic VR and BEP functions need to be evaluated and improved. The new DVI administration believes the state plan commitment to the SRC, coupled with the JLOSC recommendations are opportunities that will result in a stronger partnership that maximizes expertise and promotes continual improvement to services for Delawareans who are blind or visually impaired.

SRC statement: With regard to the Strategic Analysis section, heading A, focusing on the most recent Comprehensive Statewide Needs Assessment (CSNA), it should be noted that the amended charter named both DVI and the SRC as implementing the CSNA. However, the SRC identified irregularities with regard to data collection and analysis and transmitted those assessments and concerns to DVI prior to completion of the CSNA. A concern was raised and documented with the agency director that the VR unit leader assigned to represent DVI in the CSNA did not possess the foundational skill set or knowledge to conduct a scientifically significant survey, data collection, or analysis nor did this person engage the SRC in focus groups or survey analysis. Ultimately, the data collected was unreliable, tainted, and skewed and did not serve as credible data to draw conclusions surrounding the CSNA. The SRC previously recommended and again notes that the CSNA should be repeated in a collaborative partnership between DVI and the SRC with representatives or support staff who have experience in focus groups, surveys, data collection and analysis to offer priority focus areas based on credible data.

DVI response: The CSNA was completed by Division leadership staff with guidance from the SRC. Before beginning the next CSNA, DVI will work with WINTAC to review prior methodologies, results, and recommendations.

SRC statement: With regard to the Strategic Analysis section, heading C, DVI documents that the agency has shared status updates with RSA addressing findings and improvements from the latest monitoring activities in 2013. However, it should be noted that none of these updates from the RSA monitoring were shared with the council in an effort to utilize the advocacy strength of the council to improve on these outcomes and support the agency in positioning itself for the greatest possible outcomes and improvement efforts. This again illustrates a lack of forethought to optimize collaboration, leverage diversity of thought, and provide additional transparency in affecting positive outcomes for the consumer.

DVI response: DVI is preparing for RSA monitoring in 2020 and is committed to including the SRC in the process.

SRC statement: The council's ultimate stance is that we cannot support the current VR state plan, including goals and priorities submitted by DVI. The current plan as written is not positioned to monitor or achieve key performance standards for consumers. Moreover, it does not clearly nor objectively outline true and current priorities of the community or the consumer. More work is needed on this draft state plan before the endorsement of the council can be reevaluated. Lastly, we strongly recommend that DVI repost the draft state plan for an additional 30 days after said collaboration and other edits are completed.

DVI response: Pending recommendations from RSA, DVI will revise the state plan. DVI administration is confident that future planning will improve because of enhanced SRC relationship, continued work with WINTAC, and feedback from the 2020 RSA monitoring.

b. Request for Waiver of Statewideness (Blind)

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; (Blind)

Delaware DVI is not requesting a waiver of statewideness.

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

N/A.

3. All State plan requirements will apply (Blind).

N/A.

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

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

DVI collaborates with a variety of public and private agencies and programs that are not performing activities through the statewide workforce development system to provide comprehensive rehabilitation services to individuals who are blind and visually impaired and solutions to employment barriers. While DVI is committed to working collaboratively with its WIOA partners, it recognizes the importance of maintaining other strong partnerships to provide exceptional customer service to businesses and individuals with disabilities. Cooperation with private and non-profit service agencies, related government agencies, and other professional organizations has long been a cornerstone of public VR services for the blind in Delaware. Such collaborations help to overcome the complex and multiple barriers that confront people with disabilities who want to work or stay independent in their communities.

DVI maintains strong relationships with public institutions of higher education including Delaware Technical & Community College, Delaware State University and the University of Delaware. DVI is actively involved in, or has ongoing relationships with, several councils whose missions are related to individuals with disabilities. Legislation was recently amended and signed by the Governor that appointed the DVI Director or designee to the Employment First Oversight Commission.

DVI has established partnerships to ensure the following services are available to consumers: government employment/internship opportunities; pre-employment transition service opportunities; daily living (home energy, housing, child care, etc.) assistance; financial coaching; peer counseling; access to Medicaid for supported employment transitions; public access & accessibility (streets, buses, etc.); accessible materials creation; access to vision related medical

community; higher education; access to books and periodicals in multiple formats; and braille enrichment.

Partner agencies include: DE Division of Developmental Disabilities; DE Division of Medicaid and Medical Assistance; DE Division of Public Health; DE Division of Substance Abuse & Mental Health; DE Department of Transportation; DE Department of Human Resources; DE Department of Corrections; DE Department of Services for Children, Youth and Families; New Castle County Government; City of Wilmington Government; BlindSight Delaware; Library of Congress; National Federation of the Blind; Delaware Association of Optometry; DE School for the Deaf; University of Delaware; Delaware State University; Delaware Technical & Community College; Wilmington University; Ability Network of Delaware (formerly the Delaware Association of Rehabilitation Facilities) and Community Rehabilitation Providers.

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

DVI partners with the Assistive Technology Resource Center (ATRC). With locations in all Delaware counties, the ATRC has a vast inventory of equipment, software, communication devices and items that support people with all disabilities. As required by the Assistive Technology Act, DVI maintains representation on the Assistive Technology Loan Advisory Board. In addition to the ATRC, DVI operates statewide assistive technology training centers which are state-funded and dedicated solely to the needs of people who are blind or severely visually impaired.

The ATRC and DVI offer rehabilitation technology assessment and evaluation services for consumers across all stages of the VR process, one-to-one demonstrations and device borrowing program. Rehabilitation technology includes a range of services and devices that supplement and enhance individual functions, such as job redesign or worksite modifications that improve the work environment for individuals with visual impairments.

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

N/A.

4. Non-educational agencies serving out-of-school youth

DVI maintains and continues to establish relationships with workforce development agencies to utilize the out-of-school programs where DVI consumers are able to benefit. In addition, DVI is an active member of the WIOA partner leadership team who have been actively working on solutions for quick navigation and data sharing.

In addition to our WIOA partners, DVI provides vocational services to out-of-school youth with disabilities in collaboration with Community Rehabilitation Programs through cooperative relationships.

Partner agencies include: DE Department of Labor General Vocational Rehabilitation, Employment & Training, Unemployment Insurance, DE Health & Social Services, Division of

Social Services, Division of State Service Centers, Division of Services for Aging and Adults with Physical Disabilities, Office of Financial Empowerment (Stand by Me Financial Coaching), Department of State, Division of Libraries, DE Division of Social Services, DE State Housing Authority, Ticket to Work - Full Circle Benefits Counseling, Office of Economic Development, Community Rehabilitation Service Providers.

5. State use contracting programs

State use contracting in Delaware falls under the purview of the Commission for Statewide Contracts to Support Employment for Individuals with Disabilities (the Commission). The Commission is designed to encourage and assist individuals with visual impairments and other disabilities to achieve maximum personal independence by assuring an expanded and constant market for their products and services. They routinely work together to develop new set-aside opportunities and ensure existing contracts are operating within the established guidelines and regulations. DVI is appointed to the Commission as an Ex-Officio member and as such, is actively engaged in the state use set-aside process.

In order to effectively and fairly operate the set-aside contracts, the Commission utilizes one or more Central Nonprofit Agency (CNA) as primary contractors of set-aside opportunities. Using the state procurement process, a CNA Request for Proposal is published on a quarterly basis as a way to attract multiple types of contractors. Once contracts are secure, the CNA has the option of subcontracting or performing the job themselves. Regardless of the choice, the CNA is responsible for ensuring the contracts maintain the proper ratios of employees with and without disabilities and provide the goods/services as described in the contract.

Delaware has only one CNA; the Ability Network of Delaware (A.N.D.), who subcontracts the work to several community rehabilitation providers. The set-aside opportunities in Delaware are temporary staffing and janitorial. The DVI Vocational Rehabilitation unit works collaboratively with the A.N.D. and their subcontractors to help consumers secure positions, evaluate assistive technology needs, and offer other services to ensure success on the job.

d. Coordination with Education Officials (Blind)

Describe:

1. Designated State Unit's plans (Blind)

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.

DVI is uniquely positioned to facilitate the transition of students with visual impairments from school to the receipt of VR services due to the comprehensive structure of the division and the agency's participation in statewide transition activities. DVI has both an Education Services

Unit and a VR Unit, which allows the agency to begin working with children as soon as a visual impairment is identified.

DVI's Education Services Unit employs Teachers of the Visually Impaired (TVI) who provide assessment, direct instruction and consultation services to approximately 300 students with visual impairments annually through an itinerant model. The TVIs work with local education agencies (LEAs) and Charter Schools statewide to ensure all students with visual impairments can access educational programs equal to that of their peers. This relationship provides DVI's VR Unit with the opportunity for early identification of all students who may be potentially eligible for VR services, to educate and engage families early in the transition process and to assist the VR Transition Counselors and LEAs with coordinating and planning for transition services, including pre-employment transition services (Pre-ETS).

DVI recognizes the need to get information to families as early as possible. As such, the VR Transition Counselors work with the TVIs to ensure updated information and forms related to Pre-ETS and VR services is made available to share with families and schools prior to students beginning the transition process. Given the additional supports often required for students with visual impairments to participate in Pre-ETS, DVI encourages the application for VR services at the earliest age of 14. This allows the VR Transition Counselor to become an integral part of the student's IEP team and to assist with the coordination of several services to prepare the student for vocational success upon completion of high school. These services can include: comprehensive vocational assessment, career exploration, work-based learning experiences, workplace readiness training, self-advocacy training, preparation for post-secondary education or training, assistive technology (AT) assessment and training, independent living (ILS)/low vision services, and orientation and mobility (O&M).

Referrals for VR services are received primarily from DVI's Education Services Unit; however, they are accepted from any source. DVI will be developing a more formal referral procedure that can be shared with LEAs and families to ensure all entities are aware of the availability of Pre-ETS services to students who are potentially eligible as well as the benefits of applying for services.

Over the past few years, DVI has developed several transition programs for students with visual impairments to participate in during breaks in the school year. All units within DVI collaborate to provide students with visual impairments opportunities to learn and practice a wide range of career and independent living skills. The programs provide the students and DVI team opportunities to build rapport and get to know each other, the students become familiar with the services DVI offers, and students spend time with and learn from peers from across the state. These programs include: Transition Spring Break, Children's Beach House, Mission Transition, Summer Skills Academy and Camp Abilities. DVI coordinates these programs with community partners, such as Delaware State University, Community Rehabilitation Providers (CRP), local businesses, the University of Delaware, etc. These programs incorporate the [Expanded Core Curriculum \(ECC\)](#), transition activities and Pre-ETS – all critical for students with visual impairments.

To further educate the community and transition stakeholders about agency services, DVI participates in several statewide transition activities along with other core partners. The Education Administrator, designated TVIs, VR Transition Counselors and the VR District Administrator participate in monthly Transition Cadre meetings, hosted by the Delaware Department of Education (DDOE) and attended by Delaware's General VR agency (DVR), LEAs, Charter schools, community rehabilitation providers (CRPs), other state agencies and families. DVI is also involved in a state initiative, PIPELine to Career Success for Students with Disabilities, a pilot program developed to use data to build structured programming and interagency teams to facilitate authentic inclusion of students, including those with the most significant disabilities, in career and technical education (CTE) career pathways and work-based learning experiences while in high school. DVI will continue to work with DOE, DVR, and the Division of Developmental Disabilities Services (DDDS) to provide financial support and accessible materials for the annual Delaware Transition Conference.

Program Improvement: DVI plans to increase opportunities for students to participate in Pre-ETS and other transition activities.

1. In school year 2018-2019, DVI supported its first student to complete the Project SEARCH (PS) program. Although PS was developed by the general VR agency, all parties involved welcomed the participation of DVI's staff as part of the student's team. DVI will increase collaboration with the host school districts to identify any students with visual impairments as candidates for the program to ensure they are properly supported.
2. Since a majority of students choose to apply for VR services and the agency serves very few potentially eligible, DVI will increase partnerships with CRPs and other organizations in order to offer more individualized programming for students. DVI currently partners with two organizations for Pre-ETS services. Community Integrated Services provides community-based programming related to Work-based Learning Experiences and Workplace Readiness Training. Learning Ally provides college students with visual impairments support during their first and sometimes second year of higher education. Both organizations are engaged with DVI regularly to provide continuous improvement and respond to the needs of students.
3. The programs offered directly by DVI are separate and tend to have a specific focus (i.e. career prep, college prep, ILS skills, educational sports, etc.). The programs also occur in the summer to accommodate the availability of students. However, this conflicts with the extended school year (ESY) and students often have to choose between the DVI programs and participating in the ESY. As such, starting in FY20, DVI is planning to develop a more comprehensive program, combining aspects of a few into one longer camp-style program. DVI is working with LEAs to develop activities that can be considered part of the extended school year, so students do not need to choose between school or DVI. Efforts are also being made to alleviate transportation challenges that are often a barrier to students participating.

4. VR Transition Counselors have access to the DDOE IEP Plus system in order to provide input into the IEP goals. Additional training on understanding and using the IEP and how to enhance the sharing of data and information will be coordinated in order to maximize the benefit of the IEP and usefulness of information available to student's IEP teams.

2. Interagency Agreement with State Educational Agency

Information on the formal interagency agreement with the State educational agency with respect to: (Blind)

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; (Blind)

The MOU between DDOE and DVI outlines roles and responsibilities of the LEAs and DVI with regard to the consultation and technical assistance provided for the transition of students with visual impairments from school to post-school activities, including VR services.

The MOU includes the following:

DVI will:

1. conduct training activities with appropriate staff members concerning the MOU and its implementation.
2. coordinate training with DDOE and LEAs regarding specific procedures to be followed by DVI, DDOE and LEAs related to coordination of educational programs, placement, and appointment of educational surrogate parents for children and youth with visual impairments who are receiving cooperative services from those agencies.
3. provide visual impairment (VI) education and transition related consultant services to LEAs that employ a TVI or related staff providing VI support (consultant services such as programming, in-service training, ordering of equipment, program evaluation, and coordination of inclusive placements in the least restrictive environment).
4. provide in-house training for DVI education staff on best practices, at least annually.
5. provide information as requested to school personnel on access to "long term support" necessary to assist individuals to live independently in the community.
6. DVI's VR team participates in statewide transition activities with DOE and school personnel to allow for the exchange of information related to Pre-ETS activities, VR services and to continue collaboration with LEAs on a statewide level.

B. Transition Planning

by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs; (Blind)

DVI's VR Unit works collaboratively with LEAs and DVI program staff for the coordination of specific services to support students in the development and implementation of their

Individualized Education Program (IEP). VR staff will work with the student's IEP team and TVI to plan for more comprehensive secondary level programming and post school services.

The MOU outlines the roles and responsibilities related to DVI and the VR staff and includes the following:

1. Develop and plan Pre-ETS services for students with visual impairments no later than age fourteen.
2. Reserve funds in accordance with WIOA to provide Pre-ETS services to students who are potentially eligible or eligible for VR services.
3. Meet with students and their families to provide an overview of VR services, including Pre-ETS and other comprehensive VR services that require additional eligibility criteria.
4. For students who choose to apply for VR services, conduct intake, determine eligibility, provide vocational assessments and establish the student's individualized plan for employment (IPE) no later than two years prior to the student's expected graduation date.
5. Maintain a regular schedule with students and LEAs for service provision.
6. Attend IEP meetings for students with visual impairments.
7. Coordinate with IEP team to determine who will assume responsibility for service provision for services that are considered special education and VR.
8. Coordinate with WIOA and community partners to develop work opportunities for students with visual impairments.
9. Attend person-centered planning meetings for individuals receiving services under title XIX for the Social Security Act.
10. Enforce limits on the use of subminimum wage and maintain documentation according to standards.

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

In August 2016, the Delaware Division for the Visually Impaired, the Delaware Department of Education, and Delaware's Local Education Agencies executed a Memorandum of Understanding (MOU) that outlines the roles, responsibilities, including financial responsibilities of each agency, and includes state lead agencies and qualified personnel responsible for transition services.

D. Procedures for Outreach to and Identification of Students with disabilities who need transition services. (Blind)

DVI's VR Unit will continue to work with the LEAs and DVI's Education Services Unit to identify and provide outreach to students with visual impairments who need transition services. Given the nature of DVI's education services, all students with visual impairments are identified and served by DVI. Although education eligibility criteria are broader than VR, DVI maintains a close working relationship with Delaware's general VR agency in order to refer any individual who does not meet the visual criteria for DVI's VR services. DVI will continue to participate in outreach events to promote vision rehabilitation services and engage community partners to

collaborate on ensuring successful outcomes of students with disabilities who need transition services.

e. Cooperative Agreements with Private Nonprofit Organizations (Blind)

(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.

Delaware is a small state with a close-knit community of private nonprofit VR service providers who generally serve two designated state agencies (Blind & General). In an effort to streamline processes, the Division for the Visually Impaired (DVI) and the Department of Labor/Division of Vocational Rehabilitation (General DVR) have an agreement to utilize a section of the Delaware Procurement Code (29 Del. Code § 6933) that affords one or more procurement units the opportunity to participate in, conduct or administer cooperative purchasing agreements. This code allows DVI to ‘piggyback’ on the DVR cooperative agreements with private nonprofit organizations. DVR prepares and issues the requests for proposals and includes DVI throughout the process. The process provides the chance to ensure the solicitations meet the needs of the blind community. Once awarded, the DVI-VR constituents have access to a variety of service providers throughout the state.

The partnership with the general VR works well when soliciting common services that can support both VR agencies but is not DVI’s only option for establishing cooperative agreements. DVI routinely solicits cooperative agreements with providers that specialize or seek to specialize in services designed for people who are blind. DVI adheres to the state procurement process and shares solicitations through the State bid portal. In addition, DVI has entered into contractual agreements with organizations located outside of Delaware (with approval from the Office of Management and Budget) to secure services specific to visual impairments.

Regardless of the method by which cooperative agreements are formed, DVI offers service providers on-site training to introduce techniques and strategies to support people who are blind. Vendors are offered training sessions related to blind sensitivity, blind etiquette, assistive technology, and more. In addition, DVI-VR professionals often assist vocational training providers by evaluating common barriers faced by blind consumers and offering solutions. Examples of recommendations include updated assistive technology (software, screen readers, etc.) as well as low tech tools (bump dots, large-face devices, etc.).

f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services (Blind)

(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.

In Delaware, eligible people with developmental disabilities have access to comprehensive services from the Division of Developmental Disabilities Services (DDDS), VR services from DVI or the Department of Labor/Vocational Rehabilitation Division (DVR-General), and school-to-work transition services from the Department of Education.

General DVR: Since DVI is the agency for the blind and DVR is the general VR agency, it is extremely important that the agencies work collaboratively to ensure all qualified people with developmental disabilities receive VR services. As such, the general and blind agencies maintain a Memorandum of Understanding (MOU) which defines the relationship between the two VR agencies. This formal interagency agreement defines responsibilities, dispute resolution procedures, financial responsibilities, and procedures to effectively coordinate among the agencies.

Division for Developmental Disabilities Services (DDDS): DVI collaborates with DDDS for the provision of Supported Employment (SE) services to consumers with blindness and intellectual disabilities. If eligible, individuals may receive extended employment services from DDDS through one of three Medicaid HCBS waivers. Each waiver has defined criteria for eligibility, the services available are very similar. They include employment navigation, career exploration and assessment, individual & small group SE, Social Security benefits counseling, financial coaching, non-medical transportation, personal care (including a self-directed component), Orientation & Mobility, and assistive technology. The waiver is intended to compliment VR services by offering extended employment funding, personal care and customized services for people who may have had unsuccessful employment experiences. In an effort to avoid gaps in services, interagency coordination begins before the consumer completes the SE process with DVI. Once DVI makes a referral, DDDS does an individualized review of eligibility, application status (if applicable), and existing resources. The goal is to have a streamlined process that assists in identifying all available programs and resources, expand and improve employment services to people with significant disabilities, and maximize the use of comparable benefits. DDDS currently uses three Medicaid waivers for the provision of SE extended employment services.

Department of Education: DVI is uniquely positioned to facilitate the transition of students with visual impairments from school to the receipt of VR services due to the comprehensive structure of the division and the agency's participation in statewide transition activities. DVI has both an Education Services Unit and a VR Unit, which allows the agency to begin working with children as soon as a visual impairment is identified. The MOU between DDOE and DVI outlines roles and responsibilities of the LEAs and DVI with regard to the consultation and technical assistance provided for the transition of students with visual impairments from school to post-school activities, including VR services.

Early Start to Supported Employment Model (ESSE): For several years, DDDS, DVI, DVR, and DOE have collaboratively worked with eligible students, aged 14 and above, to ensure successful transitions from school into employment, training/education or both. DVI-VR works closely with all agencies to encourage SE eligible students with visual impairments to participate in the ESSE model. ESSE was designed to minimize gaps between exiting school and beginning employment by encouraging students with intellectual disabilities to begin the SE process up to three years

prior to exiting school. The goal is for students to experience the success and possible pitfalls of employment before their secondary education program ends.

g. Coordination with Employers (Blind)

(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

DVI-VR Business Services Structure, Key Roles & Activities: The Delaware business community plays a crucial role in the workforce system and the vocational success of DVI consumers. As such, it is critical for DVI to continually develop, cultivate and support employers throughout the state. Like our WIOA partners, DVI has embraced the dual-customer model and continues to build capacities of the Employment Service Specialists (ESS) who are tasked with employer outreach and engagement, as well as technical assistance to VR counselors and consumers. The ESS positions exist to assist the Vocational Rehabilitation Counselors (VRC) in obtaining employment for job seekers by building relationships with corporations that result in jobs and related opportunities.

DVI has three ESS positions and one job placement specialist position, located throughout the state, who are dedicated to creating new relationships and supporting the needs of existing business partners. The ESS staff are directly supervised and supported by the VR District Administrator who is responsible for VR daily operations and staff supervision. In addition, the entire VR unit is overseen by a Social Services Senior Administrator who is responsible for the VR program administrative duties such as: supervising and supporting the VR District Administrator; establishing and maintaining quality assurance and performance measures, ensuring VR regulations are met, updating policies and procedures, reviewing personnel training records, and providing technical assistance to VR staff. Although the business services continue to evolve, the established structure allows for statewide oversight, information sharing and a collaborative approach to employer engagement.

Assisting the consumers requires the ESS to assist with job seekers to develop resumes, prepare for interviews, complete applications and connect with employers. Their goal is to offer a delicate balance of guidance and assistance designed to teach functional job search skills, foster independence, provide comprehensive support (as dictated by need), and obtain meaningful employment. Currently, the ESS provides direct support in the workplace and/or discreetly assists the consumer to self-advocate as they work through the process of securing workplace accommodations.

The business service staff are responsible for promoting and marketing the employment of persons who are blind by using multiple outlets and techniques to reach employers. In addition to developing new business, ESS personnel are tasked with cultivating new opportunities from existing business partnerships. As business relationships are formed and nurtured, the ESS acts as a resource, offering a variety of services designed to minimize common workplace barriers to

companies who wish to increase recruitment efforts or better support employees with severe visual impairments. In addition to acting as a conduit connecting job seekers with employers, the ESS provides consultative advice, technical assistance, linkages to community resources, or any other means by which to assist the company.

Employer Engagement Events: DVI-VR is always looking for creative, innovative, business-friendly ways of engaging the business community. These events highlight consumer skills, provide time for networking with business leaders and/or human resource professionals, provide valuable training and motivate employers to create opportunities. The following are events hosted by DVI since FFY2018:

- *Business Champions* (FFY2018): DVI launched the fiscal year by honoring achievements and recognizing partnerships. In addition to a motivational keynote address from the CEO of the American Foundation for the Blind, attendees received Americans with Disabilities Act (ADA) training, sensitivity training and an overview of DVI business services. The event convened after presentation of recognition awards for consumers, employers, and community. The event was attended by approximately twenty-five people which included businesses, VR staff and consumer award winners. DVI staff and consumers. DVI was excited to offer this event during National Disability Employment Awareness and World Blindness Months.
- *Business Champions* (FFY2019): VR kicked off the federal fiscal year by honoring achievements and recognizing our business partners. After a networking breakfast the attendees participated in an ADA and Workplace Accommodation training presented by an expert from the Job Accommodation Network. The event convened after presentation of recognition awards for consumers, employers, and community. The crowd of about sixty attendees included a balanced mix of business representatives, DVI staff, and DVI consumers. Once again, DVI coordinated this event during National Disability Employment Awareness and World Blindness Months.
- *B2B Networking* (FFY2019): DVI partnered with the New Castle County Chamber of Commerce to offer a free networking session to members and non-members. In addition to networking, guests heard from business leaders about the benefits of hiring people who are blind and explored many types of assistive technology that was showcased from several different partners. The Business Enterprise Program (BEP) program was also highlighted during the event and three members of the business community provided operators tips on financial management, social media campaigns and organizational structure. Event attendees totaled approximately twenty people which included business representatives and several DVI staff. The event was held in May in recognition of Healthy Vision Month.
- *Workplace Accommodations/ADA Hot Topics Workshop* (FY2020): DVI is an active member of Disability:IN Delaware (formerly the Delaware Business Leadership Network, Inc.) and partnered with them to provide an educational workshop about workplace accommodations, the Americans with Disabilities Act, and national and local legal hot topics presented by a local lawyer who focuses on employment practices,

EEOC, and labor law. The event was open to the public and was attended by over forty members of the business community and a few DVI staff. Once again, DVI coordinated this event during National Disability Employment Awareness and World Blindness Months.

VR Consumer Orientation Video and Consumer Handbooks Developed: The VR team developed an orientation video outlining and explaining services in detail. Although designed to be self-paced, VR counselors provide technical assistance and respond to questions throughout the orientation process. Complementing the orientation process, the new Consumer Handbook thoroughly explains the vocational rehabilitation history, process and procedures. Additionally, the handbook outlines expectations of the VR staff and consumers, includes Client Assistance Program information, explains the Individual Plan for Employment process, and much more. DVI developed both tools to streamline new consumer orientation process, ensure information is properly explained and provide consumers with reference material.

VR Promotional Video Developed: DVI contracted a video production professional who created a comprehensive informational video about VR services directed toward consumers. In addition, the production company broke out each DVI service into one-minute clips to allow for quick access.

Continued Improvement: How DVI will work with consumers to identify employment & career advancement opportunities: DVI will continue to provide the services that have been implemented and/or improved (described above) and will improve career development and competitive integrated employment outcomes for consumers through the following activities:

- VR will improve communication and collaboration with all DVI service units and community partners to ensure timely coordination of work-based services for consumers (i.e. technology training, low-tech aids, or low-vision evaluations) that will promote employment success and job retention for both new and existing employees who are blind or losing vision.
- The business services staff will improve overall networking and job development efforts. Using supervisor facilitated planning, staff will coordinate development efforts, make direct contact with new businesses, and increase networking through business-oriented organizations such as the Society of Human Resource Managers, Rotary Clubs, Chambers of Commerce, and Disability:IN Delaware (formerly the Delaware Business Leadership Network, Inc., WIOA partners, state and Local Boards, and economic development offices). Collaborating with WIOA and economic development partners to leverage business contacts, share resources and expertise, and coordinate services that are beneficial to businesses and promote the employment of individuals with disabilities.
- The business service staff will improve efforts to routinely cultivate new opportunities from existing business partnerships. Using facilitated planning, the ESS will identify opportunities that will result in: creating more work-based learning experiences (including internships, short-term employment, apprenticeships, and fellowships); developing

additional pre-employment transition service opportunities; and assisting businesses to recruit qualified applicants who have severe visual impairments.

- DVI-VR staff will increase contact with consumers who are independently working and maintain relationships with their supervisors to secure future opportunities.
- DVI-VR staff will increase employer engagement by encouraging businesses to access DVI employer services. The ESS will work with the Director of Communications to develop a simple process, tool, and marketing materials to promote their workplace inclusion employer services including: vision-specific on-site training; Americans with Disability Act worksite training; information and resources related to federal contracting and Section 503; assistance with identifying workplace accommodations; access to the latest assistive technology; and, workplace accessibility and access for the blind. Using DVI resources, ESS personnel will create processes, curricula and materials for all workplace training options.
- The Business Services staff will serve as points of contact for businesses needing guidance regarding support to remove disability-related obstacles to employment and the provision of reasonable accommodations for recruitment, work-based learning activities, onboarding, and retention of employees, including Assistive Technology and worksite assessments.
- The ESS staff will assist to develop to develop hand-out materials or locate and print public resources about hiring incentives. The ESS will also provide technical assistance to businesses that need help to complete necessary paperwork to access hiring incentives (i.e. Federal tax credits, Delaware Disability Employment tax credit, and on-the-job training wages).
- DVI-VR will increase consumer choice by expanding use of contracted services offered through nonprofit Community Rehabilitation Programs.
- DVI-VR will continue to provide business and industry-specific career information and training sessions for consumers.

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

DVI-VR Business Services Structure, Key Roles & Activities: The ESS team at DVI provides support to both adults and students with visual impairments who are involved in transition services. The VR Transition Counselors and staff recognize the value of working as a team to utilize the established employer relationships to provide students with visual impairments opportunities for exploring careers and increasing exposure to and participation in authentic work experiences.

DVI has a well-established relationship with the City of Wilmington, New Castle County and employers in Kent and Sussex Counties in regard to the Summer Youth Program. Each site

reserves a number of positions specifically for students with visual impairments. This partnership has grown and strengthened, each year providing better coordination, communication and advanced planning in order to prepare both the students and the site managers for the experience. This has resulted in business sites being more informed and prepared to understand the abilities and potential accommodation needs of individuals with visual impairments and students having access to work experiences that align with their skills and abilities. DVI gains a better understanding and assessment of the labor market needs in the area and the employer sites learn first-hand the variety of ways DVI can support them in the employment of individuals with disabilities.

Recently VR has expanded contracts with Community Rehabilitation Providers (CRP) in order to offer more group and individualized pre-employment transition services, including workplace readiness training and work-based learning experiences. The CRP staff can provide individualized Pre-ETS activities as well as work in collaboration with DVI on the various group programs offered to students during school breaks. Through the engagement of their employer partners, the CRPs have created opportunities for students to job shadow, participate in informational interviews and worksite tours and gain work experience through paid or unpaid internships.

DVI is also a core partner in the *PIPEline to Career Success for Students with Disabilities* program. This program works closely with LEAs, state agencies and Career and Technical Education (CTE) to identify opportunities to promote and support the inclusion of students with disabilities in CTE career pathways. Delaware DOE has made a great effort to assist LEAs with aligning their CTE offerings with the high growth fields in Delaware, specifically to the labor market needs in the various regions the LEAs are located. A major component of this program is ensuring all students have access to work-based learning experiences that are incorporated into the CTE pathways, utilizing an existing partnership with employers who provide the work and training opportunities.

Continued Improvement: How DVI will work with students to identify employment preparation opportunities: DVI will continue of provide the services that have been implemented and will improve career development activities to better prepare students with visual impairments to achieve their post-school goals. These activities include:

- VR Transition Counselors will improve communication and collaboration with all DVI service units and community partners to ensure timely coordination of work-based services for students (i.e. technology training, low-tech aids, or low-vision evaluations) that will expand work-based learning opportunities.
- The business services staff will improve overall networking and job development efforts. Using supervisor facilitated planning, staff will coordinate development efforts, make direct contact with new businesses, and increase networking through business-oriented organizations such as, Society of Human Resource Managers, Rotary Clubs, Chambers of Commerce, and Disability:IN Delaware (formerly the Delaware Business Leadership Network, Inc.), WIOA partners, state and local boards, and economic development offices. Collaborating with WIOA and economic development partners to leverage

business contacts, share resources and expertise, and coordinate services that are beneficial to businesses and promote the employment of individuals with disabilities.

- The business service staff will improve efforts to routinely cultivate new opportunities from existing business partnerships. Using facilitated planning, the ESS will identify opportunities that will result in: creating more work-based learning experiences (including internships, short-term employment, apprenticeships, and fellowships); developing additional pre-employment transition service opportunities; and assisting businesses to recruit qualified applicants who have severe visual impairments.
- DVI-VR staff will increase employer engagement by encouraging businesses to access DVI employer services. The ESS will work with the Director of Communications to develop a simple process, tool, and marketing materials to promote their workplace inclusion employer services including: vision-specific on-site training; Americans with Disability Act worksite training; information and resources related to federal contracting and Section 503; assistance with identifying workplace accommodations; access to the latest assistive technology; and, workplace accessibility and access for the blind. Using DVI resources, ESS personnel will create processes, curricula and materials for all workplace training options.
- The Business Services staff will serve as points of contact for businesses needing guidance regarding support to remove disability-related obstacles to employment and the provision of reasonable accommodations for work-based learning experiences, onboarding, and retention of employees, including Assistive Technology and worksite assessments.
- The ESS staff will assist to develop handout materials or locate and print public resources about the Fair Labor Standards Act (FLSA) of 1938 and hiring incentives. The ESS will also provide technical assistance to businesses that need help to complete necessary paperwork to access hiring incentives (i.e. Federal tax credits, Delaware Disability Employment tax credit, and on-the-job training wages).
- DVI-VR will increase consumer choice by expanding the use of contracted services offered through nonprofit Community Rehabilitation Programs.
- DVI-VR will continue to provide business and industry-specific career information and training to support students with making informed decisions about participating in CTE career pathways aligned with their skills and labor market needs.

h. Interagency Cooperation (Blind)

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. State Medicaid plan under title XIX of the Social Security Act

DVI has active relationships with state agencies that access employment services through Medicaid resources under Title XIX of the Social Security Act.

DVI collaborates with the Division for Developmental Disabilities Services (DDDS) while providing Supported Employment (SE) services to consumers with visual impairments and intellectual disabilities. Eligible individuals may receive extended employment services made possible through amendments of the DDDS Home and Community Based Waiver programs, HCBS 1915(i), HCBS 1915(c) and HCBS (b)(4).

DVI partners with the Division of Substance Abuse and Mental Health (DSAMH) to coordinate the provision of evidence-based SE to eligible visually impaired consumers who have severe and persistent psychiatric needs. Employment services are made possible through the Section 1115 Medicaid demonstration waiver as authorized by Title XIX of the Social Security Act.

2. State Agency Providing Services for Individuals with developmental Disabilities

In Delaware, eligible people with developmental disabilities have access comprehensive services from the Division of Developmental Disabilities Services (DDDS), VR services from DVI or the Department of Labor Vocational Rehabilitation Division (DVR-General), and school-to-work transition services from the Department of Education.

General DVR: Since DVI is the agency for the blind and DVR is the general VR agency, it is extremely important that the agencies work collaboratively to ensure all qualified people with developmental disabilities receive VR services. As such, the general and blind agencies maintain a Memorandum of Understanding (MOU) which defines the relationship between the two VR agencies. This formal interagency agreement defines responsibilities, dispute resolution procedures, financial responsibilities, and procedures to effectively coordinate among the agencies.

Division for Developmental Disabilities Services (DDDS): DVI collaborates with DDDS the for the provision of SE services to consumers with blindness and intellectual disabilities. If eligible, individuals may receive extended employment services from DDDS through one of three Medicaid HCBS waivers. Each waiver has defined criteria for eligibility, the services available are very similar. They include employment navigation, career exploration and assessment, individual & small group SE, Social Security benefits counseling, financial coaching, non-medical transportation, personal care (including a self-directed component), orientation & mobility, and assistive technology. The waiver is intended to complement VR services by offering extended employment funding, personal care and customized services for people who may have had unsuccessful employment experiences. In an effort to avoid gaps in services, interagency coordination begins before the consumer completes the SE process with DVI. Once DVI makes a referral, DDDS does an individualized review of eligibility, application status (if applicable), and existing resources. The goal is to have a streamlined process that assists in identifying all available programs and resources, expand and improve employment services to people with significant disabilities, and maximize the use of comparable benefits. DDDS currently uses three Medicaid waivers for the provision of SE extended employment services.

Department of Education: DVI is uniquely positioned to facilitate the transition of students with visual impairments from school to the receipt of VR services due to the comprehensive structure of the division and the agency's participation in statewide transition activities. DVI has both an Education Services Unit and a VR Unit, which allows the agency to begin working with children as soon as a visual impairment is identified. The MOU between DDOE and DVI outlines roles and responsibilities of the LEAs and DVI with regard to the consultation and technical assistance provided for the transition of students with visual impairments from school to post-school activities, including VR services.

Early Start to Supported Employment Model (ESSE): For several years, DDDS, DVI, DVR, and DOE have collaboratively worked with eligible students, aged 14 and above, to ensure successful transitions from school into employment, training/education or both. DVI-VR works closely with all agencies to encourage SE eligible students with visual impairments to participate in the ESSE model. ESSE was designed to minimize gaps between exiting school and beginning employment by encouraging students with intellectual disabilities to begin the SE process up to three years prior to exiting school. The goal is for students to experience the success and possible pitfalls of employment before their secondary education program ends.

3. State Agency Responsible for Providing Mental Health Services

DVI and the Division of Substance Abuse and Mental Health (DSAMH) collaborate to provide Evidence-based Supported Employment (SE) to eligible visually impaired consumers who have severe and persistent psychiatric needs. The DSAMH PROMISE program uses a team approach to integrate employment support services and comprehensive mental health services. Eligible participants can receive career exploration, on-the-job supports, transportation, personal care, orientation and mobility training, assistive technology, and other services to help them gain and maintain employment. The waiver is intended to complement VR services by offering extended employment funding, personal care, and customized services for people who may have had unsuccessful employment experiences.

i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development (Blind)

(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 (Blind)

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. Current Personnel Status

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; (Blind)

Managers of each program within DVI are responsible for evaluating training needs for the staff in their unit. In regard to the provision of VR services, DVI has a Social Services Senior Administrator (SSSA) who oversees the VR unit, including personnel development. The SSSA determines training needs through performance planning and evaluation, requests from or conversations with staff and through online surveys. Based on feedback, training is developed or coordinated to address the needs of staff. In addition, DVI supports VR Counselors with the cost to obtain and maintain the professional certification of a Certified Rehabilitation Counselor (CRC) to ensure they have the knowledge, skills and abilities to carry out their job duties.

In FY 2018, DVI’s VR unit determined 53 individuals eligible for services and developed 51 Individualized Plans for Employment.

Job Title	Total Positions
Administrative Specialists	2
Employment Services Specialists	3
Employment Services Specialists	3
VR Placement Specialists	1
Vocational Rehabilitation Counselors	5
VR District Administrator	1
BEP Director	1
BEP Business Services Supervisor	1
Social Service Senior Administrator	1

In addition to the staff providing direct VR services, the agency is responsible for comprehensive service provision to address a wide range of needs for individuals who are blind or visually impaired. These ancillary positions provide either technical, administrative, fiscal or support roles in support of VR service provision. These positions are state funded, and staff utilize a time tracking system (Timesheet Plus) as a means to determine time and effort towards the support of VR consumers.

Additional state-funded positions tracking time towards the provision of support to VR consumers include:

Job Title	Total Positions
Certified Orientation & Mobility Specialists	6
Vision Rehabilitation Therapists	4
Trainer/Educators	2
Fiscal	5

ii. Current Personnel Requirements

the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and (Blind)

Job Title	Current Vacancy
Administrative Specialist	0
Employment Services Specialist	0
VR Placement Specialist	1
Vocational Rehabilitation Counselor	0
VR District Administrator	1
BEP Director	0
BEP Business Service Supervisor	1
Social Services Senior Administrator	0

Additional positions (state funded) tracking time towards the provision of support to VR consumers include:

Job Title	Current Vacancy
Certified Orientation & Mobility Specialist	0
Vision Rehabilitation Therapists	1
Trainer/Educator	1
Fiscal	0

iii. 5-year Projections of Personnel Needs

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. (Blind)

Job Title	Projected Vacancies
Administrative Specialist	0
VR Placement Specialist	1
Employment Services Specialist	1
Vocational Rehabilitation Counselor	2
VR District Administrator	1
BEP Director	0
BEP Business Service Supervisor	1
Social Services Senior Administrator	0

Additional state-funded positions tracking time towards the provision of support to VR consumers include:

Job Title	Projected Vacancies
Certified Orientation & Mobility Specialist	0
Vision Rehabilitation Therapist	1
Trainer/Educators	1
Fiscal	1

B. Personnel Development (Blind)

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

i. Higher Education Institutions

A list of the institutions of higher education in the State that are preparing VR professionals, by type of program; (Blind)

Delaware does not have an institution of higher education with a program to prepare Vocational Rehabilitation professionals. However, VR professionals are encouraged to pursue regional or online training programs. Currently, DVI has 5 counselors who hold a master's degree. All five counselors are preparing to take the CRC exam. One is preparing for the exam in summer of 2020, two are in the process of taking the additional coursework required to sit for the exam, two will be signing up for the additional coursework to start in the fall of 2020.

ii. Student Enrollment in Programs for VR Professionals

The number of students enrolled at each of those institutions, broken down by type of program; and (Blind)

DVI does not have any students enrolled at an institution of higher learning focused on VR. However, there are four counselors requiring additional coursework in order to sit for the CRC exam. Two are enrolled in coursework and two will be enrolling in 2020.

iii. Number of Graduates

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. (Blind)

DVI does not have any recent graduates from a Rehabilitation program.

2. Plan for Recruitment, Preparation and Retention of Qualified Personnel (Blind)

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.

DVI has partnership agreements with the University of Delaware, Salus University, the University of Maryland Eastern Shore, and Pennsylvania College of Optometry to provide internships for graduate students majoring in Rehabilitation Education and other closely related

fields of study. These partnerships afford an intern the opportunity to participate in the work environment of VR Service delivery and the delivery of other services to support VR consumers during the VR process. Interns are assigned working mentors in the VR program, as well as, working in partnership with other field services to gain the broad scope of knowledge needed to become a successful rehabilitation professional. DVI utilizes the internship process as a way to expose college students to the vision rehabilitation field and assess their qualifications for employment should a vacancy exist.

Our agency has also developed a partnership with the Office of Management and Budget (OMB). OMB operates a Selective Placement Registry for the State of Delaware. This Registry lists qualified persons with disabilities from various backgrounds who have been determined eligible to fill specific vacancies within state agencies. Agencies are free to select qualified individuals from this registry without going through the normal state recruitment process, thereby streamlining the process for any qualified individual with a disability who may choose to apply for a position with DVI.

In addition, DVI shares vacancies with various advocacy group chairpersons and program chairs of Universities in the region that prepare professionals in rehabilitation counseling, orientation and mobility, assistive technology, and teachers of students with visual impairments. They are asked to encourage qualified members, specific to the vacant position, to apply when vacancies occur.

3. Personnel Standards (Blind)

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. Consistency with National or State Professional Requirements

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 (Blind)

Currently, all five Vocational Rehabilitation Counselors have master's degree in Rehabilitation or a related field. The agency follows recruitment practices established by the state to recruit, prepare and retain qualified personnel. Although it is not a requirement of the State for VR Counselors to hold their CRC, DVI holds this as a professional standard for any practicing VR Counselor and as such, sets the expectation upon hire that a VR Counselor will pursue the CRC designation.

B. Education and Experience Requirements

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. (Blind)

DVI uses the following standards as minimum qualifications for a Vocational Rehabilitation Counselor:

- Possession of a master's degree or higher in Rehabilitation Counseling, Social or Behavioral Science or related field OR Certified Rehabilitation Counselor (CRC) designation;
- At least one-year experience in vocational rehabilitation;
- Six months experience in analyzing and interpreting medical, psychiatric, psychological, psycho-social, educational and vocational reports from medical, psychological, and other experts to determine eligibility or an individual's vocational rehabilitation needs;
- Six months experience in case management which includes assessing, planning, developing, implementing, monitoring, and evaluating options and services to meet an individual's human service needs;
- Six months experience in health or human services work which includes applying theories, principles, laws and practices of health or human services programs and services that assist with and improve life for individuals, families, or communities such as financial support, employment, unemployment, housing, health care, disease prevention, substance abuse, child protective services, physical/mental health treatment and prevention or rehabilitation;
- Six months experience in interpreting vocational rehabilitation laws, rules, regulations, standards, policies and procedures.

DVI partners with a variety of technical assistance centers, community partners and professional organizations to coordinate training with respect to visual impairments, the needs of individuals with disabilities, and the evolving labor force.

4. Staff Development. (Blind)

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 (Blind)

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

DVI staff receive annual performance reviews based on expectations related to agency goals and the expectations of the position. The annual review, online surveys and regular meetings with staff provide opportunity to discuss staff training needs and outline plans for ensuring staff have

access to training opportunities. DVI encourages professional development in areas such as best practices, assessment, vocational counseling, job placement, and rehabilitation technology and utilizes distance learning, webinars, regional and national conferences in addition to training provided by the State of Delaware through the Delaware Learning Center (DLC).

DVI also uses the DLC to assign and track professional development. Based on performance evaluations and needs assessments, the Social Services Senior Administrator for VR and other supervisors work with staff to provide them with the training needed to perform their job duties as efficiently and effectively as possible.

B. Acquisition and Dissemination of Significant Knowledge (Blind)

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

DVI supports multiple service units by employing staff who have specialized education, skills and expertise. Teachers of the Visually Impaired (TVI), Certified Orientation & Mobility Specialists (COMS), Vision Rehabilitation Therapists and VR Counselors all received specialized education and training related to their fields. In addition, three DVI employees participated in a course offered by an accredited university to remain current in the Assistive Technology (AT) industry and ensure the use of best practices in providing AT training and services to individuals who are blind and visually impaired. DVI coordinates in-house training seminars to allow for the staff to cross-train and seek support from one another. DVI values the interagency collaboration and sharing of knowledge so all staff have a more well-rounded understanding of the various needs of individuals who are blind or visually impaired.

In addition to the in-house expertise DVI can offer, access to the Delaware Department of Health & Social Services (DHSS) extensive training curriculum, the Department of Human Resources Statewide Training and Organizational Development programs, and a multitude of outside training opportunities, provide staff with a variety of ways to share and receive training. The agency considers support for membership to the Association for Education and Rehabilitation of the Blind and Visually Impaired (AER), American Foundation for the Blind, National Federation for the Blind, and the National Rehabilitation Association (NRA) as other ways to pursue opportunities for professional growth.

5. Personnel to Address Individual Communication Needs (Blind)

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.

When an applicant for services requests an interpreter, DVI staff reviews and selects from a list of local professional interpreting services with whom the State of Delaware has a contractual agreement. All written materials are disseminated to consumers in the appropriate media: Braille, large print, tape or electronic file, as well as Spanish for various forms/brochures.

6. Coordination of Personnel Development under the IDEA (Blind)

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.

Every unit within DVI provides services to students with visual impairments. This includes VR, Education, ILS, Orientation & Mobility, and the AT Training Center. DVI administration and staff maintain a close working relationship with the DDOE administration as well as administrators and educators within each school district. DVI staff work with every district and charter school to support students with visual impairments to address their education needs, teach the expanded core curriculum, and coordinate participation in transition and Pre-ETS services.

The DVI Education Administrator participates in Special Education Leadership meetings and the VI Collaborative along with DDOE representative, school districts, families and other stakeholders. The Education and VR Administrators participate in the monthly transition cadre meetings along with VR Transition Counselors, TVIs, district transition personnel, DOE administrators, other state agencies, families and community providers.

DVI is part of the Delaware Community of Practice on Transition and is a partner on various transition initiatives, including PIPEline to Career Success for Students with Disabilities and the Annual Transition Conference.

j. Statewide Assessment (Blind)

(Formerly known as Attachment 4.11(a)).

1. Assessment of Rehabilitation Needs

Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR service needs: (Blind)

A. Of Those with the Most Significant Disabilities including their need for supported employment services (Blind)

During FY2018, DVI and the Vocational Rehabilitation Advisory Council for the Blind, or DVI's SRC, conducted a Comprehensive Statewide Needs Assessment (CSNA) to identify the rehabilitation needs, particularly the VR service needs, of individuals with visual impairments. The CSNA was conducted by collecting primary data from stakeholders, including consumers, community providers, interest groups, government partners, DVI employees and members of the public. Various tools and techniques were used to gather input such as a statewide public survey, face-to-face interviews, telephone surveys and focus groups.

The findings revealed the most frequently mentioned needs among consumers surveyed were employment/placement, access to services (including transportation), and assistive technology. Both consumers and staff identified the need to enhance employment/placement services for

individuals with the most significant disabilities, including those who are eligible for supported employment. There are limited resources for providing comprehensive vocational and AT assessments, especially for individuals with multiple disabilities.

DVI will start to develop another CSNA in FY 2020 with results available in FY2022.

B. Of Minorities

In the most recent CSNA, staff reported that services are provided equally across minority groups. However, based on previous data, DVI utilized the 2018 CSNA as an opportunity to provide specific outreach to the Latino community. The need for improving information about and access to DVI services, especially for the Latino community was identified. Feedback from the focus groups uncovered some fear in accessing services.

C. Of Those Unserved or Underserved by the VR Program

The CSNA identified individuals with visual impairments who have been unserved or underserved by VR include the Latino Community, the Amish community and Veterans. Additionally, transportation was reported as a barrier so individuals in rural areas or those who have limited access to public transportation may go unserved due to difficulty with getting to or participating in VR services.

D. Of Those Served through Other Components of the Statewide Workforce Development System

Access, both physical and technological, is an ongoing need for individuals with visual impairments. As a core partner of the Statewide Workforce Development System, DVI provides AT to the Division of Employment and Training who is primarily responsible for operations at the American Job Center in Delaware. This improves the physical accessibility of the center for individuals with visual impairments to utilize the resources available to the public. However, accessibility of the Delaware Job Link System remains a barrier to compatibility with certain types of software used by individuals with visual impairments. DVI is also aware that many partners are unsure of how to accommodate for a visual impairment, which reinforces the importance of DVI remain actively engaged in activities with the other core partners.

E. Of Youth with Disabilities and Students with Disabilities including, as appropriate, their need for pre-employment transition services or other transition services

Assistive Technology (AT) remains an important issue to consumers, especially youth with disabilities. Acquiring and being trained on AT was the most frequently cited difficulty in participating in education or training and with obtaining employment. Transition services were also identified as needs for students with disabilities, with more communication and coordination between education and VR due to confusion among LEAs, providers, students and families regarding the difference between the two separate VR agencies in Delaware – DVI and the Division of Vocational Rehabilitation (DVR). DVI and DVR have a memorandum of understanding to assist with the coordination of referrals and to identify how DVI and DVR will

collaborate on cases when shared expertise is necessary and in the best interest of the consumer.

2. Improvement of Community Rehabilitation Programs

Identify the need to establish, develop, or improve community rehabilitation programs within the State; and (Blind)

Although the CSNA did not identify gaps for establishment, development, or improvement of community rehabilitation programs (CRP) within the state, it did identify the need to increase community partners. DVI recognizes the need to establish more relationships with CRPs and to provide training and technical assistance to further build their capacity with understanding the needs of individuals who are blind and visually impaired.

3. Assessment of Transition Service Needs

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. (Blind)

DVI serves approximately 80 students with visual impairments through the transition program. However, transition services were identified as a need by DVI consumers. Although DVI is confident it has identified most students with visual impairments who are potentially eligible for VR services, there are additional barriers that hinder the process. The VR Unit has enhanced the transition program and increased individualized and group services to students through transition and Pre-ETS activities, but barriers still exist. VR Counselors, Teachers of the Visually Impaired and Orientation & Mobility Specialists are members of the transition team, which is critical to coordinating services with schools, yet confusion between the two VR programs in Delaware remains a challenge for LEAs, students and families. In addition, communication within and outside of DVI, transportation, career preparation and acquiring AT are barriers that exist for many consumers but are particularly important to resolve for students exiting school and moving on to post-secondary education or directly into employment.

k. Annual Estimates (Blind)

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

1. Number of Individuals in the State Eligible for Services (Blind)

The number of Delaware citizens that could potentially be eligible for DVI services is estimated in the table below.

Table-Number Eligible (estimated)

Year	2020	2021	2022
Population (18-64 years of age)	582,063	587,883	593,762
Number Visual Difficulties	11,248	11,472	11,689
Percent of DE Population	1.9%	1.9%	1.9%

Methodology: In order to arrive at accurate predictions, DVI reviewed population estimates from the Open Data Network¹ and the U.S. Census Bureau² as well as disability data from Cornell University Disability Statistics³. According to sources, the Delaware population increased 8.4% since the 2010 census (approximately 1% per year) and is predicted to see similar growth over the next few years. In addition, three previous years of survey information from Cornell University demonstrated that 2% (avg.) of the state’s 18 to 64-year-old population indicated they have severe visual difficulties. See table below for additional information.

Table-Cornell University Disability Statistics

Year	2017	2016	2015
Population (18-64 years of age)	576,300	574,300	574,500
Number Reported Visual Difficulties (ACS)	10,600	10,300	9100
Percent of DE Population (ACS)	1.9%	2%	1.9%

2. Number of Eligible Individuals who will Receive Services Under (Blind)

A. The VR Program

The number of people who will receive VR services from DVI are estimated in the table below.

Table-Eligible Individuals who will Receive Services

Year	2019 (BL)	2020	2021	2022
Estimated people on registry	3474	3578	3685	3786
Average VR consumers on registry	6.3%	6.3%	6.3%	6.3%
Estimated VR consumers served (Title I)	194	200	206	212
Estimated VR consumers served (Title VI)	24	25	26	27
Estimated total VR consumers served	219	225	232	239

Methodology: In order to produce accurate predictions based on available data, DVI reviewed the DVI Registry for the Blind⁴ and VR data. The DVI registry is a database of residents who have met the eligibility criteria of blind, legally blind, or severely visually impaired. DVI serves consumers across the lifespan so the database includes ages from birth to 106 years of age; however, VR consumers represent 6.3% of the registry. In order to establish baselines (BL) needed to determine growth, DVI reviewed three years of registry data to reveal an average increase of 3%.

DVI researched further to determine why the average registry increase continues to be three times higher than the predicted population growth. According to the Center for Disease Control⁵, the number of Americans diagnosed with age-related eye diseases in the past decade has rapidly increased. They expected the upward trend will continue for the next three decades because of

¹ DE Population Change- [Open Data Network](#)

² [U.S. Census Bureau](#)

³ Erickson, W., Lee, C., von Schrader, S. (2017). Disability Statistics from the American Community Survey (ACS). Ithaca, NY: Cornell University Yang-Tan Institute (YTI). Retrieved from [Cornell University Disability Statistics website](#).

⁴ Welfare/Welfare Agencies/DE Commission for the Blind (1953): [31 Del. Code § 2108](#)

⁵ [Center for Disease Control](#)

the increasing epidemics of chronic diseases and a rapidly aging U.S. population. In addition, age-related eye diseases (i.e. Macular Degeneration, Glaucoma, Diabetic Retinopathy, etc.) often affect working age people (age 40+) and have little early warning signs. The registry annual increase (3%) also exceeds the estimated number of people (2%) who could be eligible for services in the previous section; however, the two figures are close enough to support our conclusion that the rate of disease onset is the primary reason the DVI registry growth.

B. The Supported Employment Program

The number of people who will receive Supported Employment (SE) services from DVI are estimated in the table below.

Table #1-Eligible Individuals who will receive SE services

Year	2019 (BL)	2020	2021	2022
Estimated VR consumers served (Title I)	194	200	206	212
Estimated VR consumers served (Title VI)	24	25	26	27
Estimated total VR consumers to receive services	219	225	232	239

Methodology: In order to produce accurate predictions, DVI reviewed three years of past VR data to determine the annual average SE consumer rate. DVI estimates that 11% of the total served each year will receive SE.

C. Each Priority Category, if under an Order of Selection

DVI is not operating under an order of selection.

3. Number of Eligible Individuals Not Receiving Services due to an order of selection (Blind)

DVI is not operating under an order of selection and all eligible individuals are receiving services. DVI anticipates having sufficient resources to continue serving all eligible individual who apply for VR services.

4. Cost of Services

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. (Blind)

DVI is not under an order of selection. The table below represents the average estimated costs for services.

Table-Cost of Services

Year	2020	2021	2022
Estimated VR cost per person	\$10,130	\$10,121	\$10,122
Estimated SE cost per person	\$7,500	\$7,500	\$7,500
Total Estimated Cost	\$2,213,596	\$2,280,004	\$2,348,404

I. State Goals and Priorities (Blind)

The designated State unit must:

1. Joint Development (Blind)

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 goals were not developed jointly with the SRC because there was no formal process to ensure the goals were reviewed annually. DVI will work with the SRC to develop an annual work plan that identifies key activities and timelines to ensure all obligations are met.

2. Goals and Priorities (Blind)

Identify the goals and priorities in carrying out the VR and Supported Employment programs. (Blind)

Goal 1: Provide quality employment outcomes for individuals with visual impairments

Performance Objective and Measure: Increase employment outcomes of total VR consumers, Supported Employment and transition students exiting high school by a minimum of 5% over previous year.

Performance Objective and Measure: Maintain an employment rate of 90% at second quarter and 80% at fourth quarter following exit from the VR program.

Performance Objective and Measure: Achieve median earnings of no less than \$15.00 per hour second quarter following exit from VR program.

Goal 2: Provide quality Pre-employment Transition Services (Pre-ETS) to students with visual impairments

Performance Objective and Measure: Increase partnerships with Community Rehabilitation Providers to five providers offering Pre-ETS services.

Performance Objective and Measure: Increase the number of students receiving Pre-ETS services by 10% over previous year.

Performance Objective and Measure: Through internal and external service provision, ensure all DVI transition students participate in at least one internship, paid/unpaid work experiences and/or apprenticeships prior to high school exit.

Goal 3: Enhance employer and community partnerships that lead to competitive, integrated employment for individuals with visual impairments

Performance Objective and Measure: In collaboration with DVI's SRC and other community partners, develop and track formal/informal opportunities (i.e. individual and group employer outreach activities, collaboration activities with other disability groups, conferences, workshops, etc.) to engage and educate employers specifically around the employment of individuals with visual impairments.

Performance Objective and Measure: Develop at least five additional partnerships with Community Rehabilitation Providers related to training, supported employment and/or placement services.

Performance Objective and Measure: Support industry-specific training programs in high demand occupations based on Delaware labor market information, demonstrated by consumers earning industry recognized credentials aligned with acquired training and employment.

Performance Objective and Measure: Develop an employer inventory that tracks engagement and demonstrates authentic business partnerships that result in competitive, integrated employment opportunities for individuals with visual impairments.

Goal 4: Increase awareness and improve access to DVI services

Performance Objective and Measure: Develop system to track and staff outreach events to ensure DVI participation.

Performance Objective and Measure: Develop a plan for increasing outreach to underserved communities (i.e. Latino, Amish and Veterans) as well the medical community.

Goal 5: Provide quality entrepreneurial opportunities in the Business Enterprise Program

Performance Objective and Measure: Develop a process and procedure to document that consumers are informed of opportunities for participation in the BEP program.

Performance Objective and Measure: Develop a Pre-ETS activity to expose students with visual impairments to work opportunities through the BEP program.

Performance Objective and Measure: Engage the Blind Vendors Committee and BEP Operators in the VR process for consumers who express an interest in the program (i.e. develop job shadow, internship and peer mentoring opportunities).

3. Strategic Analysis

Ensure that the goals and priorities are based on an analysis of the following areas: (Blind)

A. Most Recent Comprehensive Statewide Assessment

DVI conducted a Comprehensive Statewide Needs Assessment in FY18. The goals and priorities are based on the results from the most recent assessment and incorporated throughout this plan.

B. State's Performance under the WIOA Common Measures

DVI included section 116 of WIOA throughout the goals and priorities outlined above, including how performance will be measured.

C. Any Other Information on the Effectiveness of the VR program including any reports received from the State Rehabilitation Council and finding and recommendations from monitoring activities conducted under section 107

DVI has not been monitored since FY2013 but has been working with the Rehabilitation Services Administration to evaluate progress related to their monitoring recommendations. DVI is preparing for monitoring in FY2020.

m. Order of Selection (Blind)

Describe:

1. State Implementation Decision

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

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

The Division for the Visually Impaired anticipates having sufficient resources and funding streams to serve all eligible individuals making application for VR services which will preclude DVI from implementing an order of selection wait list.

B. The justification for the order. (Blind)

The designated state unit does not foresee implementing an order of selection.

C. The service and outcome goals. (Blind)

The designated state unit does not foresee implementing an order of selection.

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

The agency is not operating under an order of selection.

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

The agency is not operating under an order of selection.

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. (Blind)

Not applicable.

n. Goals and Plans for Distribution of title VI Funds (Blind)

1. Supported Employment Services Goals and Priorities (Blind)

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

The Delaware Division for the Visually Impaired will continue to provide quality supported employment services to individuals with the most significant disabilities. In addition, DVI intends to increase the number of people served to ensure eligible people with visual impairments have a greater opportunity to achieve successful employment outcomes. The following plan outlines the DVI strategy for distribution of Title VI funds and continual improvement.

Goal 1: Ensure fiscal policies, procedures and practices are fully aligned with Title VI regulations and fiscal controls are implemented.

Goal 2: Ensure supported employment costs are allocated to the proper source of funds including:

- Fifty percent reserve of Title VI allotment for the provision of supported employment services, including extended services, for youth with the most significant disabilities.
- No less than a 10% of non-Federal expenditures are used as match toward the 50% allotment reserved for supported employment services, including extended services, for youth with the most significant disabilities; match must be met by September 30 of the FFY of appropriation in order to fully expend or carryover any unobligated portion of the reserved funds.
- Administrative costs for Title VI are not to exceed 2.5%.

Goal 3: Provide DVI personnel continual training, oversight and guidance regarding Title VI fiscal regulations in relation to purchased services and allowable costs. Ongoing training will include:

- Supported Employment Title VI funds are to be used for the provision of supported employment only after the client has a job. Allowable costs include:
 - **Ongoing Support Services** are needed to support and maintain an individual with a most significant disability, including a youth with a most significant disability, in supported employment. Ongoing support services begin at the time of job placement and last until the transition to extended services. May include activities such as an assessment of employment stability and the provision or coordination of specific services at or away from the worksite that are needed to maintain stability. Other examples include the provision of skilled job trainers for the individual at the worksite, social skills training, follow-up services, facilitation of natural supports at the worksite. Title I funds may also be used for ongoing supports.
 - **VR Extended Employment Services** are only available to youth with the most significant disabilities. Youth may receive extended employment services for up to four years or until they reach the age of 25. Extended services are ongoing services needed to support and maintain an individual with a most significant disability, including a youth with a most significant disability, in supported employment and can be provided by a State agency, a private nonprofit organization, employer, or any other appropriate resources.
 - **Post-Employment Services** are available if services are required to maintain or regain employment or advance in employment.
- (Basic VR) Title I funds are used for all services that are not allowable Title VI funds but necessary for supported employment eligible consumers to achieve their employment outcomes. Examples include:
 - job placement
 - situational assessments
 - skills training
 - interview clothing
 - assistive technology

2. Services for Youth with the Most Significant Disabilities (Blind)

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

A. Extended Services for a Period Not to Exceed 4 Years

The Division for the Visually Impaired (DVI) works in collaboration with the Division of Developmental Disabilities Services to leverage funds for extended supports for youth with visual impairments and intellectual/developmental disabilities (ID/DD) who receive supported employment services. DVI also works with the Division of Substance Abuse and Mental Health in order to connect youth with mental health disabilities to necessary services and extended supports for employment. When a youth is not eligible for extended services from some other

entity, DVI will support extended services for a period not to exceed four years in order to develop natural supports and/or explore other sources of extended services.

B. Leveraging Public and Private Funds

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.

As required by section 603(d), DVI will reserve 50% of its supported employment allocation on youth with the most significant disabilities. DVI will utilize the long-standing collaborative relationship with the Division of Developmental Disabilities Services, Local Education Agencies, students, families, employers and Community Rehabilitation Providers to begin the supported employment process early and ensure youth with disabilities are connected to employment services prior to exiting high school. This provides opportunities for sharing information, exposing youth to careers and helping them learn about and apply for community services that were historically offered only once a youth turned 18.

o. State's Strategies (Blind)

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. To Expand and Improve Services to Individuals with Disabilities (Blind)

In order to expand and improve services, DVI will leverage the many opportunities to engage with stakeholders. These include educational programs, community organizations, the medical community, several councils, service providers, employers, other state agencies, families and consumers. DVI is an active partner with the other WIOA core partners which provides many regular opportunities for information sharing, planning and an overall effort to streamline services. Listening and being responsive to the needs of the community, engaging with multiple partners, and sharing information will assist DVI with improving services and helping the community better understand vision services and the abilities and needs of the individuals we serve. Engaging stakeholders and community partners will also assist DVI with the goals of expanding Pre-employment Transition Services and increasing quality employment outcomes.

2. Provision of Assistive Technology Services

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. (Blind)

Assistive technology (AT) services and devices are integral to the success of individuals with visual impairments. As such, assessment, demonstration and training related to the needs of

individuals with visual impairments is provided to nearly all individuals served by the VR Unit at DVI. To facilitate informed choice, the DVI AT Unit offers a variety of services and rehabilitation technology devices so consumers can use and identify devices that maximize their capacity to engage in vocational training, educational training, and/or a work environment. Assessment and training are provided by DVI Technology Trainers at each stage of the rehabilitation process to the extent that training or technical assistance is necessary for an individual with a disability to achieve an employment outcome. Depending on the individual's needs, they are given the choice of coming into one of two locations, have technology brought to their preferred location or, in some cases, virtual training is available. These options are provided in order to decrease scheduling and transportation barriers that can impact the timeliness of services. DVI also collaborates with other AT resources available in the community in order to connect VR Consumers to a variety of rehabilitation technology options that may be needed due to a disability beyond a visual impairment.

DVI has adopted the SETT (Student, Environment, Tasks, and Tools) framework as a validated process for assessing client's assistive technology needs. This model emphasizes the Student (or consumer), Environment, Tasks, and Tools as equally valid components in determining the AT needs of an individual with a visual impairment. While this was originally developed for transition-aged youth, the agency has broadened its applicability to all consumers served by the agency in order to consistently and effectively meet their AT needs. In addition, three DVI employees participated in a course offered by an accredited university to remain current in the Assistive Technology (AT) industry and ensure the use of best practices in providing AT training and services to individuals who are blind and visually impaired.

3. Outreach Procedures

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. (Blind)

DVI performs outreach in a variety of ways and intends to better track the results in the upcoming year. Currently, DVI hosts several well-attended events and workshops each year that are open to the public. In addition, the agency frequently exhibits at community events and health fairs; many of which are designed to attract minorities, unserved and underserved such as the Delaware Hispanic Festival, the Diabetes Expo and the 55Plus Resource Fair. DVI uses social media to connect with people who may need services. In 2019 the DVI Facebook page increased followers by 22%. More important is the number of vision related inquiries directly through the social networking site also grew by 25% during the same time period. Ultimately, the DVI Facebook page was created to reach underserved populations and the public at large. The uptick in followers, increase in service-related inquiries, and innovative use of the site features prove this will continue to develop into a valuable outreach tool.

Vision-related healthcare professionals are often the number one referral resource for people with severe vision loss. DVI is a member of the Delaware Optometric Association (DOA) and routinely exhibits at their annual conference affording the opportunity to speak with approximately fifty medical professionals. Afterward, the DOA forwards all members the list of

conference attendees and their contact information. DVI staff are active members of six large community resource sharing organizations. Each group offers organized time to learn about services and all are very well-attended. Collectively the groups have nearly 800 members throughout the state. Meetings average anywhere from 15-40% membership attendance and group facilitators will distribute all information such as events and newsletters. The group environments have afforded DVI the opportunity to educate nearly 300 potential referral sources about DVI services annually.

DVI maintains a registry of over 3,400 people who meet the division eligibility requirements. The agency regularly communicates with those who wish to be contacted. The quickest and most effective way to reach the registry is by automated call. DVI uses a text to voice system to inform consumers about upcoming events, public announcements, program related information, and other helpful resources. Information is routinely sent in various formats, according to consumers' desired media preferences. This includes electronic, automated phone calls, Braille and the large print. DVI utilizes an electronic marketing system, to create accessible newsletters, announcements, invitations and other relevant information.

4. Methods to Improve and Expand VR Services for Students

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). (Blind)

Although DVI has historically provided services to transition students, it was more recently that the agency developed a transition program with dedicated staff to provide services to students in secondary education. DVI currently has two VR Transition Counselors who provide services statewide, working in close collaboration with the Education Services Unit within DVI and the Local Education Agencies (LEA). To improve and expand VR services to students with visual impairments, DVI will continue to participate in statewide transition activities that provide opportunities to work with transition teams from LEAs and other transition stakeholders in order to share information and jointly plan the transition of students from school to post-secondary life. Some of these activities include Monthly Transition Cadre meetings, the Annual Transition Conference, and the *PIPEline to Career Success for Students with Disabilities* initiative. In addition, DVI will develop a position that will serve as the coordinator of Pre-ETS services to develop more robust programming by enhancing activities provided by internal staff and increasing the opportunities available through contracted service providers, including internships, paid/unpaid work experience and apprenticeships.

Another strategy DVI will implement in order to improve and expand VR services to students is to develop a position that is dedicated to providing instruction, training and technical assistance to students, families and LEAs regarding AT needs of students with visual impairments. This position will assist students in secondary education while also supporting the transition to post-secondary life by serving as the liaison between education and VR services, providing assessment and recommendations and assisting in the identification of required AT for supporting the student's post-secondary goals related to employment.

5. Community Rehabilitation Programs

If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State. (Blind)

DVI will work closely with the general VR agency in order to utilize similar service models, offer consistent operations to streamline processes and share the responsibility to keep CRPs apprised of changes in policies, procedures and laws. DVI will develop a more formal training program in order to assist CRP staff with understanding the unique needs of individuals with visual impairments. This training program will include workshops related to eye conditions, sensitivity training, sighted guide, accommodations and Assistive Technology. This training will be done in collaboration with the CRPs in order to address their needs and preference to better prepare them to support individuals with visual impairments.

6. Performance Improvement Strategies

Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA. (Blind)

7. Workforce Partner Capacity Building

Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities. (Blind)

DVI is actively engaged in the WIOA Leadership meetings, has representation on the work groups and assists with the planning of the Annual Statewide Convening, which is an effort to bring all partners, including leaders and direct service staff, together to share information and be more familiar with the collaborative efforts taking place across the state. Due to the unique and specialist nature of our work, the fact that DVI is a relatively small agency in comparison to most other partners, and because DVI is not housed within the Department of Labor where the American Job Center is located, we recognize the importance of staying engaged as a partner. DVI benefits by ensuring individuals with visual impairments are considered when developing programs and services, but also to serve as a liaison to partners who may not have the experience or knowledge for how to work effectively with an individual.

DVI has taken steps to develop and offer sensitivity and awareness trainings for private non-profit VR service providers with whom we hold contracts, but this is extended to any community or state partner. The internal units at DVI, including VR, Independent Living Services, AT Center, Education Services and Orientation and Mobility collaborate to provide comprehensive activities designed to teach techniques and strategies that promote skill development. These trainings demonstrate the capability of persons with severe vision loss, educate on various eye diseases, and teach skills to safely and effectively assist someone with a visual impairment.

DVI has also entered into an agreement with DVR to ensure consumers are referred to the appropriate agency and receive a “warm handoff” if they are found not eligible due to their visual acuity. In addition, the agreement addresses cases when shared expertise may be

necessary due to multiple disabilities and provides the opportunity for DVI and DVR to coordinate services in order to better service the individual.

8. How the Agency's Strategies will be Used to: (Blind)

A. Achieve Goals and Priorities by the State consistent with the comprehensive needs assessment

DVI will utilize community partnerships, staff training, expanding services and outreach to achieve goals and strategies of increasing awareness, providing more opportunities, enhancing services and increasing quality employment outcomes.

B. Support Innovation and Expansion Activities

DVI and the Vocational Rehabilitation Advisory Council (DVI's SRC) will jointly develop a work plan that identifies key priorities and activities to be carried out in the upcoming year. DVI will identify funding to support the council's efforts consistent with the agreed upon work plan and will collaborate with the council to assist in the achievement of the priorities.

C. Overcome Identified Barriers to Equitable Access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program

DVI recently expanded office locations from two to four sites in order to provide more access throughout the state. Cooperating with another state agency to share their vacant space, DVI was also able to decrease rent allowing the agency to reserve more funding for services to consumers. In conjunction with the Department of Health and Social Services, the Department of Transportation and the Division of Services for Aging and Adults with Physical Disabilities (DSAAPS), DVI is assessing all four locations to identify issues related to transportation, safe community travel and accessibility. All agencies are committed to developing a plan to improve access of state locations, especially those serving individuals with disabilities. In the meantime, DVI continues to work individually with consumers to assist with the transition to the new locations and to address any barriers that are identified.

DVI continues to work with WIOA core partners, state agencies and other stakeholders to provide technical assistance, training and recommendations to support the employment of individuals with severe vision loss and to improve accessibility to services.

p. Evaluation and Reports of Progress: VR and Supported Employment Goals (Blind)

Describe:

1. Evaluation of VR Program Outcomes Compared to Goals

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: (Blind)

A. Success Strategies

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

Goal 1: Increase the Quality of employment outcomes, and the Quantity of employment outcomes by 20% annually each fiscal year from the prior completed fiscal year.

Performance Measure 1.1: Increase successful closures each program year by 15% and continue to increase closures by 15% in each subsequent program year for this state plan. Ninety percent of DVI consumers shall maintain employment at two quarters following exit from the VR program. Eighty percent of DVI consumers shall maintain employment at four quarters following exit from the VR program.

Partially achieved: Although DVI exceeded our annual successful closure goals as established for our grant, we were unable to meet the 15% increase stretch goal as written in the state plan. We do not have the data to report on second and fourth quarter measure.

Performance Measure 1.2: Demonstrate business partnerships through at least five new employer partnerships annually, whereby DVI consumers are employed within each program year.

Achieved: Consumers placed in five new employment sites due to partnership building efforts.

Performance Measure 1.3: DVI consumers shall obtain a minimum median earnings level of \$11.00 per hour at two quarters following exit from the VR program.

Achieved: The FY2019 average consumer hourly earnings were \$16.80/hour. We do not have the data to report on second and fourth quarter measure.

Performance Measure 1.4: DVI shall continue a “business champions” program to highlight the successful partnerships established between the agency and local businesses offered. Business Champions activities will occur at least bi-annually throughout the state.

Achieved: DVI hosted a Business Champions Breakfast in October 2018 which was attended by over 60 people. After a networking breakfast, the attendees participated in Americans with Disabilities Act training presented by an expert from the Job Accommodation Network. The event convened after presentation of recognition awards for consumers, employers, and community. The event was held during National Disability Employment Awareness and World Blindness Months. The second event, focused on networking, took place in May in recognition of Healthy Vision Month. DVI partnered with the New Castle County Chamber of Commerce to offer a free networking hour. In addition to networking, guests heard from business leaders about the benefits of hiring people who are blind and explored many types of assistive technology being showcased from several different partners. Finally, several business leaders in attendance

provided operators from the Business Enterprise Program (BEP) tips on financial management, social media campaigns and organizational structure

Performance Measure 1.5: To encourage entrepreneurial opportunities under the Randolph Sheppard Act, the Division for the Visually Impaired will bi-annually host Business Enterprise Program Orientation events to provide an overview of the program, pre-requisites, and the personal experiences of current blind operators.

Partially Achieved: DVI hosted one information session during FY2019. As in the past, all sessions were held simultaneously, using video conferencing and DVI staff support, at all offices throughout the state. This session had three consumers in attendance; none were interested in the program. During FY2018 and FY2017, the bi-annual BEP information sessions drew a very small audience and yielded no results in regard to attracting new operators. In fact, the only new applicant during FY2019 was a self-referral who moved from another state. The BEP management and the Blind Vendors Committee decided to focus their resources on a review of the current information session followed by a marketing campaign.

Goal 2: Review, evaluate and implement improvements to Transition Services.

Performance Measure 2.1: Continue to implement program, policies, and procedures with 90% of potentially eligible students with disabilities being served under pre-employment transition services.

Achieved: Through our education services, DVI is aware of students with visual impairments who are potentially eligible for services; however, nearly 100% of students identified as potentially eligible choose to apply for VR so they may receive transition and pre-employment transition services through an IPE, coordinated with their VR transition counselor.

Performance Measure 2.2: Continue to use the Visually Impaired Client Registry, and the September 30th Student Count to validate the identity and school enrollment status and location of all transition-aged youth eligible for transition services by October 1st of each year.

Achieved: DVI confirmed the number of youth eligible for transition services by September 20, 2018. DVI finalized the Pre-ETS Policies and Procedure which outlines how to identify youth, how to coordinate between DVI programs, the way in which services will be provided.

Performance Measure 2.3: Continue to enhance transition model for services by, which includes direct coordination with DVI's education program and independent living services unit in establishing agency protocol for the provision of services under the expanded core curriculum, as well as incorporating the use of customized employment by all DVI team members for individuals with significant disabilities who would benefit from this service delivery strategy.

Achieved: DVI confirmed the number of youth eligible for transition services by September 20, 2018. DVI finalized the Pre-ETS Policies and Procedure which outlines how to identify youth, how to coordinate between DVI programs, the way in which services will be provided.

Performance Measure 2.4: DVI will execute the terms of a Memorandum of Understanding with the Delaware Department of Education, which details the roles and responsibilities of: (i) DVI staff; (ii) local education agencies; (iii) general VR transition personnel; (iv) and the Department of Education in providing transition-related services to students who are blind and visually impaired. DVI will distribute informational materials for staff use while working in the school districts.

Achieved: The MOU with the Department of Education was completed and executed.

Performance Measure 2.5: Continue to ensure that 100% of students that are expected to graduate within the next four school years are provided the opportunity and support to enroll in DVI VR services no later than September 1 of each program year.

Achieved: One hundred percent of students who are expected to graduate within four years have been provided the opportunity and support to enroll in VR services. The students are assigned a Vocational Rehabilitation Transition Counselor who work closely with the DVI Teacher for the Visually Impaired to ensure students have the resources they need to successfully transition from school to work and/or post-secondary education. In addition, the DVI Pre-ETS policy states that students may apply for VR services at any time if they request services that are not provided by Pre-ETS.

Performance Measure 2.6: Evaluate the current level of exposure to AT that transition students currently receive and ensure that 100% of students are referred for AT evaluations related to AT that is consistent to their IPE goals.

Partially Achieved: DVI does not have the data to prove what percentage of students were evaluated; however, DVI education and VR programs work closely with the AT training center to ensure students are provided AT assessments prior to graduation.

Performance Measure 2.7: DVI shall develop and provide internships, short term employment, apprenticeships, and fellowships to at least 75% of all students enrolled in DVI's transition program prior to graduation from high school.

Not Achieved: DVI does not have the data to prove the efforts and accomplishments that were provided to students in regard to these opportunities.

Goal 3: Improve Marketing and Outreach to Potentially Eligible DVI Consumers.

Performance Measure 3.1: DVI will focus outreach efforts on the Delaware Medical Community with targeted outreach materials.

Achieved: DVI became partners with the Delaware Optometric Association (DOA) and was afforded access to their membership through website advertising and e-news blasts. Their membership consists of hundreds of vision-related medical professionals. For the third year in a row, DVI had exhibit space at the annual DOA conference. In addition, DVI staff are members of six large community resource sharing organizations. Each group consists of people who work

in social services or nursing home/assisted living professionals. All attendees are seeking resources for the population(s) they serve. Collectively the groups have nearly 800 members throughout the state.

Performance Measure 3.2: DVI will continue to revise and publish a newsletter that includes updated information on the agency along with links to social media for the agency.

Achieved: DVI creates and sends a newsletter at least four times per year that contains agency updates and events, community events, and links to vision-related resources as well as social media sites.

Goal 4: Develop Innovation and Expansion Activities.

Performance Measure 4.1: DVI will offer ongoing professional development for all DVI staff in the foundations of eye conditions, eye anatomy, sensitivity training, accommodations, and assistive technology.

Partially Achieved: DVI staff are provided blind sensitivity training and are afforded additional training opportunities through unit workshops, webinars and conferences.

Performance Measure 4.2: Increase pool of service providers each program year statewide. All new providers shall offer specific industry focused training programs that are in high demand within the Delaware labor market pool, developed in coordination with local employers.

Achieved: DVI and the Department of Labor/Division of Vocational Rehabilitation (DVR-General) have an agreement to utilize a section of the Delaware Procurement Code (29 Del. Code § 6933) that affords one or more procurement units the opportunity to participate in, conduct or administer cooperative purchasing agreements. This code allows DVI to ‘piggyback’ on the DVR cooperative agreements with private nonprofit organizations. DVR prepares and issues the requests for proposals and includes DVI throughout the process. The process provides the chance to ensure the solicitations meet the needs of the blind community. Once awarded, the DVI-VR constituents have access to a variety of service providers throughout the state. In addition, DVI routinely solicits cooperative agreements with providers that specialize or seek to specialize in services designed for people who are blind.

Goal 5: Consistently provide a high level of consumer satisfaction.

Performance Measure 5.1: DVI will continue to share consumer satisfaction survey data every other month with the State Rehabilitation Council.

Partially Achieved: DVI provided the State Rehabilitation Council with available survey data; however, the council and DVR are working to identify additional data elements to be delivered.

Performance Measure 5.2: Conduct a Town Hall Meeting annually in coordination with the State Rehabilitation Council.

Not Achieved

Performance Measure 5.3: DVI will enhance opportunities for self-advocacy skills development through hosting or collaborating with community partners on a quarterly basis.

B. Factors that Impeded Achievement of the Goals and Priorities

DVI's case management system has limitations that make it difficult to extract and report on the required data. Collaboration between DVI and the State Rehabilitation Council has been fractured; however, new administration is in place at DVI and the two entities are working on developing a better relationship. DVI recognizes the need to provide more consistent staff development opportunities aligned with policies, procedures and regulations. DVI is working with WINTAC to review and improve policies/procedures and develop staff training.

2. Evaluation of Supported Employment Outcomes Compared to Goals

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: (Blind)

A. Success Strategies

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

DVI utilized the same goals for Supported Employment as listed above for VR services but we do not have the data to prepare an accurate response.

B. Factors that Impeded Achievement of Goals and Priorities

In addition to factors listed in q. 1. B., DVI recognizes the need to improve the provision of services for people with the most significant disabilities.

3. VR Program Performance on the Performance Accountability Indicators under Section 116 of WIOA (Blind)

DVI is currently collecting baseline data in order to effectively report on the common performance measures.

4. Use of Innovation and Expansion (I&E) Activity Funds (Blind)

DVI recently expanded office locations from two to four sites in order to provide more access throughout the state. Cooperating with another state agency to share their vacant space, DVI was also able to decrease rent allowing the agency to reserve more funding for services to consumers.

In conjunction with the Department of Health and Social Services, the Department of Transportation and the Division of Services for Aging and Adults with Physical Disabilities (DSAPD), DVI is assessing all four locations to identify issues related to transportation, safe community travel and accessibility. All agencies are committed to developing a plan to improve access of state locations, especially those serving individuals with disabilities. In the meantime, DVI continues to work individually with consumers to assist with the transition to the new locations and to address any barriers that are identified. DVI also worked to develop partnerships to provide assistive technology in rural areas and made an effort to ensure that all contracted service providers offer their services statewide.

q. Quality, Scope, and Extent of Supported Employment Services (Blind)

Include the following:

1. For Individuals with the Most Significant Disabilities

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. (Blind)

DVI will continue to provide Supported Employment services to individuals with visual impairments and co-occurring disabilities including, developmental disabilities, traumatic brain injury, physical impairments and disabilities due to mental health, that make long-term supports necessary for the individual's success in maintaining integrated and competitive employment.

DVI will continue to assure that all opportunities meet the requirements of competitive integrated employment, earn minimum wage or higher, and have access to the same workplace benefits available to all employees.

DVI will continue to focus on the provision of quality services by assessing the level of employment integration and competitiveness. DVI will continue to assess workplace access and accessibility meets the needs of people with visual impairments. Additionally, all contracted vendors shall maintain a program of professional development for those employees within its organization who provide job placement services by participating in training opportunities for on-site trainers, employment specialists and SE managers.

The scope and extent of contracted supported employment services for individuals with intellectual and developmental disabilities shall include:

- Assessment services to assist consumers to select an appropriate vocational goal consistent with their unique strengths, resources, interests, priorities, concerns, abilities, capabilities and informed choice.
- Job development and job placement in Competitive Integrated Employment (CIE) based on the assessment results.

- Comprehensive onsite or offsite job coaching to enable the individual to become stabilized in their employment.
- Upon stabilization, DVI will coordinate extended services with the identified agency/entity/resource. After successful transition to extended services, DVI will continue to facilitate supports and services to address any issues that may potentially impact job retention until 90 after the successful transition to extended services.
- VR may provide extended services as necessary to employed youth or up to 48 months or until they reach the age of 25 if external extended resources are not available.

2. Timing of transition to extended services (Blind)

Supported employment is a collaborative process that centers around the consumer. Community Rehabilitation Providers work in collaboration with the agency VR team throughout the process. DVI will provide ongoing services until the person reaches stabilization on the job and transitions to external sources of extended supports for a period that may last 24 months. Exceptions to the 24-month time limit may be made if documented circumstances indicate services will be necessary to retain employment. The transition to extended services begins when the VR counselor has sufficient information from the consumer, employer and IPE team to determine that the consumer has reached stabilization.

DVI will continue to work in collaboration with the Division of Developmental Disability Services to leverage funds for extended services for consumers with intellectual/developmental disabilities who receive supported employment services. We will also continue to work with the Division of Substance Abuse and Mental Health in order to connect supported employment consumers to necessary services and long-term employment support. These agencies work with the individuals and their social support systems to develop a plan for ongoing supports, which can be used for a variety of purposes, one of which are long term employment supports. In addition to coordinating with public entities, DVI will continue to work with employers and other natural supports to identify resources for long-term support services.

When a youth is not eligible for extended services from some other entity, DVI will support extended services for a period not to exceed four years in order to develop natural supports and/or explore other sources of extended services. DVI will continue to work with employers and other natural supports to identify resources for long-term support services.

Post-employment services are available if services are required to maintain or regain employment or advance in employment.

Certifications and Assurances (Blind)

Name of designated State agency or designated State unit, as appropriate **Delaware**
Department of Health and Social Services

Name of designated State agency **Division for the Visually Impaired**

Full Name of Authorized Representative: Sandra Miller

Title of Authorized Representative: **Director**

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:***

Current Narrative:

The State Plan must include

Include

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. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: Administration of the VR services portion of the Unified or Combined State Plan:
 - 3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act
 - 3.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 (A or B must be selected):
 - 3.b.(A) “is an independent State commission” (Yes/No)
 - 3.b.(B) “has established a State Rehabilitation Council” (Yes/No)
 - 3.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
 - 3.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)

Yes

Yes

The State Plan must include	Include
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. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	Yes
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	Yes
3.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? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	No
3.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	
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
3.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	
3.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	
3.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:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.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	
4.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? (Yes/No)	Yes
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	

The State Plan must include

Include

- 4.e. 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
- 4.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
- 4.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
- 4.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
- 4.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
- 4.j. With respect to students with disabilities, the State,
 - 4.j.i. Has developed and will implement,
 - 4.j.i.I. Strategies to address the needs identified in the assessments; and
 - 4.j.i.II. 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
 - 4.j.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:
 - 5.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
 - 5.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
 - 5.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:
 - 6.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

The State Plan must include

Include

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

6.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:

Yes

7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act

7.b. The designated State agency assures that:

7.b.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

7.b.ii. 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

- [Program-Specific Requirements for Vocational Rehabilitation \(Blind\)](#)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:

[13] Sec. 102(b)(2)(D)(iii) of WIOA

Vocational Rehabilitation Program (Blind) Performance Indicators

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit);*
- *Median Earnings (Second Quarter after Exit);*
- *Credential Attainment Rate; and*
- *Measurable Skill Gains*

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit); and*
- *Median Earnings (Second Quarter after Exit)*

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will

have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit);*
- *Median Earnings (Second Quarter after Exit); and*
- *Credential Attainment Rate*

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Current Narrative:

Performance indicators table

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	baseline	baseline	baseline	baseline

Performance indicators table

Performance Indicators	PY 2020	PY 2020	PY 2021	PY 2021
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Fourth Quarter After Exit)	baseline	baseline	baseline	baseline
Median Earnings (Second Quarter After Exit)	baseline	baseline	baseline	baseline
Credential Attainment Rate	baseline	baseline	baseline	baseline
Measurable Skill Gains	15.0		17.0	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹ “Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.