

**PROGRAM-SPECIFIC REQUIREMENTS FOR STATE VOCATIONAL REHABILITATION  
(BLIND)**

**A. STATE REHABILITATION COUNCIL.**

1. ALL VR AGENCIES, EXCEPT FOR THOSE THAT HAVE AN INDEPENDENT CONSUMER-CONTROLLED COMMISSION, MUST HAVE A STATE REHABILITATION COUNCIL (COUNCIL OR SRC) THAT MEETS THE CRITERIA IN SECTION 105 OF THE REHABILITATION ACT. THE DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPLICABLE, HAS:

(B) has established a State Rehabilitation Council

2. IN ACCORDANCE WITH ASSURANCE (A)(1)(B), IF SELECTED, PLEASE PROVIDE INFORMATION ON THE CURRENT COMPOSITION OF THE COUNCIL BY REPRESENTATIVE TYPE, INCLUDING THE TERM NUMBER OF THE REPRESENTATIVE, AS APPLICABLE, AND ANY VACANCIES, AS WELL AS THE BEGINNING DATES OF EACH REPRESENTATIVE'S TERM.

Statewide Independent Living Council (SILC)	Second	07/2024
Parent Training and Information Center	First	12/2024
Client Assistance Program	First	02/2023-awaiting reappointment
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	First	07/2024
Community Rehabilitation Program Service Provider	Second	07/2024
Business, Industry, and Labor	Second	04/2025
Business, Industry, and Labor	Second	04/2025
Business, Industry, and Labor	Second	07/2024
Business, Industry, and Labor	First	04/2025
Disability Advocacy Groups	First	01/2025
Current or Former Applicants for, or Recipients of, VR services	First	01/2025

Section 121 Project Directors in the State (as applicable)	n/a	n/a
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	First	01/2025
State Workforce Development Board	Second	09/2024
VR Agency Director (Ex Officio)	Ex Officio	Ex Officio
Representatives of an individual who are blind and have difficulty representing themselves or are unable due to their disabilities to represent themselves.	Vacant	Vacant

3. IF THE SRC IS NOT MEETING THE COMPOSITION REQUIREMENTS IN SECTION 105(B) OF THE REHABILITATION ACT AND/OR IS NOT MEETING QUARTERLY AS REQUIRED IN SECTION 105(F) OF THE REHABILITATION ACT, PROVIDE THE STEPS THAT THE VR AGENCY IS TAKING TO ENSURE IT MEETS THOSE REQUIREMENTS.

The Division for the Visually Impaired (DVI) tracks Vocational Rehabilitation Advisory Council (VRAC) appointments and collaborates with the Council Chair to comply with federal requirements. The VRAC has a membership committee focused on recruitment and engagement. DVI also coordinates with the Governor’s Office of Boards and Commissions, which processes applications and submits candidates for appointment.

Currently, there is one vacancy for a Council member representing individuals who are blind and unable to self-advocate due to disability. DVI and VRAC are working with the Governor’s Office to fill this role while maintaining the blind-to-sighted ratio. The opening has been shared with relevant registries, advocacy groups, councils, partners, and on social media, with ongoing efforts to find a qualified candidate by 9/30/2026.

4. IN ACCORDANCE WITH THE REQUIREMENTS IN SECTION 101(A)(21)(A)(II)(III) OF THE REHABILITATION ACT, INCLUDE A SUMMARY OF THE COUNCIL’S INPUT (INCLUDING HOW IT

A.4WAS OBTAINED) INTO THE STATE PLAN AND ANY STATE PLAN REVISIONS, INCLUDING  
RECOMMENDATIONS FROM THE COUNCIL'S ANNUAL REPORTS, THE REVIEW AND ANALYSIS OF  
CONSUMER SATISFACTION AND OTHER COUNCIL REPORTS.

The VRAC and DVI engaged in an in-depth review process during full council meetings, which included an examination of performance measures, program activities, annual reports, an overview of the Comprehensive Statewide Needs Assessment (CSNA), and the status of current goals. To ensure a thorough evaluation, the VRAC Chair established an ad hoc committee tasked with conducting a detailed review of the CSNA recommendations, existing goals and priorities, and other agency initiatives. This committee also assessed current goal attainment and identified emerging areas of need.

The committee reviewed the CSNA in relation to current goals, leading to recommended updates that address the changing needs of people with visual impairments. They focused discussions on agency performance, outreach, community education, and service delivery to those with significant disabilities, transitioning youth, and underserved groups including the Hispanic and deaf blind communities.

Attention was given to performance measures related to students and supported employment. The committee identified specific areas that require ongoing focus and improvement. Additionally, members reviewed recent and upcoming training initiatives, which included benefits counseling, in-house service delivery training, educating businesses, collaboration with the Business Enterprise Program (BEP), and instruction in assistive technology.

The Comprehensive Statewide Needs Assessment (CSNA) highlighted significant barriers faced by individuals who are blind, particularly with respect to employment. Consumer feedback underscored that many of these challenges stem from employers' limited understanding of accommodations, assistive technology, and the capabilities of people with visual impairments. This lack of awareness directly affects the ability of these individuals to secure meaningful employment opportunities.

In response to these identified challenges, the committee placed a strong emphasis on outreach initiatives. Key activities included engaging employers, educating the community, building medical partnerships, and collaborating with statewide associations. These efforts were designed to foster greater awareness among employers and the broader public about the skills and potential of individuals who are blind, as well as the resources and supports available to facilitate their employment.

The committee also explored strategies to enhance collaboration between the two State Rehabilitation Councils. Recognizing the value in pooling resources and expertise, members discussed the benefits of joint outreach events and coordinated representation at community engagements. By working together, both agencies aim to increase public awareness and improve operational efficiency, ultimately creating more inclusive opportunities for individuals with visual impairments.

The VRAC recommendations regarding goals and strategies were as follows:

1. Increase employment outcomes for all VR consumers, including Supported Employment and transition students exiting high school, by at least 5% compared to the previous year.
2. Enhance employment opportunities for individuals with visual impairments by pursuing jobs that offer better salaries and greater chances for career advancement.
3. Maintain minimum median earnings of \$18.00/hour for second quarter following exit.
4. Formulate approaches to enhance engagement among participants and employers.
5. Maintain existing partnerships with Community Rehabilitation Providers (CRP) while actively establishing new relationships with additional providers to broaden opportunities for participants.
6. Continue to expand pre-ETS opportunities by partnering with additional providers who specialize in services for youth with visual impairments.
7. Increase the number of students participating in pre-Employment Transition Services (pre-ETS) by 10%.
8. Ensure all transition students with visual impairments are offered opportunities to participate in at least one internship, work-based learning experience, or apprenticeship before leaving secondary education.
9. Strengthen partnerships with employers and the community to create more opportunities for competitive, integrated employment for people with visual impairments.
10. Engage in proactive outreach at job fairs and reestablish connections with employers who have previously hired DVI job seekers.
11. Continue to support consumers in making informed choices by establishing vocational goals through industry-specific training programs focused on high-demand occupations identified in the Delaware labor market. These programs should clearly show how industry-recognized credentials correspond with the training received and employment opportunities.
12. Further promote awareness and actively foster consumer engagement with DVI as a trusted resource and distinguished service provider.
13. Maintain and standardize use of the business partner tracking system.
14. Create a comprehensive strategy to enhance targeted outreach for all visually impaired communities, including Hispanic, deaf-blind, and low-incidence groups.

15. Continue to use advocates to support outreach and engagement.
16. Utilize social media to expand the consumer spotlight series highlighting employment journeys of people who are blind or visually impaired, showcasing both their challenges and achievements.
17. Collaborate with the VR General SRC to develop strategies aimed at enhancing employer education, including comprehensive initiatives to inform and engage employers.
18. Enhance employer education; strategies and objectives remain appropriate, but the methodology requires adjustment for greater effectiveness.
19. Continue developing customer satisfaction instruments with the objective of achieving full implementation by the start of the program year 2026. Collaborate with the VR General State Rehabilitation Council to facilitate continuity in creating effective surveys and addressing key topics and interests.

PROVIDE THE VR AGENCY'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS, INCLUDING AN EXPLANATION FOR THE REJECTION OF ANY INPUT AND RECOMMENDATIONS.

1. Increase employment outcomes for all VR consumers, including Supported Employment and transition students exiting high school, by at least 5% compared to the previous year. **The agency agrees with this recommendation.**
2. Enhance employment opportunities for individuals with visual impairments by pursuing jobs that offer better salaries and greater chances for career advancement. **The agency agrees with this recommendation.**
3. Maintain minimum median earnings of \$18.00/hour for second quarter following exit. **The agency agrees with this recommendation.**
4. Formulate approaches to enhance engagement among participants and employers. **The agency agrees with this recommendation.**
5. Maintain existing partnerships with Community Rehabilitation Providers (CRP) while actively establishing new relationships with additional providers to broaden opportunities for participants. **The agency agrees with this recommendation.**
6. Continue to expand pre-ETS opportunities by partnering with additional providers who specialize in services for youth with visual impairments. **The agency agrees with this recommendation. Increase** the number of students participating in pre-Employment Transition Services (pre-ETS) by 10%. **The agency agrees with this recommendation.**

7. Increase the number of students participating in pre-Employment Transition Services (pre-ETS) by 10%.
8. Ensure all transition students with visual impairments are offered opportunities to participate in at least one internship, work-based learning experience, or apprenticeship before leaving secondary education. **The agency agrees with this recommendation.**
9. Strengthen partnerships with employers and the community to create more opportunities for competitive, integrated employment for people with visual impairments. **The agency agrees with this recommendation.**
10. Engage in proactive outreach at job fairs and reestablish connections with employers who have previously hired DVI job seekers. **The agency agrees with this recommendation.**
11. Continue to support consumers in making informed choices by establishing vocational goals through industry-specific training programs focused on high-demand occupations identified in the Delaware labor market. These programs should clearly show how industry-recognized credentials correspond with the training received and employment opportunities. **The agency agrees with this recommendation.**
12. Further promote awareness and actively foster consumer engagement with DVI as a trusted resource and distinguished service provider. **The agency agrees with this recommendation.**
13. Maintain and standardize use of the business partner tracking system. **The agency agrees with this recommendation.**
14. Create a comprehensive strategy to enhance targeted outreach for all visually impaired communities, including Hispanic, deaf-blind, and low-incidence groups. **The agency agrees with this recommendation.**
15. Continue to use advocates to support outreach and engagement. **The agency agrees with this recommendation.**
16. Utilize social media to expand the consumer spotlight series highlighting employment journeys of people who are blind or visually impaired, showcasing both their challenges and achievements. **The agency agrees with this recommendation.**
17. Collaborate with the VR General SRC to develop strategies aimed at enhancing employer education, including comprehensive initiatives to inform and engage employers. **The agency agrees with this recommendation.**

18. Enhance employer education; strategies and objectives remain appropriate, but the methodology requires adjustment for greater effectiveness. **The agency agrees with this recommendation.**

19. Continue developing customer satisfaction instruments with the objective of achieving full implementation by the start of the program year 2026. Collaborate with the VR General State Rehabilitation Council to facilitate continuity in creating effective surveys and addressing key topics and interests. **The agency agrees with this recommendation.**

#### B. COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT (CSNA).

##### 1. THE VR SERVICES NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, INCLUDING:

###### A. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES AND THEIR NEED FOR SUPPORTED EMPLOYMENT;

The 2025 Comprehensive Statewide Needs Assessment (CSNA) identified the rehabilitation and VR service needs of individuals with visual impairments and significant disabilities. For the first time, DVI and DE-General (DVR) conducted the CSNA jointly, sharing costs and resources. They partnered with San Diego State University for its vocational rehabilitation expertise. The survey collected input from consumers, CRPs, interest groups, business partners, DVI staff, and community partners using electronic surveys, interviews, and focus groups.

Key needs identified for individuals with the most significant disabilities served by DVI include persistent transportation challenges, especially in rural areas, and employer misconceptions regarding the abilities of people who are blind or visually impaired. Additional common needs are access to assistive technology, benefits counseling to address concerns about losing financial support when employed, mental health counseling for grief related to vision loss, adjustment to blindness training, affordable housing, and computer training to improve job readiness. Also noted was the lack of Supported Employment (SE) or Customized Employment (CE) services provided by DVI.

According to the DVI individual survey, the main barrier to employment reported was employer concern about my ability to perform the job because of my disability. Both the limited number of available jobs and lack of transportation were equally noted as the second most common barriers. While the lack of disability-related accommodations at work was recognized as an obstacle seven times, it was mentioned less frequently by participants when asked to list their top three employment barriers.

DVI will take proactive steps to better address the needs of individuals with the most significant disabilities, including their need for Supported Employment. The agency will begin by providing Supported Employment (SE) training to its staff, improving data collection to identify and track current SE cases, and implementing processes to ensure SE participants are properly identified and served moving forward. Additionally, DVI intends to enhance its relationship with the Division of Developmental Disabilities Services (DDDS) and collaborate closely with DVR, ideally participating in SE training together. Additionally, DVI will conduct technology assessments for eligible

consumers who are unable to demonstrate marketable skills prior to the development of their Individualized Plan for Employment (IPE), utilizing the comprehensive Assistive Technology Checklist for Assessment. This approach ensures that necessary technology is identified and incorporated into the IPE services from the outset. DVI will continue to focus on expanding opportunities within the Business Enterprise Program (BEP) by obtaining more sites for future operators.

DVI will continue to utilize benefits counseling and Stand by Me, a personal financial coaching program sponsored by the State of Delaware and the United Way, services for consumers. Additionally, DVI will seek technical assistance and training from the Vocational Rehabilitation Technical Assistance Center (VRTAC) to provide financial empowerment services to its consumers. By leveraging resources from VRTAC and its partner, the National Disability Institute (NDI), DVI will offer expert financial literacy service and further support the needs and goals of its consumers.

#### B. INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES AND INDIVIDUALS WITH DISABILITIES WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

Analysis of the needs of individuals from different ethnic groups, including those potentially unserved or underserved, revealed several key themes. Rural areas were most frequently identified as underserved due to challenges like limited transportation, a shortage of service vendors, and low awareness of DVI programs. Hispanic individuals emerged as the only racial group consistently cited as potentially underserved, primarily because of government mistrust, concerns about resident status, fear of profiling, and insufficient knowledge of available services. While the rehabilitation needs of minority individuals with disabilities generally mirrored those of other consumers, non-English speakers and DeafBlind individuals faced significant barriers, making interpreters essential for access and service delivery. Additionally, the growing number of older adults seeking employment—driven by rising living costs—was noted as an emerging group that should be monitored, though they were not specifically cited as underserved.

DVI will prioritize expanding outreach to rural areas to raise awareness of its services, working closely with local schools and community partners in those communities. The agency will also explore recruiting staff with bilingual skills, especially in Spanish, to better serve non-English-speaking populations. In addition, DVI will strengthen engagement with Hispanic community organizations such as the Latin American Community Center in Wilmington and the Esperanza Center in Sussex County to further promote available services. Recognizing the absence of DeafBlind consumers as primary diagnoses within its caseload, DVI will collaborate with relevant partners to ensure individuals who are DeafBlind are properly identified and supported, leveraging its expertise to address their unique needs. These targeted efforts reflect DVI's commitment to advancing equity and accessibility across Delaware's diverse communities.

#### C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE WORKFORCE DEVELOPMENT SYSTEM; AND

The CSNA revealed several challenges for individuals with disabilities served by various components of the statewide workforce development system. The collaboration between DVI and DET centers is predominantly referral-based, with limited instances of joint funding initiatives. Accessibility continues to be a concern at some DET centers, especially for individuals who are blind or visually impaired, as assistive technology may be non-functional, and staff often lack familiarity with its operation. Additionally, DET center staff require further training to support individuals with disabilities effectively, as there is a tendency to refer such individuals directly to external agencies rather than accommodating their needs within the centers.

Through consultation and technical assistance, DVI has worked closely with the Division of Employment and Training—which oversees operations at the American Job Center (AJC)—to ensure that centers are equipped with screen readers, large monitors, zoom text, and adaptive keyboards. These enhancements improve physical accessibility for individuals with visual impairments, enabling them to access resources available to the public. DVI will reengage to ensure equipment remains current, and AJC staff receive appropriate training.

DVI will enhance collaboration with DET centers by facilitating cross-training opportunities for staff across both systems, ensuring smoother transitions and improved service delivery for individuals with disabilities. The agency will actively identify and showcase successful cases of braided funding or joint planning to encourage replication of best practices throughout the organization. Furthermore, DVI intends to work closely with DET centers to develop customized training programs tailored to the unique needs of consumers, thereby strengthening workforce development and accessibility. These actions are designed to foster greater cooperation between agencies, address accessibility challenges, and improve outcomes for individuals with visual impairments and other disabilities within Delaware's workforce development system.

#### D. YOUTH WITH DISABILITIES, INCLUDING STUDENTS WITH DISABILITIES AND THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES. 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 IDEA.

According to the CSNA, the needs of students and youth with blindness and visual impairments are consistent with other students with disabilities in Delaware in some regards, and different in others. The reoccurring themes included the following:

1. Transportation is a major barrier to employment, and the need for reliable transportation is the most pressing employment need.
2. Other similar needs include job skills, soft skills development, work experience of any kind, job search, and interview skills.
3. Assistive technology evaluation, provision and training are much more of a need for students and youth with blindness and visual impairments. It is essential that these

students and youth learn how to use AT as early as possible in their school years so that they are proficient upon entering postsecondary education and/or employment.

4. Employer education about the capabilities of blind youth is essential. Employers have a lot of misconceptions and fears about hiring blind people, so self-advocacy is a paramount need as well as employer awareness.
5. Independent living skills (O&M, Braille, ADLs) were noted as especially important for blind students and youth. Learning how to live independently increases self-efficacy and contributes to future work success.
6. DVI provides creative and helpful pre-employment transition services programs for students, though they would like to develop more work-based learning experiences. The agency does have pre-ETS vendors that provide the five required services.
7. All five required pre-ETS activities are needed by youth and students with blindness and visual impairments.
8. DVI supports unique pre-ETS activities such as sending students to the Carol Center in Boston, the Envision Level-up program in Wichita, and Space Camp.
9. DVI staff coordinate transition services with the schools, and IPEs are developed in concert with the IEP. The TVIs at the schools are important partners for DVR staff and work closely to ensure that school and DVI services are aligned.
10. WBLEs could be expanded and built to include more variety and different work sites and types.

DVI will continue supporting innovative programs that foster independent living skills, career exploration, and assistive technology use. DVI will work with pre-employment transition services vendors to broaden individualized work-based learning opportunities that reflect students' interests. The agency is committed to providing families with training and information—including success stories and guidance on employment's impact on SSI benefits—to promote high expectations for their children. DVI will ensure that pre-ETS services include access to mental health resources for students and families statewide. Efforts will be made to develop diverse work experiences, engage employers, and explore collaboration with Title I Youth programs at DET centers to expand youth work experiences. Additionally, DVI will seek ways to incentivize vendors to create more work-based learning experiences and analyze previous successes to support future replication. Additionally, DVI will work closely with Local Education Agencies to ensure students with visual impairments are aware of the agency and services.

## 2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

The CSNA consistently noted several challenges in DVI's partnerships with community providers. While DVI delivers most client services internally, it relies on external vendors for pre-employment transition, job coaching, and career placement in coordination with its business consultants. A notable gap remains as few vendors currently serve individuals who are blind or visually impaired, especially regarding job coaching services required by many DVI consumers that exceed current

vendor capacity. Furthermore, there is limited availability of local optometrists and ophthalmologists for DVI clients, underscoring the necessity to broaden provider partnerships. Additionally, DVI faces a shortage of Supported Employment (SE) and Customized Employment (CE) providers, which may result in service gaps as an increasing number of clients with secondary disabilities seek ongoing employment support.

DVI recognizes the importance of cultivating relationships with Community Rehabilitation Programs (CRPs) and is committed to providing training and technical assistance to strengthen their capacity to address the needs of individuals who are blind or visually impaired. The agency will implement targeted updates to enhance community rehabilitation programs across the state. DVI will continue delivering ongoing training on vision-related topics to its two principal employment service vendors and will extend these initiatives to additional providers, thereby increasing the pool of qualified professionals serving DVI consumers. Recognizing the value of collaboration, DVI maintains partnerships with optometrists and ophthalmologists and intends to broaden outreach efforts to encompass the wider medical community. In partnership with DVR and DDDS, the agency is examining a Value-Based Purchasing model designed to incentivize CRPs in supporting DVI consumers to achieve career-level employment. DVI will also engage with DVR regarding participation in quarterly meetings with providers to facilitate information sharing and recruit additional CRPs.

### C. GOALS, PRIORITIES, AND STRATEGIES

#### 1. DESCRIBE HOW THE SRC AND THE VR AGENCY JOINTLY DEVELOPED AND AGREED TO THE GOALS AND PRIORITIES AND ANY REVISIONS; AND

DVI is fortunate to that the Vocational Rehabilitation Advisory Council consistently provides valuable feedback and advises the agency during the regular course of work throughout the year. The VRAC members are committed to promoting quality outcomes for people with severe visual impairments and dedicated to taking an active role in developing goals, assisting with outreach, and collaborating for assessment activities. DVI and the VRAC routinely review program data, performance measures, consumer satisfaction, and annual reports, 2025 Comprehensive Statewide Needs Assessment (CSNA), previous goal attainment and opportunities for improvement.

The VRAC and DVI jointly developed and agreed to the new goals and priorities after several meetings with the VRAC state plan committee and the full council. The VRAC Chair convened an ad hoc to meet several times over a two-month period. During the committee meetings, the group reviewed and discussed the CSNA recommendations and key takeaways, goals and priorities, and other agency initiatives. The committee discussions, focused on overall agency performance, outreach and community education, and service needs for individuals with the most severe disabilities, youth in transition, and individuals from underserved and diverse communities, provided DVI with invaluable feedback. The feedback was used to develop and customize the goals for the 2026 state plan update. The committee presented the recommendations for 2026 goals and strategies to the full Council for review, discussion, and voting.

2. IDENTIFY MEASURABLE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS AND THE BASIS FOR SELECTING THE GOALS AND PRIORITIES (E.G., CSNA, PERFORMANCE ACCOUNTABILITY MEASURES, SRC RECOMMENDATIONS, MONITORING, OTHER INFORMATION). AS REQUIRED IN SECTION 101(A)(15)(D), (18), AND (23), DESCRIBE UNDER EACH GOAL OR PRIORITY, THE STRATEGIES OR METHODS USED TO ACHIEVE THE GOAL OR PRIORITY, INCLUDING AS APPLICABLE, DESCRIPTION OF STRATEGIES OR METHODS THAT—

A. SUPPORT INNOVATION AND EXPANSION ACTIVITIES;

B. OVERCOME BARRIERS TO ACCESSING VR AND SUPPORTED EMPLOYMENT SERVICES;

C. 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, POST-SECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES); AND

D. IMPROVE THE PERFORMANCE OF THE VR AND SUPPORTED EMPLOYMENT PROGRAMS IN ASSISTING INDIVIDUALS WITH DISABILITIES TO ACHIEVE QUALITY EMPLOYMENT OUTCOMES.

### **GOAL 1: PROVIDE HIGH QUALITY EMPLOYMENT OUTCOMES FOR INDIVIDUALS WITH VISUAL IMPAIRMENTS**

1.1 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.

1.2 Performance Objective and Measure: Maintain an employment rate of 40% at second quarter and 40% at fourth quarter following exit from the VR program.1.3 Performance Objective and Measure: Maintain median earnings of no less than \$18.00 per hour second quarter following exit from VR program.

### **GOAL 1 STRATEGIES**

1. Comprehensive staff training, collaborate with WIOA core partner and American Job Centers (AJC), collaborate with the VRAC, SRC, DVR, the SILC, and other partners that will result in successful career outcomes for people who have severe visual impairments.
2. Enhance outreach plan to include VRAC suggestions and Council's increased participation. Plan will address targeted outreach to employers, vision medical professionals, CRPs, community partners, and the general public. Examples of tools include social media, community events, job fairs, networking events, and video spotlight series.
3. Continue to support consumers in making informed choices by establishing vocational goals through industry-specific training programs, aligned with career pathways and focused on

high-demand occupations identified in the Delaware labor market. These programs should show how industry-recognized credentials correspond with the training received and employment opportunities that result in measurable outcomes.

4. Enhance career development and job coaching for in-demand, high-paying, and advancement-oriented positions by strengthening partnerships with local CRPs, providing vision-specific training, collaborating with national providers specializing in services for the blind and visually impaired, and connecting successful VR consumers with current job seekers for guidance.
5. Collaborate with workforce partners to seek opportunities for braided funding and increased training options. Utilize Workforce Pell Grants, as authorized under the One Big Beautiful Bill Act, which is federal financial aid for students enrolled in high-quality, short-term workforce programs based on the latest labor market information to refresh the state's in-demand industry sectors and occupations.

## **GOAL 2: PROVIDE QUALITY PRE-EMPLOYMENT TRANSITION SERVICES (PRE-ETS) TO STUDENTS WITH VISUAL IMPAIRMENTS**

2.1 Performance Objective and Measure: Continue to maintain current partnerships with Vocational Rehabilitation providers offering pre-ETS services while exploring new relationships with CPRs that specialize in services for youth with visual impairments.

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

2.3 Performance Objective and Measure: Through internal and external service provision, ensure all transition students are provided opportunities to participate in at least one WBLE prior to exit from secondary education.

### **GOAL 2 STRATEGIES**

1. Comprehensive staff training, collaborate with WIOA core partner and American Job Centers (AJC), collaborate with the VRAC, SRC, DVR, the SILC, and other partners that will result in successful career outcomes for people who have severe visual impairments.
2. Enhance communication and IEP coordination between VR Counselors and Local Education Agencies by increasing collaboration with the DVI Education program Teachers of the Visually Impaired.
3. Engage youth by offering WBLE opportunities to all students, foster parent engagement by utilizing partnerships with PIC, LEAs and DVI Education program. Utilize the community of blind and visually impaired advocates to provide support and resources to students.
4. Continue to expand pre-ETS opportunities from providers that specialize in services for the blind and visually impaired to effectively prepare consumers for opportunities with jobs in

demand, high paying jobs and jobs that lead to career advancement. DVI will also engage with its past successful consumers to provide resources and advice to current job seekers.

### **GOAL 3: ENHANCE EMPLOYER AND COMMUNITY PARTNERSHIPS LEADING TO COMPETITIVE, INTEGRATED EMPLOYMENT FOR INDIVIDUALS WITH VISUAL IMPAIRMENTS**

3.1 Performance Objective and Measure: In collaboration with the VRAC, increase opportunities to engage and educate employers regarding the benefits of employment of individuals with visual impairment, accommodations, assistive technology, and support provided by DVI and CRPs. Reengage with past employers and actively participate in job fairs and networking events.

3.2 Performance Objective and Measure: Maintain current partnerships with Community Rehabilitation Providers (CRP) related to training, supported employment, customized employment, career development, and job coaching services and develop new partnerships with providers specializing in serving individuals with visual impairments.

#### **GOAL 3 STRATEGIES**

1. Comprehensive staff training, collaborate with WIOA core partner and American Job Centers (AJC), collaborate with the VRAC, SRC, DVR, the SILC, and other partners that will result in successful career outcomes for people who have severe visual impairments.
2. Enhance outreach plan to include VRAC planning suggestions and foster their increased participation. Plan will address targeted outreach to employers, vision medical professionals, CRPs, community partners, and the general public. Examples of tools include social media, community events, job fairs, networking events, and video spotlight series.
3. Increase opportunities to educate employers, CRPs, and community partners by offering training for sensitivity, awareness, sighted guide, accessibility, and accommodations.
4. Increase opportunities to educate employers, CRPs, and community partners by offering training for sensitivity, awareness, sighted guide, accessibility, and accommodations.

### **GOAL 4: INCREASE AWARENESS AND IMPROVE CONSUMER ENGAGEMENT WITH DVI SERVICES**

4.1 Performance Objective and Measure:

Track outreach to determine effectiveness and use data to plan targeted outreach.

4.2 Performance Objective and Measure: Enhance plan for increasing targeted outreach to the underserved Hispanic and DeafBlind communities.

4.3 Performance Objective and Measure: Develop a series of videos to post on DVI's website and social media accounts that showcase consumer stories, awareness of blindness, and visual impairments and services offered by DVI.

4.4 Performance Objective and Measure: Effectively measure consumer satisfaction by updating and refining the customer satisfaction system.

#### **GOAL 4 STRATEGIES**

1. Comprehensive staff training, increase service providers, collaborate with WIOA core partners, collaborate with the SILC and other partnerships that will result in successful career outcomes for people who have severe visual impairments.
2. Develop a plan for increasing targeted outreach and creating videos for the Division website and social media platforms to foster awareness and showcase service delivery.
3. Engage youth by offering WBLE opportunities to all students and fostering parent engagement utilizing partnerships with PIC and LEAs. DVI will also utilize our blind and visually impaired advocates to provide support and resources for students.
4. DVI will seek additional educational resources from providers that specialize in services for the blind and visually impaired to effectively prepare consumers for opportunities with jobs in demand, high-paying jobs, and jobs that lead to career advancement. DVI will also engage with its past successful consumers to provide resources and advice to current job seekers.
5. Continue working with the VRAC to complete and deploy the updated customer satisfaction process by 9/30/2026.
6. Refine system to track outreach events and use data plan effective community engagement.

#### **D. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS**

##### **1. PROGRESS IN ACHIEVING THE GOALS AND PRIORITIES IDENTIFIED FOR THE VR AND SUPPORTED EMPLOYMENT PROGRAMS;**

#### **Goal 1: Provide high quality employment outcomes for individuals with visual impairments.**

1.1 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.

**Partially Achieved:** The employment outcomes of total VR consumers did not increase from the previous year, seeing 32 successful outcomes in PY2023 and 22 in PY 2024. DVI intends to tighten the focus on employment outcomes in the upcoming year. It should be noted that the focus has been quality outcomes, which tend to take longer to identify. Furthermore, the VR program has suffered a large amount of turnover throughout the year, which has caused additional challenges.

1.2 Performance Objective and Measure: Maintain an employment rate of 40% at second quarter and 40% at fourth quarter following exit from the VR program.

**Achieved:** An employment rate of 51% at second quarter and 52% at fourth quarter following exit was achieved.

1.3 Performance Objective and Measure: Achieve median earnings of no less than \$18.00 per hour second quarter following exit from VR program.

**Achieved:** DVI participants achieved a median earning of \$21.67 per hour during the second quarter following exit from the VR program

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

2.1 Performance Objective and Measure: Continue to build current partnerships with Vocational Rehabilitation providers offering pre-ETS services.

**Achieved:** DVI maintained statewide partnerships and expanded to providers outside the state to offer more options for pre-ETS services.

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

**Achieved:** The number of students receiving pre-ETS services increased 17.5% over the previous year.

2.3 Performance Objective and Measure: Through internal and external service provision, ensure all transition students can participate in at least one WBLE prior to exit from secondary education.

**Achieved:** 100% of pre-ETS students in secondary education were offered the opportunity to participate in WBLE. DVI is contracted with multiple vendors who provide WBLE opportunities for students. DVI has only been tracking paid WBLE opportunities and was not capturing volunteer or internship opportunities in the past. DVI continues to improve the tracking procedure for this service to gain higher accuracy in reporting.

## **Goal 3: Enhance employer and community partnerships leading to competitive, integrated employment for individuals with visual impairments.**

3.1 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.

**Partially Achieved:** DVI staff members participated in numerous employer engagement and outreach events including networking events, job fairs, conferences, and social media campaigns. Business development staff invite participants to job fairs giving them a chance to market themselves to multiple employers and practice job seeking skills. DVI and the VRAC are in the

process of developing a coordinated plan to increase and track joint activities to promote the employment of individuals with visual impairments.

3.2 Performance Objective and Measure: Maintain current partnerships with Community Rehabilitation Providers (CRP) related to training, supported employment and/or placement services.

**Achieved:** DVI maintained relationships with CRPs and developed new relationships, adding three new CRPs that provide training, SE and placement services. Two of these vendors specialize in serving individuals with visual impairments.

#### **Goal 4: Increase awareness and improve access to DVI services.**

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

**Achieved:** DVI's Communication Manager tracked outreach and events that were attended. The estimated number of participants at each event was also captured. DVI has also created outreach kits, which are housed at each office. These kits include small assistive technology devices as well as documentation on a variety of topics related to DVI's services and awareness related to vision loss and blindness. The kits have proven to be a quick and efficient way to ensure that employees have the necessary items to set up at outreach events.

4.2 Performance Objective and Measure: Develop a plan for increasing targeted outreach to all visually impaired communities to include closed and low-incidence communities that utilize visually impaired advocates for engagement.

**Achieved:** DVI participated in community outreach events, which were intended for low-incidence populations. DVI has provided information and education at events specifically for veterans, the unhoused, the LGBTQ+ community, and Delaware's Latino community. DVI created regular sensitivity and awareness training to CRP staff, other state agencies, first responders, and employers that were unfamiliar with blindness and visual impairment. DVI staff worked with providers to engage and educate community employers of all sizes by visiting locations to collaborate on strategies to employ the most significantly disabled jobseekers. Additionally, DVI increased awareness of blindness and severe vision loss by expanding training topics, modernizing content, and providing training to a wider audience statewide. DVI conducted training and education sessions to address barriers that may impede equitable access and participation to federally funded programs, to fifteen additional organizations. Finally, DVI partnered with the State of Delaware as they worked to improve internet access in rural and underserved communities. DVI informed all consumers about the initiative, encouraged them to self-advocate by reporting broadband access barriers, then helped consumers through the self-reporting process. As a result, the state of Delaware assisted 2,010 homes to receive high speed internet through Verizon using ARPA funding, 2,986 homes received high speed internet through Comcast-ARPA funding, and 1,855 homes received high speed internet through Mediacom-ARPA. See GEPA for more details.

4.3 Performance Objective and Measure: Develop a series of videos to post on DVI's website and social media accounts that showcase consumer stories, awareness of blindness and visual impairments and services offered by DVI.

**Achieved:** DVI highlighted five consumers who wanted to share their success stories. Communications staff created and published video interviews through social media platforms, monthly newsletters, email campaigns, and statewide listservs.

4.4 Performance Objective and Measure: Develop a plan to participate in community events hosted by state legislators to increase awareness and promote services.

**Achieved:** DVI staff have attended Senator Lisa Blunt-Rochester's Annual Constituent Resource Fair; obtained a joint resolution to recognize White Cane Day and attended the proclamation signing that recognized Disability Employment Awareness Month Proclamation.

4.5 Performance Objective and Measure: Work with our VRAC to develop effective customer satisfaction surveys and target hot topics interests.

**Partially Achieved:** DVI staff and the VRAC collaborated on a project to update the customer satisfaction process and survey instruments used at various stages of the VR process. The VRAC has taken an active role by reviewing, making recommendations, and providing valuable input. This project is ongoing, but changes are expected to be implemented in 2026.

## 2. PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR, REFLECTING ACTUAL AND NEGOTIATED LEVELS OF PERFORMANCE. EXPLAIN ANY DISCREPANCIES IN THE ACTUAL AND NEGOTIATED LEVELS; AND

The overarching goals for the Division for the Visually Impaired (DVI) align with compliance and performance expectations under Section 116 of the Workforce Innovation and Opportunity Act (WIOA) and the five pillars of Executive Order 14278. Building on evaluation of agency data, federal reporting, and regulatory guidance, DVI has expanded its activities in Program Years (PY) 2024 and 2025 to strengthen collaboration with workforce partners, enhance counselor expertise, improve data quality, tighten internal controls, and evaluate program outcomes with greater accuracy.

DVI continued delivering targeted training of the WIOA performance measures policy and process to ensure Vocational Rehabilitation (VR) staff to ensure consistent understanding and implementation. DVI employment specialists maintain a connection with consumers after exiting the VR program to ensure successful rehabilitation remains intact and gather the after-exit data necessary to report on performance. Additionally, DVI has a formal data-sharing agreement with the Division of Unemployment Insurance to obtain employment data for the second and fourth quarters after program exit and continues is part of the State Wage Interchange System (SWIS) to verify employment outcomes for individuals working outside Delaware as needed.

DVI works closely with the Division of Vocational Rehabilitation (DE-G) to review performance measures and fiscal data. This structured collaboration has proven effective and will continue as reporting systems evolve. The continued modernization of data tracking systems and collaboration with the general agency will strengthen internal oversight.

Previously, DVI used the Visually Impaired Client Registry (VICR) as its primary case management platform, a decades old system which was prone to data entry challenges and inconsistencies which contributed to incomplete and inaccurate reporting. In PY25, VICR was replaced with a new, fully accessible case management system which is expected to significantly enhance data collection, validation, and integrity. The new platform provides improved functionality for tracking participant progress, managing performance data, and supporting compliance with WIOA accountability standards. Most importantly, the new system has built-in internal controls to limit human error when entering data.

As a state, Delaware exceeded all negotiated performance levels for PY24. DVI also exceeded negotiated levels for retention with the same employer during the second and fourth quarters after exit, demonstrating strong employment stability among participants. Separately, DVI did not meet the negotiated levels for Credential Attainment (CA) and Measurable Skill Gains (MSG) which underscores the need for renewed focus on data quality and documentation. While DVI’s relatively small participant base minimizes the impact on overall statewide performance results, data gaps are evident in performance dashboards. DVI has collaborated with the Rehabilitation Services Administration (RSA) Information Systems to identify consumers included in the denominator for these calculations. Through the remainder of PY25, emphasis will be placed on documenting, recording, and uploading all relevant data to complete performance calculations. Additionally, DVI will continue to work with the National Vocational Rehabilitation Technical Assistance Center to strengthen understanding of CA and MSG measures and ensure continued improvement in performance accountability, data integrity, and reporting accuracy.

PY24	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2024 Actual Level Delaware	PY 2024 Actual Level National
Employment (Second Quarter After Exit)	45.0%	45.0%	50.8%	53.8%
Employment (Fourth Quarter After Exit)	45.0%	45.0%	47.9%	51.9%
Median Earnings (Second Quarter After Exit)	\$4,000	\$4,540	\$5,391	\$5,331

Credential Attainment Rate	51.0%	53.0%	53.8%	38.0%
Measurable Skill Gains	47.0%	50.3%	66.9%	52.2%
Effectiveness in Serving Employers*	N/A	N/A	N/A	N/A

**3. THE USE OF FUNDS RESERVED FOR INNOVATION AND EXPANSION ACTIVITIES (SECTIONS 101(A)(18) AND 101(A)(23) OF THE REHABILITATION ACT) (E.G., SRC, SILC).**

DVI utilized funds for innovation and expansion activities to increase opportunities to partner with nationwide programs that provide specialized services to people who are blind and visually impaired, which provided for the expansion of pre-ETS and advanced independent living training for college-bound high school students. DVI sought industry experts to provide comprehensive training for supported employment, customized employment and business engagement. DVI continues to partner with the Delaware Department of Education (DOE), the Division of Developmental Disabilities Services, the Division of Vocational Rehabilitation, National Alliance on Partnership in Equity, and local school districts to program designed to ensure the success of students with disabilities in high school career and technical education (CTE) pathways. Finally, DVI reserves innovation and expansion resources to support the VRAC Resource Plan and encourage members to seek professional development opportunities through the NCSRC.

**E. SUPPORTED EMPLOYMENT SERVICES, DISTRIBUTION OF TITLE VI FUNDS, AND ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.**

**1. ACCEPTANCE OF TITLE VI FUNDS:**

(A) VR agency requests to receive title VI funds.

**2. IF THE VR AGENCY HAS ELECTED TO RECEIVE TITLE VI FUNDS, SECTION 606(B)(3) OF THE REHABILITATION ACT REQUIRES VR AGENCIES TO INCLUDE SPECIFIC GOALS AND PRIORITIES WITH RESPECT TO THE DISTRIBUTION OF TITLE VI FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES. DESCRIBE THE USE OF TITLE VI FUNDS AND HOW THEY WILL BE USED IN MEETING THE GOALS AND PRIORITIES OF THE SUPPORTED EMPLOYMENT PROGRAM.**

DVI will ensure people with visual impairments, who face multiple barriers to employment due to the severity of their disability(s), will have the opportunity to achieve successful employment outcomes by utilizing a person-centered approach, customizing employment, ensuring informed choice, and encouraging self-advocacy. DVI will utilize Title I and Title VI funds to ensure

consumers have the support, customization, coaching, and skills needed to successfully obtain and maintain competitive integrated employment. The following plan outlines DVI strategy for allocation of Title VI funds and continuous improvement.

1. Reserve 50% of the Title VI allotment for the provision of supported employment services, including extended services, for youth with the most significant disabilities.
2. No less than 10% of non-Federal expenditures are used as match towards 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 to fully expend or carry over any unobligated portion of the reserved funds.
3. Administrative costs for Title VI are not to exceed 2.5%.

Supported Employment Title VI funds will be used for the provision of supported employment only after the consumer is actively working in community integrated employment setting. Allowable costs include:

1. **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. 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, and facilitation of natural supports at the worksite. Title I funds may also be utilized for ongoing supports.
2. **VR Extended Services** are only available to youth with the most significant disabilities. Youth may receive extended services for up to four years or until they reach the age of 25, whichever occurs first. 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.

(Basic VR) are used for all services that are prohibited under Title VI but necessary for supported employment eligible consumers to achieve their employment outcomes. Examples include:

1. Job placement
2. Comprehensive assessment
3. Skills training
4. Interview Clothing
5. Assistive technology

DVI utilizes the services of vendors, on a fee-for-service basis, to provide comprehensive supported employment services for those individuals with severe visual impairments and the most significant barriers to employment. Consumers and/or their representatives select the vendor to provide these services.

Ongoing training is conducted with all counselors that emphasizes the provision of extended services for youth with the most significant disabilities, under appropriate circumstances, can be provided up to four years or until they reach the age of 25, whichever occurs first. It is critical that this training identifies the non-delegable nature of this provision in WIOA. Counselor development will also ensure accurate use and tracking of supported employment services to youth with the most significant disabilities. DVI will continue to provide staff with training, oversight, and guidance regarding Title VI fiscal regulations to ensure costs are reasonable, allowable, allocable, and necessary.

**3. SUPPORTED EMPLOYMENT SERVICES MAY BE PROVIDED WITH TITLE 1 OR TITLE VI FUNDS FOLLOWING PLACEMENT OF INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES IN EMPLOYMENT. IN ACCORDANCE WITH SECTION 101(A)(22) AND SECTION 606(B)(3) OF THE REHABILITATION ACT, DESCRIBE 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; AND THE TIMING OF TRANSITION TO EXTENDED SERVICES.**

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 evaluate reemployment needs and workforce inequities. We will develop creative ways to work with CRPs as they overcome workforce challenges.

DVI will continue to ensure 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 their organization who provide job placement services by participating in training opportunities for on-site trainers, employment specialists and SE managers.

Supported employment services begin at job placement; however, vocational rehabilitation funds can be used to provide necessary VR services prior to job placement. 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 support and services to address any issues that may potentially impact job retention until 90 days 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, whichever occurs first, if external extended resources are not available.

4. SECTIONS 101(A)(22) AND 606(B)(4) OF THE REHABILITATION ACT REQUIRE THE VR AGENCY TO DESCRIBE EFFORTS TO IDENTIFY AND ARRANGE, INCLUDING ENTERING INTO COOPERATIVE AGREEMENTS, WITH OTHER STATE AGENCIES AND OTHER APPROPRIATE ENTITIES IN ORDER TO PROVIDE SUPPORTED EMPLOYMENT SERVICES. THE DESCRIPTION MUST INCLUDE EXTENDED SERVICES, AS APPLICABLE, TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THE PROVISION OF EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES IN ACCORDANCE WITH 34 C.F.R. § 363.4(A) AND 34 C.F.R. § 361.5(C)(19)(V).

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 VR (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 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 services, personal care and customized services for people who may have had unsuccessful employment experiences. To avoid gaps in services, interagency coordination begins before the consumer completes the SE process with DVI. Once DVI makes a referral, DDDS performs 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 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.

F. ANNUAL ESTIMATES

1. ESTIMATES FOR NEXT FEDERAL FISCAL YEAR—

A. VR PROGRAM; AND

The numbers below reflect the total number of people who could be eligible and served in FY2027 based on trends and internal data. DVI reviewed data related to population, people with vision difficulties, and the number of people who could be determined eligible due to severe visual impairments. This data consistently showed that approximately 40% of people with severe vision impairments received DVI services and reflected a 3% annual increase, as proven by long-term agency trends.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
n/a	202	202	\$2,491,014.00	n/a

B. SUPPORTED EMPLOYMENT PROGRAM.

DVI used the same methodology described in f.1.A, combined with agency data, to arrive estimates for supported employment. DVI reviewed data to conclude that 4.8% of people served require extensive and long-term supports. The estimated cost for the next fiscal year is based on an average of \$19,200/person using Title 1 and Title VI funds.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
n/a	10	10	\$192,000.00	n/a

#### G. ORDER OF SELECTION

1. PURSUANT TO SECTION 101(A)(5) OF THE REHABILITATION ACT, THIS DESCRIPTION MUST BE AMENDED WHEN THE VR AGENCY DETERMINES, BASED ON THE ANNUAL ESTIMATES DESCRIBED IN DESCRIPTION (F), THAT VR SERVICES CANNOT BE PROVIDED TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR AND ARE DETERMINED ELIGIBLE FOR SERVICES.

The VR agency is not implementing an order of selection, and all eligible individuals will be served.

2. FOR VR AGENCIES THAT HAVE DEFINED PRIORITY CATEGORIES DESCRIBE—

##### A. THE JUSTIFICATION FOR THE ORDER

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

B. THE ORDER (PRIORITY CATEGORIES) TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES ENSURING THAT INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

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.

C. THE VR AGENCY'S GOALS FOR SERVING INDIVIDUALS IN EACH PRIORITY CATEGORY, INCLUDING HOW THE AGENCY WILL ASSIST ELIGIBLE INDIVIDUALS ASSIGNED TO CLOSED PRIORITY CATEGORIES WITH INFORMATION AND REFERRAL, THE METHOD IN WHICH THE VR AGENCY WILL MANAGE WAITING LISTS, AND THE PROJECTED TIMELINES FOR OPENING PRIORITY CATEGORIES. NOTE: PRIORITY CATEGORIES ARE CONSIDERED OPEN WHEN ALL INDIVIDUALS IN THE PRIORITY CATEGORY MAY BE SERVED.

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

3. HAS THE VR AGENCY ELECTED TO SERVE ELIGIBLE INDIVIDUALS OUTSIDE OF THE ORDER OF SELECTION WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT?

No

#### H. WAIVER OF STATEWIDENESS.

Delaware DVI is not requesting a waiver of statewideness.

#### I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT.

##### 1. ANALYSIS OF CURRENT PERSONNEL AND PROJECTED PERSONNEL NEEDS INCLUDING—

A. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

B. THE NUMBER AND TYPE OF PERSONNEL THAT ARE EMPLOYED BY THE VR AGENCY IN THE PROVISION OF VOCATIONAL REHABILITATION SERVICES, INCLUDING RATIOS OF QUALIFIED VOCATIONAL REHABILITATION COUNSELORS TO CLIENTS;

C. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE VR 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.

Managers of each program within DVI are responsible for evaluating training needs for the staff in their unit. Regarding the provision of VR services, DVI has a Social Services Senior Administrator (SSSA) who oversees the VR program, including career services and the Business Enterprise Program. The SSSA is responsible for employee development and determines training needs through performance planning and evaluation, requests from or conversations with staff, case reviews, RSA 911 errors and customer satisfaction surveys. Based on feedback, training is developed and coordinated to address program needs. In addition, with the use of tuition reimbursement, DVI encourages counselors to take the necessary courses to obtain Certified Rehabilitation Counselor (CRC) credentials to fortify the knowledge, skills and abilities used to carry out their job duties. Once courses are complete, DVI will fund the CRC test and ongoing continuing education.

DVI counselors work statewide with consumers of all eligible ages and provide the full array of services, such as assessment, eligibility determinations, benefits counseling, job site visits, school visits/IEP meetings, wrap around service referral and coordination, person centered case management, and counseling & guidance. Additionally, DVI counselors participate in outreach events, CSAVR/NCSAB conferences, workforce development and American Job Center collaboration, and the Vocational Rehabilitation Advisory Council (DVI-SRC).

In addition to the staff providing direct VR services, the agency is responsible for the 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 that assist VR services. These positions are state funded, and staff utilize a time tracking system (Timesheet Plus) to determine time and effort toward the support of VR consumers and the VR grant.

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Administrative Specialist I	2	2	2
Office Manager	0	1	1
Employment Specialist - Adult	2	2	2
Employment Specialist - Youth	1	2	2
Vocational Rehabilitation Counselor (II & Senior)	5	5	5
VR District Administrator	1	1	1
Business Enterprise Program Director	1	1	1
Business Enterprise Employment Specialist	0	1	1
VR Senior Administrator	1	1	1
*Certified Orientation & Mobility Specialist	4	5	5
*Vision Rehab Therapist	4	4	4
*Assistive Technology Trainer	3	4	4
*Fiscal Staff (all positions)	6	6	6

\*Positions are agency staff that utilize at a time tracking system to allocate staff time used for VR.

**D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:**

1:50

**E. PROJECTED NUMBER OF INDIVIDUALS TO BE SERVED IN 5 YEARS:**

DVI expects to serve 220 people in PY30.

**2. DATA AND INFORMATION ON PERSONNEL PREPARATION AND DEVELOPMENT, RECRUITMENT AND RETENTION, AND STAFF DEVELOPMENT, INCLUDING THE FOLLOWING:**

A. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM; THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND 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.

Delaware does not have an institution of higher education with a program to prepare Vocational Rehabilitation professionals. VR professionals are encouraged to pursue regional or online training programs.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
n/a	n/a	n/a	n/a

B. THE VR AGENCY'S PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL, WHICH ADDRESSES THE CURRENT AND PROJECTED NEEDS FOR QUALIFIED PERSONNEL; AND THE COORDINATION AND FACILITATION OF EFFORTS BETWEEN THE VR AGENCY 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 with the University of Delaware, Salus University, Delaware State University, Wilmington University, Delaware Technical & Community College, 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 to introduce college students to the vision rehabilitation field and assess their qualifications for employment should a vacancy exist. DVI has a long-standing practice of hiring VR Counselor (VRC) with master's degrees; however, the talent pool may be expanded through utilization of the VRC career ladder classifications. This classification has three levels, VRC-I, VRC-II, Senior VRC, each with varying levels of essential job functions and qualifications including education, skills, abilities, and experience. DVI supports professional development, tuition assistance, and professional association membership for counselors.

### **Career Ladder Qualifications**

**VRC-I:** bachelor's degree in Rehabilitation Counseling or a Social or Behavioral Science or a related field with knowledge with skills, abilities, experience, and essential functions specific to serving individuals with disabilities.

**VRC-II:** master's degree or higher in Rehabilitation Counseling, Social or Behavioral Science or related field or Certified Rehabilitation Counselor (CRC) designation with knowledge, skills, abilities, experience, essential functions specific to vocational rehabilitation and experience in vocational rehabilitation.

**Senior VRC:** master's degree or higher in Rehabilitation Counseling, Social or Behavioral Science or related field or CRC designation with knowledge, skills, abilities, experience, and essential functions specific to vocational rehabilitation and two years' experience in vocational rehabilitation.

The qualifications, as outlined in the career ladder above, ensure DVI counselors are aligned with the State's approved personnel standards for VR counselors before they are assigned the task of determining consumer eligibility, as permitted by 34 C.F.R. § 361.42(a)(1)(iii).

DVI is an equal opportunity employer and seeks to ensure employment opportunities are available to qualified individuals from minority backgrounds and individuals with disabilities. DVI hiring managers are trained in the Delaware Department of Human Resources (DHR) policies, procedures, practices, and resources to ensure equitable recruitment and retention of employees. Examples include, but not limited to, Americans with Disabilities Act, Alternate Work Arrangements, Anti-Nepotism, Employee Rights Under the Fair Labor Standards Act, Merit System Recruitment Procedures Manual, Pregnant Workers Fairness Act, Respectful Workplace and Anti-Discrimination Policy, Standards of Conduct.

DVI works with DHR to utilize the Selective Placement Registry. This Registry lists qualified persons with disabilities from various backgrounds who have been determined eligible to fill specific job classifications within the state. State 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 positions. Additionally, DHR worked with the State Council for Persons with Disabilities-Employment First Oversight Commission to develop a paid work-based learning program for people with disabilities interested in gaining the experience necessary to qualify for state positions. This program offers potential candidates the opportunity to experience positions that match their career aspirations, skills, and education. Their time in these work experiences can be counted towards the required qualifications of the position. These efforts, combined with recruitment through two vocational rehabilitation agencies in Delaware and those in contiguous states, provide DVI with robust ways to source and employ qualified people with disabilities. DVI shares vacancies with various networks including advocacy groups, Councils, 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. Additionally, all supervisors are provided guidance to support and retain employees with disabilities through the DHR Americans with Disabilities (ADA) policy, ADA coordinator guidance, and accommodation assistance from the DHR team. DVI will continue to work with DHR to expand the VR pool of candidates.

The state continues to allow for workplace flexibility through the Alternate Work Arrangement (AWA) which provides employees with the possibility of working flexible schedules or a

combination of virtual and in-person work. This policy made it possible for counselors to geographically expand, serve people in a larger area, encourage a better work life balance, and increase staff retention.

C. DESCRIPTION OF STAFF DEVELOPMENT POLICIES, PROCEDURES, AND ACTIVITIES THAT ENSURE ALL PERSONNEL EMPLOYED BY THE VR AGENCY RECEIVE APPROPRIATE AND ADEQUATE TRAINING AND CONTINUING EDUCATION FOR PROFESSIONALS AND PARAPROFESSIONALS:

I. 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

II. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO VR AGENCY PROFESSIONALS AND PARAPROFESSIONALS AND FOR PROVIDING TRAINING REGARDING THE AMENDMENTS TO THE REHABILITATION ACT MADE BY THE WORKFORCE INNOVATION AND OPPORTUNITY ACT.

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 through YesLMS. DVI uses YesLMS 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. DVI also seeks training and guidance from the Vocational Rehabilitation Technical Assistance Center for Quality Management (VRTAC-QM), the National Technical Assistance Center on Transition Collaborative (NTACT:C), and other national experts to ensure staff have a wide variety of development presented by experts in the VR field. DVI also continues to partner with the Delaware general agency, the Division of Vocational Rehabilitation (DVR) for training initiatives and events.

3. DESCRIPTION OF VR AGENCY POLICIES AND PROCEDURES FOR THE ESTABLISHMENT AND MAINTENANCE OF PERSONNEL STANDARDS CONSISTENT WITH SECTION 101(A)(7)(B) TO ENSURE THAT VR AGENCY PROFESSIONAL AND PARAPROFESSIONAL PERSONNEL ARE ADEQUATELY TRAINED AND PREPARED, INCLUDING—

A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND

**B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(II) OF THE REHABILITATION ACT, TO ENSURE THAT THE PERSONNEL HAVE A 21ST CENTURY UNDERSTANDING OF THE EVOLVING LABOR FORCE AND THE NEEDS OF INDIVIDUALS WITH DISABILITIES.**

Currently, all counselors at DVI 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. It is not a requirement of the State for VR Counselors to hold their CRC; however, DVI encourages counselors to take the necessary courses to obtain Certified Rehabilitation Counselor (CRC) credentials to fortify the knowledge, skills and abilities used to carry out their job duties. DVI supports counselors with tuition reimbursement, once courses are complete, DVI funds the CRC test, association fees, and ongoing continuing education.

Delaware does not have state approved or recognized certification, licensing, or registration requirements for its VR classifications. As described in i.2.B, the VRC career ladder begins with minimum qualifications and progresses through to those who are highly qualified CRCs. This provides DVI with the flexibility to fill critical gaps, encourage further education, and promote from within. DVI works closely with DHR to educate the recruitment team and ensure proper screening.

**4. METHOD(S) THE VR AGENCY USES TO ENSURE THAT PERSONNEL 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 contractual agreements. The state contract offers hundreds of languages, sign language interpreters, and written transcription services. The multi-language and sign language services are available in person or virtually and all can be accessed on demand. All written materials are disseminated in the appropriate media: Braille, large print, tape, or electronic file, as well as Spanish for various forms/brochures.

**5. 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 program 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 representatives, 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, regional transition planning meetings, LEA sponsored transition events, and transition related job fairs.

#### J. COORDINATION WITH EDUCATION OFFICIALS.

##### 1. DESCRIBE PLANS, POLICIES, AND PROCEDURES FOR COORDINATION BETWEEN THE DESIGNATED STATE AGENCY AND EDUCATION OFFICIALS RESPONSIBLE FOR THE PUBLIC EDUCATION OF STUDENTS WITH DISABILITIES, THAT ARE DESIGNED TO FACILITATE THE TRANSITION OF THE STUDENTS WITH DISABILITIES FROM THE RECEIPT OF EDUCATIONAL SERVICES IN SCHOOL TO THE RECEIPT OF VOCATIONAL REHABILITATION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES.

DVI is uniquely positioned to coordinate the transition of students with visual impairments from school to VR services through the comprehensive structure of the division and the agency's participation in statewide transition activities. DVI has both an Education Services and a VR program offered by the Division, which allows the agency to begin working with children as soon as a visual impairment is identified.

The DVI Education Program employs Teachers of the Visually Impaired (TVI) who provide assessment, direct instruction, and consultation services to approximately 350 students with visual impairments annually through an itinerant model. The TVIs work with local education agencies (LEAs), Charter Schools, private schools, and parents of home-schooled children statewide to ensure all students with visual impairments can access educational programs equal to that of their peers. Although TVI services are funded through the state and are separate from all vocational rehabilitation funds, the relationship provides the DVI-VR program with the opportunity for early identification of students who may be potentially eligible for VR services, to educate and engage families early in the transition process, and to assist the VR Counselors and schools 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 program employs a Pre-ETS Coordinator who works closely with the internal VR and Education teams to ensure updated information and forms related to Pre-ETS and VR services are made available to 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 for students who meet the definition of a student with a disability:

- Enrolled in a recognized education program.
- at least 14 years old but less than 22.

- has a disability (i.e., receives services under an IEP or 504 plan, or has a disability for purposes of section 504).

This allows the VR Counselor to become an integral part of the student's IEP team and to assist with the coordination of 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 the DVI Education Program; however, they are accepted from any source. DVI recently employed a newly licensed teacher of the visually impaired, whose own visual impairment and active involvement in the NTACT-C Youth Engagement Transition Initiative (YETI), inspired her to inquire about assisting DVI with transition. The plan is to expand her teaching role to include the internal coordination of transition and pre-ETS activities. This TVI will work closely with the VR Pre-ETS Coordinator and leadership to develop seamless procedures to ensure ease of access for transitioning youth and their families.

DVI continues to develop several transition programs for students with visual impairments to participate in during breaks in the school year. All programs 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, 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. Additionally, students participate in career-focused activities such as the NASA Space Camp for Students with Visual Impairments in Huntsville, AL, Envision Level Up provided by Wichita State University in Wichita, KS, and several transition programs offered by the Carroll Center for the Blind in Boston, MA.

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 statewide 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 attend transition and career focused events through the DOE and LEAs. DVI plans to increase opportunities for students to participate in transition activities by:

1. DVI will continue to partner with the Division of Vocational Rehabilitation in support of students interested in participating in Project SEARCH (PS) program to ensure proper supports for participants with visual impairments
2. DVI will continue to partner with organizations to access pre-ETS services. Community Integrated Services and Opportunity Center, Inc (OCI) provide community-based programming related to Work-based Learning Experiences, Workplace Readiness Training, and five core services. Sky's the Limit provides programming for students on all five core PreETS services. All organizations are engaged with DVI regularly to provide continuous improvement and respond to the needs of students and OCI represents CRPs on the VRAC.
3. The programs coordinated by DVI are separate and tend to have a specific focus (i.e., career prep, college prep, ILS skills, educational sports, etc.). Programming also occurs in the summer to accommodate the availability of students. DVI will continue to develop programs that are weekend or week-long transition events that feature experts in the field of visual impairments as guest speakers or program hosts.
4. DVI VR Counselors will continue to provide input into the IEP goals when invited. Counselors will use the IEP with students to assist in developing the individualized plan(s) for employment (IPE).

2. DESCRIBE THE CURRENT STATUS AND SCOPE OF THE FORMAL INTERAGENCY AGREEMENT BETWEEN THE VR AGENCY AND THE STATE EDUCATIONAL AGENCY. CONSISTENT WITH THE REQUIREMENTS OF THE FORMAL INTERAGENCY AGREEMENT PURSUANT TO 34 C.F.R. § 361.22(B), PROVIDE, AT A MINIMUM, THE FOLLOWING INFORMATION ABOUT THE AGREEMENT:

A. CONSULTATION AND TECHNICAL ASSISTANCE, WHICH MAY BE PROVIDED USING ALTERNATIVE MEANS FOR MEETING PARTICIPATION (SUCH AS VIDEO CONFERENCES AND CONFERENCE CALLS), TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES AND OTHER VOCATIONAL REHABILITATION SERVICES;

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY PERSONNEL FOR STUDENTS WITH DISABILITIES THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS (IEPS) UNDER SECTION 614(D) OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT;

C. THE ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES;

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES. OUTREACH TO THESE STUDENTS SHOULD OCCUR AS EARLY AS POSSIBLE DURING THE TRANSITION

PLANNING PROCESS AND MUST INCLUDE, AT A MINIMUM, A DESCRIPTION OF THE PURPOSE OF THE VOCATIONAL REHABILITATION PROGRAM, ELIGIBILITY REQUIREMENTS, APPLICATION PROCEDURES, AND SCOPE OF SERVICES THAT MAY BE PROVIDED TO ELIGIBLE INDIVIDUALS;

E. COORDINATION NECESSARY TO SATISFY DOCUMENTATION REQUIREMENTS SET FORTH IN 34 C.F.R. PART 397 REGARDING STUDENTS AND YOUTH WITH DISABILITIES WHO ARE SEEKING SUBMINIMUM WAGE EMPLOYMENT; AND

F. ASSURANCE THAT, IN ACCORDANCE WITH 34 C.F.R. § 397.31, NEITHER THE SEA NOR THE LOCAL EDUCATIONAL AGENCY WILL ENTER INTO A CONTRACT OR OTHER ARRANGEMENT WITH AN ENTITY, AS DEFINED IN 34 C.F.R. § 397.5(D), FOR THE PURPOSE OF OPERATING A PROGRAM UNDER WHICH YOUTH WITH A DISABILITY IS ENGAGED IN WORK COMPENSATED AT A SUBMINIMUM WAGE.

The existing Memorandum of Understanding (MOU) between the Delaware Department of Education (DDOE), all Local Education Agencies (LEA), and DVI outlines roles and responsibilities of the LEAs and DVI about 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 was fully executed by August 9, 2016, and is currently being updated and revised by all parties. Additionally, DVI is working with the Division of Vocational Rehabilitation, the Division of Developmental Disabilities Services, and the Department of Education to develop a MOU that outlines roles and responsibilities of all four entities.

The purpose of the Interagency Agreement is to ensure, through a cooperative effort, that a free, appropriate public education is provided to all children and youth with visual impairments who are served by the DVI, and the LEAs under the general supervision and direction of the DDOE. This agreement also ensures that students are offered and provided, when eligible, appropriate transition services leading to competitive employment outcomes under the Workforce Innovation and Opportunity Act of 2014, as well as Medicaid funded employment services funded through the 1915(i) Pathways program.

The MOU between DVI and DDOE defines the DVI-VR transition services and pre-ETS activities in detail. Information was extracted and summarized to respond below.

**Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services.**

DVI provides consultation and technical assistance as summarized below:

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, evaluation, transition and pre-ETS services, 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.

**Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under Section 614(d) of the Individuals with Disabilities Education Act;**

Under the MOU, DVI is authorized to provide transition services to youth with disabilities, ages 14-22, in accordance with pre-employment transition services requirements of the Rehabilitation Act of 1973, as amended in the Workforce Innovation and Opportunity Act of 2014, State Vocational Rehabilitation (VR) Services Program. DVI, in collaboration with the local educational agencies involved, shall provide, or arrange for the provision of, pre-employment transition services for all students with disabilities in need of such services who are eligible or potentially eligible for vocational rehabilitation services.

**The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services;**

The roles and responsibilities of each agency are documented in the MOU, and become effective under the following conditions:

- When either DVI, LEA, or a sub-contracted agency provides educational and/or transition related services to a child or youth with a visual impairment or,
- When a child or youth with a visual impairment is identified as eligible for DVI education services and/or DVI Vocational Rehabilitation Services.

**DVI roles and responsibilities**

DVI is responsible for ensuring conducts operational oversight of DVI staff & related funding. This includes requesting annual state funds sufficient for the provision of education services provided by DVI teachers, applying for IDEA sub-grants and high need grants, conducting annual census for American Printing House for the Blind annual quota funds, and purchasing and maintain all

textbooks and equipment for children with visual impairments, organize and fund diagnostic and low vision examinations, purchase the prescribed glasses or low vision aids,

### **DDOE roles and responsibilities**

1. The DDOE shall ensure that services for children and youth with visual impairments shall be provided in accordance with the IDEA and State regulations.
2. DDOE provides DVI with funding opportunities including IDEA sub-grant and high need sub-grant funds, when available.
3. DDOE provides monitoring oversight and communicate findings of monitoring noncompliance to DVI and/or LEA responsible for provision of services.
4. DDOE collaborate on policy development and coordinate with DVI and LEAs in the development of policies and procedures designed to ensure the provision of a free, appropriate public education for children and youth with visual impairments.
5. DDOE provide technical assistance to DVI in the development of additional interagency agreements, as needed, with LEAs and other public and private agencies.
6. Disseminate and provide technical assistance to DVI and LEAs on the rules and regulations pertaining to the education of children and youth with visual impairments contained in the IDEA and State Regulations.
7. Provide consultation on coordination of services between DVI and LEAs.
8. Conduct training activities with appropriate staff concerning this Agreement and its implementation, in cooperation with DVI, which delineates specific procedures to be followed by DVI, DDOE, and LEA school personnel in the coordination of educational programming and placement for youth with visual impairments who are receiving cooperative services from those agencies.
9. Participate in the DVI Vocational Rehabilitation Advisory Council (VRAC) as required and the Governor's Advisory Council on the Blind when requested.
10. Provide technical assistance to DVI and review and approve proposals for federal funds based upon the annual count of students served to supplement services for children and youth with visual impairments, and to provide technical assistance to obtain such funds.

### **LEA(s) roles and responsibilities**

1. Provide special education services to children and youth with visual impairments in compliance with the IDEA, State and Federal rules and regulations that apply in providing a free and appropriate public education in the least restrictive environment.
2. Include appropriate staff from the DVI in the IEP and IFSP processes for children and youth with visual impairments. Notify appropriate DVI staff, including TVIs, Orientation & Mobility instructors, Assistive Technology Professionals, Child Youth Counselors, Employment Navigators, and DVI Vocational Rehabilitation Counselors, of IEP and related

meetings within 10 school days. Convene meetings as appropriate including times when coordination of services is needed such as when DVI notifies the LEA of a change in available services (see #26 under DVI above).

3. Ensure informed written consent for release of information is obtained from adult students or parents of minors prior to sharing information with the DVI staff. All the student records will follow the Family Education Rights and Privacy Act (FERPA), the Health Information Portability and Accountability Act (HIPAA), the IDEA and State law and regulations. DDOE staff will encourage parents to contact DVI directly to learn about programs and resources that may be available to their children.
4. After parent approval (e.g., signature of DVI VR application), verify, collect and provide information relevant to secondary transition (defined in MOU) to DVI VR Counselors.
5. Develop the IEP and IFSP in collaboration with the appropriate DVI staff based upon assessment and feedback provided. Include VI-related services as related services with each service identified (e.g., TVI direct or consult, Orientation & Mobility direct or consult, VR Rehabilitation Counselor services).

**DDOE and DVI jointly agree to:**

1. Request funding for jointly operated programs on an annual basis sufficient for the provision of a free appropriate public education for children and youth with visual impairments served in collaborative programs.
2. Seek federal funding to supplement services for children and youth with visual impairments including, but not limited to, America's Schools Act (ASA)-Title I (H), Carl Perkins Vocational Technical Education Act-Title II (CPVTEA) & IDEA-B.
3. Coordinate the development of policies and procedures necessary to ensure the provision of appropriate services and compliance with federal and State rules and regulations.
4. Coordinate legislative activities that impact children and youth with visual impairments; specifically, to propose amendments to the Delaware Code to further delineate responsibilities of DVI and DDOE and to propose improvements in funding and policy.
5. Review and revise certification requirements for teachers of children and youth with visual impairments.
6. Share responsibility for the planning and provision of transition services for students who will be moving between the educational system and DVI, other adult service providers, and the community.
7. Coordinate services with LEAs to maintain sufficient staff levels to meet student needs.
8. Cooperate in the development of new programs and in the revisions of existing programs.
9. Reviewing assessment approaches to ensure that assessments are appropriate for age and the individual's disability, as well as that transition planning needs of youth with disabilities

and the requirements of the participating agencies are met. If student goal is higher education, a discussion between agencies to determine what current assessment information is needed/required for successful student outcome. Both parties agree to conduct appropriate and timely assessment without regard to financial considerations/obligations.

**Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals.**

The MOU provides details related to outreach to and identification of students to assess their potential need for transition and pre-employment transition services. The agreement includes the process of receiving internal referrals from DVI teachers, collaborating with schools, and disseminating information to reach individuals who are members of traditionally unserved populations.

The MOU defines the coordination of transition activities provided by local educational agencies under the Individuals with Disabilities Education Act U.S.C. § 1400 et seq. It outlines transition planning roles DVI and educational personnel to facilitate the development and implementation of a student's individualized education plan (IEP). It includes the DVI vocational rehabilitation counselors (VRC) role in the process and includes a detailed description of transition services, pre-employment services.

**Coordination necessary to satisfy documentation requirements set forth in 34 C.F.R. part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and**

The MOU outlines the documentation requirements set forth in section 511 of the Rehabilitation Act about students with disabilities who are seeking subminimum wage employment.

Delaware legislators passed a law in FY21 which prohibits use of subminimum wage certificates starting 10/01/2024. When the law passed, Delaware had just two businesses that utilized certificates allowable under section 14 (c) of the Fair Labor Standards Act of 1938 (29 USC § 214(c)). Both businesses were closed since the public health emergency began in 2020, and both have discontinued subminimum wage practices.

**Assurance that, in accordance with 34 C.F.R. § 397.31, neither the SEA nor the local educational agency will enter a contract or other arrangement with an entity, as defined in 34 C.F.R. § 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.**

The MOU states that DVI will enforce limits on the use of subminimum wage and maintain documentation according to the standards in this section. DVI shall ensure that no entity in Delaware, including a contractor or subcontractor of the entity, which holds a special wage

certificate as described in section 14 (c) of the Fair Labor Standards Act of 1938 (29 USC § 214(c) may compensate an individual with a disability who is age 24 or younger at a wage (referred to in this section as a subminimum wage) that is less than the Federal minimum wage. This statement is followed by a detailed explanation of all standards, details, and exceptions.

The MOU assures that the DDOE will not enter into any form of contract or cooperative agreement with an entity for purposes of operating a program in which youth with disabilities are employed at subminimum wage.

The MOU assures that the LEAs will provide Policy Development by assuring that the LEAs will not enter into any form of contract or cooperative agreement with an entity for purposes of operating a program in which youth with disabilities are employed at subminimum wage. Subminimum wages for individuals with disabilities officially became illegal in Delaware on January 31, 2024. The [Jamie Wolfe Employment Act](#), signed in October 2021, mandated a phased elimination of certificates.

## K. COORDINATION WITH EMPLOYERS

### **DVI-VR Business Services Structure**

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 two ESS positions who are directly supervised and supported by the VR District Administrator who is responsible for VR daily operations and staff supervision. An additional ESS position has been dedicated to the coordination of pre-ETS activities (Pre-ETS Coordinator) and services. The entire VR program, including career services and the Business Enterprise Program 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, submitting required federal performance reports, updating policies and procedures, reviewing personnel training records, and providing technical assistance to VR staff. The established structure allows for statewide oversight, information sharing and a collaborative approach to employer engagement.

### **DVI-VR Business Services Activities**

The DVI ESS team will continue to be responsible for the following efforts:

1. Assist VR Counselors by obtaining meaningful employment for job seekers.

2. Develop work-based learning experiences (including internships, short-term employment, apprenticeships, and fellowships), and opportunities for pre-employment transition services.
3. Join and actively network with professional organizations and groups such as the Rotary Clubs, Chambers of Commerce, etc.
4. Recruit and prepare consumers with responding to employer recruiting needs.
5. Assist employers with their workforce needs through engagement and collaboration.
6. Provide site surveys and solutions to help businesses identify reasonable accommodations, physical barriers, and safety needs.
7. Coordinate blindness sensitivity training for business and their employees.
8. Help advance the hiring of people with visual impairments in State government through the Agency Aide and Selective Placement program.
9. Collaborate with schools, CRPs, and community organizations by engaging in events designed to enhance workforce development (job fairs, transition conference/events, etc.).
10. Promote awareness of blindness related obstacles to continued employment.

Supporting consumers requires ESS to help job seekers 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, 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 DVI ESS team is 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.

The DVI ESS team will continue to provide consultation, technical assistance, and support to employers on workplace accommodations, assistive technology, and facilities and workplace access through collaboration with community partners and employers, across States and nationally, to enable the employers to recruit, job match, hire, and retain qualified individuals with disabilities who are recipients of vocational rehabilitation services or who are applicants for such services. DVI will continue to assist employers with utilizing available financial support for hiring or accommodating individuals with disabilities, including but not limited to, a renewed agreement with the Division of Employment and Training regarding utilization of the Work Opportunities Tax Credit for individuals with visual impairments. DVI will continue to develop relationships with employers to craft customized supported employment opportunities in integrated settings that are consistent with the individual's unique skills, abilities, interests, and informed choice.

The VR team will continue to provide the following services and coordination:

- Vocational Rehabilitation Counselors (VRC) and Employment Services Specialists (ESS) will continue to enhance communication and collaboration with all DVI programs, community partners and business partners to provide more work-based learning and work-based readiness services for students. Some of the services provided to prepare students for competitive integrated employment will be soft skills, internships, interviewing skills, networking skills, resume building, technology training and job shadowing.
- Maintain the Business Partners tracking database which continues to evolve and assists the ESS team to better meet the needs of business partners by tracking services used or needed to onboard new employees with visual impairments. It is also used to track technical assistance to business partners, number of consumers hired and location of placements (county, city, etc.). The intention is for the team to use the database to demonstrate successful outcomes, develop work-based learning, and initiate paid and unpaid internships that allow students to explore different careers as well as to identify opportunities for job development and promote workplace inclusion.
- ESS will continue to coordinate development efforts, contact new businesses, and increase networking through business-oriented organizations such as, Society of Human Resource Managers, Rotary Clubs, Chambers of Commerce, 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 inclusive employment opportunities for individuals with visual impairments.
- The ESS team will continue to improve efforts to cultivate new opportunities from existing business partnerships. Using facilitated planning targeting DVI and Business partner inputs, the ESS will identify opportunities to create more work-based learning experiences (including paid internships, short-term employment, apprenticeships, and job shadowing); developing new pre-employment transition strategies; and supporting businesses with recruiting qualified applicants with visual impairments. These efforts will provide increased probabilities for successful outcomes.
- ESS team will support employer engagement by providing businesses with access to all DVI services. The VR Program will continue to regularly update marketing materials and training for consumers and businesses. Workplace inclusion services, such as 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. DVI ESS will also provide technical assistance to businesses with the necessary paperwork to access hiring incentives (i.e., Federal tax credits, Delaware Disability Employment tax credit, and on-the-job training wages).

- The ESS team 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.

### **Labor Market Information**

As of December 2025, Delaware's seasonally adjusted unemployment rate rose to 5.2%, marking the highest level since September 2021. The state experienced a significant increase in unemployment, with the number of unemployed workers rising by 8,300 over the year compared to December 2024, amid a year-over-year rise of 1.6 percentage points from 3.6%. Meanwhile, area unemployment rates – which are not seasonally adjusted – were mostly lower. New Castle County, Wilmington, Middletown, Kent County, Dover and Sussex County were all down. The Private Education and Health sector led the increase in Delaware over the last year with an increase of over 300 jobs, while Manufacturing jobs saw the sharpest decline, losing 600 since December 2024.

The state unemployment rate continues to be higher than the national rate (3.7%) and of two of three contiguous states, two of which are below the national average (MD 4.2%, PA 4.2%, NJ 5.4%). ADVI also reviewed the current labor market to identify gaps and opportunities related to jobs for people who are blind. According to the National Federation of the Blind, more than 70% of people with severe vision loss are not working full time and 27.7% live with income below poverty level.

### **Emerging Industries**

Emerging industries, such as biotechnology, artificial intelligence, and clean energy can provide opportunities for people who are blind or visually impaired provided candidates are equipped with diverse skill sets (often technical), adaptability, and creative problem-solving ability.

DVI will continue to work with workforce partners on initiatives related to emerging industries and occupations to ensure people with visual impairments and blindness are provided appropriate career development resources.

### **Looking Ahead**

According to the Delaware Office of Occupational and Labor Market Information, the fastest growing occupations over the next six years will be nurse practitioners (54.14%), physician assistants (37.20%), medical and health service managers (36.77%), physical therapy assistants (35.55%), and financial examiners (34.70%). There are some key takeaways to consider when planning for the next four years including:

- The rise in remote work will increase the need for technology and training
- Baby boomer generation is retiring at a rapid rate, taking years of knowledge with them but opening doors for restructuring of jobs.
- People with bachelor's degrees are still twice as likely to be employed as those without. Increase training and education for youth and adults.

- Identify high demand career opportunities both locally and nationally.
- Develop small business engagements target chambers of commerce, Small Business Association, and increase use of the American Job Center resources.
- Work with CRPs to identify social service positions needed.
- Target remote and part time positions to enhance both employer and job seeker flexibility.
- Outreach, outreach, outreach – there is a greater need to educate employers (especially small business) about the benefits of hiring DVI consumers.
- Engage job seekers and employers with regular job fairs, meet & greets, mentoring, paid internships, job shadowing (take advantage of successfully closed consumers as networkers and mentors).

### **DVI-VR Business Services Transition Activities**

DVI will reestablish the coordination of summer youth program and utilize relationships with the City of Wilmington, New Castle County and employers in Kent and Sussex Counties to provide opportunities. Before the public health emergency, each site reserved several positions specifically for students with visual impairments. This opportunity resulted in businesses being more informed and better prepared to understand the abilities and potential accommodation needs of individuals with visual impairments and provided students with access to work experiences that align with their skills and abilities.

DVI will continue to utilize existing CRP that offer group and individualized pre-ETS transition services, including workplace readiness training and work-based learning experiences and work to establish additional partnerships. 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 shadow, participate in informational interviews and worksite tours and gain work experience through paid or unpaid internships.

DVI will continue to be 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. DVI will continue to participate in Cadre meetings to help identify gaps in educational pathways, develop best practices for skills needed after school to enter the workforce and to help educational staff with identified barriers to employment.

The DVI ESS team will provide consultation, technical assistance, and support to employers on workplace accommodations, assistive technology, and facilities and workplace access through collaboration with community partners and employers, across States and nationally, to enable the employers to recruit, job match, hire, and retain qualified individuals with disabilities who are recipients of vocational rehabilitation services or who are applicants for such services. DVI will assist employers with utilizing available financial support for hiring and providing accommodations for individuals with disabilities, including but not limited to, a renewed agreement with the Division of Employment and Training regarding utilization of the Work Opportunities Tax Credit for individuals with visual impairments. The Division for the Visually Impaired will continue to develop relationships with employers to craft customized supported employment opportunities in integrated settings that are consistent with the individual's unique skills, abilities, interests, and informed choice.

#### L. INTERAGENCY COOPERATION WITH OTHER AGENCIES

##### 1. STATE PROGRAMS (DESIGNATE LEAD AGENCY(IES) AND IMPLEMENTING ENTITY(IES)) CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

DVI partners with the Assistive Technology Resource Center (ATRC) which is run by the University of Delaware Center for Disability Studies. 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 school-aged students who are blind or severely visually impaired and are an active member of the State Council for Persons with Disabilities Statewide Electronics Accessibility Committee.

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.

##### 2. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

According to the Delaware Occupational and Labor Market statistics, agriculture, forestry, fishing, and hunting jobs will decrease by 4.17% by the year 2030[1]. However, when consumers wish to pursue careers in the industry, DVI utilizes the following resources to assist with career readiness and employment development:

1. Delaware Department of Agriculture training and certification programs to assist consumers interested in Grain Inspection, Nutrient Management, Pesticide Applicators, and Farm Food Safety.
2. AgrAbility Program Resources: Although Delaware is no longer an active State participant in the AgrAbility program through the United States Department of Agriculture, DVI has access

several resources available to all states. For example, the National AgrAbility Project provides certain information and services remotely, such as recommendations on types of technologies or advice about navigating the social services system. Additional resources include an assistive technology toolbox, publications, and archived webinars.

[1]Long-Term Industry (delaware.gov)

### 3. 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 that would benefit job seekers. DVI is an active member of the WIOA partner leadership team and participates in ongoing initiatives for quick navigation through services and data sharing. DVI provides vocational services to out-of-school youth with visual impairments in collaboration with Community Rehabilitation Programs through cooperative relationships. Additional partners 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.

### 4. STATE USE CONTRACTING PROGRAMS;

State use contracts in Delaware fall under the purview of the Commission for Statewide Contracts to Support Employment for Individuals with Disabilities (the Commission). The Commission codified by DE Code 16 § 9600 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 operate 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.

To operate the set-aside contracts effectively and fairly, 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 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.

There is currently one CNA in Delaware, 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 technological needs, and offer other services to ensure success on the job.

DE Code 16 § 9606 defines Business Enterprise Program (BEP) priority to vending contracts in State buildings. The DVI Director is a non-voting member of the Commission. This provides a chance to gain input from stakeholders and aids in the ongoing preservation and development of State opportunities prioritized for BEP.

5. STATE AGENCY RESPONSIBLE FOR ADMINISTERING THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT (42 U.S.C. 1396 ET SEQ.);

The Division of Medicaid and Medical Assistance (DMMA) administer Title XIX of the Social Security Act for the State of Delaware. 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 mental health needs. Employment services are made possible through Section 1115 of the Medicaid demonstration waiver as authorized by Title XIX of the Social Security Act.

DVI, DMMA, DDDS, and DSAMH are all situated under the Delaware Department of Health and Social Services.

6. STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES;

In Delaware, people with intellectual and/or developmental disabilities, who meet eligibility, have access to comprehensive services from the Division of 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 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 services, personal care and customized services for people who may have had unsuccessful employment experiences. 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.

DVI and DDDS are both housed under the Department of Health and Social Services and members of the Employment First Oversight Commission (EFOC), the governing body for ensuring people with disabilities are provided the opportunity to enter jobs and develop careers.

## 7. STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES; AND

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 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 services, personal care, and customized services for people who may have had unsuccessful employment experiences. Like DVI, DSAMH is also situated under the Department of Health and Social Services (DHSS) which provides DVI with quick access to Division leadership if needed to resolve consumer issues.

## 8. OTHER FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS OUTSIDE THE WORKFORCE DEVELOPMENT SYSTEM.

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 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 including the Employment First Oversight Commission and the State Council for Persons with Disabilities.

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; Peer Support 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.

#### 9. OTHER PRIVATE NONPROFIT ORGANIZATIONS.

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). Historically, DVI provided most services using internal staff and referred a very small number of participants to CRPs. DVI understood the importance of offering choice and using providers who specialize in placement services, so an initiative was launched to utilize the services of providers and to build more relationships. This initiative began in FY20 and has resulted in partnerships with two local CRPs who provide all vocational services and one CRP who specializes in adjustment to blindness and peer support services. This partnership has resulted in 75% increase in the use of vendors for all community-based services including assessments, job placement, job coaching, supported employment, and Pre-Employment Transition services as well as services for comprehensive benefits counseling and entrepreneur preparation and training. Additionally, DVI VR counselors routinely review training opportunities with consumers. These options include the programs supported by the DE workforce development system and innovative online training designed specifically for job seekers who are blind or visually impaired.

DVI continues to search for partnerships and contracts with providers that specialize in, or aspire to specialize in, services designed for people who are blind and utilizes organizations located outside of Delaware to secure highly specialized 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 provided training sessions related to blind sensitivity, blind etiquette, assistive technology, and more. During the sessions, DVI professionals ask attendees to wear blindfolds and/or goggles that depict various types of vision loss, while they perform tasks such as pouring a drink and icing a cupcake. The attendees are also provided with Sighted Guide instruction and experience using a white cane. Since launching the training, DVI has conducted six sessions for over fifty CRP staff. The DVI staff also provide guidance to providers by evaluating common barriers faced by blind consumers and recommending solutions. Examples of recommendations include updated assistive technology (software, screen readers, etc.) as well as low tech tools (bump dots, large-face devices, etc.).

When seeking partner organizations, DVI adheres to the State procurement process, shares solicitations through the State bid portal, and gains approval from the Secretary of the Department of Health and Social Services as required. The procurement process is outlined in the newly revised grants manual which includes policies, procedures, and internal controls.

#### ASSURANCES

The State Plan must 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 State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

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

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).

3.e. as applicable, 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.

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

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

3.h. the requirements 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.

The State Plan must include
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 as set forth in section 101(a)(18)(A).
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)(E) 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 or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.
4.d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.
4.e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) 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

The State Plan must include
Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 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.A. strategies to address the needs identified in the assessments; and
4.j.i.B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113).
4.j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5. Program Administration for the Supported Employment Title VI Supplement to the State plan:
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.
6. Financial Administration of the Supported Employment Program (Title VI):
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 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)(H) and (I) of the Rehabilitation Act.

The State Plan must include
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:
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 the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.

Do you attest that these assurances will be met?

Yes

VOCATIONAL REHABILITATION (BLIND) CERTIFICATIONS

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY TITLE IV OF WIOA[1], AND ITS STATE PLAN SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT;

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Delaware Division for the Visually Impaired

2. IN THE EVENT THE DESIGNATED STATE AGENCY IS NOT PRIMARILY CONCERNED WITH VOCATIONAL AND OTHER REHABILITATION OF INDIVIDUALS WITH DISABILITIES, THE DESIGNATED STATE AGENCY MUST INCLUDE A DESIGNATED STATE UNIT FOR THE VR PROGRAM (SECTION 101(A)(2)(B)(II) OF THE REHABILITATION ACT). AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (DESIGNATED STATE AGENCY OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT)[2] AGREES TO OPERATE AND IS

RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[3], THE REHABILITATION ACT, 34 CFR 361.13(B) AND (C), AND ALL APPLICABLE REGULATIONS[4], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE TO STATES UNDER SECTION 111(A) OF THE REHABILITATION ACT ARE USED SOLELY FOR THE PROVISION OF VR SERVICES AND THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

ENTER THE NAME OF DESIGNATED STATE AGENCY

Delaware Department of Health and Social Services

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY, OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT, AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[5], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[6], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER TITLE VI ARE USED SOLELY FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES AND THE ADMINISTRATION OF THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

4. THE DESIGNATED STATE UNIT OR, IF NOT APPLICABLE, THE DESIGNATED STATE AGENCY HAS THE AUTHORITY UNDER STATE LAW TO PERFORM THE FUNCTIONS OF THE STATE REGARDING THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE VR PROGRAM IN ACCORDANCE WITH 34 CFR 361.13(B) AND (C);

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Deborah Talley

8. THE (ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND THE SUPPLEMENT FOR SUPPORTED EMPLOYMENT SERVICES;

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

Director, Delaware Division for the Visually Impaired

9. THE AGENCY THAT SUBMITS THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT HAS ADOPTED OR OTHERWISE FORMALLY APPROVED THE PLAN AND ITS SUPPLEMENT.

[1] PUBLIC LAW 113-128. [2] ALL REFERENCES IN THIS PLAN TO "DESIGNATED STATE AGENCY" OR TO "THE STATE AGENCY" RELATE TO THE AGENCY IDENTIFIED IN THIS PARAGRAPH. [3] NO FUNDS UNDER TITLE I OF THE REHABILITATION ACT MAY BE AWARDED WITHOUT AN APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN IN ACCORDANCE WITH SECTION 101(A) OF THE REHABILITATION ACT. [4] APPLICABLE REGULATIONS, IN PART, INCLUDE THE EDUCATION DEPARTMENT GENERAL ADMINISTRATIVE REGULATIONS (EDGAR) IN 34 CFR PARTS 76, 77, 79, 81, AND 82; 2 CFR PART 200 AS ADOPTED BY 2 CFR PART 3474; AND THE STATE VR SERVICES PROGRAM REGULATIONS AT 34 C.F.R. PART 361. [5] NO FUNDS UNDER TITLE VI OF THE REHABILITATION ACT MAY BE AWARDED WITHOUT AN APPROVED SUPPORTED EMPLOYMENT SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN IN ACCORDANCE WITH SECTION 606(A) OF THE REHABILITATION ACT. [6] APPLICABLE REGULATIONS, IN PART, INCLUDE THE CITATIONS IN FOOTNOTE 4, AS WELL AS SUPPORTED EMPLOYMENT PROGRAM REGULATIONS AT 34 C.F.R. PART 363.

CERTIFICATION SIGNATURE

Signatory information	Enter Signatory information in this column
<b>Name of Signatory</b>	Deborah Talley
<b>Title of Signatory</b>	Division Director
<b>Date Signed</b>	January 15, 2024

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	48.0.0%		49.0%	
Employment (Fourth Quarter After Exit)	48.0%		49.0%	

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Median Earnings (Second Quarter After Exit)	\$4,630		\$4,675	
Credential Attainment Rate	55.0%		55.0%	
Measurable Skill Gains	52.0%		53.0%	
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

1

*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

**GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - VOCATIONAL REHABILITATION**

**1. DESCRIBE HOW YOUR ENTITY’S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.**

The Delaware Division for the Visually Impaired (DVI) strives to ensure General Education Provisions Act (GEPA) regulations compliance by ensuring all citizens have equitable access to, and participation in federally funded Vocational Rehabilitation programming by working to overcome barriers based on race, color, religion, sex (including pregnancy), national origin, age, disability, marital status, sexual orientation, gender identity, genetic information, veteran status, residency or any other legally protected category. The mission of DVI is to provide educational, vocational, and technical support to empower and foster independence for Delawareans with visual impairments.

DVI ensures consumers and employees have equal access to programs and/or employment through the following:

1. Adherence to relevant Delaware Department of Health and Social Services (DSU) and the Division for the Visually Impaired (DVI) policies regarding equity in access and participation such as the Equal Employment Opportunity Policy and the Technology Accessibility Policy.
2. In accordance with 34 CFR §361.37 (information and referral programs) and §361.41 (processing referrals and applications), DVI processes all referrals and requests for information in an equitable and timely manner.

3. Use of a variety of marketing and communication strategies to ensure all information is digitally accessible and available in multiple medias and languages.
4. Program and employee applicants may receive auxiliary aids and services to access VR program as defined in Title II of the Americans with Disabilities Act (ADA) "auxiliary aids and services" in 28 CFR §35.104.
5. Ensure all VR staff are well-trained and understand the importance of the recently revised and updated VR policy and procedures manual. The policies promote equity through well-defined standardized access to all visually eligible persons interested in the program and funded activities.
6. Ensure hiring practices are fair and equitable by using an objective and standardized process for selecting qualified VR counselors, employment services specialists, trainers, and support staff.

**2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?**

Delaware has three counties with three different dynamics ranging from urban to suburban, small town, rural, and coastal. As such, Delaware experiences both statewide and localized barriers that could impede equitable access and participation if not addressed.

**Statewide:**

Lack of awareness of blindness and severe vision loss:

1. Little public knowledge of blind and visually impaired etiquette (i.e., Sighted Guide, guide dogs, etc.)
2. Limited understanding of when/how to offer a person who is blind assistance
3. Lack of local Community Rehabilitation Providers (CRP) that specialize in VR services to people with severe visual impairments and blindness.
4. Knowledge gaps in developing and sharing documents or messages using accessibility basics.

**Kent and Sussex Counties:**

Inconsistent availability of internet connectivity which results in limited access to assistive technology and resources.

**3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?**

To address the lack of awareness of blindness and severe vision loss, DVI plans to expand training topics and modernize content to be offered to a wider audience statewide. In addition to DVI employees, businesses, and family members, DVI will offer training to community rehabilitation providers that want to specialize in VI services, police departments, police cadet academy, first responders, schools, community groups, doctor offices, senior centers, WIOA core partners, and other state agencies. DVI will provide training and education, to address barriers that may impede equitable access and participation in federally funded programs. Training sessions will continue to be interactive, conducted by vision professionals, and customizable from the list below.

1. Sensitivity
2. Sighted guide
3. Disability etiquette
4. Common visual impairments (VI) that affect the aging eye and eye diseases
5. VI simulation
6. White cane safety
7. Basic communication and document accessibility (Office 365, Google docs, email, social media)

To increase access to the internet, DVI will work with the Delaware Department of Technology and Information (DTI) as Bipartisan infrastructure Law - Broadband, Equity, Access, and Deployment (BEAD) project is implemented. BEAD, made possible by the Bipartisan Infrastructure Bill (BIL), is dedicated for broadband expansion, and may be used to connect unserved homes and upgrade connection.

#### 4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Increase training to improve awareness of blindness and severe vision loss for people receiving general vocational rehabilitation services:

1. DVI conducted at least 15 training sessions during 2024 and 2025.
2. DVI will continue to improve access by conducting training throughout 2026 and 2027.

Improve internet access and improve awareness of blindness and severe vision loss for people receiving general vocational rehabilitation services:

1. DVI informed all consumers about the initiative and encouraged them to self-advocate by reporting broadband access barriers. DVI provided assistance and support through the self-reporting process as requested.
2. The state of Delaware assisted 2,010 homes received high speed internet through from Verizon using ARPA funding, 2,986 homes received high speed internet through Comcast-ARPA funding, and 1,855 homes received high speed internet through Mediacom-ARPA

3. 2026 –2028: Continue to advocate for the blind and visually impaired community through the BEAD planning and implementation committee.

#### GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - SUPPORTED EMPLOYMENT

#### 1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

The Delaware Division for the Visually Impaired (DVI) strives to ensure General Education Provisions Act (GEPA) regulations compliance by ensuring all citizens have equitable access to, and participation in federally funded Vocational Rehabilitation programming by working to overcome barriers based on race, color, religion, sex (including pregnancy), national origin, age, disability, marital status, sexual orientation, gender identity, genetic information, veteran status, residency or any other legally protected category. The mission of DVI is to provide educational, vocational, and technical support to empower and foster independence for Delawareans with visual impairments.

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5. Ensure all VR staff are well-trained and understand the importance of the recently revised and updated VR policy and procedures manual. The policies promote equity through well-defined standardized access to all visually eligible persons interested in the program and funded activities.
6. Ensure hiring practices are fair and equitable by using an objective and standardized process for selecting qualified VR counselors, business consultants, trainers, and support staff.

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Inconsistent availability of internet connectivity results in limited access to assistive technology and resources.

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