# Workforce Innovation and Opportunity Act (WIOA) Combined State Plan for Program Years (PY) 2020 to 2024

# -DRAFT- (V1- to OOD Council for feedback – 11-6-19)

### Program-Specific Requirements for Vocational Rehabilitation

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

 \* Sec. 102(b)(D)(iii) of WIOA**

#### a. Input of State Rehabilitation Council.

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

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

INSERT OOD COUNCIL’S INPUT HERE- MEETING NOVEMBER 13

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

##### INSERT OOD’S RESPONSE TO OOD COUNCIL’S INPUT HERE

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

#### (INSERT OOD’S EXPLANATION HERE.)

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

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

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

OOD is not requesting a waiver of statewideness. All vocational rehabilitation services offered by OOD are available in all areas of the state.

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

OOD is not requesting a waiver of statewideness. All vocational rehabilitation services offered by OOD are available in all areas of the state.

##### 3. requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

OOD is not requesting a waiver of statewideness. All vocational rehabilitation services offered by OOD are available in all areas of the state.

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

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

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

Opportunities for Ohioans with Disabilities (OOD) has a long history of interagency cooperation with agencies and programs not carrying out activities through the statewide workforce development system. These cooperative partnerships contribute towards available services and promote the achievement of competitive integrated employment for individuals with disabilities served by the Vocational Rehabilitation (VR) program.

OOD has established Interagency Agreements with several state agencies that serve individuals with disabilities in Ohio. This includes the Ohio Department of Developmental Disabilities, the Ohio Department of Medicaid, the Ohio Department of Education and the Ohio Department of Mental Health and Addiction Services. These Interagency Agreements describe how the agencies coordinate services in a manner that will maximize resources and promote the achievement of competitive integrated employment for mutually eligible individuals with disabilities.

More specifically, these Interagency Agreements describe how the agencies will:

* Partner to identify and refer individuals with disabilities who may be interested in VR services,
* Share diagnostic and other collateral information needed to determine eligibility for VR services and/or to assist the eligible individual in career planning,
* Coordinate services such as employment readiness services, treatment services, transportation or long term supports needed to achieve competitive integrated employment,
* Provide technical assistance and consultation to field staff, and
* Share data to jointly evaluate and improve services to mutually eligible individuals.

Additional details about these Interagency Agreements are provided in subsequent sections of this plan.

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

AT Ohio is the agency that oversees Ohio’s Assistive Technology program carried out under Section 4 of the Assistive Technology Act of 1998. AT Ohio periodically provides training regarding assistive technology to OOD staff. In addition, OOD recently partnered with AT Ohio to obtain assistive technology from their lending library for demonstration at training events for employer partners. This training was a part of OOD’s five regional DisAbility Job Fairs held in celebration of National Disability Awareness Month in October 2019. An OOD representative was recently added to AT Ohio’s Board, which will support the agencies in identifying additional opportunities for future partnership.

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

OOD works in partnership with the Ohio AgrAbility program, which is administered by the Ohio State University in partnership with Easter Seals. AgrAbility is part of a national program from the U.S. Department of Agriculture that promotes independence for people in agriculture who want to continue to farm after experiencing the onset of a disability. OOD works with individuals served by the AgrAbility program to support access to the assistive technology and other vocational rehabilitation services needed to continue farming. OOD recently worked with the Ohio Department of Agriculture to bring awareness to Ohio’s AgrAbility program and share the impact the program has on the lives of Ohio farmers with disabilities.

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

OOD staff work with a variety of agencies that serve out-of-school youth at the local level. OOD collaborates locally with county boards of developmental disabilities in addition to other community partners such as local mental health agencies and OhioMeansJobs Centers.  In addition, OOD is a member of Ohio’s Employment First Taskforce that is developing a transition vision plan as a result of Ohio being one of 16 states selected to participate in the Employment First State Leadership Mentor Program (EFSLMP) coordinated by the Office of Disability Employment Policy (ODEP). The vision plan is centered on serving transition age youth and increasing community employment outcomes for youth with disabilities.  Members of the taskforce include OOD; DODD; ODE; MHAS; Medicaid; ODJFS; and DD Council. Those same partners, also, collaborated to develop the employment first transition framework that is intended to address barriers to transition planning and services in order to achieve meaningful adult outcomes.  OOD is, also, a representative on the Ohio Interagency Council for Youth focusing on serving youth in different systems.  In addition, OOD is a statutory member of the re-entry coalition where the Ohio Department of Youth Services is also a member.  An example of this collaboration is increased outreach and link of youth with OOD services prior to release.

##### 5. State use contracting programs.

The Ohio Department of Administrative Services (DAS) operates the Office of Procurement from Community Rehabilitation Programs (OPCRP), which is supported by an executive order directing all state agencies to purchase goods and services from Community Rehabilitation Programs (CRPs) whenever possible. OOD collaborates with DAS by participating on the OPCRP steering committee, which has developed a strategic plan for the program. This committee is comprised of representatives from: DAS; multiple CRPs across the state; the Ohio Department of Transportation; the Ohio Department of Developmental Disabilities; and OOD. Key initiatives of the strategic plan include: Business Development (expanded customer base, standardized system, updated OPCRP policies/procedures to reflect best practice, and develop an understanding of the capabilities within all CRPSs); CRP Development (best practices for general management, marketing/sales, quality service/product, contract management, including pricing methodologies and customer service); and Marketing Development (innovative marketing campaign that informs and promotes expansion of the CRPs).   OOD has also partnered with DAS to add language to lease agreements that require the payment of at least minimum wage for janitorial contracts at leased state office space.

**d. Coordination with Education Officials.**

**Describe:**

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

OOD implemented its current Vocational Rehabilitation (VR) Transition Services procedure (Procedure 80-VR-11-12) in August 2019 which includes updated language to better align with concurrent OOD policies and procedures (i.e. VR Eligibility and Order of Selection, Transportation Services, Comprehensive Assessment, etc.) and to further clarify the provision of transition services to students with disabilities. The procedure complies with 34 CFR 361.45, ensuring that the Individualized Plan for Employment (IPE) for students with disabilities is developed as early as is reasonably possible, but no later than the time at which the student leaves the school setting. Specifically, the transition procedure states that the Individualized Plan for Employment (IPE) must be completed and a specific employment outcome identified as soon as they are able but at minimum prior to the eligible student exiting school.

The current transition procedure outlines a practice to foster partnership and collaboration, in which a liaison VR staff person is assigned to each local school district and/or high school. The procedure directs these liaisons to hold initial meetings with school staff members to discuss transition and pre-employment transition services at the beginning of each school year. These discussions are intended to facilitate the coordination of transition and pre-employment transition services including projections for new referrals; timelines; planning activities; providing updates and reviewing student progress; meeting space at the school; and education and outreach activities for students and families.

The current transition procedure outlines a service delivery model with increased focus on the skill development needs of each eligible individual student with a disability, as young as age 14, in order to meet them where they are on their path to employment. It is designed to be person-centered with flexibility in service provision based on each individual student’s unique strengths, resources, priorities, concerns, abilities, capacities, interests, circumstances, and experiences. Students with disabilities, regardless of age, who need to gain a general understanding about employment and/or help identifying their career interests may participate in developmental activities and/or pre-employment transition services while others may already have basic work skills and a fundamental understanding about employment and may benefit from paid work experiences such as a summer youth work experience or assistance obtaining and maintaining a seasonal or after school job. The flexibility of this service delivery model allows VR program staff to provide more highly individual services and to become involved with the student at an earlier age, as young as 14, thus becoming a more active participant in the transition planning process overall.

In accordance with 34 CFR 361.65 OOD reserves 15 percent of the state’s allotment for the provision of pre-employment transition services, as described in 34 CFR 361.48(a) and described below. OOD, also, approved its most current Vocational Rehabilitation (VR) Pre-Employment Transition Services Subcategories procedure (Procedure 80-VR-11-18) in November 2019. The procedure addresses both students with disabilities who are Potentially Eligible (PE) and students who have open VR cases. The procedure outlines the process for connecting Potentially Eligible (PE) students with disabilities with services. It details how the seven designated PE staff process requests, enter student information into a PE case type, and authorize services for PE students. The procedure, also, outlines the process for students with disabilities who have open VR cases and complies with 34 CFR 361.46 ensuring Pre-ETS is added to the IPE when a student has an Individualized Plan for Employment.

In 2017, OOD began implementing Pre-Employment Transition Services for students with disabilities who are either Potentially Eligible (PE) or have open VR cases throughout the state. The five Pre-Employment Transition Services include Job Exploration Counseling; Work-based Learning; Counseling on Opportunities for Post-secondary Education; Workplace Readiness Training; and Instruction in Self-Advocacy. Services were originally contracted with Ohio’s Centers for Independent Living (CILs), Community Centers for the Deaf (CCDs), and Sight Centers, as well as several county boards of developmental disabilities.

In November 2018, OOD began awarding contracts to multiple VR Community Rehabilitation Programs (CRPs) in order to expand capacity. OOD updated its VR Fee Schedule in October 2019 to add the five pre-employment transition services to its transition service options for transition youth (including Summer Youth-Career Exploration, Summer Youth-Work Experience, Non-Permanent Job Development, and School-Based Job Readiness Training), in order to further increase capacity and availability of pre-employment transition services. Effective October 1, 2019, providers with one-year experience working with students with disabilities can be approved to provide pre-employment transition services after attending a mandatory in-person training and obtaining approval for the curriculum(s) submitted for each service they choose to provide. Curriculums must be focused on vocational rehabilitation activities and outcomes outlined in OOD’s Pre-Employment Transition Services Matrix document.

OOD has worked with the Ohio Department of Education (ODE), Office for Exceptional Children to promote collaboration between local education authorities and OOD field staff to coordinate Transition and Pre-Employment Transition Services. Both agencies now have public facing documents on their websites to highlight the availability of services. In 2018, OOD created a “Students 14+” tab to our website where students with disabilities, families, schools, county boards of developmental disabilities, and other interested parties can easily obtain information about services and learn how to be connected with OOD.

In addition, OOD currently hosts a statewide Youth Leadership Forum (YLF) for 11th and 12th grade high school students with disabilities. The program has a focus on one of the five pre-employment transition services, instruction in self-advocacy, and is designed to bring students with disabilities together to learn and improve leadership, citizenship, independence, self-advocacy, and social skills. Moving forward, OOD plans to expand the current model to five (5) regionalized YLF programs throughout the state increasing access to services for additional students.

**2. Information on the formal interagency agreement with the State educational agency with respect to:**

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

OOD maintains two interagency agreements with the Ohio Department of Education, Office for Exceptional Children (ODE/OEC). The first is an overarching agreement that outlines how the agencies will work together to support effective service and improved outcomes for students with disabilities in Ohio. The second is a data sharing agreement for mutually served students with disabilities.

The first interagency agreement between OOD and ODE/OEC was recently updated and will remain in effect until June 30, 2021. The purpose of this agreement is to share efforts to prepare students with disabilities for successful careers, community jobs and independent living; outline a collaborative framework for coordinating state and local resources; and provide basic guidance for coordinating plans, policies and procedures, to facilitate the transition of students with disabilities from school to post-school activities - including receipt of vocational rehabilitation (VR) services. It, also, addresses the following: roles and responsibilities; outreach to and identification of students with disabilities; consultation and technical assistance to assist VR and educational personnel in planning for the transition of students including the development and implementation of a student’s individualized education program (IEP) and individualized plan for employment (IPE); documentation requirements set forth in section 511 of the Rehabilitation Act with regard to youth with disabilities who are seeking subminimum wage employment; and deliverables for the Ohio Transition Support Partnership (OTSP) which through a recent expansion, dedicates 58 VR counselors to serve approximately 5,000 students with disabilities annually through OTSP alone.

The Ohio Transition Support Partnership (OTSP) began in October 2016. This statewide collaboration between OOD and ODE expands transition services for students with disabilities, ages 14 to 21, who are receiving services under an Individualized Education Program (IEP) and meet OOD eligibility criteria. Through the OTSP model, VR staff have an increased presence in each of the 91 career technical planning districts (CTPDs) and other local education agencies statewide. OTSP: • Expands access for students with disabilities to engage in career exploration and skill development at a younger age, launching them on a path to career success and independence; • Increases participation of VR counselors in IEP team meetings ensuring cross-agency planning and earlier career preparation; strengthens the partnership between OOD staff and ODE’s regional state support teams; and • Improves strategies to ensure that students with disabilities secure employment prior to graduation and connect with long-term supports services when needed and available to ensure long term success.

According to the Ohio Department of Education, there are more than 90,000 students with disabilities ages 14 and over with an IEP, many of which may be potentially eligible for OOD VR services. In 2014, OOD served nearly 12,000 youth between the ages of 14 and 24, indicating a significant need to expand services to youth and students with disabilities throughout Ohio.

The OTSP model utilizes a person-centered, agency-neutral and outcome-focused approach to comprehensive career planning that is based on established evidence-based predictors of success. The model is designed to increase independence and career readiness. While a full range of VR services are available, service provision is based on individual specific data driven decisions and is designed to meet people where they are on their unique path to employment.

Counselors assigned to OTSP receive training in transition-specific items, including coordinated multi-agency planning, approach to service delivery for student with disabilities, the roles and functions of VR and education in serving students with disabilities; and strategies for communication and outreach. To develop and strengthen relationships between counselors and educators at the local level, ODE’s Regional Support Teams and OOD staff coordinate meetings with local education agencies and career technical planning districts. These meetings provided an opportunity for local partners to learn about the program model and discuss potential referrals at the local level. Partners work together to plan for upcoming outreach events with students and their families.

OOD and ODE’s second agreement, The Interagency Data Sharing Agreement, allows for the exchange of student/participant data through utilization of an intermediary contractor. This agreement calls for a cross-agency data governance group. The two agencies share data collected related to students with disabilities who are receiving special education services and those receiving VR services, including pre-employment transition services in order to facilitate statewide coordination of Ohio Transition support Partnership; VR, transition, and pre-employment transition services; referral development; and technical assistance to better support students with disabilities in meeting their competitive integrated employment goals. The data will be utilized for the purposes of: identifying and determining outreach efforts; anticipating demographic need for staff and caseload distribution for both VR and PE case types; evaluating OTSP effectiveness; determining where service delivery gaps have closed; and providing technical assistance where gaps continue to exist. Recently the data share was utilized to compare the number of students on an IEP in each school with the number of open VR cases in those same schools. The information is being utilized to determine staffing and outreach needs.

Consultation and Technical Assistance under the Interagency Agreement:

ODE/OEC, through its network of 16 State Support Team transition contacts and four Career Technical Planning District consultants, and OOD central office staff provide statewide oversight and leadership for the development of policies, procedures, interagency training and other partnership activities for transition services. As mentioned previously, OOD’s transition procedure outlines a practice to assign liaisons to each school district or high school to serve students with disabilities on targeted and/or general caseloads. These liaison counselors also participate on interagency transition teams in both special education and career-technical education programs.

The Ohio Department of Education maintains Operating Standards for the Education of Children with Disabilities to guide the provision of special education and related services for students with disabilities, including transition services. The document defines “transition services” to include the development of competitive integrated employment goals. It also requires that staff coordinating transition shall either obtain the Transition to Work endorsement or possess the skills and knowledge necessary to facilitate a planning process with multiple agencies, communicate with other agencies, assist in referring students to adult services systems, and create strategies that support the career development pathways of students with disabilities leading to career and college readiness.

OOD staff at the state and local level provide consultation and technical assistance to school personnel, students, families and other agency partners through formal and informal trainings, joint problem solving and the exchange of information on policies and procedures. VR counselors serve as liaisons to local schools, attend IEP meetings regularly for potential referrals and serve on state and local interagency groups. They also present at state and local conferences and training seminars and participate in local district career fairs and other interagency forums on VR eligibility and services.

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

The Interagency Agreement outlines how transition planning is to occur at the local level for individual students with disabilities. Specifically, the agreement provides for consultation and technical assistance to educational agencies and VR personnel in planning for the transition of students with disabilities that facilitates the development and completion of individualized plans prior to the student exiting school. This includes the Individualized Plan for Employment (IPE), the 504 Plan, the Individualized Education Program (IEP), and any other plans that lead to post-secondary vocational outcomes. The agreement encourages educational agencies to develop linkages with VR offices as early as possible in the transition process. The agreement also specifies training efforts to promote the use of evidence-based practices and predictors to improve youth skills for competitive, integrated employment and community participation, driven by principles of informed choice, community-based services and measurable results. Additionally, Ohio Administrative Code now requires transition planning and services under an IEP to begin no later than age 14 and include a statement describing appropriate measurable post-secondary goals based on age-appropriate transition assessments related to employment in a competitive environment in which workers are integrated regardless of disability.

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

The Interagency Agreement between the Ohio Department of Education and the Opportunities for Ohioans with Disabilities outlines roles and responsibilities for education and vocational rehabilitation staff, including assurances that local education agencies are implementing Ohio’s Operating Standards for the Education of Children with Disabilities. This means that transition services are based on the individual child’s needs, taking into account the child’s strengths, preferences, and interests, and includes: instruction, related services, community experiences, the development of employment in an integrated competitive environment and other post-school adult living objectives, and when assessment data supports, a need for acquisition of daily living skills and provision of a functional vocational evaluation. Additionally, as previously mentioned, transition services must be provided by staff who have obtained the Transition to Work Endorsement or who possess equivalent skills and knowledge. Roles and responsibilities for VR staff under the Interagency Agreement between the ODE and OOD include providing a liaison counselor for each local school district and/or high school to formalize collaboration in planning and referral development and facilitating identification of students with disabilities who may benefit from VR services as early as possible during the transition planning process. This ensures that transition services and goals on a student’s IPE are aligned with the IEP, utilizing ready and existing documentation of the student’s disability as well as information needed to determine appropriate services whenever possible. Staff also finalizes the IPE prior to a student exiting school. VR services should complement services funded by schools, but not replace those services. This means that neither the local education agency nor OOD may shift the financial burden for providing a service for which it would be responsible to the other entity.

Transition services are funded by the various state agencies that serve the individual youth in accordance with requirements under WIOA, IDEA and other pertinent laws. In addition to the Interagency Agreement between ODE and Opportunities for OOD, Ohio’s Employment First Task Force works across multiple systems to align policies and practices and issues guidance to the field as needed to ensure that students receive the services needed to ensure achievement of employment and other post-secondary outcomes. While OOD and ODE are the two lead agencies with regard to facilitating transition services for students with disabilities, the Ohio Department of Jobs and Family Services, the Ohio Department of Developmental Disabilities, the Ohio Department of Mental Health and Addiction Services and the Ohio Department of Medicaid, as Employment First Task Force agencies also support this work, including funding services for mutually served students and youth with disabilities.

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

As noted above, OOD’s transition procedure outlines a practice to foster outreach and partnership collaboration, in which a liaison VR staff person is assigned to each local school district and/or high school to formalize collaborative approaches to student planning, referral development, tracking, as well as coordination and provision of pre-employment transition services, transition services, and other VR services. The procedure directs these liaisons to hold initial meetings with school staff members to discuss transition services at the beginning of each school year. These discussions are intended to facilitate the coordination of transition services, including projections for new referrals, timelines, planning activities and meeting space at the school, as well as education and outreach activities for students and families.

VR staff are also directed to conduct outreach activities including proactive introductions and education with multiple partners, attending transition fairs, conducting presentations, and attending school-based meetings in order to: describe the purpose of the VR program; discuss the application process; review the process for linking potentially eligible students with pre-employment transition services; and to distribute transition specific publications for future reference. One recent user-friendly publication, “Connecting Students with Work”, is a flyer resulting from a lean process improvement workgroup addressing the transition referral process. OOD gathered a team of professionals representing various positions and areas within OOD and incorporated feedback from the ODE and the State Support Teams to develop a streamlined, standardized referral development process later captured in the new flyer widely distributed to partners and located on OOD’s website. A postcard with a QR code was also created to market to students directly. It poses questions such as: “Are you in High School? What Is Next? Want to earn your own money?” in order to help recruit students with disabilities. In addition, OOD created a statewide school liaison list housed and updated on the intranet for all staff to quickly and more efficiently link potential applicants with staff assigned to their school.

To further assist with outreach to students with disabilities, OOD has recently created a Pre-Employment Transition Services fact sheet and flyer distributed through OOD and ODE to help students, families, school staff and other interested parties gain understanding about each of the five (5) services, how to access services, and that services are made available to both potentially eligible students with disabilities and students with open VR cases.

In addition, as previously mentioned, OOD has dedicated funds for 58 VR counselors to provide services to approximately 5,000 students with disabilities annually under the OTSP program alone. Aggressive outreach efforts with Career Technical Planning Districts and local education agencies are employed to actively engage students with disabilities in VR services. State Support Team staff from the education system is assisting OOD in these efforts.

#### e. Cooperative Agreements with Private Nonprofit Organizations.

**Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.**

OOD has approximately 368 providers that provide at least one of the 29 vocational rehabilitation (VR) services included on the VR Fee Schedule. Prior to providing any of these VR services, providers must go through a process to become an approved VR service provider. This process includes meeting certain accreditation or certification requirements and completing a VR Provider Agreement. By signing the VR Provider Agreement, the provider agrees to abide by the requirements for service delivery as outlined in the VR Fee Schedule and the VR Provider Manual, including accepting the established rates for services, utilizing standardized service reports and submitting invoices in a timely fashion. For other programs and services the provider offers that are not subject to the VR Fee Schedule, the provider completes a Fee Schedule Addendum. Examples of services that commonly fall under this addendum include transportation or skills training programs.

Since FFY 2013, OOD has used a standardized VR Fee Schedule that is designed to ensure a consistent pattern and quality of services purchased statewide. The VR Fee Schedule provides standard service definitions and outlines standard rates for services. In FFY 2017, the VR Fee Schedule was updated to move rates from market based rates to cost informed rates.

OOD implemented the FFY 2020 VR Fee Schedule with an effective date of October 1, 2019. In developing the update, OOD solicited feedback from stakeholders and providers throughout the state. This update increased rates in order to promote consistent, quality services for individuals with disabilities. The base increase for core services was based on the Employment Cost Index, based on provider feedback that this tool, produced by the Bureau of Labor Statistics, best captures not only inflation, but also the growth of total employee compensation, including employee wages and benefits. The update also includes added incentives for timely work assessments and facilitating job placement. Additionally, services previously contracted were added to the fee schedule. These include pre-employment transition services (Pre-ETS), Rehabilitation Technology, Activities of Daily Living, and Orientation and Mobility.

OOD also follows fee schedules to authorize Medical, Psychological and Dental services such as exams and assessments, restoration and treatment and durable medical equipment such as such as hearing aids or eyeglasses. Effective October 1, 2017, OOD aligned with fee schedules established by the Ohio Department of Medicaid. Use of maximum Medicaid rates aligns the VR program with purchasing practices of other state and local partner agencies, increases consistency across the agency in purchasing, expands the number of VR purchased services that have established standards and rates, makes available a pool of potential providers that meet requirements established by the Ohio Department of Medicaid; and simplifies the approach to purchasing many of these services.

Since 2015, OOD has collaborated with the Ohio Department of Developmental Disabilities to adapt an online tool known as the Provider Management Program (PMP) for use by VR service providers. This self-service tool has provided an interface for OOD to work with the provider community, as well as an interface for individuals with disabilities to identify available providers and make more informed decisions about provider selection. The system allows the provider to designate which of the services, subject to the fee schedule, it will provide and which counties it will serve. Once agreements and addendums are approved, the provider is notified. The PMP system allows providers to make changes to their services and delivery area at any time. This allows for expansion of services if a need arises during the fiscal year. This tool also includes functionality to allow individuals served by the program, their families and VR counseling staff to research provider information to facilitate informed choice when selecting a provider. This tool houses a provider scorecard that includes demographic information about individuals historically served by the program as well as performance data related to outcomes achieved by the program. OOD is currently exploring updates to the Provider Management Portal and to provider scorecards and is targeting FFY 2020 as a planning year for these items. These updates will be designed to enhance the interface for providers and individuals with disabilities when using these tools. Additionally, during FFY 2020, OOD will begin developing a VR Vendor Portal that will allow VR service providers to electronically receive authorizations for services, upload invoices and reports, and track billing and payment status. This portal will provide the foundation for greater standardization of the reporting and billing process and will offer significant increases in the efficiency of these processes for both providers and OOD staff.

In FFY 2013, OOD in partnership with the Ohio Department of Developmental Disabilities (DODD) established a dual certification program as part of the Employment First Partnership Agreement. This dual certification program is designed to ensure continuity of services and allow for more successful transition from time-limited to long-term supports. In addition, it is designed to better respond to the needs of individuals served by the program as well as our business partners. Through this program, OOD provided a waiver of accreditation requirements to approved DD supported employment providers, allowing them to provide VR services to individuals being served by OOD in the Employment First Partnership. Performance-based job development is utilized to ensure a more outcome-focused method of service provision. Staff providing services under this waiver must pass an online course and attend mandatory trainings on VR services, fee schedules, billing, and reporting expectations before they can begin providing services. They must also attend in-person trainings on employer engagement and on-the-job supports within one year of passing the online supported employment web course to continue providing services. OOD is currently in the process of incorporating this dual certification program into the Ohio Administrative Code.

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

**Describe the designated State agency’s efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.**

Opportunities for Ohioans with Disabilities (OOD) maintains policy guiding the provision of supported employment services and this supported employment policy and procedure is in accordance with requirements under WIOA. The policy and procedure provide a strong foundation for improving supported employment service delivery and relative employment outcomes for individuals with the most significant disabilities. Upon the publishing of the final regulations, OOD finalized the draft policy and procedure, and provided statewide training OOD staff. Needs assessment data will serve as an ongoing tool to assist OOD with identifying areas in the state where there is limited capacity for supported employment and long-term supports.

OOD, the Ohio Department of Developmental Disabilities (DODD), and the Ohio Department of Mental Health and Addiction Services (OhioMHAS) have consistently worked together to serve mutually eligible individuals with disabilities. As OOD provides services to an increased number of individuals with the most significant disabilities, the development of long-term supports and services is essential to the maintenance of the employment outcomes achieved.

Ohio is an Employment First state with an active taskforce of state agency representatives, including OOD. The taskforce meets regularly to align policies, funding and planning for services and supports that prioritize competitive integrated employment for Ohioans with developmental (and other) disabilities. As part of the Employment First Initiative, OOD and DODD have established an Interagency Agreement to expand supported employment services for working-age adults with developmental disabilities. According to DODD data, there are more than 35,000 working-age adults who receive adult services, the vast majority of which are in facility-based settings. This statewide initiative supports job seekers to transition from non-integrated settings into competitive integrated employment. Thirty OOD VR counselors provide VR services to eligible individuals served by the partnership. Counselors work with local county boards of developmental disabilities to identify candidates for the program. They deliver individualized, person-centered career planning services to assist in the development of the Individualized Plan for Employment (IPE). They purchase supported employment services, including supported employment - job development (SE-JD), from approved providers who have passed the Certified Employment Support Professionals (CESP) exam. Beginning January 2019, individual job developers who deliver supported employment- job development services are required to be CESP. We believe that Ohio is the first state VR program to require this credential for service providers. In addition, OOD has five in house Work Incentive Consultants on staff specifically for the partnership. The staff hold either a Community Partner Work Incentives Counselor (CPWIC) certification or a Work Incentive Practitioner (WIP) certification, and are tasked with expanding the availability of work incentives counseling for individuals with developmental disabilities who are served as part of the partnership. OOD also has a Work Incentives Program Administrator to oversee the agency’s delivery of work incentives consultation services.

An important component of the EF partnership includes professional development activities for both internal OOD and DODD staff and providers. In-person and web-based trainings are provided across the state. The dual-certification process allows DODD-certified Medicaid HCBS waiver providers to deliver both VR services and long-term follow-along supports to ensure continuity of services. Training for all other service providers includes web-based competency-based supported employment training and requires a passing score prior to serving individuals within the program.

For individuals with developmental disabilities who are eligible for Medicaid home and community based services (HCBS) waivers, OOD works with local county boards of developmental disabilities and providers to transition individuals with developmental disabilities into long-term supports needed to maintain competitive employment once the individual’s case has been successfully closed. For those individuals with developmental disabilities who are not eligible for an HCBS waiver, OOD will coordinate with the county board to establish alternative funding for long-term supports.

Supported employment performance-based job development (SE-JD) was added to OOD’s Vocational Rehabilitation Fee Schedule in 2017 and the service rate was updated in October 2019. Qualified providers of this service are dually certified by the Ohio Department of Developmental Disabilities in employment services or meet Ohio Mental Health and Addiction Service’s fidelity requirements for Individual Placement and Support – Supported Employment (called IPS-SE or IPS).

OOD and OhioMHAS also continue several important projects to promote supported employment services for individuals with severe and persistent mental illness (SPMI). The agencies are working together to increase the utilization of an evidenced-based supported employment model, also known as Individual Placement and Support – Supported Employment (IPS or IPS-SE). OOD is committed to improving employment outcomes for individuals with SPMI and considers IPS to be an important component to achieving this commitment.

OhioMHAS has hired four internal staff as IPS Trainers to conduct fidelity reviews with providers throughout the state and to provide technical assistance as needed. OOD and OhioMHAS also continue as active participants of the IPS Learning Community, which is connected to the IPS Employment Center at the Rockville Institute. This program works with states and a variety of different countries to implement IPS for individuals with SPMI who are interested in gaining employment. OOD and OhioMHAS are often called upon by members of the community to help their states with the implementation of IPS and other supported employment models. OOD and Ohio MHAS staff also worked together to develop training for all OOD field staff on Substance Use Disorders that was delivered in the spring of 2019.

Starting in FFY2020, OOD Jobs for Recovery will replicate a successful model of partnership, established with the Butler County Mental Health and Addiction Recovery Services Board and the Butler County Court of Common Pleas. This unique approach embeds a vocational rehabilitation counselor as an active member of the drug court team to help individuals with employment. The program model will support the recovery of individuals served by providing rapid engagement in OOD services, timely access to job placement services, on-the-job supports and retention services, and case service funding to meet additional needs. This team will consist of one Vocational Rehabilitation Counselor to serve a caseload that is dedicated to eligible individuals involved with the certified specialized dockets, one Caseload Assistant to facilitate rapid engagement, and one Job Developer to provide immediate access to job placement assistance when the individual is ready for employment. OOD will continue with Butler County and have six new counties in FFY 2020 and seven more counties added in FFY 2021.

#### g. Coordination with Employers.

**Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:**

##### 1. VR services; and

OOD’s Division of Employer and Innovation Services works with more than 500 Employer Partners to promote a talent pool of job-ready candidates, and to support businesses in the hiring and retention of individuals with disabilities. OOD’s five regional Business Relations Specialists assist businesses with recruitment of new employees and provide access to supports for existing staff who need services to keep their jobs. Business Relations staff also provide no-cost disability etiquette and awareness training, share information about employer tax credits, and coordinate local job fairs and hiring events to connect employers with job-ready candidates with disabilities.

OOD employs a full-time Worksite Accessibility Specialist, who is a registered and licensed occupational therapist, to provide personalized consultations on worksite accessibility and job accommodations. Employers who benefit from this no-cost service receive practical recommendations that they can implement to boost employee productivity and keep employees with disabilities on the job.

Business Relations Specialists utilize current labor market information tools and industry growth projections to identify those employers that have in-demand jobs and/or are experiencing job growth, and approach them about partnership opportunities. Business Relations Specialists are also connected with business and professional networks to identify and prioritize Employer Partners. They regularly network with businesses in their local communities through chambers of commerce, rotary clubs, and other professional organizations.

OOD’s Business Relations Unit streamlines access to employment opportunities for in-demand jobs for both the Employer Partner and the job seeker with a disability. By directly supporting business as a customer, OOD positions itself as a comprehensive resource for disability inclusion. From recruitment, to training and technical assistance, to retention supports, and worksite accessibility services, employers turn to OOD for their disability hiring needs.

In addition to the five Business Relations Specialists, through a partnership with the Poses Family Foundation, OOD employs 12 Talent Sourcing Coordinators throughout the state. These staff meet with vocational rehabilitation counselors at least monthly to discuss Employer Partner job openings that align with the goals of job-ready participants. Through the “Job Now” process, Employer Partners’ current job postings are shared with counselors, job seekers with disabilities, and job developers. OOD’s Talent Sourcing Coordinators are part of the job development team and are notified by the job developer each time they assist a job seeker in applying for a job opening with an Employer Partner. The Business Relations Specialists, in turn, advocate to the Employer Partner on the candidate’s behalf.

Now in its third year, OOD and The Ohio State University (OSU) partner to embed an OOD Talent Sourcing Coordinator within the university’s human resources office to identify available openings, and source candidates for jobs. As the state’s fourth largest employer with more than 33,000 employees, its main campus and OSU Wexner Medical Center have more than 1,000 active, diverse job openings at any time. This staff person has access to OSU’s applicant portal and assists candidates through the application and interview process. OOD and Giant Eagle, Inc. recently replicated this model to increase hiring at their supermarkets in Northeast Ohio. An OOD Talent Sourcing Coordinator is embedded at the company’s human resources department to assist in sourcing qualified OOD candidates for employment in Giant Eagle retail locations. This partnership also provides supports to current team members with disabilities to keep their jobs by rapidly engaging them with VR services.

OOD contracts with Disability: IN Ohio, which is the state affiliate of the Disability: IN national network and is incorporated as a nonprofit 501(c)(3) organization with an executive board of directors. Its mission is to provide employers with valuable information and resources to support their disability inclusion initiatives through a robust peer network of business practitioners. OOD supports the organization to promote disability inclusion in the workplace, and assist in navigating employers to OOD services to support recruitment, hiring, and retention of individuals with disabilities. Disability: IN Ohio actively participates in OOD’s job fairs and other hiring events, and partners with OOD to host regional employer networking events throughout the state.

In January 2019, just moments after taking the oath of office, Governor Mike DeWine signed Executive Order 2019-03D, which established Ohio as a Disability Inclusion State and Model Employer of Individuals with Disabilities. To support this effort, OOD launched its Vocational Apprentice Program, which provides opportunities for students and adults with disabilities to gain work experience, exposure, and access to state government employment through paid apprenticeships with state agencies. The goal of the program is for apprentices to secure permanent employment in state government upon completion of the apprenticeship. A dedicated Business Relations Specialist collaborates with state agencies to identify occupations in high demand, and then works with vocational rehabilitation counselors to identify candidates who meet qualifications and have an aligned job goal. OOD supports the application and onboarding process at the state agency and funds the apprentice’s wages for up to 1,000 hours.

To support the Ohio College2Careers initiative, which immerses vocational rehabilitation counselors in the disability services offices at 15 public colleges and universities, OOD expanded its Business Relations team by two Career Development Specialists. These staff work directly with the disability and career services staff at partnering colleges to assist students with disabilities served by OOD in obtaining internship and job placement opportunities in their career field. These staff collaborate with the five regional Business Relations Specialists to target leads for potential employer partnerships and to facilitate placements with existing employer partners.

Every October, in recognition of National Disability Employment Awareness Month, OOD hosts five regional job fairs in Cincinnati, Columbus, Toledo, Canton, and Cleveland. These hiring events provide individuals with disabilities a unique opportunity to connect one-on-one with employers. Each year, approximately 700-800 job seekers and 170 employers participate. A vast array of industries are represented at the job fairs, including health care, financial institutions, manufacturing, telecommunications, food service, retail, higher education, staffing agencies, and state/municipal government. OOD staff provide an employer education session immediately prior to the start of the job fair, covering topics such as assistive technology in the workplace and disability etiquette.

In addition to the five job fairs held each October, OOD also hosts hiring events in smaller markets (Lima, Mansfield, Youngstown, Zanesville, etc.) to ensure job seekers in less densely populated areas have access to job opportunities with Employer Partners. These events typically include less than 10 employers and are sometimes targeted to a specific industry. Job seekers who participate often receive job offers at the event or an invitation to a second interview. OOD also partners with the Ohio Department of Education’s State Support Team Region 14 Transition Council to host a transition expo for students with disabilities in five rural counties in Southwest Ohio (Adams, Brown, Clinton, Fayette and Highland). OOD’s Business Relations Specialist for Southwest Ohio recruits employers to participate in the event to meet students looking for jobs.

OOD’s Employer Partners of Inclusion Awards, which take place in October, recognize and honor businesses that hire individuals with disabilities. To be considered for an Employer Partners of Inclusion Award, businesses must be an Employer Partner with OOD, have hired at least five OOD job seekers during the one-year evaluation period, and must meet specific criteria that demonstrates their level of diversity and inclusion practices for individuals with disabilities in the workplace. Criteria include efforts to recruit and retain Ohioans with disabilities, hosting disability etiquette and awareness training for employees, and other best practices to foster an inclusive work environment. Awards are presented for Champion of Inclusion, Platinum Level, Gold Level, and Silver Level.

In accordance with Ohio Senate Bill 3, which designates the first full week of May as In-Demand Jobs Week, OOD partners with employers across the state to hold multiple events designed to connect OOD job seekers with high demand occupations. Past events have included employer panels, business tours, networking events and a job fair held in Dayton, Ohio at the Wright State University.

Further reinforcing OOD’s role as a core workforce agency in Ohio, OOD’s Director is appointed by the Ohio Governor to serve on the Governor’s Executive Workforce Board, a statewide panel that advises the Governor and the Governor’s Office of Workforce Transformation on the development, implementation and continuous improvement of Ohio’s workforce system.

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

See Section (g)(1) above.

#### h. Interagency Cooperation.

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

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

As mentioned previously, OOD partners with the Ohio Department of Developmental Disabilities (DODD) to expand vocational rehabilitation (VR) services to individuals with developmental disabilities as part of the state’s overall Employment First Initiative. It also should be noted that DODD is the lead agency for Ohio’s Employment First initiative, which was implemented in March 2012. OOD is an active member of the Employment First Task Force, which is examining existing practices in the state system to identify and address barriers to employment for people with developmental and other disabilities.

The state agencies participating in the Employment First Taskforce agencies have jointly agreed to Common Principles, which have been memorialized in a written agreement. This includes the Ohio Departments of Developmental Disabilities, Education, Job and Family Services, Mental Health and Addiction Services, and Medicaid, the Ohio Developmental Disabilities Council and OOD. The member agencies agree that community employment should be the first and preferred option for all working age adults and transition-age youth with developmental disabilities. The member agencies have agreed to develop or review state-level interagency agreements to ensure coordination of services and enable data sharing. The agencies have developed cross agency tools and processes to reduce duplication of services such as enrollment, eligibility, assessment and planning.

Ohio is a core state in the State Employment Leadership Network. Through this grant, which is funded through the U.S. Department of Labor’s Office of Disability Employment Policy (ODEP), the Employment First Taskforce has identified action steps that each agency will complete to promote the core principles for transition in Ohio: • Competitive, integrated employment is expectation for all youth with disabilities; • Transition planning for youth requires multi-agency collaboration; • Early dialogue with individuals and families is critical to ensuring employment outcomes; • There are multiple pathways to employment; and • Person-centered planning is key to the development of effective services and supports for transition-age youth.

OOD has a joint interagency agreement with DODD and the Ohio Department of Medicaid (ODM) in accordance with requirements of WIOA. DODD and ODM maintain a separate interagency agreement that outlines programmatic and fiscal responsibilities between the two agencies, in which ODM delegates the day-to-day operations of the DODD Home and Community Based Services (HCBS) waiver programs to DODD. The purpose of OOD’s interagency agreement with DODD and ODM is to improve opportunities for individuals with developmental disabilities, including individuals with developmental disabilities enrolled in a home and community based services waiver administered by DODD, in accordance with its interagency agreement with ODM to achieve employment and independence. The agreement outlines a collaborative framework for coordinating services that prioritizes competitive integrated employment and assists individuals with developmental disabilities to move from non-integrated settings to competitive integrated employment. The agreement identifies methods to improve outreach to individuals with developmental disabilities and their families regarding VR programming and services. It also improves information and data sharing between the agencies and provides technical assistance and training to DODD and local county boards to increase employment opportunities for people with developmental disabilities.

OOD and with the Ohio Department of Mental Health and Addiction Services (OhioMHAS) maintain an Interagency Agreement to assist in promoting positive employment outcomes for individuals with severe and persistent mental illness (SPMI) and/or co-occurring substance use disorders. OOD also partners OhioMHAS to conduct joint trainings on the Individual Placement and Support - Supported Employment (IPS-SE) model for VR staff and IPS qualified providers.

The purpose of the Interagency Agreement between OOD and OhioMHAS is to outline a collaborative framework for coordinating services to improve engagement and facilitate outreach to individuals, as well as facilitate eligibility and improved utilization of state VR services. The agreement identifies the roles and responsibilities of each agency, methods for providing technical assistance to the field including information and consultation on each agency’s programs and procedures for outreach, and data sharing. This will ensure consistent information and guidance about VR programming and availability of services is provided for individuals served through the two programs.

OOD Jobs for Recovery is a partnership with the Supreme Court of Ohio, RecoveryOhio, OhioMHAS, and OOD to embed a vocational rehabilitation counselor, a job developer and a caseload assistant as an active member of the drug court team in 14 counties over FFY 2020 and FY 2021, to help eligible individuals with employment. The program model will support the recovery of individuals served by providing rapid engagement in OOD services, timely access to job placement services, on-the-job supports and retention services, and case service funding to meet additional needs.

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

See Section (h)1. above.

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

See Section (h)1. above.

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

**Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:**

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

###### A. Qualified Personnel Needs.

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

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

OOD has developed and maintained a system of utilizing and analyzing available data regarding qualified personnel needs with respect to hiring staff, distribution of the workload and the efficient utilization of staff resources. Each year when planning for staffing needs, OOD evaluates a variety of data elements to determine the vocational rehabilitation (VR) service needs and resources in the state. This includes analysis of counties or areas of the state that have the highest numbers of individuals with disabilities applying for services, review of counties that are covered by case management contracts including contracted capacity for the upcoming year, referral numbers, and data contained in the Comprehensive Statewide Needs Assessment (CSNA). This analysis provides the foundation for OOD to establish where staff will be needed in the upcoming year. The area managers use this information to continuously reevaluate staffing needs with each counselor vacancy to ensure that positions are filled in accordance with service demand and planned outreach initiatives.

The VR program has developed a staffing structure that is comprised of teams that on average includes one VR supervisor, eight VR counselors, one caseload assistant, and two support staff (administrative professionals and/or accountant examiners). Caseload assistants primarily focus on facilitating applications and intakes for VR services and gathering information needed for eligibility determination or serve as job developers or talent sourcing coordinators. Administrative professionals primarily focus on answering phones, processing mail and other general clerical duties. Accountant examiners primarily focus on creating authorizations and processing bills for purchased VR services. At the end of FFY 2019, OOD employed 322 vocational rehabilitation counselors (VRCs). Altogether 31,212 people were served through the VR program in FFY 2019. Served in this context means the total number of individuals served under an Individualized Plan for Employment during the Federal Fiscal Year.

OOD projects a continued need to hire VR staff in the above referenced classifications over the course of this Combined State Plan. OOD prioritizes the use of available resources to hire direct service personnel and therefore, the greatest area of need will likely continue to be VR counselors and caseload assistants as well as supervisory staff. Identified cost savings are reinvested strategically to further improve performance for the VR program. A projected area of increased need over the course of this plan will likely be for staff hired to provide counseling services to support our expanded initiatives (e.g. Ohio College2Careers and Jobs for Recovery).

Figure 1: Personnel Projections by Position

| **Job title** | **Total** | **Current vacancies** | **Projected vacancies over the next five years** |
| --- | --- | --- | --- |
| Acct. Exam 2, Admin Professional 1 | 69 | 1 | 31 |
| Admin Professional 2 & 4 | 8 | 1 | 2 |
| BE Specialist | 10 | 0 | 3 |
| Deputy Director 4, 5, & 6 & Human Services Program Admin 3&4 | 12 | 0 | 2 |
| Program Admin 2, 3, HCM Sr. Analyst & Info Tech 3 | 19 | 2 | 4 |
| Rehab Program Specialists | 12 | 1 | 5 |
| VR Caseload Assistants | 74 | 12 | 22 |
| Work Incentives ConsultantVR Counselors & Sr. VR Counselors | 5328 | 016 | 072 |
| VR Supervisors, Managers | 60 | 1 | 12 |

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

See Section (1) (A) i above.

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

See Section (1) (A) i above.

###### B. Personnel Development.

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

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

Kent State University, Ohio University, Wilberforce University, and Wright State University are the four CORE-accredited (Council on Rehabilitation Education) Master of Science in Rehabilitation Counseling (MRC) programs in Ohio.

OOD contacted each CORE-accredited MRC program in Ohio for its enrollment, graduation and credentialing information. Figure 2 shows the number of students enrolled and the number of graduates for each program. All graduates from each of these programs are qualified to sit for the Certified Rehabilitation Counselor examination administered by the Commission on Rehabilitation Counselor Certification (CRCC).

Figure 2: Institution Graduation Rates

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Institutions** | **Students Enrolled 2019** | **Employees sponsored by agency and/or RSA** | **Graduates sponsored by agency and/or RSA** | **Graduates from the previous year (2018)** |
| Kent State | 18 | 0 | 0 | 10 |
| Ohio University | Not Available | 0 | 0 | 8 |
| Wilberforce University | 10 | 0 | 0 | 7 |
| Wright State | 17 | 0 | 0 | 4 |

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

See Section (B) i. above.

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

See Section (B) i. above.

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

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

A human capital management (HCM) analyst in OOD’s Human Resources (HR) selections unit is responsible for recruitment efforts for the agency. The HCM analyst continues to maintain relationships with CORE-accredited programs in Ohio and contiguous states. These networking relationships have proven invaluable when sourcing, recruiting, and hiring qualified graduates as vocational rehabilitation counselors. OOD has conducted outreach for unpaid internships for students in CORE-accredited programs. OOD’s HR selection unit in collaboration with VR administration have re-established a paid college internship program to actively post for paid internships to help expand opportunities for internships.

The key to an effective recruitment strategy is recognizing that recruitment efforts must target both active and passive job seekers. Using this as a starting point, a multi-dimensional recruitment strategy is developed for the positions to be filled. Each vacancy is evaluated and depending upon various factors (e.g., rural areas, small towns) a specialized plan may be developed.

The recruitment plan is devised prior to an announcement. Announcements are posted for a minimum of a two-week period and the recruitment plan is launched simultaneously. All recruitment plans are multi-faceted and include social networking (e.g., LinkedIn), job fairs, web-based advertising, partnering with CORE-accredited universities in Ohio and contiguous states and outreach to the disability community. In selected situations, print advertising is used to reach applicants in areas that may not be technically connected. In all cases, print advertising is connected to web-based advertising such as OhioMeansJobs.com and indeed.com, so the announcement is still reaching a broad base of applicants. OOD makes extensive use of cost-effective recruitment resources to include maintaining an extensive list of contacts to reach out to when a vacancy become available. Announcements for vacancies are posted on university alumni electronic bulletin boards (e.g., Handshake,), university career & disability services websites, and websites that target veterans (e.g., veteranjoblistings.com).

In surveying applicants, OOD HR has found most applicants identified careers.ohio.gov as the primary recruitment source. We worked with Department of Administrative Services to customize the recruitment report and better identify our recruitment efforts. Applicants have begun to identify specific recruitment sources including job fairs, indeed.com, OhioMeansJobs, Internal email, handshake, college/university job board, LinkedIn, Twitter, Ohio Latino Affairs Commission, Urban league, Latino Business league, Asian American Professionals, Veteran job listing, etc. We will direct future recruitment efforts toward the most frequented sources.

OOD is committed to recruiting and hiring diverse and qualified staff who embrace OOD’s mission and vision and reflect Ohio’s population. Announcements are shared with Historically Black Colleges and Universities (HBCUs) with CORE-accredited rehabilitation counseling programs such as Wilberforce University and we are actively working on a request for proposal that will identify a vendor to assist with targeted diversity recruitment online & social media.

We are exploring ways to utilize a pipeline requisition in our applicant tracking system for the positions we most frequently hire for and for hard to fill positions. This will allow us to build a continuous list of candidates and streamline our recruitment efforts.

OOD has continued to hire VRCs and as recruitment trends and technology evolve, so does the recruitment plan. Addressing current and projected needs for personnel who are qualified in accordance with paragraph (c) of this section is critical to successfully fulfilling OOD’s mission to empower Ohioans with disabilities though employment.

Each year, OOD’s HR training department creates a comprehensive plan to prepare and retain qualified individuals for service. The development of the plan begins with a review of training requests throughout the past year and a discussion of training needs with various staff members. The goal of each training is to ensure that staff has the skills and information necessary to successfully assist individuals with disabilities to achieve a successful employment outcome. Through a collaborative effort, training topics that would benefit the entire agency are identified and discussed with HR. Topics range from customer service to Excel training. Since these items are included in the training plans across multiple divisions, HR works with other departments to ensure duplication of training does not occur. Training plans are utilized to develop a training catalog and agency-wide training calendar so staff are aware of training opportunities. The catalog includes a listing of all planned trainings throughout the year. Each training identifies the performance competencies that are addressed. Supervisors and staff use this information to enhance staff development and target performance improvements. In an effort to maximize the value of training provided to staff and to ensure deliberate planning from the ground up, HR has expanded the way the needs assessment was conducted. Based on this information, OOD is able to provide just in time training to address specific staff identified needs.

While agency-wide trainings are developed within HR, training that is designed to meet specific requirements of vocational rehabilitation (VR) staff is developed and implemented within the VR division. This allows OOD to effectively provide VR relevant, targeted training to all VR designated staff. Creating targeted training assists OOD in retaining and maintaining qualified staff. OOD’s collaborative environment allows all training staff to work together creating a diverse and comprehensive training agenda that meets the targeted general and professional development needs for all VR staff. Basic core training provided throughout the year includes monthly VR Essentials training for new VR caseload assistants and VR counselors. This comprehensive training is a mix of on-line and classroom style modules over a multi-day period that provides staff with the VR fundamentals needed to prepare for the provision of services in the field. The training combines instructor-led learning with e-learning modules on topics such as “Application and Intake” and “Eligibility and Order of Selection” to provide in-depth review and analysis of topics. In addition, as part of OOD’s core training, each region comes together for quarterly training and staff also participate in monthly webinars that can be accessed from their desktop. Monthly topics have included ethics, updated policies and procedures, confidentiality, appeals process, other agency resources, and labor market information.

The structured training program implemented for onboarding new VR counselors includes five dedicated VR supervisors. These supervisors are responsible for the supervision of all probationary VR counselors during at least the first six months of a yearlong probationary period. This model allows for consistent training and development of new VR counselors statewide and ensures they are properly supported while learning the core functions and responsibilities of the counselor role.

##### 3. Personnel Standards

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

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

The State of Ohio neither certifies nor licenses vocational rehabilitation (VR) counselors; therefore, data is not available in those areas. All graduates from Ohio’s CORE-accredited programs are eligible to sit for the nationally recognized Certified Rehabilitation Counselor (CRC) examination administered by the Commission on Rehabilitation Counselor Certification (CRCC). All of these graduates would meet the minimum qualifications to be VR counselors at OOD.

OOD has updated the qualifications and educational standards for vocational rehabilitation counselors by modeling the Code of Federal Regulations, Title 34-Subtitle B-Chapter III-Part 361, as the state of Ohio does not define a standard for VR professionals. OOD’s qualifications for counselors are Master’s degree in vocational rehabilitation counseling, counseling, social work, psychology, disability studies, special education, or related rehabilitation or human services area;

Or, Master’s degree in business administration, human resources, law, management, public administration or related field which provides competence in the employment sector &/or the field of disability; 12 months direct work experience with individuals with disabilities (e.g. Independent Living Center) or 12 months experience providing direct service or advocacy activities with individuals with disabilities.

Or, Bachelor’s degree in vocational rehabilitation counseling, counseling, social work, psychology, disability studies, special education, business administration, human resources, economics or related rehabilitation or human services area; 24 months experience direct work with individuals with disabilities (e.g. Independent Living Center or 24 months providing direct service or advocacy activities with individuals with disabilities. In addition, students who are currently enrolled in qualifying degree programs with a graduation date prior to the hire date are encouraged to apply.

OOD works with organizations both in Ohio and throughout the country to identify qualified individuals with disabilities for employment with OOD. For example, HR notifies all OOD staff, including all VR counselors, each time a vacancy occurs at OOD. VR counselors notify job ready candidates about opportunities for external applicants. In addition, all announcements are posted through the state of Ohio’s website at http://careers.ohio.gov. In turn, these announcements are picked up by a job posting consolidating site such as http://indeed.com, expanding the audience to whom vacancies are publicized.

###### 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.

See Section (3)(A) above.

##### 4. Staff Development.

**Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:**

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

Like all state of Ohio agencies, OOD has integrated to an Enterprise Resource Planning (ERP) system to improve the efficiency and effectiveness of the administrative processes across all state government agencies. This ERP system, called OAKS (Ohio Administrative Knowledge System), integrates the functions of capital improvements, financials, fixed assets, human resources and procurement. OAKS reports allow OOD to track current staffing levels, historical staffing patterns, staff ratios and other pertinent information. OOD is exploring the Kronos system to allow for greater mobility for our staff.

OOD is a learning organization with ongoing commitment to fostering the skill development of staff at all levels. Specifically, vocational rehabilitation staff is offered both internal and external educational opportunities for position-specific skill gain. OOD encourages staff to pursue knowledge related to the changing needs of the agency, the individuals with disabilities that are served and the evolution of the roles within the vocational rehabilitation (VR) role. OOD also works to ensure staff is informed of critical information at all levels of the organization. Information is shared at quarterly area meetings with all staff as well as at monthly leadership meetings. OOD seeks to provide various avenues to share critical information so that all staff are informed and trained.

OOD seeks to provide meaningful training for all personnel. Staff development begins on day one of employment at OOD. Every new staff member is required to attend a two-day new employee orientation (NEO). Following NEO, OOD has designed position job specific training that aids in the development of skills that are needed for a designated position. For example, new counselor training provides job specific information including topics such as conducting a thorough intake, determining eligibility, assessments, Individualized Plan for Employment (IPE) development, and case closure. New counselors report directly to training supervisors for their first six months on the job. This allows each VR Counselor to have hands-on, individualized, training in the field that builds upon to what is learned in the classroom. This on-boarding training model incorporates various training techniques such as observation, on-the-job training, in depth case analysis and caseload specific topics. VR also provides continuous training opportunities for specialized caseloads such as Employment First. VR Supervisors, Account examiners and Job Developers also receive training specific to their support roles to VR counseling staff.

OOD has a designated VR Policy and Training team that facilitates a monthly web-based training series as well as in-person regional training that offers a platform for up-to-date case management updates (e.g. policy/procedures, new programs, AWARE case management system updates), disability related topics and other topics such as confidentiality and ethics. Offering these regularly scheduled training sessions also supports VR counseling staff by providing continuing educational credits to support relevant licensures and/or certifications (i.e. LSW, CRC and LPC). The web-based monthly training series allows staff to receive the information they need without leaving their desks. This format allows interaction via polling staff and chat sessions and for those who cannot attend training or need a refresher, each session is accessible via recording. Various additional training topics are offered within field offices, agency administrative offices, regional locations and area meetings. Staff have been trained on rehabilitation technology, substance use disorders and the VR process, case documentation/management, work incentives, community resources, medical and psychological aspects of disabilities, pre-employment transition services, resume writing, person-centered planning, comparable benefits, The Career Index Plus, Jobs Now, writing effective case notes, disability coding and service categories, hearing aid purchasing and more. OOD brings in topic experts and partners with other state and/or county agencies, which allows staff to remain up-to-date on the latest research and techniques.

OOD has developed three of a planned six e-modules that have proven extremely helpful to new VR counseling staff. The modules include Use of the AWARE Manual which offers new staff the fundamentals navigating the manual which is the desk reference for use of the AWARE case management system; VR Eligibility and Order of Selection which teaches the requirements for eligibility determination and identifying the functional limitations imposed by disabilities; and finally VR Application and Intake which teaches staff how to handle a referral and application for services. Most of the e-modules have a “choose your adventure” element that helps staff with decision-making and offers outcomes based upon the options that they choose. All e-modules have an assessment as well. Staff complete each e-module, take a pre-test, then sit through the topic in classroom and finally take a final assessment to ensure they have grasped accomplished the learning objectives.

Identifying training topics is a combination of what is needed for staff roles as well as staff requests for what they believe are topics that they need to know more about. Topics requested range from technical writing to working with an aging population.

OOD values its employees and strives to create a work environment that supports the retention of qualified staff. The availability of training as described above serves to keep staff feeling challenged and interested in future opportunities for growth, whether in a current position or in seeking a promotion. OOD supports the ability of staff to pursue on-going training by allowing each staff person up to 40 hours of release time for training initiatives each federal fiscal year. This release time may include, but is not limited to seminars, conferences and workshops geared toward the professional development of staff. All staff also have access to voluntary training funding, either through their union or, for exempt and 1199 staff, through Employee Development Funds (EDF). Annual funding amounts can be up to $3,000 per year

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

See Section (4)(A) above.

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

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

OOD continues to experience challenges when recruiting rehabilitation counselors for the deaf or Spanish-speaking counselors. In 2019**,** OOD had ten rehabilitation counselors for the deafandone vocational rehabilitation (VR) program specialistwith proficient American Sign Language (ASL) skills, and one counselor who is fluent in Spanish.OOD continues to market opportunities to diverse populations, including students at Gallaudet University, whose student population includes a substantial number of deaf and hard-of-hearing students, ASL clubs and organizations including Registry for Interpreters of the Deaf, National Association of the Deaf, Ohio Association of the Deaf & deafjobwizard.com. OOD markets all of its counselor opportunities to VR counseling staff so they may share these announcements with their qualified job seekers with disabilities.

In 2018, OOD was able to hire two rehabilitation caseload assistants for the deaf (RCD-CA) and they were both reassigned to vocational rehabilitation counselor due to our qualifications being updated to model the Code of Federal Regulations, Title 34-Subtitle B-Chapter III-Part 361. The applicants learned of the opportunity from a web posting demonstrating technology plays a key role in communicating OOD’s opportunities to a broader audience. OOD has had several vacancies for RCDs and continues to employ a creative strategy to attract qualified applicants. OOD has posted these positions as continuous postings, unlike postings for regular counselors that are posted for a specific time. OOD has been able to fill some of the RCD positions as regular counselors, but as vacancies still exist.

Once hired, caseload assistants who wish to obtain a qualifying master’s degree have access to tuition benefits through their union to pay for the degree. The Vocational Rehabilitation Counselor (VRC) classification qualifications have been updated and now include a bachelor’s degree in related fields with relevant experience. Once they obtain their degree/experience, caseload assistants may bid on counselor vacancies as an internal applicant, giving them an advantage over external applicants. OOD has one part time Interpreter who assists with intakes, meetings and trainings and we are looking to expand staff in the future.

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

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

OOD and the Ohio Department of Education (ODE) collaborate on a regular basis to provide guidance to educational agencies and vocational rehabilitation (VR) personnel responsible for facilitating transition services. These staff also offer consultation and technical assistance resources to assist schools and related community support entities in planning for transition of students with disabilities.

At the state level, both agencies have designated personnel to provide oversight and leadership for the development of policies, procedures, interagency training and other state-level partnership activities for transition services. On the local level, VR counselors are assigned as liaisons to schools and work with local school districts’ transition specialists.

OOD will provide targeted training to enhance personnel development. This will include targeted training on Employment First, supported employment, eligibility, transition procedures and clarification of roles and responsibilities of OOD and school personnel.

#### j. Statewide Assessment.

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

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

OOD’s 2018 Comprehensive Statewide Needs Assessment (CSNA) was published and concurrently submitted to the Rehabilitation Services Administration (RSA) in October 2018. This CSNA was produced by OOD’s Division of Employer and Innovation Services, with supplemental analysis, regarding factors that correlate with positive employment outcomes for VR participants, conducted by Mathematica Policy Research.

This CSNA was focused on addressing the following questions: What is the projected number of individuals that will experience each category of disability in Ohio? How many individuals with disabilities are projected to be seeking employment, who currently are not working? How do prevalence estimates differ for individuals by race/ethnicity and age groups? How many individuals with disabilities received services from OOD? How have the Employment First Partnership and the Ohio Transition Support Partnership impacted service delivery to those target populations? What are the gaps in serving disability populations and how should gaps be prioritized?

Questions specific to youth with disabilities included: What are the job goals for Summer Youth Work Experience (SYWE) participants and what kinds of work experiences have been provided? How are SYWE programs distributed geographically and how does that compare with the location of students with SYWE or Summer Youth Career Exploration on their VR plan? What services for students with disabilities are most likely to lead to improved employment outcomes? Is the number of students served by OOD proportionate to the number of students with IEPs in Ohio based on Ohio Department of Education data? What percentage of students with disabilities in Ohio are enrolled in the Social Security Administration’s Supplemental Security Income (SSI) program and how many are removed each year due to age-18 redetermination? How can OOD ensure that students with disabilities are aware of SSI redetermination information and how can we engage them in VR services to better prepare them for employment and independence?

Questions specific to employer engagement activities included: What industry sectors exhibit the most growth potential in Ohio? What are the gaps in alignment of VR participant job goals with growth industries? What services are most needed by businesses in relation to staff education and awareness of disability issues, and to support retention of employees with disabilities?

Building upon the foundation set from the 2015 CSNA methodology, OOD developed 2018 projections of the number of individuals with disabilities by impairment category, age group, race, and county of residence in Ohio. Similarly, service data from OOD’s vocational rehabilitation (VR) case management system and employment statistics were utilized to develop estimates of the number of individuals likely to need VR services by disability impairment category, age group, race, and by county. This provided a basis for developing estimates of the number of individuals actively participating in the labor force that need services to assist them in finding a job and that could benefit from OOD VR services.

The establishment of the Ohio Transition Support Partnership (OTSP) with the Ohio Department of Education increased OOD’s level of engagement with students with disabilities. Additionally, OOD continued to support the Summer Youth Work Experience program as a means of teaching students with disabilities vocational skills and appropriate work behaviors. The 2018 CSNA included an analysis of the degree to which the experiences of students who participated in that program aligned with their employment outcome goals, and whether those experiences are distributed appropriately across the state according to the needs of the participants.

As a follow-up to the Survey of Disability and Employment (SDE) conducted in 2014, OOD asked Mathematica Policy Research to link survey data with state earnings data to identify factors correlated with positive employment outcomes for VR participants.

Another key component of the CSNA involved an analysis of projected industry growth across Ohio to determine which industries have the potential to provide the most job opportunities for VR participants. The purpose of this analysis was to provide tools and resources that can assist VR counselors and participants in selecting employment goals that have the greatest likelihood of success. Additionally, this information would help inform decisions regarding business partnership development by OOD’s Business Relations Specialists. The CSNA also included survey data related to the needs of employers in relation to services designed to promote staff education and awareness of disability issues and the retention of employees with disabilities.

Although the 2018 CSNA data indicate that OOD serves African Americans and individuals ages 18 to 34 at a higher rate than the demographic makeup of the state, there remains significant need for VR services among African Americans and individuals of Hispanic/Latino origin with disabilities, and among adults with disabilities ages 35 to 64.

When considering the estimated number of working-age African Americans with disabilities in Ohio who are actively looking for work and could benefit from VR services, OOD’s service ratio for this population is approximately 63 percent. It should be noted that more than eight out of 10 African Americans (80.3 percent) reside in the following Ohio counties: Cuyahoga, Franklin, Hamilton, Lucas, Mahoning, Montgomery, and Summit.

Of the estimated population of Hispanic/Latinos with disabilities in Ohio who are actively looking forward and could benefit from VR series, OOD’s service ratio for this population is approximately 47.3 percent.

When considering the estimated number of Ohioans ages 18-34 with disabilities in Ohio who are actively looking for work and could benefit from VR services, OOD’s service ratio for this population is approximately 138.5%. This is due, in large part, to the significant number of students with disabilities served by OOD who are preparing for employment but not actively looking for work.

Of the estimated population of Ohioans with disabilities ages 35-64 who are actively looking for work and could benefit from VR services, OOD’s service ratio for this age group is approximately 24.7 percent.

When considering Ohioans with disabilities age 65 and over who are actively looking for work and could benefit from VR services, OOD’s service ratio for this age group is approximately 7.3 percent. Although the VR outcomes tied to competitive employment may not be a focus of older Ohioans with disabilities, OOD’s Independent Living and Older Blind program continues to deliver services designed to support the pursuit of independence among individuals in this population.

The CSNA estimated the African American population in Ohio on a county-by-county basis and included analysis of OOD services to African Americans by county. Ohioans of Hispanic/Latino ethnicity were evaluated in a similar fashion to identify any unmet needs. For the year ending September 30, 2019, OOD’s Ratio of Minority Service Rate to non-Minority Service Rate (Standard 2.1 of the Standards and Indicators) was 0.920, exceeding the federal minimum standard of 0.800. This is a continuation of the results OOD has achieved over the past four years, with a minority service ratio of 0.873 in FFY 2016, 0.890 in FFY 2017, and 0.920 in FFY 2018.

The discrepancy between the employment rate for individuals with and without disabilities in the U.S. is mirrored at the state level in Ohio. According to the American Community Survey (ACS), in 2017 in Ohio, 36.8 percent of individuals with disabilities ages 18 to 64 were employed compared to 78.9 percent of individuals without disabilities. These data reveal an employment gap of 42.1 percent between the two groups. Furthermore, only 22.4 percent of the total population of individuals with disabilities ages 21 to 64 were employed full time and year round, whereas 61.5 percent of the population ages 21 to 64 without disabilities were employed full time and year round in Ohio. This represents a gap of 39.1 percent.

Since 2016, OOD has continued to expand services to youth and students with disabilities. In addition to assigning VR counselors specifically to serve this population, OOD has a formal agreement with the Ohio Department of Education (ODE) through the Ohio Transition Support Partnership. These efforts have allowed OOD to increase the number of individuals served between the ages of 14 and 25 by nearly 20 percent from 13,903 in FFY 2016 to 16,605 in FFY 2019.

In serving students with disabilities, OOD seeks to allocate resources in a manner that reflects the distribution of individuals in need of services throughout the state. For the 2015 – 2016 school year, ODE data indicate that the statewide number of students with disabilities was 52,695. In that same timeframe, OOD delivered services to 7,609 students with disabilities. To measure the relative proportionality of services delivered by OOD, the number of students is compared on a county-by-county basis to the volume of students served through the VR program. OOD’s data indicate that the proportionality of service in 87 of 88 Ohio counties fell within two percentage points of the distribution of students as reported by ODE. This ratio was 2.5 percentage points in the remaining county. Though there is an ongoing need to increase the total volume of students served statewide, the distribution of services is well balanced to the Ohio student population.

The 2018 CSNA included an analysis of the impact of progressive career development services provided to students with disabilities on continued engagement with the VR program or attainment of a successful employment outcome. A comparison of case status suggested that students who received at least one progressive career development service were more likely to continue engagement with VR over time and achieve a successful outcome. The data also show that, among the progressive career development service options, School-based Job Readiness Training and Non-permanent Job Development have the highest probability of positively impacting the achievement of a successful employment outcome.

The 2018 CSNA also included an assessment of service provision to individuals according to the type of impairment reported. OOD’s service provision is higher for individuals with psychosocial and cognitive impairments. This is most likely explained by the fact that OOD has concentrated efforts through focused contracts with local mental health and recovery boards, local developmental disabilities boards, and most recently through the Ohio Department of Developmental Disabilities funding for Employment First. Each of these populations also has an organized representative presence through established county public agencies across the state.

From FFY 2015 to FFY 2018, OOD data indicate a 5.6 percent increase in successful employment outcomes for individuals with cognitive or psychosocial impairments. OOD also monitors services delivered for all primary disability categories by evaluating the “balance” of investment of resources methodology, referred to as “relative proportionality”. This approach is a means to assess the discrepancy between needs for services and the number of individuals served. As a result, OOD is working to address outreach and services for individuals with visual, hearing, and communicative impairments. From 2014 to 2017, OOD increased the number served with cognitive and psychosocial impairments by more than 9 percent (from 18,551 to 20,246) while the number served with visual impairments decreased by 30.4 percent (from 1,999 to 1,392). Services to individuals with hearing impairments increased by nearly 36 percent (from 1,084 to 1,473), and those served with communicative impairments increased from 294 to 430. Figure 3 shows the relative proportionality for Ohio by impairment category.

Figure 3: Relative Proportionality for Ohio – Working Age Population

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Impairment Category** | **Est. Seeking Employment****2017** | **Proportion of Total Est. Seeking Employment****2017** | **OOD VR Served****2017** | **Proportion of OOD VR Served****2017** | **Percentage Point Difference** |
| Cognitive | 26,784 | 23.8% | 10,982 | 39.2% | 15.3 |
| Communicative | 9,873 | 8.8% | 430 | 1.5% | -7.2 |
| Hearing | 10,865 | 9.7% | 1,473 | 5.3% | -4.4 |
| Physical | 29,266 | 26.0% | 4,509 | 16.1% | -10.0 |
| Psychosocial | 25,295 | 22.5% | 9,264 | 33.0% | 10.5 |
| Visual | 10,365 | 9.2% | 1,392 | 5.0% | -4.3 |
| **Total** | **112,488** | **100%** | **28,050** | **100%** | **N/A** |

OOD has emphasized employers as a dual customer and a critical component for the success of individuals with disabilities that are seeking employment. OOD has developed targeted employer relationships, specifically: Expanding the Disability: IN Ohio (formerly known as the Ohio Business Leadership Network) membership from 70 members in 2017 to 191 members in 2019. Increasing the number of employer partners from 224 in FFY 2017 to more than 500 in FFY 2019, expanding the employment opportunities for individuals served by OOD. Embedding VR staff within two prominent employers to facilitate placement of VR participants. Providing services to employers designed to increase awareness of disability issues, develop or enhance a culture of inclusion among their existing workforce, assist with the retention of employees with disabilities, and ensure awareness of and compliance with worksite accessibility requirements.

The final report from the CSNA can be found at <https://ood.ohio.gov/Services/Comprehensive-Statewide-Needs-Assessment-2018>. OOD has incorporated findings from the CSNA as a part of the strategic focus and has been using the data and analysis for informed decision-making. A wealth of additional knowledge can be obtained by referencing the CSNA report for more specific findings. Based on the recommendations made in the CSNA, OOD has developed program objectives outlined in the agency strategic plan to meet the needs of Ohioans with disabilities.

OOD has continued to utilize the CSNA for informing VR management; for guiding outreach efforts; the establishment of CRP fee structures; developing and scoring Requests for Proposals (RFPs) by program specialists; Disability: IN Ohio planning purposes; establishing the size and market power of the population of individuals with disabilities in Ohio by legislative and fiscal staff; and for Executive Team review and prioritization of VR program needs.

###### B. who are minorities;

See Section (j)(1)(A) above.

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

See Section (j)(1)(A) above.

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

See Section (j)(1)(A) above.

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

See Section (j)(1)(A) above.

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

See Section (j)(1)(A) above.

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

See Section (j)(1)(A) above.

#### k. Annual Estimates.

**Describe:**

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

According to OOD’s 2018 Comprehensive Statewide Needs Assessment, Ohio estimates that there are 112,448 individuals with disabilities seeking employment who could benefit from VR services.

Over the last five Federal Fiscal Years (FFY), OOD has experienced an upward trend in the number of Ohioans with disabilities who have been determined eligible for vocational rehabilitation (VR) services (as shown in Figure 4). It is anticipated that this upward trend will continue given OOD’s new budget initiatives planned in FFY 2020 and 2021, described elsewhere in this state plan.

Figure 4: Eligibility Determination by FFYY

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| FFY 2015 | FFY 2016 | FFY 2017 | FFY 2018 | FFY 2019\* |
| 17,887 | 19,443 | 18,542 | 17,870 | 18,396 |
| \*Projected, to be updated once FFY 2019 figures are finalized, prior to submission of the state plan. |

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

###### A. The VR Program;

Over the last five Federal Fiscal Years, Ohio’s VR program has experienced an upward trend in the total number of new Individualized Plans for Employment (IPE) developed (as shown in Figure 5). It is anticipated that this upward trend will continue given OOD’s new budget initiatives planned in FFY 2020 and 2021, described elsewhere in this state plan.

Figure 5: Individualized Plans for Employment by FFYY

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| FFY 2015 | FFY 2016 | FFY 2017 | FFY 2018 | FFY 2019\* |
| 12,875 | 14,090 | 13,480 | 13,188 | 13,934 |
| \*Projected, to be updated once FFY 2019 figures are finalized, prior to submission of the state plan.  |

Over the last five Federal Fiscal Years, Ohio’s VR program has similarly experienced an upward trend in the total number of individuals served under an Individualized Plan for Employment (IPE) (as shown in Figure 6). It is anticipated that this upward trend in the number served will continue given OOD’s new budget initiatives planned in FFY 2020 and 2021, described elsewhere in this state plan.

Figure 6: Individuals Served under an Individualized Plan for Employment by FFY

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| FFY 2015 | FFY 2016 | FFY 2017 | FFY 2018 | FFY 2019\* |
| 28,705 | 29,800 | 29,142 | 29,171 | 31,212 |
| \*Projected, to be updated once FFY 2019 figures are finalized, prior to submission of the state plan. |

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

Over the past several Federal Fiscal Years, OOD has experienced an upward trend of individuals receiving supported employment services (as shown in figure 7). It is anticipated that this upward trend will continue given OOD’s continued partnerships with the Ohio Department of Developmental Disabilities and the Ohio Department of Mental Health and Addiction Services.

Figure 7: Supported Employment Services after Employment Start

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | FFY 2016 | FFY 2017 | FFY 2018 | FFY 2019\* |
| Receiving Supported Employment after Employment Start | 1,453 | 1,604 | 1,595 | 1,567 |
| \*Projected, to be updated once FFY 2019 figures are finalized, prior to submission of the state plan. |

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

OOD does not expect to operate under an order of selection for the duration of this state plan.

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

OOD does not expect to operate under an Order of Selection for the duration of this state plan.

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

As a result of new OOD’s new budget initiatives, Ohio’s VR program is projecting to serve more individuals with disabilities in FFY 2020 and 2021. These increases in the number served will be continued through FFY 2022 and 2023.

OOD received increased General Revenue Funds to support case service spending for these initiatives in SFY 2020 and 2021. In addition, changes to OOD’s Vocational Rehabilitation Fee Schedule that was implemented as of October 1, 2019 is projected to increase case service spending by $7M in each year. This has been factored into OOD’s case service spending projections, below.

Figure 8 shows the number of individuals with disabilities projected to receive services under an Individualized Plan for Employment (IPE) and the case service expenditures related to those services in FFY2020-FFY2023. Please note that this table includes numbers served and case service expenditures for both the Vocational Rehabilitation and the Supported Employment grants.

Figure 8: Projected Number of Individuals Served and Case Service Expenditures by FFY

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | FFY2020 | FFY2021 | FFY2022 | FFY2023 |
| Estimated Served after IPE | 33,494 | 34,994 | 34,994 | 34.994 |
| Estimated Cost of Service | $91,000,000.00 | $96,000,000.00 | $96,000,000.00 | $96,000,000.00 |
| Estimated Cost Per Served | $2,716.90 | $2,743.33 | $2,743.33 | $2,743.33 |

Based upon these projections, OOD does not expect to operate under an Order of Selection for the duration of this state plan.

**(Please Note: To date, the Rehabilitation Services Administration has not issued guidance on the development of these Annual Estimates. This section will need to be modified upon the issuance of this guidance.)**

#### l. State Goals and Priorities.

**The designated State unit must:**

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

Legislation was passed (Senate Bill 144) that established the Opportunities for Ohioans with Disabilities (OOD) Council in Ohio. This legislation took effect on May 29, 2018 and the OOD Council held its first meeting in August 2018. Over the course of their first year of meetings, OOD has presented information to the OOD Council in regards to the results of the 2018 Comprehensive Statewide Needs Assessment (CSNA), the results of local Participant Focus Groups (held quarterly in each region of the state), the results of customer satisfaction surveys as well as regular program updates.

The OOD Council formed a committee to assist in the development of input into this VR Services Portion of Ohio’s Combined State Plan. OOD provided additional information to this committee to aid them in making recommendations to the full OOD Council regarding the content of their input into this Plan. The input of the full OOD Council is contained in section (a) of this Plan.

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

In January 2019, just moments after taking the oath of office, Ohio Governor Mike DeWine signed Executive Order 2019-03D, which established Ohio as a Disability Inclusion State and Model Employer of Individuals with Disabilities. His executive budget, which has been approved by the general assembly, made a strong commitment of investing in Ohioans with disabilities, to ensure that they are not left behind.

In June of 2019, OOD established an updated mission statement and developed guiding principles for the agency.

OOD’s updated mission is empowering Ohioans with disabilities opportunities through employment, disability determinations and independence.

OOD’s guiding principles are as follows: In striving for excellence in service, we will:

* Listen first
* Act with a sense of urgency
* Honor diversity
* Foster inclusiveness
* Value collaboration
* Inspire innovation
* Be transparent
* Be accountable
* Celebrate success

OOD develops its Strategic Plan on a biannual basis. OOD’s Strategic Plan for 2020 and 2021 includes the following goals and objectives **(Please Note: As of November 15, 2019, OOD is in the process of finalizing the Strategic Plan for 2020 and 2021. Once complete, this section of the state plan will be updated.)**:

Goal 1: To increase competitive integrated employment and independent living outcomes for Ohio citizens with disabilities. Objective 1a: Increase the number and percentage of individuals with competitive integrated employment outcomes. Objective 1b: Remove barriers so individuals may obtain and maintain quality employment. Objective 1c: Increase the number of youth and students who receive transition services.

Goal 2: To expand OOD’s statewide network of businesses, providers and partnerships to effectively deliver services. Objective 2a: Increase service delivery capacity through statewide partnerships and provider networks. Objective 2b: Increase the number of employers that hire individuals with disabilities. Objective 2c: Improve awareness of OOD services through coordinated outreach and marketing efforts.

Goal 3: To ensure excellence and accountability of OOD’s programs, services and partnerships. Objective 3a: Maximize the use and accountability of available funds. Objective 3b: Increase the knowledge and productivity of staff through training and lean processes. Objective 3c: Improve service delivery quality through technological enhancements.

Strategic initiatives designed to achieve these goals and objectives that are specific to the Vocational Rehabilitation program are outlined throughout this Combined State Plan.

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

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

OOD updated its Comprehensive Statewide Needs Assessment (CSNA) in FFY 2018 and this assessment has informed the development of OOD’s Strategic Plan as well as this Combined State Plan. Details regarding the results of the 2018 CSNA are outlined in section (j) of this Plan.

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

Initiatives prioritized for inclusion on OOD’s Strategic Plan are those that will assist in enhancing program performance on the Performance Accountability Measures outlined in WIOA.

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

OOD conducts quarterly Participant Focus Groups in each of OOD’s five regions of the State. The purpose of these Participant Focus Groups is to gather feedback about services from individuals with disabilities as well as family members and other partners. The results of these Participant Focus Groups are shared with leadership for the VR program and with the OOD Council. This feedback has informed the contents of this Plan.

In addition, OOD conducts customer satisfaction surveys to gather feedback from individuals who have participated in services through the VR program and whose case has been closed, both with and without employment. In FFY 2019, OOD has made several enhancements to the process that have increased the number of individuals who have responded to the survey and the quality of feedback received. OOD plans to continue to enhance this process, in collaboration with the OOD Council.

The Rehabilitation Services Administration conducted a monitoring visit of Ohio’s Vocational Rehabilitation Program in FFY 2017 and published their report on June 25, 2018. OOD has successfully resolved all findings from this monitoring visit and the associated Corrective Action Plan has since been successfully completed. OOD’s continuous improvement efforts in the areas of focus from RSA’s monitoring visit (i.e., Pre-Employment Transition Services, Supported Employment Services, etc.) are reflected throughout the contents of this Plan.

#### m. Order of Selection.

**Describe:**

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

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

###### OOD does not expect to operate under an order of selection during the course of this state plan.

OOD has established, by way of Administrative Rule, the following definitions for priority categories under the order of selection. • Individual with Most Significant Disability (MSD): an individual who meets the definition of significant disability but whose disability seriously limits three or more functional capacities in terms of an employment outcome; • Individual with Significant Disability (SD): an individual who has a disability that seriously limits one or two functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, and work skills), in terms of an employment outcome, and who is expected to need multiple vocational rehabilitation services over an extended period of time; and • Individual with Disability (D): an individual who meets the definition of eligible per rule 3304-2-54 of the Ohio Administrative Code (consistent with 34 CFR 361.42(a,)) but whose impairment does not rise to the level of a significant disability.

OOD has established policies and procedures for administering an order of selection, should the need arise. Accordingly, at any given time while OOD is operating under an order of selection, one of the following scenarios will be in effect. Regardless of scenario in effect, eligible individuals are released from the waiting list first by priority category, then by order of application date, then alphabetically by last name. 1. Eligible individuals in all priority categories wait on the statewide waiting list. 2. Eligible individuals determined to have a Most Significant Disability are served immediately, and eligible individuals determined to have a Significant Disability or a Disability will wait on the statewide waiting list. When the capacity exists, a predetermined number of eligible individuals with Significant Disabilities will be released from the waiting list in order of application date. All eligible individuals with Significant Disabilities must be served before any individuals with Disabilities are released from the waiting list. 3. Eligible individuals determined to have a Most Significant Disability and those determined to have a Significant Disability are served immediately, and all individuals with Disabilities wait. When the capacity exists, a predetermined number of eligible individuals with Disabilities will be released from the waiting list in order of application date. 4. No eligible individuals wait and all are served immediately.

OOD is currently operating under scenario 4, as outlined above, as OOD eliminated all waiting lists for VR services in February 2015. This includes the waiting list for individuals with Disabilities, a priority category that had not been provided service in Ohio since 1991.

As noted above, and as described in the annual estimates in section (k) of this state plan, OOD projects that there are sufficient resources to meet the demand for vocational rehabilitation (VR) services in Ohio. Ohio has served all eligible individuals without a wait since February 2015. OOD is continuing to aggressively pursue efficiency and effectiveness measures that will allow Ohio’s VR program to continue to serve more eligible individuals with available resources. OOD is closely monitoring the demand for VR services as well as the utilization of available resources to ensure that all eligible individuals can continue to receive VR services without a wait.

OOD is not projecting to operate under an order of selection over the course of this state plan; therefore, Ohio is not projecting service and outcome goals for an order of selection.

###### B. The justification for the order.

OOD will not operate under an order of selection. See Section (m)(1)(A) above.

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

See Section (m)(1)(A) above.

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

See Section (m)(1)(A) above.

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

See Section (m)(1)(A) above.

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

WIOA has implemented changes in the Rehabilitation Act that give states the flexibility to serve individuals who are in need of specific services or equipment for the purpose of maintaining employment regardless of an order of selection. OOD intends to make changes to Ohio Administrative Code and subsequently to OOD VR policies and procedures, to allow for this prioritization of eligible individuals. While OOD is projecting that there will not be a need for Ohio to operate under an order of selection during the course of this state plan, OOD intends to ensure that this flexibility is available should there be a need in the future to resume an order of selection.

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

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

OOD continues to expend all Title VI, Part B funds on direct supported employment case services. Individuals with an Individualized Plan for Employment (IPE) that includes an employment outcome of supported employment are targeted for the use of these funds. OOD utilizes an auto-budget feature in its case management system to ensure the proper expenditure of supported employment grant funds.

OOD delivers supported employment services and expends supported employment grant funding in accordance with a supported employment policy. An updated supported employment policy and procedure was implemented in November 2017, including the provision of extended services for a period not to exceed 4 years. OOD provided supported employment training for all vocational rehabilitation (VR) field staff upon implementation of the revised policy and procedure, and continues to provide additional technical assistance to VR Field staff.

The policy and procedure aligns with changes implemented by WIOA related to the supported employment grant and supported employment services in general, including specific requirements related to the provision of supported employment services for youth with disabilities. Content includes • Definition of supported employment services; • Eligibility for supported employment services; • Assessment process for identifying a supported employment outcome; • Documentation of supported employment services on an Individual Plan of Employment; • Required documentation and proper coding for a supported employment case; • Process for transitioning to extended services; • Case closure for a supported employment case; and • Accessing any needed post-employment services.

WIOA implemented changes related to the supported employment grant, including a requirement to expend 50 percent of the grant on services to youth with disabilities. Since FFY 2015 the supported employment grant, as directed by the Rehabilitation Services Administration, has been expended and OOD has ensured compliance with this requirement.

OOD partners with a variety of local agencies related to the provision of extended services needed for individuals pursuing an employment outcome of supported employment. In particular, this includes partnership with local county boards of developmental disabilities as well as local behavioral health authorities. OOD works at the state level with the Ohio Department of Developmental Disabilities and the Ohio Department of Mental Health and Addiction Services in this regard as well.

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

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

See Section (n)(1) above.

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

See Section (n)(1) above.

#### o. State's Strategies.

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

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

Governor Mike DeWine’s proposed budget for fiscal years 2020-2021 supports OOD’s mission to provide individuals with disabilities opportunities to achieve quality employment, independence and disability determination outcomes. With a strong commitment of investing in Ohioans with disabilities, to ensure they are not left behind, the proposed budget represents a state investment of $17.4 million in General Revenue Funds in the first year and $18.9 million in the second (an 8% increase each year). This budget will strengthen our current programs by developing new patterns of service to ensure we are meeting the employment needs of all Ohioans with disabilities.

Ohio College2Careers Program: Governor Mike DeWine’s executive budget for SFY 2020-21 established the Ohio College2Careers program. This program immerses an OOD vocational rehabilitation counselor in the disability services offices at 15 Ohio Colleges and Universities to ensure that students have the support they need to complete their degree and/or credential, earn higher wages and meet the demands of tomorrow’s labor market. This counselor provides career counseling and purchases additional services and supports to ensure the success of students served. Services may include career exploration, assistive technology, placement services for internships and other work experiences and placement and on the job supports for permanent employment upon graduation to ensure the success of students served. OOD is also enhancing its business relations efforts for this initiative by hiring two Career Development Specialists who will work directly with the disability and career offices at these partnering colleges to promote the hiring of students with disabilities for internships and permanent placement opportunities. In addition to this initiative, OOD has established liaison counselors for many of the other colleges and universities across Ohio to ensure access to VR services for all students with disabilities.

OOD Jobs for Recovery Program: Governor Mike DeWine’s executive budget for SFY 2020-21 established the OOD Jobs for Recovery program. This program will **replicate** a successful model established in partnership with the Butler County Mental Health and Addiction Recovery Services Board and Butler County Court of Common Pleas drug court. In this model, OOD embeds a vocational rehabilitation counselor, a caseload assistant and a job developer as active members of the drug court team. This service delivery model ensures rapid engagement in services that are needed for the individual to get a job, such as career counseling, job placement and retention services. In addition to this new initiative, OOD has established liaison counselors to drug court programs in several additional counties. It is expected that liaison counselors will be established to serve individuals with disabilities participating in additional specialty docket programs as OOD continues our general outreach to this population.

OOD has several Interagency Agreements that are designed to implement service delivery models that will increase outcomes for specific populations served by the VR program. The Employment First Partnership Agreement with the Ohio Department of Developmental Disabilities and the Ohio Transition Support Program (OTSP) with the Ohio Department of Education are both examples of this. Details about these strategic initiatives are located in (d) and (f). Governor Mike DeWine’s executive budget for SFY 2020-21 expands OTSP to serve additional students with disabilities throughout Ohio.

Ohio State School for the Blind and Ohio School for the Deaf: Governor Mike DeWine’s executive budget for SFY 2020-21 provides funding for two additional VR counselors to provide services to students attending the Ohio State School for the Blind (OSSB) and the Ohio School for the Deaf (OSD). Previously, OOD has served a limited number of students attending these schools due to barriers in accessing services from OOD staff throughout all 88 counties of the state. This new model will immerse a Bureau of Services for the Visually Impaired (BSVI) counselor at OSSB and a Rehabilitation Counselor for the Deaf (RCD) who is proficient in sign language at OSD so that students have ready access to their VR counselor at school.

Social Security Demonstration Project: OOD is in the final stages of negotiating a demonstration project with the Social Security Administration (SSA) called the Ohio Director Referral Demonstration (ODRD). This demonstration project will be a joint effort by SSA, and OOD’s Division of Disability Determination (DDD) and Ohio’s Bureau of Vocational Rehabilitation (BVR). This project will test the effectiveness of providing direct referrals to vocational rehabilitation services for 18 and 19 year-olds who are, or may become, Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI) beneficiaries. The participants in the demonstration will be individuals ages 18 and 19 at the time of enrollment, who are either (1) applying for SSDI or SSI or (2) undergoing an age-18 redetermination of SSI eligibility.

Transition Transformation: As noted previously in this state plan, OOD plans to update our transition strategy to increase the flexibility of services provided to better meet the needs of students with disabilities throughout the state. OOD will be gathering feedback from students, families, providers, partners and field staff to inform this updated strategy.

Alternate Dispute Resolution: OOD is exploring opportunities to establish an alternate dispute resolution process that would assist individuals with disabilities to identify available options for resolving concerns about their services. This process would also identify perceived patterns and trends and make recommendations for agency improvements.

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

OOD recognizes the importance of the full utilization of assistive technology (AT) services and devices to assist eligible individuals with disabilities to achieve their full potential.

During FFY 2019, OOD issued a Request for Proposals (RFP) for Innovative Technology projects. OOD has awarded two contracts as a result of this RFP. One will pilot the use of technology for career exploration and job training, specifically for individuals with hearing impairments. The second will pilot the use of technology to provide remote on-the-job supports. These pilots began on October 1, 2019 and will conclude at the end of FFY 2020.

OOD has been exploring simplified and modernized methods for providing vehicle modification services to individuals served by the VR program. OOD will be initiating the administrative rule making process in early FFY 2020 and anticipates full implementation in the spring.

OOD anticipates that assistive technology will be a particularly important service for students with disabilities served through the above referenced Ohio College2Careers program. As this program is implemented, it is anticipated that there will be additional training and provider capacity building activities to ensure access to assistive technology for students served.

OOD will continue its partnership with AT Ohio to deliver training for staff regarding AT products and services.

OOD has also updated its fee schedule that went into effect October 1, 2019. In this latest update, providers of Rehabilitation Technology services who maintain specific accreditations or certifications as outlined in the fee schedule will be compensated at a higher rate for services. OOD acknowledges that providers with these certifications or credentials demonstrate a higher competence in analyzing the needs of individuals with disabilities and providing services effectively. OOD will now be focusing on recruitment of more providers of AT services that will increase choices and quicker availability of services for the individuals served by the program.

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

The results of the Comprehensive Statewide Needs Assessment (CSNA) are used to target outreach efforts for the VR program, including outreach efforts to individuals from minority backgrounds and individuals with the most significant disabilities. This outreach is accomplished in a variety of ways. The CSNA data is broken down to the county level. This allows local staff to review the data for the communities that they serve and tailor outreach strategies to promote equity in access to VR services. Local supervisors, counselors and caseload assistants all assist in conducting community education and outreach activities. The 2018 CSNA suggests that outreach efforts should prioritize outreach to individuals who are blind or visually impaired and who are deaf or hard of hearing. Specific outreach plans have been established related to both of these disability populations.

OOD will have dedicated counselors embedded at the Ohio State School for the Blind and Ohio School for the Deaf whose caseloads will be students from the respective schools.

OOD has been and will continue working on strengthening its relationships with advocacy groups such National Federation of the Blind and the American Council of the Blind to increase referrals and educate the community about OOD and the services that can be provided. OOD will be focusing on the local chapters of the advocacy groups and will be requesting time on their meeting agendas and will be available to present at their conferences. OOD will also be developing a Work Incentives Training for staff and community partners that is specific to individuals with blindness or low vision. OOD will also be developing a fact sheet specific to these incentives and an outreach effort targeted especially to parents regarding benefits and working.

All of these outreach efforts include a focus on individuals from a minority background.

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

OOD has implemented an updated Transition Services Procedure that has incorporated the new requirements for the VR program under the Workforce Innovation and Opportunity Act (WIOA). This procedure outlines a progressive model of service delivery for students with disabilities, with services that are defined in OOD’s VR Fee Schedule.

OOD, in partnership with the Ohio Department of Education, launched the Ohio Transition Support Partnership (OTSP) in September 2015. This successful partnership has substantially improved the capacity of the VR program to serve students with disabilities and improve the outcomes achieved by these students. Additional details about this program can be found in section (d) of this Plan.

OOD has added Pre-Employment Transition Services (Pre-ETS) to the VR Fee Schedule as of October 1, 2019. This will substantially increase the number of service providers available to deliver Pre-ETS to students with disabilities statewide.

In FFY 2020, OOD will be re-evaluating its current progressive model of service delivery based upon feedback to be obtained from students with disabilities, their families, provides and field staff. The intent of this transition transformation will be to allow for more flexibility in services delivered to better meet the needs of students with disabilities.

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

OOD, in partnership with the Ohio Department of Developmental Disabilities (DODD), has engaged in capacity building activities to increase the number of providers delivering employment services in both the VR and the developmental disabilities system. This allows individuals to maintain a continuity of service provider as they transition from time-limited VR services to extended services provided by the developmental disabilities system. This provides the foundation for improved quality and efficiency of services for both individuals served by the programs as well as for business partners.

Similarly, OOD has been working with the Ohio Department of Mental Health and Addiction Services (MHAS) to improve access to Individual Placement and Support (IPS) model of supported employment for individuals with mental illness.

As noted above, OOD has added Pre-Employment Transition Services (Pre-ETS) to the VR Fee Schedule in order to increase the capacity for these services for students with disabilities across the State.

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

OOD is currently in the process of establishing baseline performance for new performance accountability indicators under WIOA.OOD has implemented several updates to the AWARE case management system over the past several years that have been necessary to allow OOD to report on these new performance accountability indicators. OOD has been able to submit the new quarterly RSA 911 report for both open and closed cases by the deadlines established by RSA, including the addition of wage record information. OOD continues to work with state level partners to implement data sharing agreements that will facilitate the most efficient and accurate data reporting possible, in particular related to the credential and skill gain measures. OOD has enhanced Ohio’s business relations strategies and implemented several new strategic initiatives that will promote improved performance on WIOA performance accountability measures. These initiatives are outlined throughout this state plan.

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

OOD works closely at the state level with the Office of Workforce Transformation, the Ohio Departments of Job and Family Services and Higher Education, and other entities, to align programs and services and to improve outcomes for individuals with disabilities served in the workforce development system. At the local level, area managers and supervisors serve on local workforce boards and OOD counselors have a presence at local OhioMeansJobs Centers. OOD partners specifically with local OhioMeansJobs Centers in a variety of ways. This includes the utilization of available job seeking skills training and other career resources, participation in OOD DisAbility Job Fairs and hiring events and partnering related to other workforce initiatives throughout the state.

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

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

###### Several initiatives outlined in this state plan are specifically designed to address findings of the Comprehensive Statewide Needs Assessment (CSNA). This includes specific plans for outreach to the blind and visually impaired and the deaf and hard of hearing; redesigning OOD’s service delivery model for students with disabilities; establishment of a demonstration project with the Social Security Administration (SSA); and implementation of the Ohio College2Careers program.

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

OOD will continue to utilize a portion of available General Revenue Funds awarded to support the Independent Living Program as match for Innovation and Expansion activities under the VR program. This funding was utilized to support the operation of Ohio Statewide Independent Living Council (OSILC), consistent with federal regulations. By using Innovation and Expansion funding to support the OSILC, Ohio was able to award all Part B, Title VII funds to Centers for Independent Living (CILs) for the provision of direct independent living services.

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

#### See Section (8)(A) above

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

**Describe:**

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

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

OOD outlined several program goals in the previous state plan. A summary of these goals and related progress are as follows:

Vocational Rehabilitation (VR) Fee Schedule: OOD has worked with the provider community to identify several enhancements to the VR Fee Schedule, which were implemented as of October 1, 2019. These enhancements are designed to improve the quality of VR services delivered to individuals with disabilities and to support OOD’s achievement of Performance Accountability Measures under WIOA. In addition, OOD has added Pre-Employment Transition Services (Pre-ETS) to the VR Fee Schedule. This will significantly increase the number of service providers throughout the state and increase access to services to students with disabilities.

Medical, Psychological and Dental Fee Schedules: OOD has continued to align rates for Medical, Psychological and Dental services with Ohio Medicaid rates. This change has been a significant adjustment for the VR program, requiring increased expertise in the area of Medicaid billing. OOD has recently conducted additional training for staff in this area and plans to conduct more in the future. OOD is also in the process of identifying more streamlined processes for the procurement of services under these fee schedules, based upon feedback from field staff.

In-house service delivery: OOD is currently delivering approximately 4% of job development services through in-house job developers. OOD expects to continue to deliver the vast majority of job development services through purchase from providers under the VR Fee Schedule. The percentage of individuals served through the in-house model may increase slightly over the course of this next state plan as OOD implements the OOD Jobs for Recovery program outlined in section (o) of this Plan, which includes in-house job development services as part of the program model. OOD has recently updated its onboarding training for new job developers in order to ensure the consistency of training statewide. OOD also has five in-house work incentive consultants who provide services under OOD’s Employment First Partnership Agreement with the Ohio Department of Developmental Disabilities. Over the course of implementation of the 2016 Combined State Plan, OOD hired a Work Incentives Program Administrator who has developed policies and procedures for the delivery of services and supervises the Work Incentives Consultants to ensure a consistent high quality service statewide.

Employment First Partnership Agreement with the Ohio Department of Developmental Disabilities (DODD): OOD has continued this successful partnership with DODD. Additional information about the progress of this initiative can be found in sections (f) and (p) of this Plan.

Ohio Transition Support Program (OTSP) with the Ohio Department of Education (ODE): OOD has expanded the OTSP over the course of implementation of the 2016 state plan. OOD has also restructured the personnel providing services under this program to a more efficient model, which has increased OOD’s capacity to serve additional students with disabilities. Additional information about the progress of this successful partnership can be found in section (d) of this Plan.

Partnership with the Ohio Department of Mental Health and Addiction Services (MHAS); OOD has continued its partnership with MHAS to increase access to the Individual Placement and Support (IPS) supported employment model. OOD has conducted joint training and technical assistance for OOD liaisons and supervisors and staff of the partnering IPS provider. Additional information about the progress of this successful partnership can be found in sections (f) and (p) of this Plan.

Rehabilitation Technology: Rehabilitation Technology services were included in the VR Fee Schedule that was implemented on October 1, 2019. OOD requires rehabilitation technology providers to complete provider agreements that require the provision of services consistent with standardized service definitions, and requirements for the provision of services, rates of services, and report formats.

Business Relations: OOD has further elevated its business relations strategy by establishing a Division of Employer and Innovation Services. OOD has made additional investments in personnel by adding a fifth Business Relations Specialist and a Worksite Accessibility Specialist. Additional information about OOD’s progress in this area can be found in section (g) of this Plan.

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

OOD has been aggressively implementing various WIOA alignment activities over the duration of the 2016 state plan. This has involved significant investment of staff time participating in training related to new policies, procedures, federal reporting requirements and case management upgrades. This has been a challenging time for staff as this has detracted from the time that they have to spend directly providing services to individuals with disabilities. Staff have done an excellent job of meeting the needs of individuals served by the VR program during this challenging time period.

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

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

Please see updates above in 1. A. regarding OOD’s Employment First Partnership Agreement with the Ohio Department of Developmental Disabilities and OOD’s work with the Ohio Department of Mental Health and Addiction Services to implement IPS in Ohio.

Policy and Procedure: OOD has implemented a Supported Employment Policy and a Supported Employment Procedure that reflects the changes in federal regulations under WIOA. In addition, OOD added a service definition and rates for Supported Employment-Job Development in the VR Fee Schedule that was effective October 1, 2017. Effective January 1, 2019, providers delivering Supported Employment-Job Development services under the VR Fee Schedule must be Community Employment Support Professional (CESP) certified. Because of the fidelity standards established by the IPS model, IPS providers are exempt from this requirement.

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

OOD has been aggressively implementing various WIOA alignment activities over the duration of the 2016 state plan. This has involved significant investment of staff time participating in training related to new policies, procedures, federal reporting requirements and case management upgrades. This has been a challenging time for staff as this has detracted from the time that they have to spend directly providing services to individuals with disabilities. Staff have done an excellent job of meeting the needs of individuals served by the VR program during this challenging time.

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

OOD is currently in the process of establishing baseline performance for new performance accountability indicators under WIOA.OOD has implemented several updates to the AWARE case management system over the past several years that have been necessary to allow OOD to report on these new performance accountability indicators. OOD has been able to submit the new quarterly RSA 911 report for both open and closed cases by the deadlines established by RSA, including the addition of wage record information. OOD continues to work with state level partners to implement data sharing agreements that will facilitate the most efficient and accurate data reporting possible, in particular related to the credential and skill gain measures.

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

OOD utilized a portion of available General Revenue Funds awarded to support the Independent Living Program as match for Innovation and Expansion activities under the VR program. This funding was utilized to support the operation of Ohio Statewide Independent Living Council (OSILC), consistent with federal regulations. By using Innovation and Expansion funding to support the OSILC, Ohio was able to award all Part B, Title VII funds to Centers for Independent Living (CILs) for the provision of direct independent living services.

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

**Include the following:**

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

The purpose of OOD’s Supported Employment Program is to assist individuals with the most significant disabilities, including youth with the most significant disabilities, to achieve supported employment outcomes in competitive integrated employment by developing and implementing collaborative programs with entities that provide extended supports. The following individuals are targeted for supported employment services: Individuals participating in day programs, employed in sheltered workshops and other facility-based settings; • Students in special education programs transitioning to community employment; • Individuals moving from institutional care into the community; • Individuals with severe and persistent mental illness, who have traditionally been unsuccessful in obtaining and maintaining competitive, integrated employment; • Individuals with multiple disabilities who require coordinated services from diverse agencies; and • Individuals who have been traditionally underserved in supported employment by virtue of ethnic origin, geographical considerations or an inability to access extended supports, and who require the development of natural supports for employment retention.

Eligibility for supported employment services is established in OOD’s supported employment policy and procedure. OOD’s vocational rehabilitation (VR) counselors evaluate individuals during the comprehensive assessment process to determine if individuals require supported employment services to achieve or maintain their employment outcome. Individuals who are eligible for supported employment services include individuals with a most significant disability, including students and youth with a most significant disability, who require ongoing support services provided by a partnering entity (generally a county board of developmental disabilities or local behavioral health authority) to maintain employment.

Ohioans with disabilities who are determined eligible for SSI or SSDI, designated as eligible for services from county boards of DD, and those designated as having a severe and persistent mental illness and eligible for services from a community mental health board, are targeted populations for supported employment. OOD has developed Interagency Agreements with the Ohio Department of Developmental Disabilities (DODD), the Ohio Department of Medicaid, and the Ohio Department of Mental Health and Addiction Services (OhioMHAS), to develop and implement improved coordination of supported employment services. The Interagency Agreements include training opportunities and technical assistance for staff across all involved agencies. For all supported employment cases, OOD ensures the coordination and facilitation of extended services for individuals, which can be funded through Medicaid Home and Community-Based Services (HCBS) waivers, local county board of DD or county behavioral health authorities, including natural supports. Such services provide the supports individuals with the most significant disabilities need to sustain long-term employment. Within the Interagency Agreements, there is also a focus on data collection between agencies.

Community Rehabilitation Programs (CRPs) typically provide services purchased by OOD for Ohioans served in Supported Employment. Currently these services are purchased on a fee-for-service basis, according to OOD’s VR Fee Schedule. The 2017 VR Fee Schedule update included new specific rates for Supported Employment Job Development services. The service definition for this service specifies that these are intensive, ongoing support services that are needed to assist an individual with the most significant disabilities to work in an integrated employment setting. There are requirements for more frequent contacts, as well as higher rates compared to the standard Performance Based Job Development services.

Qualified Supported Employment Job Development providers are dually certified by the Ohio Department of Developmental Disabilities in career planning or individual employment supports, or meet Ohio Mental Health and Addiction Services fidelity requirements for Individual Placement and Support - Supported Employment (IPS-SE). Providers offering this service must be certified in the individual placement and support (IPS) model for individuals with severe and persistent mental illness (SPMI), or the supported employment training that has been established for providers serving individuals with developmental disabilities under the EF Partnership Agreement. Individual provider staff offering Supported Employment Job Development outside of the IPS model are required to hold the Certified Employment Support Professional (CESP) credential through the Association of People Supporting Employment First (APSE) effective January 2019. The 2020 VR Fee Schedule removed the CESP requirement for Tier III (retention) portion of Supported Employment Job Development, and allowed staff who are Certified Rehabilitation Counselors (CRC) to provide this service without CESP certification.

In accordance with federal requirements, supported employment services provided include the following: • Assessment services supplementary to the comprehensive assessment needed to ensure appropriate job match and supports; • Job development and training; •social skills training; • Intensive on-the-job training or coaching of individuals with the disability, their employer, supervisor and/or coworkers by skilled employment consultants; • Other VR or support services needed to ensure success in community employment; • Follow-up and monitoring of job performance during the stabilization process; • Discrete post-employment services not commonly available from those who provide extended services; • Identification and development/facilitation of natural supports; and • Customized employment.

In accordance with federal requirements of section 511 of WIOA, OOD has been meeting the requirements by providing services and supports, including career counseling, to individuals, including youth with disabilities, who are receiving sub-minimum wage. OOD has dedicated staff to meet this requirement and ensure individuals with disabilities who are paid subminimum wage have access to career counseling, designed to promote opportunities for competitive integrated employment.  Topics covered includes information on Employment First; places on the path to community employment; competitive integrated employment; supported employment services; work incentives and benefits; overview of OOD services, including application process; and explanation of individuals’ rights and informed choice.

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

At present, the transition to extended supports begins at the point of job stabilization and at least 90 days prior to successful case closure, but for a period not to exceed four years. This ensures a smooth transition VR funded supports to ongoing and/or natural supports as outlined in the IPE.

#### Certifications

Name of designated State agency or designated State unit, as appropriate

Name of designated State agency      **Opportunities for Ohioans with Disabilities**

Full Name of Authorized Representative:      **Kevin L. Miller**

Title of Authorized Representative:      **Executive Director of Opportunities for Ohioans with Disabilities**

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

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

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

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

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

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

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

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

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

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

##### Footnotes

\_\_\_\_\_\_\_\_\_\_

**Certification 1 Footnotes**

\* Public Law 113-128.

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

**Certification 2 Footnotes**

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

\*\* No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

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

**Certification 3 Footnotes**

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

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

##### Additional Comments on the Certifications from the State

#### Certification Regarding Lobbying — Vocational Rehabilitation

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

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

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

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

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

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

Applicant’s Organization      **Opportunities for Ohioans with Disabilities**

Full Name of Authorized Representative:      **Kevin L. Miller**

Title of Authorized Representative:     **Director of Opportunities for Ohioans with Disabilities**

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

#### Certification Regarding Lobbying — Supported Employment

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

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

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

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

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

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

Applicant’s Organization      **Opportunities for Ohioans with Disabilities**

Full Name of Authorized Representative:      **Kevin L. Miller**

Title of Authorized Representative:      **Executive Director of Opportunities for Ohioans with Disabilities**

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

#### Assurances

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan.      **No**

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

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

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

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

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

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

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

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

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

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

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

Agency will provide the full range of services described above       **Yes**

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

###### e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.

###### f. comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act.

###### g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.

###### h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14)of the Rehabilitation Act.

###### i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs

###### j. with respect to students with disabilities, the State,

###### has developed and will implement, strategies to address the needs identified in the assessments; and

###### 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

###### has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).

##### 5. Program Administration for the Supported Employment Title VI Supplement:

###### a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.

###### b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.

###### c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act.

##### 6. Financial Administration of the Supported Employment Program:

###### a. The designated State agency assures that it will expend no more than 2.5 percent of the State’s allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act.

###### b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.

##### 7. Provision of Supported Employment Services:

###### a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.

###### b. The designated State agency assures that:

###### the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act

###### an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act , which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.

##### Additional Comments on the Assurances from the State