

# **VR Portion of WIOA State Plan for the State of Kansas PY-2022-2023 (Mod)**

## **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;**

In matters of program administration and planning, Kansas Rehabilitation Services (KRS) has a strong commitment to seeking the advice of consumers of vocational rehabilitation services, service providers, family members, advocates, employers and others interested in disability issues. Comprised of representatives of these stakeholder groups, the State Rehabilitation Council makes a major contribution to KRS through advice provided during regular business meetings, State Plan work sessions, Policy Committee meetings, Business Committee meetings, and other activities the members determine to be appropriate. The State Plan and attachments are developed in cooperation with the Council.

#### **Input provided by the Council and KRS response**

*Council comment - The Council is concerned about the high turnover rate among VR Counselor positions and encouraged KRS to look at a variety of options including an increased pay scale, career ladder opportunities, caseload size, incentives (such as student loan repayment), and internships to give upcoming graduates the opportunity to learn more about working in the public VR program.*

KRS Response: KRS and DCF have assisted with addressing a few strategies with recruitment and retention by positing position on Indeed.com, a work from home policy, developing internship positions, and DCF workgroup to improve retention. KRS will continue to work with the Kansas Department of Administration Personnel Services and DCF leadership to identify strategies to address recruitment, retention, hiring incentives, caseload size and internships.

*Council comment: The Council endorsed recommendations made by the Kansas Advisory Committee for the Blind and Visually Impaired to modify the KRS maintenance policy, especially pertaining to determining an individual's normal expenses.*

KRS Response: KRS Maintenance means monetary support provided to an individual for expenses, such as food, shelter, and clothing, that are in excess of the normal expenses of the individual and that are necessitated by the individual's participation in an assessment for determining eligibility and vocational rehabilitation needs

or the individual's receipt of vocational rehabilitation services under an individualized plan for employment. KRS implemented the recommendation to deem 30% of their actual SSI and/or SSDI benefits to figure the normal expenses. Previously the policy KRS deemed their normal expenses to be 75% of the maximum SSI amount.

*Council comment: The council is concerned about the recruitment and participation of the State Rehabilitation Council members.*

KRS Response: KRS worked with SRC to address recruitment during 2021. We had proposed to SRC to have a recruitment sub-committee to help increase the number of SRC members on the Council. We elected three members from the SRC group to serve on the recruitment sub-committee. The sub-committee met to determine our course of actions to recruit SRC members for 2022. We developed some marketing materials that we used to help educate the community about our council's needs and the role of the SRC. We had a two-month campaign where the council, the sub-committee, and VR staff shared the marketing materials that were developed to gather individuals that were interested in serving. Once we completed the campaign the recruitment subcommittee reviewed the applications and made suggestions to the board of approval for new members. The approval from the governor's office takes a little time so we need to make sure we plan according to have new members approved by January 1<sup>st</sup>.

We will continue to have a quarterly report that will report the attendance of each board member, the makeup of the board and if we are meeting the requirement of the council seats. We will also continue to have a recruitment sub-committee to help with keeping this council strong. We will elect members from the Council to serve on the recruitment sub-committee the first meeting of the year.

KRS is also ensuring to send out reminders for the quarterly meeting and setting all the dates at the last quarterly meeting for the following year to put on State Rehabilitation members calendar.

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

For ease of correlating the KRS responses directly to the Council recommendations, this information is included in Section 1.

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

KRS did not reject any of the Council's recommendations.

## **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;**

KRS is not requesting a waiver of statewideness. This section does not apply.

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

KRS is not requesting a waiver of statewideness. This section does not apply.

### **3. All State plan requirements will apply**

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

KRS is not requesting a waiver of statewideness. This section does not apply.

### **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;**

Kansas Rehabilitation Services (KRS) collaborates and coordinates services with federal, state and local employment and rehabilitation agencies that contribute to the vocational rehabilitation (VR) of Kansans with disabilities. At the local level such collaborations are individualized according to each person's needs and interests. This individualized approach is one of the cornerstones of VR services.

At the state level, KRS collaborates with other units within the Kansas Department for Children and Families (DCF) and with other state departments. For example:

- KRS and DCF Economic and Employment Services collaborate to serve recipients of Temporary Assistance for Needy Families (TANF) who have disabilities. Consumers benefit by being able to receive the coordinated and specialized services they need to achieve employment before their time limited TANF benefits cease.
- KRS and DCF Prevention and Protection Services independent living staff will coordinate to address the employment and/or post-secondary education needs of youth with disabilities who age out of foster care.
- Cooperative working relationships between the Kansas Department for Aging and Disability Services oversight units for community developmental disability organizations and community mental health centers facilitate discussions about the importance of competitive, integrated employment, an employment-first strategy, evidence-based practices, and supported employment services. Managed Care Organizations coordinate services for HCBS participants with employment goals on plans of care.
- KRS maintains an active presence on numerous councils and committees, including:
  - The Statewide Independent Living Council of Kansas.
  - The Kansas Commission on Disability Concerns.
  - The Governor's Behavioral Health Planning Council and its Vocational Sub-Committee.
  - Kansas Council on Developmental Disabilities
  - Five Local workforce development boards
- A memorandum of understanding with the Prairie Band Potawatomie Nation Native American VR program addresses the coordination of services to help consumers achieve employment.
- To maximize resources and to help consumers access needed services, KRS works cooperatively with numerous other local and state programs, including Working Healthy and independent living centers.
- KRS collaborates with the Department of Corrections and individual correctional institutions to assist individuals with disabilities who are being released from custody to become employed.

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

KRS coordinates with the Assistive Technology for Kansans program for the assessment and provision of individualized assistive technology services for VR consumers. Training on state-of-the art technology is

provided to all new VR counselors and program specialists as a key component of their in-service training. KRS is also represented on the ATK advisory committee.

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

When consistent with the Rehabilitation Act and regulations, KRS may use the Rural Development Programs of the U.S. Department of Agriculture to the extent these programs are available to local communities.

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

KRS will coordinate with local workforce operators and Adult Education on employment services for out-of-school youth. The Combined Portion of this Plan includes extensive operational strategies related to youth services. KRS also provides funding for the Kansas Youth Empowerment Academy for leadership training, self-advocacy skill development, and mentoring services for youth with disabilities. KRS staff participate in Family Employment Awareness Trainings offered by Families Together as well as participate in local level planning and referral for Project Search programs. Additionally, KRS staff support beginning the job placement services while in Project Search third internship. KRS will also investigate how it might assist in the expansion of promising practices to increase employment options and outcomes.

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

Kansas Rehabilitation Services does not participate in the management of the State Use Catalog or purchasing process. It is overseen by the Kansas Department of Administration. As is required of all state agencies, KRS makes purchases from the State Use Catalog, which includes “Products and Services Manufactured and Offered by Blind and Severely Disabled Kansans,” at any time when the listings in that catalog will meet the needs of the agency.

Interaction with state use contracting programs is handled in compliance with the competitive, integrated employment purpose of the Rehabilitation Act and regulations.

## **d. Coordination with Education Officials**

Describe:

### **1. DSU's plans**

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

Major goals of Kansas Rehabilitation Services (KRS) are to emphasize the employment potential of students with disabilities as well as improve the outreach and outcomes for students and youth with disabilities. To accomplish this goal, KRS will continue to work with local school officials to implement Pre-Employment Transition Services (Pre-ETS) and to facilitate a smooth transition from education to vocational rehabilitation (VR) services and employment. This approach provides a continuum of services directed toward additional post-secondary education or direct entry into the workforce.

### **Pre-ETS**

KRS will reserve 15% of its federal VR funding to provide Pre-ETS to students with disabilities who are eligible or potentially eligible for VR services. Pre-ETS is designed to provide job exploration and other services, such as counseling and self-advocacy training, in the early stages of the transition process.

KRS has built its capacity to provide Pre-ETS through the 30 transition specialists to local VR offices, six Pre-ETS Managers, and a Statewide Program Administrator. KRS has also established service provider agreements with several of the Local Workforce Development Boards, numerous Centers for Independent Living and the Kansas Youth Empowerment Academy pertaining to specific components of Pre-ETS. A major emphasis is paid work-based learning experiences. Such experiences allow students to gain an early attachment to employment as the avenue to self-reliance, explore career options and develop the soft skills that are necessary for long-term employment success. KRS is working on building service provider capacity to ensure statewide access for paid work-based learning experiences. Other services offered through service providers include self-advocacy training, post-secondary education, and workplace readiness training.

According to the Kansas State Department of Education, each year there are about 21,000 youth with disabilities ages 14 to 21 receiving special education services through an Individual Education Plan (IEP). These numbers exclude individuals in the gifted program. Also excluded are individuals with Section 504 plans. The target population for Pre-ETS does include individuals with Section 504 plans.

### **Policies and procedures to facilitate the transition of students from school to receipt of VR services**

KRS policies and procedures in providing VR services for youth with disabilities are influenced by the available level of staff resources. Within these resources, KRS will accept referrals for VR services from transition students. Coordination/collaboration between VR and Special Education is essential to assure that students with disabilities have access to the continuum of services they need to become employed and self-reliant. Youth with disabilities may apply for services directly or be referred by the Local Education Agency (LEA). RS will not implement any arbitrary age or time frame limit on when a youth with a disability can submit an application for VR and transition services. Federal regulations define youth with disabilities as individuals who are not younger than 14 years of age and not older than 24 years of age. RS will coordinate with the individual, the LEAs and the individual's IEP regarding initiation of and provision of services.

Referrals are encouraged for students who are receiving special education services and students with disabilities receiving services or accommodations as required by Section 504. Referral timelines are designed to assure that the Individualized Plans for Employment (IPEs) for students who can be served under Order of Selection are coordinated with Individual Education Plans. IPEs must be written as early as possible during the transition planning process, and no later than when the student exits high school.

In addition, KRS may provide technical assistance, such as participation in IEP meetings or referral to community resources, for students prior to the referral timeline, if existing staff resources are available to make this possible.

## **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;**

### **Formal interagency agreement between KRS and the Kansas State Department of Education (KSDE)**

This agreement includes the following:

KSDE and KRS will conduct joint professional development, in-service training, and development of resource materials for school personnel, VR staff, other adult service providers, parents, and students. This may include orientation to programs, referral processes, policies, procedures, pertinent legislation and other areas as may be appropriate, along with the development of related informational materials.



KSDE and KRS may access and share national resources and expertise to support the delivery of technical assistance and training.

KSDE and KRS will provide TA or support for local efforts in implementing transition planning and programming to educate LEA staff, VR counselors and Pre-ETS Transition Specialists about procedures related to transition planning and services for employment and postsecondary education for students eligible or potentially eligible for Pre-ETS and/or VR services.

KSDE and KRS may participate in TA and advisory opportunities to support the goals of this agreement.

KSDE and KRS will provide training and TA to LEAs and local VR offices on coordinating the transition planning process. Topics in this area may include, but are not limited to, the following:

- Inviting KRS counselors and Pre-ETS Transition Specialists to IEP meetings.
- Providing information about Pre-ETS and VR services in the IEP development process.
  - KRS will attend meetings for the development of an IEP when invited, with appropriate consent and as resources allow. Participation by KRS staff (VR or Pre-ETS) may include in-person attendance, conference call, live video, LEA personnel presenting written, oral or video materials highlighting VR and/or Pre-ETS information, or other mutually agreed upon options.
  - KSDE will encourage LEAs to distribute the Pre-ETS and VR services brochure to students, family members, and/or guardian and their representatives at all IEP meetings as part of the routine information shared. KSDE will emphasize this best practice with all LEAs at least annually.
  - KRS, in collaboration with LEAs, will provide or arrange for the provision of Pre-ETS to all students with disabilities who meet criteria for participation in Pre-ETS. The Pre-ETS Transition Specialist will make the determination that the student meets the criteria.
  - KRS shall determine the eligibility for VR services of all students with disabilities who have applied for VR services as soon as possible but no later than 60 calendar days from the date of application, in accordance with KRS policy and regulations, pursuant to section 102(a)(6) of the Rehabilitation Act and section 34 C.F.R. § 361.41(b)(1) of its implementing regulations.
  - KRS will develop an Individualized Plan for Employment (IPE), which takes into consideration the student-client's IEP as soon as possible but no later than 90 calendar days from the determination of eligibility, in accordance with KRS policy and regulations.

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

As outlined in the agreement, KRS will provide VR services for students in accordance with KRS policy under the following conditions:

- The student has been determined eligible for VR and can be served within the Order of Selection.
- The student (and his/her parents or representative if appropriate) and the VR counselor have agreed to an Individual Plan for Employment (IPE).
- The goods or services provided will be necessary for post-high school training or employment, or will substantially contribute to achievement of the competitive, integrated employment objective on the IPE.
- Employment or post-secondary services provided by VR must occur outside the established school sessions. The term “school sessions” refers not only to the school semester or term, but also to the school day.
- Consideration of comparable benefits are required, and application of the economic need policy may be required.

- No supplanting transition services under IDEA.

According to the agreement and consistent with regulations, the Local Education Agency/Authority (LEA) is not relieved of any responsibility to provide transition services until the student formally exits the public school program and as long as the student remains eligible for and receives special education services.

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

KRS and KSDE agree on the following:

The responsibilities of KRS are to:

- Serve as the lead agency for carrying out federal and state policies relating to the program under the Rehabilitation Act, including, upon written request from LEA staff, and with parent, guardian, or adult student consent, distribution of general information related to services, consultation, TA, attendance at transition events and other forums to provide information about Pre-ETS and VR services, attend IEP meetings, provide Pre-ETS services, make referral for VR services, eligibility determination, IPE development, and VR services, pursuant to 34 C.F.R. §300.321(b)(3). Pre-ETS will accept referrals of students with disabilities during the transition planning process as long the student meets all criteria to participate.
- Accept and process applications for VR services from students in transition in accordance with KRS policy.
- Provide consultation with school LEA staff on transition planning to prepare eligible students to move from school to work or post-secondary education leading to employment in accordance with the student's unique needs as determined through the IEP process and provision of Pre-ETS.
- Assess, plan, develop, and provide VR services for eligible individuals with disabilities who have been referred for VR services, consistent with their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice, so that such individuals may prepare for and engage in competitive integrated employment.
- Ensure that IPEs are developed and signed for students determined eligible for VR services as early as possible during the transition planning process, but at the latest, before they exit school, or if KRS is operating under an Order of Selection, for each eligible student able to be served.
- Develop an IPE, which is consistent with and which takes into consideration the student-client's IEP, within 90 days of VR eligibility determination in accordance with KRS policy and regulations.
- Provide consultation to assist in the identification of eligible and potentially eligible students with disabilities, and assessment of their individual needs for Pre-ETS.
- Provide or arrange for the provision of services identified on the IPE, when the student has been determined eligible for VR, and the services are specific to his/her employment objective, and are not services customarily provided to the student by the LEA under the IDEA.
- Provide training and technical assistance for KRS staff to facilitate coordination of the transition planning process with LEAs for students with disabilities. Actions in this area may include but are not limited to:
  - Local KRS staff members' participation in IEP meetings, in person or through conference technology, within available resources and in accordance with KRS policy.
  - Training of LEA staff about VR services, processes and timelines.
- Provide VR services for students in accordance with KRS policy under the following conditions:
  - The student has been determined eligible for VR and can be served within the Order of Selection.

- The student (and his/her parents or representative if appropriate) and the VR counselor have agreed to an IPE.
- The goods or services provided will be necessary for post-high school training or employment, or will substantially contribute to achievement of the competitive, integrated employment objective on the IPE.
- Employment or post-secondary services provided by VR must occur outside the established school sessions.
- Consideration of comparable benefits and application of the economic need policy are required.
- No Supplanting transition services provided under IDEA.
- Obtain written consent for the release of confidential information, pursuant to KRS VR policy and procedures, federal and state laws and regulations regarding confidentiality.
- Provide contact information for KRS VR counselors and Pre-ETS Transition Specialist.
- Identify a single point of contact who will coordinate transition activities within each school LEA.
- Share information regarding policies, procedures, guidelines, programs, and services for the purpose of improving the access to, and availability of, transition services.
- Provide brochures and materials about the VR process and services to the school LEAs for distribution to the students, parents, legal guardians, teachers, and others.
- Provide TA to inform teachers, KSDE, students, legal guardians, and parents of the mandates found in the Rehabilitation Act in Section 511 as amended (34 C.F.R. § 397), which require the youth with a disability exiting school, to be referred to VR prior to working in a subminimum wage work with a 14c certificate holder.

The responsibilities of KSDE are to:

- Encourage LEA and VR collaboration and coordination for the purpose of providing more opportunities and resources to move students from school to work, (e.g. participation on local multi-agency teams), Career and Technical Education (CTE), post-secondary education, leading to employment and other opportunities for collaboration for improved Pre-ETS and VR services outcomes.
- Identify a single point of contact within the KSDE for collaboration of transition activities with VR.
- Develop active communication and outreach efforts for parents and students to increase awareness of coordinated transition services and opportunities.
- Upon formal request following the KSDE process for data requests, share aggregated student data with KRS including statewide students with disabilities exit data, students with disabilities 14 years of age and older per building, LEA, and statewide.
- KSDE will facilitate joint training between VR and appropriate LEA personnel on new state or federal requirements, or initiatives that impact the provision of services by both entities.
- KSDE will encourage LEAs to provide the required documentation identified in the Referral for Vocational Rehabilitation Services prior to the provision of Pre-ETS, to coordinate IEP meetings with VR, to coordinate the provision of services, to obtain the required parental consent to invite a representative from an outside agency to any such meeting prior to sharing confidential information about the child, and to meet its ongoing requirement to provide all special educational services or related transition services required under IDEA in accordance with section 101(c) of the Rehabilitation Act, and 34 C.F.R. § 361.22(c) of its implementing regulations.
- Provide training and technical assistance to LEAs to identify the transition needs of each student, and document those needs on the IEP of each student with a disability age 14 and over. Provide training and technical assistance to LEAs to facilitate the sharing of the following information, contained in the student's education record, at the time of referral to KRS (with parent consent):
  - The source documentation from which eligibility for special education services was determined;



- The most recent evaluation or re-evaluation information;
- Age-appropriate transition assessments;
- Current IEP; and
- Current contact information for student and parents or guardian, if appropriate;
- Behavior plans, other documentation ancillary to the IEP, 504 plans, medical records or any other documentation available to support eligibility for Pre-ETS and VR services.
- Provide training and technical assistance to LEAs specific to the provision of transition services related to employment and/or postsecondary education activities, which occur within established school sessions.

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

KRS maintains staff liaisons for each public high school to ensure statewide coverage. In addition to working with special education staff, KRS staff contact vocational education departments, school nurses and guidance counselors to provide greater outreach to students with disabilities and their families.

Consistent with the goals and priorities in Section L, KRS will emphasize the employment potential of students with disabilities and improve the outreach and outcomes for transition-aged students. In doing so, KRS will pursue opportunities to collaborate with students, families, the Kansas State Department of Education, schools, and other stakeholders.

All regions are responsible for outreach to students, parents and schools. Some examples include: scheduling specific days for Pre-ETS transition specialists and counselors to work at schools and meet with students and transition staff; operating informational booths at transition fairs or parent-teacher events; and participating in special events such as Job Olympics and Disability Mentoring Day events.

KRS will promote the use the Career Technical Education initiative for students to participate in technical education while in high school. As a result, they graduate with a qualifying certificate in-hand and are, therefore, able and prepared for direct entry into the workforce.

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

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

To offer a full array of vocational rehabilitation (VR) services to meet the needs and interests of people with disabilities, Kansas Rehabilitation Services (KRS) will continue its extensive partnerships with community service providers.

##### **Manner in which such agreements are established**

Contracts and service provider agreements are established to help KRS consumers achieve their individual employment goals, to increase system capacity for community services, to support innovative approaches to service delivery, to enhance services to specific populations, and to increase consumer choice among available service providers. These contracts and agreements also help KRS maintain geographic distribution of services.

Procedures in establishing such agreements emphasize the role of regional KRS offices to identify needed services and to monitor the usage and effectiveness of the services provided through the agreements. The contracts and agreements define the nature and scope of services to be provided, outcome measurements, procedures for referrals, authorizations, reporting requirements, fees, billing and financial procedures.

Service provider agreements are available for a variety of services, including vocational assessment, independent living assessment, community-based work assessment, community-based job tryout, job

preparation, work-based learning experiences, guided placement, customized placement, job coaching, rehabilitation engineering, assistive technology, rehabilitation teaching, comprehensive facility-based training for persons who are blind or visually impaired, and orientation/mobility. These agreements emphasize the development of action plans, strengthened approaches to ongoing communication among KRS staff and service providers, and accountability measures for successful rehabilitation outcomes.

Service providers participating in these agreements include community rehabilitation programs for individuals with intellectual disabilities, consumer-run organizations, independent living centers, mental health centers, substance abuse programs, assistive technology access sites, and independent contractors. Providers may offer more than one service and serve more than one region of the state.

In addition, state-only funding supports:

- \$125,000 to the Cerebral Palsy Research Foundation (CPRF), Wichita to provide individual assistive technology equipment, devices and services to enhance the independent living of Kansas with disabilities. The state funds are matched with private funds provided through UCPK and other private donors, leveraging additional spending power from the state's investment. In SFY 2021 CPRF assisted 175 individuals in securing equipment valued at a total of \$617,919
- \$160,050 to the Kansas Youth Empowerment Academy for career and leadership training, and mentoring for youth with disabilities.

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

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

Kansas Rehabilitation Services (KRS) enters into provider agreements with a variety of community agencies for the provision of supported employment services. Providers include community developmental disability organizations, mental health centers, independent living centers, and other public and private entities. Through customized employment provider agreements, six key components or milestones are specified for supported employment services:

1. Creation of a job development action plan.
2. Placement.
3. Stabilization.
4. 45 days of continuous, successful employment.
5. Finalization of an extended ongoing service plan.

(This plan describes how the supported employment service provider will maintain extended supports once the time-limited VR services end. Or, the plan may describe how the overall community service system will provide the extended supports the consumer will need to maintain employment. These extended supports are not funded with VR dollars.)

6. Successful VR case closure in accordance with all of the requirements set out in federal regulations.

Direct hourly Job Coaching services are provided for VR consumers in conjunction with the Customized Employment milestones services described above. Short and long-term individualized job coaching is also provided through service provider agreements.

The provider agreements also:

- Describe the time-limited services that will be provided through KRS for eligible individuals with the most significant disabilities.
- Address responsibility of the providers to coordinate with the community service system, which has responsibility for funding and providing the extended ongoing services necessary for the consumer to maintain employment once they exit the VR program.

The Individual Plan for Employment is used as the basis for referral to one of the providers. It also describes the criteria, specific to each consumer, for determining that job performance is stable, determining how and when progress will be evaluated, and describing how extended ongoing support services will be provided. After the consumer reaches stability on the job, the consumer, service provider and VR counselor work together to finalize the plan for extended ongoing supports. This allows the plan to be specific and customized according to the consumer's current work situation and support needs. As a result, the ongoing support section of the IPE may be amended, with the consumer's agreement, in order to reflect the most current information available.

Through the provider agreement requirements and performance benchmarks, KRS' intention is to develop a network of effective supported employment providers whose focus is on the vocational objectives, goals, rehabilitation needs and priorities of the consumers to be served. KRS regional managers meet with providers on a periodic basis to maintain a collaborative relationship in this service delivery system and to address accountability and performance improvement when necessary. KRS intends to develop a network of effective supportive employment providers whose focus is on vocational objective, goals, rehabilitation needs, and consumer priorities. In implementing supported employment services, KRS funds individual job placements. KRS emphasizes the importance of geographic distribution of services. KRS also places a priority on working with community agencies that have the capacity to:

- Develop productive relationships with employers.
- Encourage people with disabilities to learn about developing natural support networks.

## **g. Coordination with Employers**

(Formerly known as Attachment 4.8(b)(5)). Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

### **1. VR services; and**

Kansas Rehabilitation Services (KRS) emphasizes employer engagement activities that market the skills and abilities that qualified workers with disabilities have to contribute to the success of Kansas business and industry. KRS will build and maintain its capacity for effective outreach and engagement with employers statewide in order to:

- Meet their workforce needs through the labor pool of qualified persons with disabilities.
- Identify competitive, integrated employment opportunities for vocational rehabilitation (VR) consumers, including such opportunities for youth and adults who are diverted from sub-minimum wage employment through Section 511 of the Workforce Innovation and Opportunity Act.

- Increase opportunities for youth with disabilities to engage in paid work-based learning experiences as part of the Pre-Employment Transition Services program. Such work-based learning is intended to facilitate career exploration and development of the soft skills necessary for lifelong employment success.
- Collaborate with partners in the workforce development system on coordinated business outreach processes.
- Coordinate with Economic and Employment Services in the Department for Children and Families, which administers the Temporary Assistance for Needy Families and the Supplemental Nutrition Assistance Program, and its employer development activities.

KRS has service provider agreements for job placement and on-the-job supports with nearly 120 local providers (community rehabilitation programs, local organizations and individual providers).

In 2013, the State Rehabilitation Council of Kansas established a committee to address employer outreach and engagement. The committee initiated the “Good for Business” campaign, which continues to be used on an ongoing basis. This campaign highlights how hiring people with disabilities will contribute to the success of Kansas businesses through:

- Workers qualified to meet business workforce needs.
- Workers who are safe, reliable and productive, and who tend to have lower turnover rates than other employees.
- Hiring incentives.
- Supports to business in areas such as recruiting and performance coaching.
- Innovative options such as no-risk no-cost job tryouts to help determine if there is a good employment match between a VR consumer and business.

Also in the campaign, VR consumers who are successfully employed in high-wage, high-demand, and career pathway jobs are highlighted.

Each year, KRS and its provider network make contact with hundreds of employers, with various levels of engagement.

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

Collaboration with workforce development system Core Partners and local workforce operators will enhance services for VR consumers, transition youth, and youth participating in Pre-Employment Transition Services., Such collaboration will enhance the KRS employer engagement activities. All Partners are committed to vigorously representing the employment needs of individuals (including youth) with disabilities and other consumers with significant barriers to employment.

## **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;**

#### **Interagency agreement**

Kansas Rehabilitation Services (KRS) will work with the Kansas Department for Aging and Disability Services (KDADS) and the Kansas Department of Health and Environment (KDHE) to establish an interagency agreement regarding roles and responsibilities pertaining to competitive, integrated employment for Kansans with disabilities. KDADS and KDHE share responsibilities for administration of the Medicaid program. KDADS oversees services for persons with intellectual disabilities and behavioral health disabilities.

The purpose of the agreement will be to create a common understanding of responsibilities, policies and procedures. It will address data sharing to better analyze how mutual consumers interact with the various services and supports available to them. Perhaps most importantly, the agreement will establish a collaborative framework for services that will improve competitive, integrated employment outcomes for people with disabilities. A priority will be to address procedures for referring youth with disabilities to vocational rehabilitation (VR) services so they may explore options for competitive, integrated employment rather than being placed directly in sub-minimum wage employment after exit from school, consistent with Section 511 of the Workforce Innovation and Opportunity Act. In addition, the agreement will address referral procedures for adults who are already employed in sub-minimum wage jobs so that VR may provide periodic information and career counseling related to competitive, integrated employment options.

### **Ongoing communication and collaboration**

KRS is in frequent contact with other agencies related to competitive, integrated employment of Kansans with disabilities. Some examples include participation on the:

- Governor's Behavioral Health Planning Council and its vocational sub-committee.
- The Developmental Disabilities Council.
- The Kansas Commission on Disability Concerns.
- The Employment First Commission.
- Kansas Commission for the Deaf and Hard of Hearing

KRS has agreements with Comprehensive Schools for the Blind in Colorado (Colorado Center for the Blind) and Missouri (Alphapointe) to provide access to the intensive level of training needed by some consumers. On an ongoing basis, KRS will seek additional agreements as needed to meet the needs of our consumers.

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

KDADS oversees services for persons with developmental/intellectual disabilities. Please refer to Part 1 of this section for more information on collaborative efforts leading to competitive, integrated employment outcomes.

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

KDADS oversees services for persons with developmental/intellectual disabilities. Please refer to Part 1 of this section for more information on collaborative efforts leading to competitive, integrated employment outcomes.

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

(Formerly known as Attachment 4.10)). Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

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



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

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

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

The Kansas Rehabilitation Services (KRS) mission is: Working in partnership with Kansans with disabilities to achieve their goals for employment, independence and self-reliance. Qualified staff are an essential asset to the agency's ability to achieve this mission. Therefore, KRS has established a Comprehensive System of Personnel Development to assure that staff are well-qualified, take part in ongoing training to maintain expertise in the field of vocational rehabilitation (VR), and are accountable through performance-based evaluations.

### **Data system on personnel and personnel development**

KRS maintains a system for collecting and reviewing information about the personnel who carry out the VR program. The data includes the number of individuals currently employed, the number of positions vacant, the classifications of positions, and the educational qualifications of counselors. Sources for this data system include the state's personnel/payroll system, budget reports, and the KRS database on staff credentials.

June 2021, KRS employs 73 vocational rehabilitation counselors who deliver basic VR and supported employment services through local service centers. There are 12 vacancies. The starting salary for VR counselors is \$41,845.44.

The number of persons served in PY 2020 was 8,453. The average VR counselor active caseload as of June 30, 2021 was 115. In addition, KRS employs Program Specialists who work in concert with counselors to provide case management services. Only qualified VR counselors employed directly by KRS continue to determine eligibility and order of selection categories, approve Individual Plans for Employment, authorize expenditure of VR funds, and make decisions to close cases.

KRS also employs eight rehabilitation managers who have supervisory responsibilities in service centers and four program administrators who are responsible for directing the VR program in their assigned geographical regions. Other staff provide vocational assessment and rehabilitation teaching services. Positions in the general category of administrative assistants or clerical support are also included among VR staff. When clerical support functions are provided on a percentage basis through the DCF regional offices, the positions are funded through the cost allocation process rather than direct VR funding.

### **Counselor qualifications**

KRS maintains a database about the educational qualifications/credentials of counselors. A total of 37 of the 67 counselors currently meet the requirements of the Comprehensive System of Personnel Development. The 30 others are working to complete the additional course work.

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

### **Number of personnel needed**

To help determine personnel needs, KRS analyzes workloads and caseload size. Each staff person's caseload is compared to the average caseload within the entire program. (Please refer to caseload numbers provided in the previous section.)

Kansas Rehabilitation Services (KRS) continues to experience significant recruitment and retention issues regarding VR Counselor positions. In recent State Fiscal Years, the average monthly number of filled counselor positions has ranged between only 60 and 66, and the agency experienced turnover ranging from 33% to 43%. The agency is continuously recruiting to fill about 12 vacant Counselor positions, which represent nearly 19% of the Counselor workforce. VR services carried out in DCF Service Centers statewide provide counseling, guidance, vocational assessment, job coaching, supported employment, physical/mental restoration, job-related training, assistive technology, and job placement. These services are critical to empowering Kansans with disabilities to achieve competitive integrated employment, increase their self-sufficiency, and reduce reliance on other public benefits.

Challenges in recruiting and retaining counselors with master's level degrees continues to be a significant factor impacting staffing levels. Finally, recruiting of qualified counselors who are also certified in American Sign Language is a long-term concern.

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.

*Note regarding the table below: Information is based on the number of personnel employed as of June 30, 2021. Projected vacancies over the next five years are based on a projected turnover rate of 37.5% per year for counselors/direct service staff and 8% per year for all other positions. Annual turnover is then multiplied by five to determine the projected vacancies that will occur over the next five years. This calculation simply projects the vacancies that will occur, and does not estimate the number of vacancies that will eventually be rehired or filled.*

<b>Job Title</b>	<b>Total Positions</b>	<b>Current Vacancies</b>	<b>Projected vacancies over next 5 years</b>
Administrative staff	25	2	10
Counselors	63	15	146
Staff supporting counselors	35	5.5	14

Administrative staff includes central office positions and four regional program administrators. It also includes eight rehabilitation managers, who directly supervisor counselors. Staff supporting counselors includes vocational evaluators, program specialists, drivers, and clerical support positions.

## **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;

### **Institutions of higher education preparing VR professionals**

Emporia State University (ESU) currently offers a master's degree in clinical counseling with concentration areas available in rehabilitation, mental health or addiction counseling. There are currently 42 students enrolled in the rehabilitation track. ESU expects two will enroll in 2022 and additional ten in 2023. They also reported ten individuals are enrolled in a 12-credit certificate program focused on vocational rehabilitation with persons who are on the Spectrum. ESU projects 15 graduates in 2022 and 14 in 2023.

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

### **Emporia State University Snapshot as of the September 2021**

- Employees sponsored by agency and/or RSA: 0
- Students sponsored by RSA: 37
- CRC Graduates in 2020: 4
- CRC Graduates in 2021: 1
- Anticipated graduates in 2022: 15
- Anticipated graduates in 2023: 14
- 5 individuals received their RSA-ASD certificate in May 2021

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.

Emporia State had one graduate with a Master's in Clinical Counseling with a CRC in 2021.

## **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.

### **Plan for recruitment, preparation and retention of qualified personnel**

KRS strives to fill vacant positions with well-qualified and diverse individuals. Vacancy postings clearly state the educational requirements consistent with the national CRC educational standard, which was the requirement prior to WIOA. Recruiting individuals who already meet the qualification standards has been a challenge, and numerous new hires must complete additional educational requirements. A total of 30 of the 67 employed counselors, or 45%, require additional graduate level classes in order to meet the CSPD standards.

In addition to the traditional advertising methods, Regional Program Administrators and DCF Personnel Services have made personal contacts with universities that have master's programs in rehabilitation counseling, have provided information to candidates about the geographical regions where vacancies exist, and have recruited candidates through specialized programs, such as programs for people who are deaf or hard of hearing or programs teaching service delivery for people who are blind.

Vacancy announcements are distributed to independent living centers and colleges that are traditionally minority institutions in order to encourage cultural diversity in the KRS workforce. Recruitment also occurs through professional, advocacy and service provider associations, as well as recruiting sources such as Indeed.

The Personnel Services office has represented KRS at various opportunities, including career fairs. KRS also posts vacant position announcements through a recruiting system for rehabilitation counselors at [www.experience.com](http://www.experience.com); such announcements are then distributed to more than 200 schools both regionally and

nationally. Job vacancy announcements are also distributed directly to a listing of 30 masters level programs and programs specializing in the rehabilitation of individuals who are blind.

The following factors also influence the ability of KRS to recruit and retain qualified staff:

- The starting salary for a Human Services Counselor classification is \$1,609.44 bi-weekly.
- The graduate training program for rehabilitation counselors at Emporia State University anticipates a limited number of graduates compared to the vacancies experienced by KRS.
- KRS has experienced difficulty recruiting candidates for counselor positions who already meet the CSPD requirements or who are willing to take the additional graduate-level classes necessary to meet the CRCC educational requirements as a condition of their employment.
- KRS has had difficulty recruiting to fill qualified VR counselor positions with fluency in American Sign Language and knowledge of the deaf culture.

### 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**

#### **Personnel standards**

Educational and experience requirements are intended to ensure that personnel have a 21st-century understanding of the evolving labor force and the needs of individuals with disabilities.

To address recruitment and retention issues, and ensure an adequate supply of qualified rehabilitation professionals, KRS will pursue updates to its personnel standards as follows:

- Establish a Level I Vocational Rehabilitation Counselor (VRC) I position to be hired with a bachelor's degree along with the requirement to complete the master's degree educational requirements within five years of the employment start date.
- Continue the ability to hire VRCs (at Level II) with Certified Rehabilitation Counselor (CRC) designation, master's or doctorate in Rehabilitation Counselor, or a master's or doctorate in a closely related field.
- Continue the ability to hire Program Specialist positions for case management. Unlike the VRC I and II levels, these positions may not perform the non-delegable functions of eligibility determination, approval of Individual Plans for Employment, authorization for case service expenditures, and decisions to close cases.

**VR Counselor I:** Determines eligibility and order of selection categories, approves Individual Plans for Employment, authorizes expenditure of VR funds, and makes decisions to close cases.

Minimum qualifications are as follows: A bachelor's degree in a field of study reasonably related to vocational rehabilitation, indicating a level of competency and skill demonstrating basic preparation in a field of study such as vocational rehabilitation counseling, social work, psychology, disability studies, business administration, human resources, special education, supported employment, customized employment, economics, or another field that reasonably prepares individuals to work with consumers and employers.

Experience working with people with disabilities and/or experience in competitive integrated business environments and/or human resources, supervision or training preferred.

Within 5 years of the employment start date, individuals in the VRC I positions must complete the master's level requirements (minimum of SEVEN graduate courses):

- Priority to complete: ONE integrated OR TWO separate graduate courses with the primary focus on Theories of Counseling AND Techniques of Counseling
- ONE on Foundations of Rehabilitation Counseling
- ONE on Assessment
- ONE on Occupational Information OR Job Placement
- Priority to complete (medical and psychosocial aspects): TWO with the individual or combined primary focus on 1) Medical Aspects of Disabilities; 2) Psychosocial Aspects of Disabilities; AND 3) Multicultural Issues
- ONE on Case Management AND Rehabilitation Services

**VR Counselor II:** Determines eligibility and order of selection categories, approves Individual Plans for Employment, authorizes expenditure of VR funds, and makes decisions to close cases.

Standard 1: A current Certified Rehabilitation Counselor designation; or

Standard 2: A master's or doctorate degree in Rehabilitation Counseling; or

Standard 3: A master's or doctorate in one of the following closely related fields, majors or disciplines plus the additional education requirements described below:

Behavioral Health

Behavioral Science

Business Administration

Clinical Social Work

Counseling

Counseling Psychology

Disability Studies

Education

Human Relations

Human Resources

Human Services

Law

Management

Marriage and Family Therapy

Occupational Therapy

Psychology



Psychometrics

Public Administration

Rehabilitation Administration/Services

Rehabilitation Psychology

Social Work

Special Education

Vocational Assessment/Evaluation

**Additional education requirements for Standard 3 for VRC II:** Candidates selected under Standard 3 will be required to complete additional graduate level courses within three years of their employment start date, as follows:

- One integrated or two separate courses in the Theories of Counseling and the Techniques of Counseling; and
- One integrated or two separate courses in the Medical Aspects of Disability and the Psychosocial Aspects of Disability.

Staff who must meet additional educational requirements will have professional development plans based on the following principles:

- Training is intended to increase the knowledge, skills and abilities of rehabilitation counselors, thereby enhancing the provision of VR services and the quality of employment outcomes.
- Counselors may continue to perform all counselor functions during their training periods in accordance with KRS policies and procedures for “new counselors.”
- VR funds may be used to help staff maintain compliance with the standards through the support of continuing education requirements.
- KRS compliance with the standards will be reviewed annually, in consultation with the State Rehabilitation Council.

**Program Specialist:** Works in concert with VR Counselors to provide case management services and to research information necessary for eligibility determination, order of selection categories, Individual Plans for Employment development, expenditure of VR funds, and case closures.

Minimum qualifications

In accordance with state classification specifications:

Five years of experience interviewing, investigating, compiling information, documenting decisions, interpreting guidelines and/or providing technical assistance relevant to the agency's programs. Post-secondary education may be substituted for experience as determined relevant by the agency.

Preferred qualifications:

A bachelor's degree in a field of study reasonably related to vocational rehabilitation, indicating a level of competency and skill demonstrating basic preparation in a field of study such as vocational rehabilitation

counseling, social work, psychology, disability studies, business administration, human resources, special education, supported employment, customized employment, economics, or another field that reasonably prepares individuals to work with consumers and employers.

Demonstrated paid or unpaid experience, for not less than one year, consisting of—

- Direct work with individuals with disabilities in a setting such as an independent living center;
- Direct service or advocacy activities that provide such individual with experience and skills in working with individuals with disabilities; or
- Direct experience in competitive integrated employment environments as an employer, as a small business owner or operator, or in self-employment, or other experience in human resources or recruitment, or experience in supervising employees, training, or other activities.

For hard-to-fill positions, KRS may use Title I funds for employment incentives, including but not limited to relocation expenses or student loan payback after a qualifying period of employment. Such incentives would be offered in exchange for the candidate's commitment to work in the position for a specified period of time.

State personnel standards require the following knowledge, abilities and skills at entry into Counselor positions:

- Knowledge of the principles and techniques of counseling.
- Knowledge of the physical and psychological aspects of disability and human behavior.
- Knowledge of individual appraisal instruments and their applications.
- Knowledge of job analysis, job modification and rehabilitation engineering.
- Knowledge of agency policy and procedures.
- Ability to relate to and work effectively with persons with diverse disabilities.
- Ability to communicate effectively with a variety of people.
- Ability to review and evaluate information and to adapt trends and developments in the field to a practical program application.
- Ability to analyze medical, psychological, economic, social and academic information to formulate recommendations.
- Ability to evaluate personal and psychological characteristics, physical abilities, work background, potential capabilities and interests of the disabled individual and to interpret these in terms of their occupational significance.
- Ability to develop individual written plans for employment.
- Ability to use reference materials on disability to guide eligibility decisions and rehabilitation plan development.
- Ability to use computer technology with accommodations as needed, to complete job duties.

**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.**

KRS will work with DCF Personnel Services to incorporate the following WIOA priorities into the personnel standards:

Ensuring that personnel have a 21st-century understanding of the evolving labor force and the needs of individuals with disabilities means that personnel have specialized training and experience that enables them to work effectively with individuals with disabilities to assist them to achieve competitive integrated employment and with employers who hire such individuals. Relevant skills include, but are not limited to—

- (A) Understanding the medical and psychosocial aspects of various disabilities;
- (B) Assessing an individual's skills and abilities to obtain and retain competitive integrated employment and establishing a plan to meet the individual's career goals;
- (C) Counseling, case management, and advocacy to modify environmental and attitudinal barriers;
- (D) Understanding the effective utilization of rehabilitation technology;
- (E) Developing effective relationships with employers in the public and private sectors; and
- (F) Delivering job development and job placement services that respond to today's labor market.

#### **4. Staff Development.**

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

##### **A. System of staff development**

Describe 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

KRS will continue to develop, implement and maintain a professional development system for new and experienced staff. A priority focus area will be to address effective communication strategies to assure consumer engagement and progress toward employment, and development and implementation of effective Individual Plans for Employment (IPEs). Other areas of focus continue to be informed choice; understanding the purpose and intent of the VR program; linkages between eligibility, rehabilitation needs, consumer goals and priorities, and services provided; development of effective progress measures; time and caseload management techniques; financial accountability; cultural competence; accountable decision-making; expertise related to disability populations served (specifically persons who are blind or visually impaired, persons with Autism Spectrum Disorders, persons with mental illness, and persons with head injury); leadership development; use of comparable benefits; basic benefits counseling issues surrounding employment; use of Kansas specific labor market trends and demands; and, effective career counseling and guidance related to employment as the avenue to self-reliance.

KRS will conduct an annual training conference on the use of evidence-based and promising practices. KRS will also conduct an intensive initial training for new Pre-Employment Transition Services staff as well as new Counselors and Program Specialists. KRS will provide monthly training on trends from the case review results,

targeted reviews, internal controls, and topics of interest from field staff to ensure best practices and consistency statewide.

KRS will seek technical assistance and opportunities to contract for the development of on-line training related to services for persons with mental illness, autism, dual sensory impairment, blindness/visual impairment, head injury and other specific populations as may be determined necessary.

Staff are evaluated annually using the process and forms prescribed by the DSA. Each staff member's position description is a primary source document for the evaluation system. The position description explains the staff member's duties and responsibilities related to the KRS mission, including the emphasis on serving people with the most significant disabilities.

The comprehensive Performance Management System, originally established in KRS in November 2009, has been updated to emphasize the core priorities of the program: competitive integrated employment outcome, quality employment as measured by average hourly wages, timely access to services, and excellence in case/caseload management and customer service.

## **B. Acquisition and dissemination of significant knowledge**

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

Numerous strategies assure that information about research, best practices, trends, and state agency policies and procedures are distributed to staff statewide. KRS maintains both public and internal web sites which post information on agency policies and service provider agreements. KRS uses technology, such as statewide web casts with live audio and video, to conduct staff meetings and trainings.

## **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.

KRS provides a full range of special media options and accommodations. The Kansas Commission for the Deaf and Hard of Hearing provides support to staff and consumers statewide. Foreign language interpreting is provided as needed through use of DSA foreign language interpreting contracts. The KRS Handbook of Services, application for services, and informational brochures have been translated into Spanish and Vietnamese.

When accommodations cannot be provided by staff directly, services may be contracted through a private individual or organization, such as a sign language interpreter or foreign language interpreters. When appropriate, family members may assist with communication if that is the consumer's informed choice.

## **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.

A Memorandum of Understanding between KRS and the Kansas Department of Education addresses the intention to share staff training resources and to facilitate cross-informational training among special education and rehabilitation staff.

## j. Statewide Assessment

(Formerly known as Attachment 4.11(a)).

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

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

#### Executive Summary of Comprehensive Statewide Needs Assessment

Kansas Rehabilitation Services (RS) contracted with the Public Consulting Group, LLC. (PCG) to conduct a Comprehensive Statewide Needs Assessment (CSNA) related to the employment needs of Kansans with disabilities. The CSNA was conducted from June through September 2021.

The CSNA is a required component of the Vocational Rehabilitation (VR) services portion of the Combined State Plan to be submitted to the U.S. Departments of Education and Labor under the Workforce Innovation and Opportunity Act (WIOA). Results of the CSNA are used to inform the priorities and strategies established in the VR services portion of the plan.

A CSNA is completed every three years to ensure plans are based on current relevant data. The needs assessment must include information on three populations: 1. Individuals with the most significant disabilities; 2. Individuals with disabilities who are minorities or who are unserved and underserved; and, 3. Individuals with disabilities who are served through other components of the statewide workforce system.

#### Methodology

PCG used multiple data sources to develop the analysis and recommendations within this report including:

- Secondary data sources (American Community Survey (ACS) 1- and 5-year estimates and Kansas Department of Labor website)
- Consumer, KRS staff, and community rehab partner (CRP) surveys; also known as community rehabilitation provider
- Key informant interviews and focus groups
- Case management data

#### Findings

PCG collected and analyzed data (as described in the methodology section) to assess the rehabilitation needs of individuals with disabilities residing in KS.

These key findings are broken out by population and described below.

- (I) **Individuals with the most significant disabilities, including their need for supported employment services:** Individuals with most significant disabilities become successfully employed at rates higher than their peers with less impactful disabilities. However, individuals from this population earn less than their peers.
- (II) **Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by KRS:** Individuals who are minorities are equitably represented in the KRS service population. While there are differences in outcomes that correlate to different minorities, these are nominal compared to the differences experienced by all KRS consumers compared to the general KS population.



- (III) **Individuals with disabilities served through other components of the statewide workforce investment system (other than KRS), as identified by such individuals and personnel assisting such individuals through the components:** KRS has built partnerships and successful practices with their WIOA partners. KRS and its partners have the opportunity to build and expand upon this success.
- (IV) **Youth with disabilities, and students with disabilities, including their need for pre-employment transition services or other transition services:** CSNA results indicate that youth with disabilities are represented at three times the expected rate based on population estimates. Results also indicate that there is opportunity to target fields that yield higher wages and career growth opportunities.

PCG also assessed the needs of individuals with disabilities for transition services and pre-employment transition services (Pre-ETS), and the extent to which such services provided under this Act are coordinated with transition services provided under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.) in order to meet the needs of individuals with disabilities.

Finally, the CSNA must include an assessment of the need to establish, develop, or improve community rehabilitation programs within Kansas.

### **Recommendations and a Call to Action**

PCG developed the following recommendations and associated “Call to Action” to indicate where KRS could take important steps to address the needs of its consumers, in response to the findings identified within this report. The recommendations are summarized below.

#### **Increase Staff Capacity and reduce turnover**

1. Identify root causes for low staff capacity and high turnover rates. PCG suggests that KRS explore several frequent barriers to staff capacity, including the competitiveness of staff salary, increased efficiency in administrative processes, and opportunities for increased staff leadership and autonomy.
2. Identify projected staffing needs to maintain manageable caseloads and retain staff. PCG suggests researching evidence-based practices and other VR state staffing numbers to determine counselor to participant ratio caseload sizes, along with support staff ratios to develop staff projections for maintaining appropriate caseload sizes. PCG also suggest evaluating opportunities to support counselors and other staff by modifying business processes or technological opportunities to increase efficiency.
3. Assess and adjust training content and approach to align with the needs of new counselors. This should include knowledge of KRS processes and services but also available resources to serve consumers.
4. Develop a partnership with local universities with rehabilitation programs, such as Emporia State University, to develop an internship program agreement to allow students in the rehabilitation counseling program to intern with KRS.
5. Develop specialized caseloads for populations that require specialized services specific to individuals who are deaf or hard of hearing, blind or with a visual impairment, or with a traumatic brain injury.

#### **Increase and Improve CRP Services for targeted populations**

1. Identify specific areas with limited CRP providers.
2. Conduct outreach with existing providers as well as possible new providers to expand service coverage.
3. Assess the existing rate structure to determine options to provide support for the additional time required for supported employment and extended services to serve individuals with most significant disabilities.

4. Increase training to service providers on best practices in providing supported employment and extended services to consumers.
5. Identify specific service option program limitations in rural areas and expand outreach to increase work experience and internship opportunities to these locations.

### **Coordinate transportation resources for consumers**

1. Identify gaps in transportation capacity.
2. Document successful practices.
3. Begin targeted outreach, based on gaps, to existing transportation providers and new providers to promote expansion.
4. Identify opportunities to coordinate and collaborate on the State level.
5. Explore partnership opportunities for transportation passes, possibly purchasing in bulk or streamlining the existing process to reduce administrative paperwork and delays in transportation services.
6. Examine policy and process to identify opportunities that encourage counselors to engage in transportation discussions during Individualized Employment Plan (IPE) development with consumers, their families, and direct care support staff.

### **Educate stakeholders and consumers on KRS**

1. Provide clarification to consumers and stakeholders on the relationship and delineation of services between KRS and the Department for Children and Family (DCF) Service Administration. This clarification may consist of updating referral and application materials, update website content, or educational presentations.
2. Educate consumers and stakeholders on differences between VR and Pre-ETS services. This could include updating materials provided to consumers and stakeholders about these programs and services, updating website content, and meetings with stakeholders to provide programmatic information.
3. Design communication materials for different target audiences to assist in understanding services and program goals.

### **Quality of employment outcomes**

1. Set strategies to improve overall opportunities to improve employment outcome quality and wages. This should include regional and statewide supports for partnerships, training initiatives, and relationship building.
2. Explore partnership opportunities with Workforce development to identify labor market information for high wage and high need job industries.
3. Consider adding regional positions for employer engagement.
4. Develop relationships with employers with high skill and high wage positions.
5. Consider additional training for counselors to increase education and training opportunities for consumers consistent with the local labor market.

The goal of the CSNA process is to assess consumer needs to advise future policy and decision making so KRS can best serve their consumers and meet their rehabilitation needs. PCG collected and analyzed quantitative and qualitative data to assess the required areas of need to meet this goal. Our results and analyses describe successes and strengths that KRS, along with other partners, have worked to achieve. They also identified opportunities to improve access and service delivery to improve outcomes of Kansans with disabilities. Key opportunities for growth include increasing staff capacity, increasing employment provider capacity, expanding

transportation resources, and educating stakeholders on program services. KRS is well-positioned to continue to growth and change to support optimal outcomes for Kansans with disabilities seeking employment, given its strengths and partnerships.

## **SUMMARY OF CSNA REQUIRED ANALYSIS**

Below provides a summary of the CSNA required analysis of the aggregated results from surveys, interviews, focus groups, as well as data collected and analyzed for active VR cases as of May 27, 2021 and all cases reported in Performance Years 2017-2019. PCG collected and analyzed data (as described in the methodology section) to assess the rehabilitation needs of individuals with disabilities residing in KS. These key findings are broken out by population and described below.

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

Overall, individuals with the most significant disabilities make up the majority of the KRS population, are represented highest in age group 14 to 21, and have the highest successful closure rate. MSD individuals are 78.2% of the KRS population, which is 20.1% higher than RSA's 2019 national average. This suggests that the disability significance criteria calculation may be less stringent than how other states calculate and should be explored further. In addition, individuals with a most significant disability were represented highest in youth aged "14-21", compared to the age group "65 and older" which had the smallest percentage of individuals in the "Most Significant Disability" group. This suggests the majority of MSD consumers are derived from transition youth.

Regarding employment and closures, MSD consumers earned the lowest average hourly wage (\$10.82) and worked, on average, the least weekly hours (27.9) compared to SD and NSD consumers. This average was slightly below the KRS average of \$11.01 and 28.4 hours worked per week. However, notably, this group also represented the highest successful closure rate at 32.8%. **Although individuals with an MSD are more likely to gain and maintain employment, they are also more likely to be closed in lower paid/lower hour positions.**

When analyzing feedback received throughout the focus groups and surveys, many respondents perceived individuals with most significant disabilities, primarily individuals with an intellectual disability and/or the need for supported employment, were amongst the highest group of underserved individuals. Suggestions for improving the payment model funding to allow for additional funding for support was recommended to assist in improving services for this population. Furthermore, training to service providers working with individuals with MSD, particularly youth, was also noted. Since youth make up the largest population of individuals determined MSD, this could be beneficial in serving many consumers in this population. Further exploration overall on training and work experiences, specifically for higher paying, higher wage careers, including youth with most significant disabilities, should be considered.

### **Individuals with disabilities who are minorities or who have been unserved or underserved by KRS**

The below includes an analysis of individuals who are minorities and groups who have been unserved or not served well enough.

## **B. Individuals who are minorities**

**The KRS population is representative of minority and ethnic groups in comparison to Kansas state population data.** Furthermore, some groups of minorities are represented in the KRS service population at rates higher than expected. These groups included individuals who are 'Black or African American' and individuals identified as 'Hispanic', both of which were represented at twice the percentage compared to the overall KS population estimates.

**Regarding services, findings indicated service needs for members of minority groups had similar trends to the overall service needs of the KRS population,** with the exception the additional need for language translators and outreach for services. According to KRS staff and CRP respondents, “Outreach on the availability of services” and “Language translators” are services needed to address underserved and unserved minority groups. Furthermore, similar to the overall KRS population service needs, transportation, job coaching, and training were also identified as needs to better serve underserved and unserved ethnic or racial groups according to CRP’s. Furthermore, outreach of services and the availability of language translators should also be further evaluated to address potential barriers to accessing or receiving services.

## **C. Groups Underserved or Not Served Well Enough**

When looking at groups underserved or not served well enough, similar trends on consumer needs were identified compared to the KRS population. Overall, KRS staff and CRP’s both reported the following individuals as unserved or underserved:

- **Individuals residing in rural areas**
- **Individuals with the most significant disabilities**
- **Individuals transitioning from high school to the workforce**
- **Individuals with mental health disabilities**
- **Individuals with intellectual and developmental disabilities**

Feedback received in interviews with educators and CRPs, as well as with focus groups mirrors these results.

When looking at service needs of groups potentially underserved or unserved, again similar trends to overall KRS population was noted. A common service need identified was transportation, as well as increased outreach and increased training for specific populations. These recommendations mirrored not only overall KRS population needs, but also many of the underserved populations. Similar to needs identified for MSD and minority groups, KRS staff identified “Ways to address language barriers” and “Increased training for employment specialists or job coaches” as the best ways to improve services to underserved populations.

**Exploration of expanding services that specifically address the needs of underserved or unserved populations should be considered.**

## **D. Individuals with disabilities served through other components of the statewide workforce investment system:**

Many respondents expressed getting connected to workforce centers was extremely helpful, especially for those not meeting the income criteria for KRS services. Respondents also indicated that this partnership could be extended and expanded to increase services for individuals with disabilities and expand opportunities for benefits counseling. Still some individuals believed they could continue to improve this relationship through

more training on working with individuals with disabilities from KRS. There are opportunities to overcome job-related barriers such as job training, work skills, and employment experience. **Results and analysis indicate the opportunity to replicate successful practices to increase access and reduce barriers for individuals with disabilities across Kansas.**

#### **E. Youth with disabilities, and students with disabilities, including their need for pre-employment transition services or other transition services:**

PCG assessed the needs of individuals with disabilities for transition services and pre-employment transition services (Pre-ETS), and the extent to which such services provided under this Act are coordinated under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.) in order to meet the needs of individuals with disabilities. Compared to the ACS estimates, individuals between 14 to 21 are represented over three times than expected. The large number of individuals ages 14-21 may reflect this priority, suggesting that KRS has implemented effective processes to assist in expanding outreach to youth. Service costs for the age group “14-21” had the largest average expenditure of \$6,044.50 followed second by age group “22-34” at \$4,355.85; suggesting not only outreach but also higher average costing services such as training activities, are being provided to assist transition youth in KRS.

**Regarding overall services provided, there are opportunities for growth to and expansion of services.** Half (48%) of CRP respondents felt that all Pre-ETS services were provided adequately in their community. Educators felt individuals aged 14-16 youth, were among the populations being underserved by KRS, which may be contributed to KRS capacity limitations and prioritizing transition services to latter high school years. Educators also mentioned individuals with a significant intellectual disability, individuals with significant mental health conditions, and single parent participants were also amongst the group underserved, and additional consideration, training, and services should be considered to address these populations.

**The age group “14-21” earns the lowest average wage at \$10.23 per hour and the works the lowest average hours per week at 26.2 hours.** This may be contributed to lack of higher paying work experience and skills. Further exploration should be given on the types of specific work experience opportunities that are being provided in comparison to high demand, high income job markets.

Overall, KRS appears to have prioritized transition-aged youth and expanded outreach to these populations. However, opportunities for improvement may be explored. **Further exploration of the work experiences and job training opportunities, specifically high demand high jobs should be considered given this population also has the lowest hours and wages reported.** Additionally, notable feedback to continue this outreach to students aged 14-16, as well as provide special consideration for individuals with significant intellectual disability, significant mental health conditions, and single parent participants should be made when considering education and training activities.

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

When assessing the need for establishing, developing or improving community rehabilitation programs, KRS will be guided by whether services (individual programs as well as statewide systems) meet the following objectives:



- Involve persons with disabilities and the community in making best use of current resources according to local needs.
- Improve coordination of services.
- Demonstrate outcomes and accountability.
- Advocate for community inclusion.
- Contribute to the growth of quality transition planning services.
- Aid in the development of supported employment programs by maintaining quality standards.
- Increase outreach programs to meet the needs of individuals in underserved areas or for minorities.
- Create new service delivery strategies for unserved or underserved disability populations.
- Increase opportunities for competitive, integrated employment.

The CSNA must include an assessment of the need to establish, develop, or improve community rehabilitation programs in Kansas. Exploration should be given to establishing programs in rural areas and expanding service providers in those areas. Furthermore, consideration may be given to:

- **Increasing the number of providers, with a focus on supported employment providers and those in rural areas.**
- **Improving and expanding services to meet the diverse needs of consumers.**
- **Training and communication on implementing best practices and supporting special populations.**

By investing in the growth of CRPs, KRS invests in consumer opportunities of provider choice, successful services demonstrated to yield results, and a higher successful case closure rate.

### **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 .**

To evaluate the efficacy of KRS' coordination with education to support transition services, PCG gathered information from educators, advocacy stakeholders, parents, and transition-aged youth. PCG wished to understand the impact of policy implementation, successful opportunities, and what works well.

A focus group comprised of educators reported positive perceptions of the coordination and collaboration between KRS and schools. The group discussed that they would and do recommend KRS services to students and families. A participant remarked: *"If we see a need as freshman, we start talking to parents about VR, so 70-75% are on track through Pre-ETS into Voc Rehab (Vocational Rehabilitation)."*

Referrals and encouragement from trusted partners, such as known educators, can play a pivotal role in the buy in and commitment to services.

The educators focus group also identified barriers to participation in KRS services. They reported that completing paperwork can be difficult and can become a barrier. During discussion, several educators recommended holding meetings where a professional explains the paperwork process to students and families where questions can be asked, and interpreters provided when needed. Another focus group participant suggested a similar meeting where education and information about the different roles of providers and KRS counselors could be explained.

Educators identified additional opportunities to improve coordination with IDEA services. During focus groups and interviews, half of educators agreed that they would like to see improved and more timely communication with KRS and half believed they had a positive, open communication with KRS. Educators felt that a break down in and delayed communication affects consumers' basic, immediate needs being met. One example provided by educators was the reported confusion on what services were provided by KRS and which were provided by a Pre-ETS provider. Educators felt that better education and even training would improve the partnership, so that everyone understood the process. They had also heard from students and families that there was a fear or misconception of KRS's relationship to Department for Children and Families. Educators also felt KRS staff turnover may impact communication. Finally, educators in focus groups and interviews reported that transportation continues to be a barrier, especially in rural areas.

In addition to recommendations for improving coordination with KRS, educators also offered several recommendations related to improving KRS service delivery. Educators recommended the following:

- Increase authorized job coaching hours
- Increase the number of supported employment providers
- Provide education and training to employers and families
- Individualize the service structure to meet needs of individuals, with more flexibility and increased compensation

Finally, educators perceived several populations as being underserved. Focus group participants perceived youth ages 14-16, individuals with a significant intellectual disability, individuals with significant mental health conditions, and students who live in single parent homes, as underserved.

Furthermore, feedback from one of the local State Universities noted that KRS has not been willing to accept interns, which is required for master's program, which has resulted in students leaving the state for VR internships and not returning to the state. Professors from the Counseling and Education Department at the University mentioned they would like to be invited to do a presentation on what they can offer, such as an internship program, and discuss mutually beneficial opportunities. KRS has established a partnership with the University's Counseling Department. KRS has developed internship guidelines and is currently going through the approval process.

### ***Analysis***

Feedback from educators regarding coordination and collaboration between KRS and schools indicates there are some successful practices that can be extended across the State to grow capacity and improve coordination. Some participants noted that they had regular communication and meetings with their respective KRS offices. These practices can be replicated for other participants who expressed the desire or need to increase meetings to discuss different roles and how services could be coordinated. Educators further noted several populations as being underserved: 14-16 aged youth, individuals with a significant intellectual disability, individuals with significant mental health conditions, and single parent individual. These populations may benefit from successful practices leveraged with other populations. For example, successful practices for youth older than 14-16 may be examined and extended for the younger transition population. Individuals with intellectual and developmental disabilities, and individuals with mental health conditions may benefit from enhanced services already provided in KRS services. Students living in single parent homes may benefit from coordination with community resources. In other words, bolstered communication and coordination could address these perceptions or available services.

Further exploration may provide insight and background behind the educators' recommendations for improving KRS service delivery, such as increasing supported employment providers, providing education to employers and families, and individualizing the service rate structure to meet the individual needs. Many educators are trusted stakeholders for individuals with disabilities and their families. Educators may hear from individuals who have exited schools and experience employment services. Furthermore, exploration on training needs for staff on flexibility in spending limits, and exceptions a counselor can make if additional job coaching hours are necessary and required to meet job coaching needs, should be considered.

## **k. Annual Estimates**

Describe:

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

According to the Rehabilitation Research and Training Center on Disability Statistics and Demographics, there are 20,323,589 civilians ages 18-64 with disabilities living in the community, and 38.8% are employed. 78.6% of their non-disabled peers are employed, resulting in an employment gap of 39.8%. *(Source: 2020 Disability Statistics Compendium)*

At any given time, about 20,000 youth ages 14 to 21 are receiving special education services through an Individual Education Plan. This number excludes students in the gifted program and students with Section 504 accommodation plans.

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

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

For FFY 2021, Kansas Rehabilitation Services (KRS) projects that services will be provided for 8642 individuals. KRS monitors caseload and expenditure trends regularly. The KRS projection method tracks consumers and costs by status as they move through the system. Using historical data and known future events, consumer movement and the related costs are projected. This information is updated each month, allowing assumptions about movement and/or costs to be adjusted through a review of actual vs. anticipated activity. The following table identifies the number of eligible individuals projected to receive services with funds provided through Title I Vocational Rehabilitation and Title VI Supported Employment. Persons are identified by Order of Selection priority category.

Please note that Title VI supported employment funds may be expended only for individuals with the most significant disabilities (Category 1). In addition, because of the limited amount of Title VI funds provided, KRS will also expend Title I funds in order to meet consumer needs for supported employment services. In the table below, the Title VI funds are divided by the average cost for a supported employment case from all funding sources in order to provide the estimated number of persons to be served with Title VI funds.

The average annual cost of services for FFY 2021 is projected. Projections are subject to change based on budget appropriations and allocations.

This information does not include projections for Pre-Employment Transition Services.

- Category 1: 7,135 (Includes persons in Category 1 receiving Title VI funding)
- Category 2: 1,148
- Category 3: 359

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

KRS projects that 359 individuals will be served with funds through the Title VI Supported Employment program. All individuals are in Order of Selection Category 1 (individuals with the most significant disabilities).

In addition, because of the limited amount of Title VI funds provided, KRS will also expend Title 1 funds in order to meet consumer needs for supported employment services.

(the Title VI funds are divided by the average cost for a supported employment case from all funding sources in order to provide the estimated number of persons to be served with Title VI funds.)

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

- Category 1: 7,135 (includes persons receiving Title I and/or Title VI funded services)
- Category 2: 1,148
- Category 3: 359

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

None. There are currently no waiting lists for services in Kansas.

## **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.**

The average annual cost of services for FFY 21 is projected. Projections are subject to change based on budget appropriations and allocations.

Category	Title I or Title VI Funds	Estimated Number to be Served	Average Cost of Services
Category 1 - Title I	\$6,429,524	5885	\$1,093
Category 1 - Title VI	\$2,264,823	1250	\$1,812
Category 2 - Title I	\$1,333,325	1148	\$1,161
Category 3 - Title I	\$300,172	359	\$836
Totals	\$10,327,844	8642	\$1,195

## **I. State Goals and Priorities**

The designated State unit must:

### **1. Identify if the goals and priorities were jointly developed**

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

VR goals, strategies and indicators are based on:

- Results of the comprehensive statewide needs assessment, which included extensive opportunities for consumers, service providers, school personnel, stakeholders and advocacy groups to provide input.
- An analysis of the agency's performance on federal standards and indicators.
- Monitoring and agency performance reviews or audits.
- Consultation with the designated state agency and workforce development partners.
- Work sessions with the State Rehabilitation Council on development of goals and priorities.
- Work sessions with the KRS field staff.

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

### **Kansas Rehabilitation Services (KRS)**

**Mission:** Working in partnership with Kansans with disabilities to achieve their goals for employment, independence and self-reliance.

**KRS Goals and Priorities:** As the State's Vocational Rehabilitation (VR) agency, KRS will:

- Collaborate with the Core Partners under the Workforce Innovation and Opportunity Act to achieve the performance accountability requirements of the Kansas workforce development system.
- Establish an ambitious strategic direction for the VR program, as described below, emphasizing employment outcomes for Kansans with disabilities, empowerment, collaboration, innovation and accountability.

### **VR Principles**

The following core principles will be infused into all VR operations:

- Competitive, integrated employment is a key component to reaching self-reliance, independence, inclusion, economic equality, and integration into society for people with disabilities.
- All people with disabilities, including those with the most significant disabilities, are presumed to be capable of engaging in gainful employment.
- KRS, its consumers, providers and partners will be accountable for the achievement of employment and the effective use of resources.
- KRS expects and encourages meaningful involvement of people with disabilities, public/private partners, employers and other stakeholders in KRS programs, services and activities.
- KRS promotes the use of evidence-based practices in VR service delivery to empower Kansans with disabilities to maximize employment and economic self-reliance.
- KRS emphasizes employer engagement activities that market the skills and abilities of qualified workers with disabilities have to contribute to the success of Kansas business and industry.

### **VR Goals, Strategies and Indicators**

Baseline indicators listed below are based on WIOA Program Year (PY) 2020 (July 1, 2020 through June 30, 2021). The KRS goal throughout the period of this plan is to show continuous improvement.

#### **Empowerment —**

- **Increase the quality and quantity of employment outcomes for Kansans with disabilities.**

- **Emphasize the employment potential of students with disabilities and improve the outreach and outcomes for transition-aged students.**
  1. Number of persons achieving stable competitive integrated employment.  
PY 2020: 933
  2. Average hourly earnings of persons employed.  
PY 2020: \$11.69
  3. Percent of persons employed who report their own earnings as their primary source of support.  
PY 2020: 80%
  4. Number of students with disabilities participating in Pre-Employment Transition Services, including work-based learning experiences. (unduplicated count of students with disabilities receiving Pre-ETS services)  
PY 2020: 1,416
  5. Number of students receiving Pre-ETS and VR services who are also in foster care.  
PY 2020: 78
  6. Number of youth with disabilities who achieve competitive, integrated employment.  
PY 2020: 250

To support these employment-focused outcome measures for all consumers with disabilities, KRS will implement the following strategies:

- Implement plan to improve recruitment and retention of VR counselors, and thereby improve capacity, timeliness and quality of services.
- Identify and implement options to streamline equipment purchases for VR clients, thereby improving the quality and timeliness of services.

KRS will also implement the following strategies to empower youth and students with disabilities to achieve their goals for direct entry into employment and/or post-secondary education.

- Enhance partnerships with school transition personnel to encourage career-focused and work-based experiences to be incorporated into transition Individual Education Plans and to increase referrals of students with disabilities to the VR program.
- Increase the number of targeted outreach activities with students, parents, and school personnel in order to foster a cultural shift that emphasizes employment expectations for students with disabilities.
- Collaborate with employers, centers for independent living, and workforce development system partners to increase opportunities for youth with disabilities to participate in paid work-based learning experiences, explore career options, and develop the soft skills necessary for lifelong employment success.
- Educate, train, and support employers on employment and accessibility for people with disabilities.

#### **Collaboration —**

- **Partner with service providers, grantees, contractors, MCOs, disability advocacy groups, and other state agencies to increase the quality and quantity of VR employment outcomes.**



To support collaboration, KRS will implement the following strategies to be in alignment with Employment First legislation:

- Evaluate/maintain provider and contractor agreements that deliver quality services and outcomes.
- Explore/establish/maintain provider rates that allow our partners to be successful.
- Establish ongoing service provider quarterly regional meetings.
- Build and maintain the Workforce Innovation and Opportunity Act core partnerships.
- Coordinate outreach efforts with KDADS for individuals impacted by new protected income levels and CMS final rules on integrated settings to encourage VR as an avenue to employment. Secure necessary benefits counseling.
- Explore options and analyze capacity to issue a competitive RFP to fund collaborative and innovative approaches with community partners to increase access to services and employment outcomes.

#### **Accountability —**

To assure accountability, KRS will implement the following strategies:

- Establish capacity to report on WIOA common performance accountability measures. Participate in the State Wage Interchange System (SWIS) process.
- Continue to emphasize collecting Social Security Reimbursement funds used for grants to Centers for Independent Living. Implement the Ticket Tracker software to assist in identifying Social Security Reimbursement eligible cases.
- Establish annual training conference to assure that regional staff have learning opportunities about best practices, policy and fiscal accountability.
- Continue to emphasize and focus on quality outcomes, effectiveness in case/caseload management, timely access to services, engagement, and customer service through case reviews, targeted special reviews, and performance management processes.
- Utilize data to promote Diversity, Equity and Inclusion.

#### **Innovation —**

To foster innovation, KRS will implement the following strategies:

- Modernize the Kansas Management Information System, a 30-year old legacy system for case management, fiscal processing, data reporting, accessibility and client experience with application and IPE process.
- Engage an evaluation entity to conduct a process review of the KRS service delivery structure, and to make recommendations regarding best and promising practices, efficiencies, improvements, innovations, and partnerships.
- Continue to explore and promote virtual consumer meetings.
- Foster continuous learning through multiple monthly trainings in community resources, policy and procedures, disability specific topics, and content to promote growth in staff development.

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

The goals and priorities were developed with consideration given to the Comprehensive Statewide Needs Assessment, statewide stakeholder meetings, and consultation with the designated state agency and workforce development partners. They were developed in joint planning sessions with the State Rehabilitation Council.

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

The goals and priorities were developed with consideration given to the Comprehensive Statewide Needs Assessment, statewide stakeholder meetings, and consultation with the designated state agency and workforce development partners. They were developed in joint planning sessions with the State Rehabilitation Council.

**B. the State's performance under the performance accountability measures of section 116 of WIOA; and  
WIOA Common Performance Accountability Measures**

- A. Employment Rate – 2nd Quarter After Exit: The percentage of participants who are in unsubsidized employment during the second quarter after exit from the program. Employment Rate 2<sup>nd</sup> Quarter is PY 2020: 44.9%
- A. Employment Rate – 4th Quarter After Exit: The percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program.  
PY 2020: 44.3%
- B. Median Earnings – 2nd Quarter After Exit: The median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program.  
PY 2020: 2891.14
- C. Credential Attainment: The percentage of those participants enrolled in an education or training program (excluding those in on-the-job training (OJT) and customized training) who attain a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program.  
PY 2020: 12.1%
- D. Measurable skill gains: The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains, defined as documented academic, technical, occupational, or other forms of progress, towards such a credential or employment.  
PY 2020: 10%
- E. Effectiveness in Serving Employers (currently being piloted by federal partners before being finalized):
  - Approach #1 — Retention with the same employer – addresses the programs' efforts to provide employers with skilled workers. PY 2018 data is listed below.
    - i. Workforce Centers and Wegner Peyser: 63.07%
    - ii. Adult Education: 67%
    - iii. Vocational Rehabilitation (KRS): 40%
  - Approach #2 – Repeat Business Customers – addresses the programs' efforts to provide quality engagement and services to employers and sectors and establish productive relationships with employers and sectors over extended periods of time. PY 2018 data is listed below.
    - i. Workforce Centers and Wegner Peyser: 44.4%
    - ii. Adult Education: NA
    - iii. Vocational Rehabilitation (KRS): 56%

**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.**

Recommendations from the State Rehabilitation Council were included in the development of the goals and priorities. There were no current Section 107 monitoring activities.

## **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.**

**Kansas Rehabilitation Services (KRS) projects that all categories in Order of Selection will remain open with no waiting list during the remainder of PY 2021 and throughout PY 2022.**

KRS categories are defined as follows:

Category 1: Eligible individuals with a most significant physical or mental impairment that seriously limits two or more functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance or work skills) in terms of an employment outcome, and whose vocational rehabilitation can be expected to require multiple VR services over an extended period of time. In the event that VR services cannot be provided to all eligible individuals in Category 1, a waiting list based upon the date of application will be activated.

Category 2: Eligible individuals with a significant physical or mental impairment that seriously limits one or more functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance or work skills) in terms of an employment outcome; whose vocational rehabilitation can be expected to require multiple VR services over an extended period of time; and who has one or more physical or mental disabilities resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, head injury, heart disease, hemiplegia, hemophilia, respiratory or pulmonary dysfunction, mental retardation, mental illness, multiple sclerosis, muscular dystrophy, musculo-skeletal disorders, neurological disorders (including stroke and epilepsy), paraplegia, quadriplegia, other spinal cord conditions, sickle cell anemia, specific learning disability, end-stage renal disease, or another disability or combination of disabilities determined on the basis of an assessment for determining eligibility and vocational rehabilitation needs to cause comparable substantial functional limitation. In the event that VR services cannot be provided to all eligible individuals in Category 2, a waiting list based upon the date of application will be activated.

Category 3: All other eligible individuals. In the event that VR services cannot be provided to all eligible individuals in Category 3, a waiting list based upon the date of application will be activated. For purposes of these category definitions:

- Multiple services means more than one service as listed on the IPE. Support services (maintenance, transportation, personal assistance, and services to family members) may not be counted toward multiple services. Routine counseling and guidance to facilitate participation in the VR process may not be counted toward multiple services. Core services which are not provided by KRS but which are necessary for achievement of the employment outcome may be counted toward multiple services.
- Extended period of time means at least four months between Status 12 and closure.

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

Several factors will be considered in periodically determining whether KRS has sufficient funds to serve all eligible persons who apply. These factors include:

- Availability of state general funds to match available federal VR funds
- Application, referral and caseload trends
- Adequacy of staff coverage

- Costs of purchased services, such as diagnostics, medical, restoration and training
- Estimated costs of continuing services under existing IPEs
- Emphasis on serving persons with the most significant disabilities
- Timeliness of determination of eligibility and provision of services
- Outreach efforts
- Unserved or underserved groups

Determinations will be made prior to the beginning of each fiscal year and whenever a change in circumstances warrants. Consultation with the State Rehabilitation Council is an important component of such a determination.

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

Based on the analysis of factors listed above:

- KRS previously implemented waiting lists for Categories 2 and 3 effective July 1, 1999 through March 8, 2001, impacting the number of persons receiving planned services during that time and subsequent years.
- KRS closed all categories on October 4, 2002. Periodically, individuals were taken off the Category 1 waiting list according to their date of application. Effective February 17, 2003, the waiting list for Category 1 was discontinued. Waiting periods for individuals in Categories 2 and 3 were lifted April 1, 2004.
- There was no waiting list for services during SFY 2005.
- A waiting list for all Categories was implemented effective October 16, 2005. On January 6, 2006 KRS began periodically removing individuals in Category 1 from the waiting list. As of June 30, 2006, a total of 3,244 individuals had been released from the Category 1 waiting list. In July and August 2007, an additional 758 individuals were removed from the Category 1 waiting list and it has remained open since that time. At the same time, 658 individuals were removed from the Category 2 waiting list, and a waiting list for new individuals in Category 2 was reinstated. Categories 2 and 3 were re-opened in January, 2008 and remain open.

KRS monitors caseload and expenditure trends routinely to determine whether it will be necessary to implement Order of Selection. KRS projects that all categories will continue to be open for services during FFY 2022. Projections are subject to change based on the analysis (justification) factors identified in this Attachment and funding appropriations.

*Notes related to information below: Projections use FFY 2019 and 2020 as the baseline. Status 26 outcomes are successful rehabilitation closures (persons employed). Status 28 outcomes are closures which did not result in employment following the receipt of VR services. Time within which goals are to be achieved is based on Status 26 outcomes. Cost of services is the average cost for the lifetime of the case. All projections are subject to change based on budget appropriations and allocations.*

The following information represents projections for FFY 2022.

#### **Priority Category 1**

- Number of individuals to be served: 7135
- Outcome goals - Status 26: 938
- Outcome goals - Status 28: 1179
- Time within goals are to be achieved: 610 days
- Cost of services: \$6,799

## Priority Category 2

- Number of individuals to be served: 1,148
- Outcome goals - Status 26: 124
- Outcome goals - Status 28: 203
- Time within goals are to be achieved: 533 days
- Cost of services: \$5,850

## Priority Category 3

- Number of individuals to be served: 359
- Outcome goals - Status 26: 39
- Outcome goals - Status 28: 25
- Time within goals are to be achieved: 356 days
- Cost of services: \$4,287

## Total:

- Number of individuals to be served: 8642
- Outcome goals - Status 26: 1,101
- Outcome goals - Status 28: 1,344

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

KRS monitors caseload and expenditure trends routinely to determine whether it will be necessary to implement Order of Selection. KRS projects that all categories will continue to be open throughout FFY 2023. Projections are subject to change based on the analysis (justification) factors identified in this Attachment and funding appropriations.

*Notes related to Table below: Projections use FFY 2019 and 2020 YTD as the baseline. Status 26 outcomes are successful rehabilitation closures (persons employed). Status 28 outcomes are closures which did not result in employment following the receipt of VR services. Time within which goals are to be achieved is based on Status 26 outcomes. Cost of services is the average cost for the lifetime of the case. All projections are subject to change based on budget appropriations and allocations.*

The following information represents projections for FFY 2023.

## Priority Category 1

- Number of individuals to be served: 7,993
- Outcome goals - Status 26: 1,041
- Outcome goals - Status 28: 1,086
- Time within goals are to be achieved: 553 days
- Cost of services: \$6,799

## Priority Category 2

- Number of individuals to be served: 1,286
- Outcome goals - Status 26: 138

- Outcome goals - Status 28: 129
- Time within goals are to be achieved: 454 days
- Cost of services: \$5,850

#### Priority Category 3

- Number of individuals to be served: 402
- Outcome goals - Status 26: 43
- Outcome goals - Status 28: 23
- Time within goals are to be achieved: 344 days
- Cost of services: \$4,287

#### Total:

- Number of individuals to be served: 9681
- Outcome goals - Status 26: 1,222
- Outcome goals - Status 28: 1,238

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

An order of selection gives priority to persons with the most significant disabilities when there are insufficient resources to provide vocational rehabilitation services to all eligible individuals who apply. After eligibility has been determined, each consumer is assigned to a category group. The consumer will be assigned to the highest priority category for which he or she is qualified, and a rationale will be documented in the case file. If the consumer's circumstances change or new information is acquired, the category designation can be changed.

Depending on available resources, all categories may be served. However, if there is a need to close one or more categories for services:

- Kansas Rehabilitation Services (KRS) will set aside sufficient funds to purchase services necessary to determine eligibility. Applications for services will be accepted without restriction.
- The closure will not affect individuals who already have final Individualized Plans for Employment (IPEs). IPE services will continue.
- Persons who need post employment services will not be affected.

### **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.**

KRS will exempt eligible individuals from Order of Selection if they need specific services or equipment in order to maintain employment. The status of employment must be verified by the Counselor. Services provided must be specified on an Individual Plan for Employment. Only those services necessary to maintain employment may be provided through this exemption, not services the individual may need for other purposes.

### **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.**



Kansas Rehabilitation Services (KRS) anticipates the availability of about \$300,000 in Title VI supported employment (SE) funds annually assuming there are no changes in the federal appropriation. In addition, KRS projects that Title I funds will also be spent annually in accordance with consumer needs for SE services. Such funds are expended through counselor payment authorizations which support specific services identified in the Individual Plans for Employment of consumers with the most significant disabilities.

Service provider agreements for customized SE services identify the following key components or milestones.

1. Creation of a job development action plan
2. Placement
3. Stabilization
4. 45 days of continuous, successful employment
5. Finalization of an extended ongoing service plan
6. Successful VR case closure in accordance with all of the requirements set out in federal regulations.

Individualized job coaching is paid by hourly contact and may also be provided through separate service provider agreements.

### **Goals and priorities**

KRS has established the following goals and indicators related to SE services in Kansas.

#### **Goal 1: Individual job placements in competitive, integrated employment will meet the vocational goals and priorities of persons served.**

KRS will track the following measures of success.

Indicator 1.1: Number of persons served with SE plans (Title I and/or Title VI).

Indicator 1.2: Number of persons rehabilitated after receiving SE services through any funding sources (Title I and/or Title VI).

#### **Goal 2: An effective network of service providers will offer quality, cost effective services resulting in measurable competitive, integrated employment outcomes.**

KRS will track the following measures of success.

Indicator 2.1: Geographic distribution of services will be maintained as reflected by an annual analysis of the percentage of counties with service provider coverage.

Indicator 2.2: 80% of persons referred to service providers will obtain jobs within an average of 120 days.

*Tracking of this measure will require Information Technology (IT) solutions.*

Indicator 2.3: 60% of persons referred will achieve successful employment outcomes.

*Tracking of this measure will require Information Technology (IT) solutions.*

## **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**

**Funds reserved for youth with the most significant disabilities**

KRS will reserve and expend 50% of its Title VI funding to provide SE services to eligible youth with the most significant disabilities in order to assist them in achieving employment. The reserve percentage will be applied to the total amount allotted to Kansas through each SE Grant Award Notification, thus assuring that this requirement is met in light of potential federal reallotments and/or continuing resolutions. KRS will provide 10% match from State General Funds for this reserved funding. In the event KRS uses more than 50% of its SE federal funds to provide services to youth, there is no requirement that KRS provide non-federal matching funds for the expenditures in excess of 50%. KRS does not anticipate using SE funds for administrative costs. These provisions do not apply to Title I funds used to support SE services.

To assure financial accountability, tracking will occur through the fiscal office in the Department for Children and Families, the designated state agency. To assure necessary data collection, tracking will also occur through the Kansas Management Information System, which is the caseload and fiscal information technology system for KRS.

Youth with a disability means an individual who is 14 to 24 years old.

## **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.**

### **Expansion of supported employment**

KRS will work with Technical Assistance to assist in efforts to expand supported employment opportunities through successful and evidence-based models.

KRS will also:

- Recruit additional service providers to expand access to supported employment services statewide.
- Continue ongoing collaborative meetings with sources of long-term support, including HCBS waiver services and managed care organizations.
- Enhance data collection related to referral sources, consumers served by multiple agencies and programs, extended services and outcomes.
- Create a service provider agreement to expand the availability of highly qualified benefits counselors so that consumers have accurate information about employment incentives.

## **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.**

Kansas Rehabilitation Services (KRS) has established the following major goals:

1. Kansans with disabilities will achieve quality, competitive, integrated employment.
2. KRS will emphasize the employment potential of students with disabilities and improve the outreach and outcomes for transition-aged students.

### **Methods to expand and improve services**

When considering opportunities to expand and improve the provision of vocational rehabilitation (VR) services, KRS emphasizes strategies that will address the needs of people with the most significant disabilities and people who have been unserved or under-served. Collaborative efforts with consumers, advisory councils, parent groups, advocacy organizations, community rehabilitation programs and other state agencies are undertaken to expand access to VR services and to promote supported employment, customized employment, Pre-Employment Transition Services and assistive technology services.

## **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.**

### **Assuring access to assistive technology**

KRS policy and practice assures that the assistive technology needs of VR consumers are considered at every stage of the rehabilitation process, and that equipment, devices or services are provided to meet individual consumer needs.

KRS has established assistive technology service provider agreements with seven organizations throughout the state. This process has improved geographic access to services. Through this provider agreement process, individual consumers are referred for services such as assessment, functional analysis, and training or technical assistance according to their specific needs and goals. Through such a process, consumers have the opportunity to review and analyze assistive technology options and make informed choices about specific services or equipment to meet their needs. Equipment purchases may then be included on Individual Plans for Employment and purchased through VR funds.

## **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.**

### **Outreach procedures**

Within available staff resources, outreach activities are undertaken by regional KRS offices to assure that persons from minority backgrounds and from potentially underserved populations have information about VR services. Following up on the needs assessment which identified the need for greater distribution of information about VR, KRS will prioritize development of outreach strategies and support materials.

KRS maintains an active presence on numerous councils and committees, including:

- The Statewide Independent Living Council of Kansas.
- The Kansas Commission on Disability Concerns.
- The Vocational Sub-Committee of the Governor's Behavioral Health Planning Council.
- The Assistive Technology Advisory Committee.
- The Kansas Commission for the Deaf and Hard of Hearing
- Kansas Council on Developmental Disabilities
- Employment First Oversight Commission

This involvement facilitates the provision of information about VR services to other disability service organizations, and often results in additional outreach activities or specific referrals.

VR counselors and Pre-ETS transition specialists participate, within available resources, in Individual Education Plan meetings for transition-aged youth with disabilities to assure that they have information about VR services and how to apply.

**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).**

**Services for transition-aged youth with disabilities**

Improving outreach and outcomes for transition-aged youth with disabilities is a major focus for KRS.

- KRS has 25 positions and recently approved 12 new positions for a total of 37 to provide Pre-Employment Transition Services statewide. Provider agreements are in place with the Kansas Youth Empowerment Academy, a couple of workforce centers and some centers for independent living to assist in the provision of Pre-ETS services. KRS is working on expanding the provider agreement for paid work-based learning and doing outreach to gain more providers to have statewide coverage.
- All regions conduct outreach to students, parents and schools. Some examples include: scheduling specific days for counselors to work at schools and meet with students and transition staff; participating in activities such as Job Olympics; participating in local transition councils; and operating informational booths at transition fairs or parent-teacher events.
- KRS provides \$160,050 in state-only funding support to the Kansas Youth Empowerment Academy through a contract that provides for outreach activities; training and education on the disability rights movement and disability pride to schools and other organizations; the Youth Leadership Forum; and mentoring with students with disabilities.

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

**Plans to establish, develop or improve community rehabilitation programs**

The State of Kansas currently has no plans to establish new community rehabilitation programs (CRPs). KRS continues to offer opportunities for CRPs to partner in the provision of VR services through service provider agreements. KRS is working with technical assistance to gain insight on strategies to improve supported employment services.

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

Since 2010, KRS implemented a Performance Management Process establishing individual expectations and evaluation standards for all staff. For VR counselors, Rehabilitation Managers and Program Administrators involved in direct service delivery, this performance evaluation system is designed to improve individual accountability and contributions to achieving federal standards and indicators. For example, specific expectations and evaluation standards are established for the number of rehabilitations achieved and timely completion of plan development.

Regional accountability measures, reported and reviewed monthly by KRS, address number of rehabilitations and the average wage of persons rehabilitated.

Quarterly key indicator reports address all federal standards and indicators at state and regional levels, facilitating analysis and identification of areas for improvement.

We have established a Quality Assurance manual to address internal controls. We have case reviews and targeted reviews to address performance accountability and to assist with making sure effective policies and procedures are in place, that best practices are being followed, finding areas where policy issues need to be revised, as well as looking at areas for training and training needs. The case review system is intended, in part, to identify effective strategies that contribute to the achievement of standards and indicators, and well as to identify areas for performance improvement. For example, the targeted reviews are reviewing cases opened over 5 years, closure checklists, expenditures, credential attainment and measurable skill gains.

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

### **Workforce development system**

The KRS Director, administration staff and field management have a high level of involvement with workforce development system partners. The Director serves on the KANSASWORKS State Board and at least one person from management staff from VR serve on the boards of all five local workforce development areas. The Director and administrative staff serve on the WIOA State Plan Management Team. Along with regional VR staff, they also participated on work groups to develop operational strategies for the Combined Portion of the State Plan. Regional staff continue to participate on local committees, allowing for communication, interagency planning, and cross-informational training to occur with other components of the workforce development system, including One-Stop operators and partner programs. This collaboration is intended to improve access to these services for individuals with disabilities so that they can fully benefit from all the advantages of the system. Current memorandums of understanding (MOUs) address issues such as referral procedures and itinerant staffing at one-stops. MOUs will be updated in accordance with the provisions in the Combined Portion of this Plan.

KRS continues to work with Core Partners to track and analyze performance on the common performance accountability measures required under WIOA.

As a core partner, VR will be aligned with the workforce system through:

- Representation on the local boards.
- Collaborative case management and co-enrollment when needed by the consumer.
  - Co-enrollment occurs when consumers are actively participating in services from more than one system partner. Partners will make referrals to initiate co-enrollment if/when the consumer could benefit from the services of another partner program, if the consumer agrees, and/or if the consumer so requests. Referrals will be made on an individual consumer-by-consumer basis, and not as a blanket referral throughout the workforce system.
- Collaboration with other core partners on targeted outreach activities.
- Enhanced consumer referrals among core partners.
- Participation in evaluation and continuous improvement strategies.
- Specific strategies to strengthen communications among core partners.
- Collaboration among core partners for business outreach activities.

- Increased familiarization with partnering program requirements, services and benefits.

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

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

Section L describes this information in detail.

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

#### **Innovation, continuous improvement and expansion**

KRS promotes expanded community capacity to provide services for people with disabilities through service provider agreements for supported employment, job placement, community-based work assessments, community-based job tryouts, assistive technology, rehabilitation teaching, orientation/mobility and a variety of consumer support functions. In addition, KRS staff serve on numerous commissions, advisory boards and interdisciplinary teams to stay current with the needs of people with disabilities, and to identify opportunities for collaborative efforts to improve services. KRS also provides administrative support and direct expenses totaling about \$20,000 annually for operation of the State Rehabilitation Council. This funding arrangement is consistent with 34 CFR 361.35.

#### **Services for unserved or underserved populations**

Current activities include the following:

- Cooperative working relationships between the Kansas Department for Aging and Disability Services oversight units for community developmental disability organizations and community mental health centers address capacity to provide supported employment services.
- KRS and DCF Economic and Employment Services continue to collaborate to serve recipients of Temporary Assistance for Needy Families (TANF) and the Supplemental Nutrition Assistance Program (SNAP) who have disabilities.
- KRS and DCF Prevention and Protection Services will coordinate to address the employment and/or post-secondary education needs of youth with disabilities who are aging out of foster care.
- In-service training will focus on best practices in service delivery for persons who are blind or visually impaired, persons with Autism Spectrum Disorders, persons with traumatic brain injury, persons with disabilities who have a criminal background, and persons with mental illness. Contracted service providers will be included in these training opportunities whenever possible to enhance their expertise in service VR consumers.

#### **Competitive, integrated employment for people with the most significant disabilities**

One of the major strategic goals of KRS is to empower people with disabilities to achieve competitive, integrated employment and self-sufficiency. To advance this vision for people with the most significant disabilities, KRS will be collaborating with technical assistance to gain strategies for improving our supported employment services.

#### **Cooperative agreements**

As described in Section O, KRS will establish interagency agreements with the state agencies responsible for Medicaid, behavioral health and intellectual disability services. KRS established memoranda of understanding with the local workforce development boards and Kansas State Department of Education.



### **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.**

Please refer to specific strategies for each goal in Section L.

The Comprehensive Statewide Needs Assessment indicated that VR Individuals who are minorities in KRS' are equitably represented in the KRS service population. Data indicates that KRS served twice the expected number of individuals who identified as 'Black or African American' (16.4%) based on ACS data (6.9%). The ethnic group 'Hispanic' is overrepresented in KRS twice as high (15.3%) compared to the overall KS population (7%). Other minority populations fall within one percent of the expected Kansas ACS population.

PCG analyzed age groups by race and ethnicity. As expected, individuals who are 'White' are the largest race group in all age groups. The race 'Black or African American' is represented highest in age group 55 to 64 but is also overall evenly distributed through ages 22 to 65 and older. However, the age group 14 to 21 is served 4-7% lower than expected. This data points to an opportunity to increase engagement of students who identify as "Black or African American" in Pre-ETS. The age group 'American Indian or Alaska Native' is represented highest in age group 45 to 54 but overall, fairly evenly distributed.

Significance of disability by ethnicity was also analyzed. The 'White' and 'Non-white' groups were more likely identified with a Most Significant Disability (MSD), followed by Non-Severe Disability (NSD), and lastly 'Significant Disability' (SD). Both ethnic groups were evenly dispersed in comparison to one another.

### **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.**

#### **Highlights and accomplishments**

Kansas Rehabilitation Services (KRS) reports the following accomplishments in implementing the State Plan Goals and Priorities. These highlights are based on PY 2020 (July 1, 2020 through June 30, 2021) indicators.

- A total of 933 Kansans with disabilities achieved stable employment as a result of VR services, earning an average of \$11.69 an hour. VR consumers achieved employment in high-wage, high-demand jobs, for example: \$35 an hour as a Registered Nurse, multiple placements of approximately \$30 an hour in the nursing field, and numerous placements of approximately \$23 an hour as a teacher.
- The percent of individuals who reported their own earnings as the largest source of support at the time of vocational rehabilitation (VR) case closure was 80%. This represents a significant milestone toward increased self-reliance.

#### **Performance related to federal indicators**

The following information is based on KRS analysis of data for PY 2020.

- Indicator 1.1 (number of rehabilitations). 933

- Indicator 1.2 (rehabilitation rate). 39%
- Indicator 1.3 (competitive employment). 100%
- Indicator 1.4 (outcomes for persons with significant disabilities). 96.8%
- Indicator 1.5 (average hourly wage). \$11.69 or a ratio of .66 of the average hourly wage of all employed Kansans.
- Indicator 1.6 (self-support). 80%.

## **Timeliness Standards**

- Federal regulations require that eligibility for VR services be determined no later than 60 days from the date of application, unless the applicant agrees to a time extension. The statewide average in Kansas is only 24 days (as of 6-30-21).
- Federal regulations require that an Individual Plan for Employment be developed no later than 90 days from the date of eligibility, unless the client agrees to a time extension. The statewide average in Kansas from application to IPE development is only 50 days (as of 6-30-21).

## **Update on indicators related to State Plan goals and priorities**

The following information provides a detailed update on the performance indicators related to the State Plan Goals and Priorities. Performance updates are for Program Year 2020 (July 1, 2020 through June 30, 2021), the most recent complete program fiscal year at the time of this State Plan submission. Indicators address a wide scope of performance measures identified by KRS and stakeholders during a collaborative planning process.

### **Goal 1: Kansans with disabilities will achieve quality employment and self-sufficiency.**

Indicator 1.1: The number of persons achieving employment.

PY 2020: 933

Indicator 1.2: The percentage of individuals rehabilitated who achieve competitive employment.

PY 2020: 100%

Indicator 1.3: The average hourly earnings of all individuals who exit the program in competitive employment as a ratio to the average hourly earnings for all employed Kansans.

PY 2020: \$11.69 .66 ratio

Indicator 1.4: Of the individuals who achieve competitive employment, the percent who reported their own income as the largest single source of economic support at closure.

PY 2020: 80%

Indicator 1.5: The average number of hours worked per week by persons rehabilitated.

PY 2020: 28

Indicator 1.6: The percent of persons rehabilitated in full-time competitive employment who are covered by health insurance through employment.

PY 2020: 20%

Indicator 1.7: The number of successful employment outcomes achieved by consumers after participating in post-secondary education.

PY 2020: 69

**Goal 2: KRS, its providers and partners will be accountable for the achievement and maintaining employment and the effective use of resources.**

Indicator 2.1: Rehabilitation rate.

PY 2020: 39%

Indicator 2.2: Percent for whom eligibility is determined in 60 days or less from application unless the consumer agrees to an extension.

PY 2020: 94%

Indicator 2.3: Percent of accurate eligibility decisions, based on case review results.

PY 2020: 93%

Indicator 2.4: Percent for whom IPEs are developed within 90 days or less from eligibility unless the consumer agrees to an extension.

PY 2020: 94%

Indicator 2.5: Average expended per rehabilitation for the life of the case.

PY 2020: \$6,707

Indicator 2.6: Rehabilitation rate of persons referred to placement or supported employment providers.

PY 2020: 66%

Indicator 2.7: The average wage achieved by persons referred to placement or supported employment providers.

PY 2020: \$10.81

Indicator 2.8: Percent of case review results for which there is evidence that the consumer had the opportunity to exercise informed choice throughout the rehabilitation process.

PY 2020: 73%

Indicator 2.9: Percent of case review results for which there is evidence that the service provider was given clear information about the consumer's employment goals and expectations.

PY 2020: 92%

Indicator 2.10: Percent of case review results for which referral to a job placement or supported employment service provider was appropriate based on the individual needs of the consumer.

PY 2020: 97%

Indicator 2.11: Percent of case review results for which there was evidence of counseling and guidance related to maximizing employment and high-wage, career-track employment options.

PY 2020: 67%

Indicator 2.12: Percent of cases reviewed for which correct use of service codes was demonstrated.

PY 2020: 98%

Indicator 2.13: Percent of cases reviewed for which adherence to procurement policies and procedures was demonstrated.

PY 2020: 83%

Indicator 2.14: Percent of Regional Program Administrators and Unit Rehabilitation Managers who meet expectations related to fiscal management through the evaluation process.

Evaluation Year ending 2021: 100%

Indicator 2.15: Percent of counselors who meet or exceed expectations for the fiscal management competency in the performance evaluation system).

Evaluation Year ending 2021: 91%

**Goal 3: KRS will emphasize the employment potential of students with disabilities and improve the outreach and outcomes for transition-aged students.**

(These indicators are based on the individual being age 24 or younger at the time of the case action referenced.)

Indicator 3.1: Number of new applications from transition youth.

PY 2020: 741

Indicator 3.2: Number of new IPEs for transition youth.

PY 2020: 380

Indicator 3.3: Rehabilitation rate for transition youth.

PY 2020: 39%

Indicator 3.4: Number of employment outcomes achieved by consumers who were transition-aged at the time of application for services.

PY 2020: 250

Indicator 3.5: Of the transition students who achieve competitive employment, the percent who reported their own income as the largest single source of economic support.

PY 2020: 76%

Indicator 3.6: Average hourly wage of transition students rehabilitated.

PY 2020: \$10.41

Indicator 3.7: Increase participation of youth with disabilities in the Prevention and Protection Services Independent Living program in Pre-Employment Transition Services and VR Services, and thereby improve their successful outcomes in post-secondary education, employment and independent living/self-sufficiency.

Number of foster care youth participating in VR.

PY 2020: 78

**Goal 4: KRS will emphasize the meaningful involvement of people with disabilities, public/private partners, employers and other stakeholders in KRS programs, services and activities.**

Indicator 4.1: The percent of individuals who have significant disabilities among those who achieve competitive employment.

PY 2020: 96.8%

Indicator 4.2: The service rate for all individuals with disabilities from minority backgrounds as a ratio of the service rate for all non-minority individuals with disabilities.

PY 2020: .93

Indicator 4.3: Number of annual statewide stakeholder meetings.

PY 2020: 10

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

**Factors that impeded the achievement of the goals and priorities**

Factors which impeded progress include the difficulty experienced by persons with no work experience or extended periods of unemployment in getting work, the turnover rate among counselors, and difficulty in recruiting qualified VR counselor applicants, especially in the least populated geographic areas of Kansas.

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

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

**Supported employment goals**

Supported employment goals are identified in Section F. Implementation and achievement of these goals is addressed through the case review system, which monitors quality of services and outcomes, and through ongoing monitoring of service provider performance. KRS purchases supported employment services through service provider agreements with CRPs, community organizations and individuals across Kansas. In addition, specific standards for quality, timeliness, consumer involvement and outcomes are identified in service provider agreements.

**Supported employment (SE) indicators**

Title VI, Indicator 1.1: Number of persons with SE plans.

PY 2020: 683

Title VI, Indicator 1.2: Number of persons achieving competitive, integrated employment after receiving SE services.

PY 2020: 161

Title VI, Indicator 2.1: Geographic distribution of services (percent of counties with coverage from an SE service provider).

PY 2020: 100%

Title VI, Indicator 2.2: Percent of persons referred to a service provider who achieve employment (rehabilitation outcome) within 120 days of referral.

A data source for this indicator is pending.

Title VI, Indicator 2.3: Percent of persons referred to SE service providers who achieve successful employment outcomes.

A data source for this indicator is pending.

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

### **Factors that impeded progress on SE goals**

It is difficult to maintain job coaching and SE services in the rural and frontier areas of the state. It is a challenge to find funding for extended supports after VR services end. Much of the overall disability employment system in Kansas includes sub-minimum wage employment, such as sheltered work. Improved IT solutions are needed to better track and assess service provider outcomes and to produce “report cards” of performance.

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

#### **Workforce Innovation and Opportunity Act (WIOA) performance accountability measures**

KRS will monitor performance on the standard performance accountability measures required for all Core Partners under WIOA. VR did not have negotiated indicators of performance for the first two years of this plan.

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

#### **Update on funds used for innovation and expansion**

KRS uses the innovation and expansion authority, as specified by the Rehabilitation Act, to support the functions of the State Rehabilitation Council. Expenditures primarily relate to member travel and reimbursement for participating in meetings. Operating within existing resources, the Council does not receive any direct allocation of funds.

Consistent with the KRS goals and priorities, innovation and expansion efforts are also underway to promote improved employment outcomes for transition-aged youth and to assist community service providers to build and maintain their capacity to provide evidence-based employment 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.**

Supported employment means competitive employment in an integrated setting with ongoing support services for individuals with the most significant disabilities. This service is intended for individuals:

- For whom competitive employment has not traditionally occurred or for whom competitive employment has been interrupted or intermittent as a result of a significant disability; and
- Who, because of the nature and severity of the disability, need intensive supported employment services from Kansas Rehabilitation Services (KRS) and extended services/ongoing support from non-VR sources such as community agencies in order to perform the work and maintain employment.

Supported employment also includes transitional employment for individuals with severe and persistent mental illness. Transitional employment means a series of temporary job placements in competitive work in integrated settings with ongoing support services for individuals with the most significant disabilities due to mental illness. In transitional employment, the provision of ongoing support services must include continuing sequential job placements until job permanency is achieved. Supported employment services provided by KRS are time-



limited and are provided for a period not to exceed 24 months unless the consumer and counselor agree to an extension in order to achieve the objectives identified in the Individual Plan for Employment. Any appropriate service needed to support and maintain an individual in supported employment may be provided. Services typically focus on:

- Job development and placement.
- Intensive on-the-job training and other training provided by skilled job coaches.
- Regular observation and coaching of the consumer at the work site.
- Discrete post-employment services that are not available from an extended services provider and that are necessary to maintain the job placement, such as job station redesign; repair and maintenance of assistive technology; and the replacement of prosthetic and orthotic devices.
- Coaching to develop natural supports.

Supported employment services are provided through a Customized Placement service provider agreement that identifies the following key components or milestones:

1. Creation of a job development action plan
2. Placement
3. Stabilization
4. 45 days of continuous, successful employment
5. Finalization of an extended ongoing service plan
6. Successful VR case closure in accordance with all of the requirements set out in federal regulations

Direct hourly job coaching services are provided for VR consumers in conjunction with the Supported Employment and Customized Employment milestones services described above. Short and long-term individualized job coaching is also provided through service provider agreements.

After the time-limited VR services end, the supported employment service provider maintains extended ongoing services with the consumer or has identified a plan specifying how the community-service system will provide the extended ongoing supports the consumer needs to maintain employment. These extended services are not funded with VR dollars. To reinforce and maintain stability of the job placement, ongoing services include regular contacts with:

- The consumer.
- Employers.
- Parents, guardians or other representatives of the consumer.
- Other appropriate professional, advisory and advocacy contact persons.

Individual job placements in competitive, integrated employment are the outcome of supported employment services funded by KRS. Such outcomes have higher earnings, consumer choice, community integration and more co-worker interaction. KRS supported employment outcomes do not include enclaves, work crews or other congregate work settings.

### **Service delivery system**

In implementing supported employment services, KRS emphasizes the importance of geographic distribution of services. KRS also places a priority on working with community agencies with the capacity to provide

extended/ongoing support services. Providers include community developmental disability organizations, mental health centers, independent living centers, and other public and private entities. Provider agreements:

- Describe the time-limited services that will be provided through KRS for eligible individuals with the most significant disabilities.
- Address responsibility of the providers to coordinate the community service system, which has responsibility for funding and providing the extended ongoing services necessary for the consumer to maintain employment once they exit the VR program.

The Individual Plan for Employment is used as the basis for referral to one of the providers. It also describes the criteria, specific to each consumer, for determining that job performance is stable, determining how and when progress will be evaluated, and describing how extended ongoing support services will be provided. After the consumer reaches stability on the job, the consumer, service provider and VR counselor work together to finalize the plan for extended ongoing support services. This allows the plan to be specific and customized according to the consumer's current work situation and support needs. As a result, the ongoing support section of the IPE may be amended, with the consumer's agreement, in order to reflect the most current information available.

### **Quality of services**

VR counselors and regional management staff are charged with assuring the quality of services provided. KRS will develop updated reports on provider performance to assist consumers in selecting services, to assist KRS and its providers in monitoring performance, and to identify opportunities for continuous improvement.

The performance of these providers in helping consumers secure meaningful employment and wages consistent with their goals and priorities significantly impacts the overall KRS performance on standards and indicators. Therefore, accountability benchmarks have been established with the target of 80% of persons referred to service providers obtaining jobs within an average of 120 days, and 60% of persons referred achieving successful closures. The goal is a network of effective supported employment providers whose focus is on the vocational objectives, goals, rehabilitation needs and priorities of the consumers to be served. Improved Information Technology support solutions are needed to better track and assess service provider outcomes and to produce "report cards" of performance.

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

After the consumer has achieved job stability, KRS will continue services for at least 90 days at a level and scope comparable to those expected to be provided through extended services after VR services cease. This period is intended to assure that the consumer will continue to be successful with the level of support anticipated once transition to extended services provided by the community service system has been completed. The case may be closed if stability is continued after this time period.

## **Certifications**

Name of designated State agency or designated State unit, as appropriate      **Kansas Rehabilitation Services**

Name of designated State agency      **Kansas Department for Children and Families**

Full Name of Authorized Representative:      **Daniel Decker**

Title of Authorized Representative:      **Director of Kansas Rehabilitation Services**

**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

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### Certification 1 Footnotes

\* Public Law 113-128.

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

### Certification 2 Footnotes

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

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

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

### **Certification 3 Footnotes**

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

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

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

### **Certification Regarding Lobbying — Vocational Rehabilitation**

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

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

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

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

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

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a

Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization     **Kansas Rehabilitation Services**

Full Name of Authorized Representative:     **Daniel Decker**

Title of Authorized Representative:     **Director of Kansas Rehabilitation Services**

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](mailto:MAT_OCTAE@ed.gov)

## **Certification Regarding Lobbying — Supported Employment**

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

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

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

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

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

The undersigned states, to the best of his or her knowledge and belief, that:

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

Applicant's Organization     **Kansas Rehabilitation Services**

Full Name of Authorized Representative:     **Daniel Decker**

Title of Authorized Representative:     **Director of Kansas Rehabilitation Services**

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      **No**

- d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.**
- e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.**
- f. comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act.**
- g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.**
- h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act.**
- i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs**
- j. with respect to students with disabilities, the State,**
  - i. has developed and will implement,**
    - A. strategies to address the needs identified in the assessments; and**
    - B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and**
  - ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).**

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

- a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.**
- b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.**
- c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act.**

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

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

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

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

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

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

- i. the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act**
- ii. an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act , which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.**

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