

2018 Proposed State Plan Amended Sections for Order of Selection

A. INPUT OF STATE REHABILITATION COUNCIL

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;

On June 15, 2018 The Washington State Rehabilitation Council for the Blind held its quarterly meeting. Lou Oma Durand, Director and Michael MacKillop, Deputy Director provided information on the proposed order of selection process, budget concerns, the vocational rehabilitation services portion of the combined State Plan and a review and analysis of DSB's most recent consumer satisfaction reports. SRC council members and the public had an opportunity to comment on the information presented. Input and recommendations from the SRC are as follows:

- There should be no changes to the current intake/application process for a participant who has applied for DSB services after the order of selection process is implemented.
- Staff training to ensure consistent assessment of an applicant's functional limitations is critical to ensuring equitable assignment to the wait list.
- A system to track referrals of eligible, waitlisted participants for other services should be implemented to ensure connection is made to community resources.
- Ongoing, periodic contact with waitlisted participants is essential. How often will vocational rehabilitation counselors check in with eligible participants on their caseloads who are waiting to develop an individualized plan for employment?
- To what extent has DSB examined other blind agencies order of selection processes? The SRC considers this helpful in developing best practices for entering an order of selection.
- There is a concern that word will get out in the blind community that it makes no sense to apply for DSB services. How is DSB planning to deliver the message to community partners, that the date of application is an important factor in receiving services within the climate of an order of selection?
- The SRC would like assurance that DSB will be able to provide services necessary to determine a participant's eligibility when an order of selection is in place.

- After an order of selection is implemented, is it projected that job retention cases will be served in the immediate priority category, or will they have to wait? Will a job retention participant's vocational goal remain the same?
- The SRC is concerned about the impact on collaboration with Tribal VR. Although DSB will not be able to coordinate services with Tribal VR until the participant is off the waitlist, will the participant receive counseling and guidance and information and referral services from DSB?
- DSB has recently changed the method of gathering participant satisfaction information. The SRC survey committee would like survey questions to remain unchanged for the period of a year for the purpose of consistency and data comparison. Will DSB have a method in place to capture feedback from participants on the waitlist once an order of selection is implemented?
- The SRC appreciates DSB's proactive approach to developing a plan for implementing an order of selection that is as respectful of participant rights as possible. The SRC would like to collaborate closely with the DSB order of selection planning committee, and continue to partner after implementation.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

The agency received input from the State Rehabilitation Council's Policy Committee on July 2nd, 2018. The agency is grateful for the thoughtful input to the State Plan Amendment in preparation for implementing an Order of Selection.

The agency has prepared responses to the items noted in the SRC feedback, entered below individually addressing each point.

We expect the SRC input and agency response to be the start of a continued dialogue as we enter the new territory (for this agency) of an Order of Selection wait list situation. We value the SRC's perspective, and will look forward to their input on-going to ensure this challenging OOS is implemented in the smoothest way possible and prioritizing those individuals with the greatest needs.

SRC comment 1.a:

There should be no changes to the current intake/application process for a participant who has applied for DSB services after the order of selection process is implemented.

Agency response 1.a:

The agency is in agreement that there should be no fundamental change to the application and intake processes in implementing the Order of Selection, but we anticipate some few additional considerations that will help support the applicants.

In our outreach efforts and discussions with community partners and interested individuals, the agency will need to emphasize the importance of the date of application

in determining placement on the wait list within a priority category. Our message will encourage earliest application, even though there may be a wait for services, in order to be placed at the highest spot possible on the wait list.

The intake process is anticipated to have an added emphasis on explaining what an Order of Selection is, and what it might mean for an applicant. We also expect an increased focus on identifying and providing relevant information and referral resource contacts for the individual whose case will be placed on the wait list.

So while the application and intake processes will be fundamentally unchanged, we expect there will be added layers that will need to be addressed – for the individual's benefit - as a direct impact of the OOS

SRC comment 1.b:

Staff training to ensure consistent assessment of an applicant's functional limitations is critical to ensuring equitable assignment to the wait list.

Agency response 1.b:

The agency is in agreement that we expect the participant experience of a functional limitation assessment, and the resulting assignment of priority category status, to be consistent no matter what office or what counselor an individual may be working with.

It is important that staff consider functional limitations of all visual and secondary disabilities. It is also important that staff understand that a priority category is not based on the existence of disability/disabilities, but instead the functional limitations to employment that are due to the disability/disabilities.

To that end, we are preparing training materials to assist in the counselor judgement process, and have a July 30th staff training planned. The July 30th training will include all vocational rehab counselors, rehab technicians, and rehab teachers that have a direct or indirect role in the functional limitation assessment process. We have also invited key stakeholder partners to observe the training (including the SRC chair).

SRC comment 1.c:

A system to track referrals of eligible, waitlisted participants for other services should be implemented to ensure connection is made to community resources.

Agency response 1.c:

The agency is developing processes to document the information and referral services provided to individuals whose cases are placed on a wait list after an eligibility determination.

The documentation is presumed at this time to be in a formal communication that is sent to an individual in tandem with their eligibility certification and information about wait list and priority categories.

The intent is that during the intake, the VR counselor will actively connect an individual to relevant resources that can initiate progress towards their employment goals, and the letter will document those and additional resources that might meet the individual's situation.

Every six months that an individual's case remains on the wait list, the agency expects that staff will make a check in call, to alert the individual to the wait list status, and to check in about outcome and success of the referred resources.

SRC comment 1.d:

Ongoing, periodic contact with waitlisted participants is essential. How often will vocational rehabilitation counselors check in with eligible participants on their caseloads who are waiting to develop an individualized plan for employment?

Agency response 1.d:

This response is in addition to the Agency Response 1.c above.

The expectation is that anyone whose case is on the wait list will be contacted by agency staff at least once every six months.

The agency is concerned that these check-in contacts have value to the individual eligible participant awaiting services, and doesn't become an irritant to the individual. A VR counselor will not have the information that an individual whose case is on the wait list will be most interested in: "when will I be able to receive services?". That will be a question that can't be answered, and the lack of a definitive answer could naturally create a frustration on the part of the eligible individual.

To defuse this frustration as possible, the VR counselor will need to be clear and transparent during intake about the expected OOS process, including that the VRC will call to check in periodically but will not have definitive information about time a case might be removed from the wait list towards services.

The check-in call will also need to provide added value for the eligible individual. A check in on the results of the previous resource referrals, and an assessment of other resources, or active connection to those resources, may help to lower the inherent frustration of waiting for services without a clear timeline to receiving those services.

SRC comment 1.e:

To what extent has DSB examined other blind agencies order of selection processes? The SRC considers this helpful in developing best practices for entering an order of selection.

Agency response 1.e:

The agency has had in-depth conversations with other blind, general and combined VR agencies that have implemented an order of selection, and other agencies that are anticipating a similar need in the very near future. Minnesota Blind in particular provided extensive guidance and coaching over the steps to implement an order of selection, and considerations for both the early days and the on-going processes during a wait list situation. There were materials shared from the National Council for State Agencies of the Blind (NCSAB) Spring 2018 conference where order of selection was a topic. The agency also has been the recipient of much useful guidance from the Washington General agency which implemented OOS in 2017.

Many agencies ascribed the mandated 15% set-aside as the major instigator for needing to implement a wait list, as Washington Blind has experienced.

The interactions have helped the agency to be aware of mandatory steps and considerations in preparing to implement an order of selection, and to help maintain as customer-friendly a process as is possible when a wait for services is the end result.

SRC comment 1.f:

There is a concern that word will get out in the blind community that it makes no sense to apply for DSB services. How is DSB planning to deliver the message to community partners, that the date of application is an important factor in receiving services within the climate of an order of selection?

Agency response 1.f:

The agency shares concerns that individuals who require vocational rehabilitation services may have the tendency to self-select out if there is a wait list situation. In our consultation with the Minnesota Blind agency, this was highlighted as a factor for their implementation process.

Our message to individuals with visual disability and to our community partners and referral sources will be to acknowledge that, despite the frustration of a wait list, in reality there is a benefit to applying as soon as possible in order to get as high on the wait list within the priority category as possible; in other words, the sooner the date of application, the sooner that individual's case will come off the wait list. The agency acknowledges that there may feel little consolation for the hurry-up-and-wait message, but we do want to emphasize the importance for the individual to get the application in as soon as they are able.

SRC comment 1.g:

The SRC would like assurance that DSB will be able to provide services necessary to determine a participant's eligibility when an order of selection is in place.

Agency response 1.g:

The agency, in its fiscal projections, accounted for the 5-year averaged pre-plan costs that represent those assessment costs to assist in determining eligibility. That cost must be accounted for in any consideration of adequate resources to provide comprehensive services.

SRC comment 1.h:

After an order of selection is implemented, is it projected that job retention cases will be served in the immediate priority category, or will they have to wait? Will a job retention participant's vocational goal remain the same?

Agency response 1.h:

To be eligible for our proposed "Immediate Priority" an individual must currently be working; at risk of losing their job because of functional limitations due to visual and other disabilities; intend to maintain their current position (as their employment goal); and require vocational rehabilitation services or goods that can assist to keep them working in that job.

Depending on the potentially ever-changing status of the agency being able to project that we have adequate resources in which to provide comprehensive VR services, all the priority categories might be closed until resources become available; a priority category might be partially open and date of application used to determine which cases within that priority can be taken off the wait list, and which remain; or a priority category is fully open, and anyone within that category is provided immediate services. This fiscal status – and ability to open or need to close categories - will change over time, and will be monitored carefully by the agency.

The agency recognizes the critical impact on quality of life for an individual – and their family and their employer – if the individual loses their current job because they do not have the adaptive tools or skills to continue to be effective due to limitations from visual and other disabilities. Losing a current job due to disabilities can create multiple, complex, and long term obstacles for the individual. A job loss can create a situation for reliance on public supports that would not be necessary if the job were retained. There is a critical imperative to be able to provide the necessary rehabilitation tools and services that help retain a job at risk.

SRC comment 1.i:

The SRC is concerned about the impact on collaboration with Tribal VR. Although DSB will not be able to coordinate services with Tribal VR until the participant is off the waitlist, will the participant receive counseling and guidance and information and referral services from DSB?

Agency response 1.i:

The agency shares this concern. We understand the impact that not being able to immediately serve all participants who are eligible and require vocational rehabilitation services will have on those partners that we have shared share cases and expertise with, such as the Tribal VR programs. The reality is that an order of selection complicates our normal practice of shared services for the individuals who require them.

To mitigate the initial impact of implementing an OOS, the agency has informed our Tribal partners of our expected implementation of order of selection, and inquired as to the Tribal VR program's needs of us in this process. There have been requests to preview communications to participants and to be invited to join DSB staff trainings on OOS in order for the Tribal VR programs to better counsel and guide the participants with visual disabilities they work with.

The agency may not be able to provide services within the same timelines as our Tribal VR partners, depending on the results of the wait list on individual cases. However, the agency can continue to provide information and referral services, and can answer partner questions and provide potential resources that might meet an individual's immediate needs while awaiting full services form DSB.

SRC comment 1.j:

DSB has recently changed the method of gathering participant satisfaction information. The SRC survey committee would like survey questions to remain unchanged for the period of a year for the purpose of consistency and data comparison. Will DSB have a method in place to capture feedback from participants on the waitlist once an order of selection is implemented?

Agency response 1.j:

The agency understands the SRC preference for continuity in the customer satisfaction data. The agency does not have a formalized plan for methods to anonymously capture participant feedback on the impact of order of selection, but do intend to solicit input at various levels. At minimum of six month intervals, staff will be checking in with those individuals whose cases are on the wait list, and seeking participant input. The agency will ensure that the Client Assistance Project is a known advocacy resource for those with a case on the wait list, and look to our CAP partners to alert the agency to patterns of concerns we may not otherwise be aware of.

The agency does hope that in the future participant input on the OOS experience will be folded in to the Customer Satisfaction Survey, as it is an anonymous, third-party method for soliciting participant feedback and provides less risk to bias error.

The agency expects that there will be frustration and disappointment among eligible and wait-listed participants, directly because of the Order of Selection and the agency's inability to serve every eligible individual in the moment they request services. We hope that through clarity and transparency of communications from agency to participant, and by facilitating referrals to alternative and effective resources while an individual awaits full services from DSB, we can mitigate that frustration in some small way.

SRC comment 1.k:

The SRC appreciates DSB's proactive approach to developing a plan for implementing an order of selection that is as respectful of participant rights as possible. The SRC would like to collaborate closely with the DSB order of selection planning committee, and continue to partner after implementation.

Agency response 1.k:

The agency is very grateful for the State Rehabilitation Council's thoughtful input, questions, suggestions and supports as we move into the order of selection wait list situation. We are thankful for the promise of continued dialogue and shared problem-solving as we transition into this new way of doing business.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

There is no State Rehab Council input or recommendations that the agency has rejected. The agency agrees with all of the SRC's input and shares similar concerns, and we hope that we have clarified our perspective on areas of question in the comment section above. We appreciate the passion for the agency mission and desire for quality services for individuals with visual and other disabilities shown by the State Rehab Council, and look forward to our partnership in navigating

K. ANNUAL ESTIMATES

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES;

An individual is eligible for vocational rehabilitation services at the Department of Services for the Blind (DSB) if the individual:

- Has a visual disability
- Experiences functional limitations due to the visual disability that limit her/his ability to get or keep a job, or advance in his/her career, and
- Requires vocational rehabilitation services to mitigate those functional limitations and obstacles to employment

The Department of Services for the Blind takes application starting at age 14 for vocational rehabilitation services.

The agency provides non-individualized career exploration services to potentially eligible and eligible students with a disability, ages 9 – 21, through the Pre-Employment Transition Services arm of vocational rehabilitation services.

While traditional working age is considered ages 18 – 64, the agency serves a large proportion of adults ages 64 and above through the vocational rehabilitation services program – approximately 13% of the FFY 2018 caseload are adults over age 64.

The annual American Community Survey (ACS) through the US Census Bureau provides estimates on numbers of people in the United States – and within Washington State – who experience “blindness or serious difficulty seeing things even with use of corrective lenses”. The ACS results are based on self-report, and are extrapolated from a small sample of individuals who are surveyed each year. While not representing an exact accounting and while numbers may be inflated relying solely on self-report, the American Community Survey is among the few and strongest data sets estimating the number of individuals within Washington State who experience a visual disability.

Per the American Community Survey (ACS) 2016 5-year estimates, there are approximately a total of 150,000 individuals who experience a “serious visual difficulty” in Washington State, representing 2.2% of the general population.

For traditional working age adults (ages 18 – 64), the ACS documents around 78,000, or 1.8%, of individuals with a visual difficulty in the state.

The ACS also shows that approximately 46% of those individuals with a “serious visual difficulty” are employed and 54% are not in the labor force, with a 4.3% subset actively seeking work in unemployed status. That indicates that potentially approximately 42,000 individuals with a visual disability could be seeking vocational rehabilitation services in order to find work, with a subset of approximately 3,500 individuals who are more actively seeking work while in an unemployed status.

Eligible individuals may also be employed, requiring vocational rehabilitation services in order to keep a job that may be at risk due to visual disability. Approximately 13% of those served by DSB in the last 5 years have been employed individuals seeking to retain their job.

The category of traditional working age is also expanded by the agency’s vocational rehabilitation work with students with a visual disability. Students may be eligible to receive individualized services through the vocational rehabilitation program starting at age 14, and simultaneously receive non-individualized career exploration services through the Pre-Employment Transition Services program ages 9 – 21.

In 2016, there were 320 students with visual disabilities, including students who are Deaf Blind, documented as having an individualized special education plan through the Office of Superintendent of Public Instruction within the age range 9 – 21 in the state of Washington. The number of students in schools that require accommodation for their visual disability (through Section 504 of the Americans with Disabilities Act) is not recorded. Anecdotally the Washington State School for the Blind serves 1,200 students with needs for alternative print materials through the American Printing House - this number also includes students with a print disability, and is not a scientific count of students with visual disabilities.

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

From FFY2012 – FFY2016, the Department of Services for the Blind Vocational Rehabilitation program has served an average of 1,343 participants per year, who were provided with in-house and/or agency-purchased externally provided services and goods:

- 208 cases where the individual was employed and seeking to retain that job, and
- 1135 cases where the individual was seeking new employment
- As of FFY2018, approximately 320 students with a disability are served in a year, either solely through the Pre-Employment Transition career exploration services program or also in combination with individualized vocational rehabilitation services.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

From FFY2014 – FFY2018, the Department of Services for the Blind Vocational Rehabilitation program has served an average of 24 participants per year who require long-term supports to be able to work in competitive and integrated employment.

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION;

The projections anticipated for numbers to be served in plan status under each priority category are based on averaged numbers from FFY2014 – FFY2018 for those participants the agency has purchased goods or services.

- For immediate priority of need for immediate services and/or goods to retain a current job at risk due to visual disability: 139 per year that require purchased services and/or goods.

- For those with the most significant disabilities (exhibiting three or more functional limitations to employment and requiring substantial rehabilitation services): 670 per year that require purchased services and/or goods.
- For those with significant disabilities (exhibiting one or two functional limitations to employment and requiring substantial rehabilitation services): 302 per year that require purchased services and/or goods.

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

The most conservative of projections show that, upon implementation of an Order of Selection October 1, 2018, potentially all categories will need to be closed. With a basic obligation to serve the anticipated 900 participants who would already be in active plan status, the agency in this most conservative estimation would not be able to serve any new eligible individuals in FFY2019.

Through the same conservative lens, it is projected the agency would be able to serve all new job retention cases that have accumulated on the wait list (150 served of 150 on the wait list); and 170 of the accumulated priority one cases (170 served of 370 on the wait list) in the second year of the OOS (FFY2020).

Less conservatively, the range of projections show that upon implementation of an Order of Selection October 1, 2018, categories for priority two will need to be closed, and priority one partially open. With an anticipated 900 participants already in active plan status and required to be served, the agency in this less conservative scenario would also be able to serve all new eligible individuals whose jobs are at risk due to visual disability, and some of those cases categorized as priority one (70 served out of the accumulated 185 priority one cases) for the first full year of implementation. Anticipated in this scenario to remain on the wait list are 115 cases categorized as priority one, and 78 cases as priority two.

By FFY2020, in this same scenario it is projected the agency would be able to serve all new job retention cases that have accumulated on the wait list (78 of 78); and 100 of the accumulated priority one cases (100 served of 300 on the wait list). Priority two cases would grow to an expected 152 cases on the wait list.

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 cost per case per year for each priority category is based on 4 year spending data for each category for those who have required purchased goods and/or

services. Costs for priority one and two category cases are averaged together, as the business management system does not have a means to distinguish the historical costs among the two categories.

- Immediate priority (need for immediate services and/or goods to retain job at risk due to visual disability): \$3,636 per case per year
- Priority 1: \$3,404 per case per year
- Priority 2: \$3,404 per case per year

M. ORDER OF SELECTION

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1. DESCRIBE WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION.

After thorough review and evaluation, the Washington State Department of Services for the Blind (DSB) has determined that implementing an Order of Selection is necessary to ensure sufficient funds remain available for existing Individual Plans for Employment (IPE) and eligibility determinations. Implementing an order of selection on 10/1/2018 and closing all three categories will ensure funds remain available to provide services to all applicants and the full range of services to eligible individuals in an equitable and expeditious manner.

IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES.

When the order of selection is in effect, eligible individuals will be assigned to one of three priority categories:

- Immediate Priority – New applicants who meet eligibility criteria of at least significantly disabled, and who require immediate service or tools required to maintain their current job.
- Priority 1 – New applicants who meet eligibility criteria and the definition of most significantly disabled (MSD) (three or more functional limitations to employment that require substantial services over time)
- Priority 2 – New applicants who meet eligibility criteria and the definition of significantly disabled (SD) (one or two functional limitations to employment that require substantial services over time)
- Note: anyone who has no functional limitations to employment would not be found eligible for vocational rehabilitation services

Individuals applying for services in FY 2019 will be assessed and their eligibility and priority category determined based on functional limitations to employment due to visual and any other disabilities.

Eligible individuals' names will be placed on a waiting list in order by priority category by date of application.

When financial resources are available, first priority will be given to eligible individuals who require immediate services and/or goods to retain a current job that is at risk due to visual and other disabilities.

The Priority 1 category will be given to eligible individuals who are most significantly disabled with three or more functional limitations to employment due to visual and other disabilities that require substantial services over time

The Priority 2 category will be given to eligible individuals who are significantly disabled with one or two functional limitations to employment due to visual and other disabilities that require substantial services over time

Individuals whose cases are placed on a wait list will be provided information and referral services to other appropriate federal, state and community programs best suited to address the specific employment needs of the individual. These services will also include referral to programs carried out by other components of the Statewide Workforce Investment System. The information and referral service, where possible, should identify a specific point of contact within the agency to assist in preparing for, securing, retaining, regaining or advancing in employment.

A priority category, or categories, will be opened if and when adequate resources are forecast to be available. Individual cases will be taken off the wait list in a chronological order based on the individual's application date within an open priority category. Adequate resources are determined based on whether the agency forecasts being capable to provide individualized and comprehensive vocational rehabilitation services that are necessary for each case taken off the wait list.

B. THE JUSTIFICATION FOR THE ORDER.

The Workforce Innovation and Opportunity Act (WIOA) of 2014 requires 15% of the vocational rehabilitation grant to be set aside to provide pre-employment transition career exploration services for students with a disability.

The remaining 85% of the vocational rehabilitation grant is no longer adequate to cover the costs of individualized and comprehensive vocational rehabilitation services provided

to the same number of eligible individuals as before the 15% set aside was mandated. Federal carryover funds which had assisted the agency to continue to provide full services to the same number of eligible individuals after the 15% set aside have declined since 2015 and are now depleted.

In addition to the 15% grant reduction for services to the adult vocational rehabilitation population, DSB is experience increased costs due to the implementation requirements of WIOA which includes increased costs for American Job Centers/WIOA partner participation; staffing costs; travel, and training. Costs for participant services and goods also continue to increase.

The agency has a model of service provision that works to provide excellent rehabilitation services while containing costs. Most rehabilitation assessment and training services - which are necessary for almost every eligible participant - are provided by in-house staff: Rehabilitation Technicians provide administrative supports but also provide direct vocational assessment and job readiness services; Rehabilitation Teachers provide almost all assessment and training services for adaptive skills of blindness; and Adaptive Technology Specialists provide almost all technology assessments and jobsite accommodation services. To outsource any of these services provided by in-house staff would cost the agency significantly more, and skilled vendors statewide are rare or non-existent.

Purchased goods and services for participants are primarily represented by adaptive technology devices (approx. 573 participants and \$1 million per year); post-secondary education (approx. 177 participants and \$840k per year); job readiness and placement services (approx. 205 participants and \$320k per year); assessment (approx. 86 participants and \$205k per year); diagnosis and treatment of impairments (approx. 161 participants and \$160k per year); disability-related skills training (approx. 59 participants and \$146k per year), and other supports to ensure participation in vocational rehabilitation program.

DSB has reduced discretionary expenditures where feasible: staff training and travel have been strictly curtailed; centralized state agency supports have been analyzed and assessed for reductions; recruitment for critical positions have been delayed where the delay does not impact client services; identification of sources of comparable benefits have been explored and re-emphasized among staff; and, where client services are not impacted, vocational rehabilitation staff workloads have made temporary and part-time shifts to business management project and/or pre-employment transition direct service provision, and salaries accrued to those other funding sources accordingly. The agency has worked to identify funds due to the agency, and has worked to secure those funds.

For the VR adult program, DSB estimates funding of approximately \$21,955,000 for federal fiscal year 2018 and 2019 and we estimate approximately \$24.6 million in total expenditures. While we are working to close anticipated fiscal gaps, there will be a gap in FFY2019, and an order of selection will be necessary.

Projected Funding and expenditures for VR Adult Program:

Federal Year	Grant Funding (85%)	State Match	Total Projected Revenue	Total Projected Expenditures (Less Pre-ETS)
2018	\$8,036,786	\$2,558,988	\$10,595,774	\$11,425,000
2019	\$8,615,295	\$2,743,191	\$11,358,486	\$12,000,000
2020	\$9,133,250	\$2,908,113	\$12,041,363	\$12,000,000

C. THE SERVICE AND OUTCOME GOALS.

While the agency has served a 5-year average of 1360 individuals with visual disability through the Vocational Rehabilitation Program, under an order of selection projections indicate the agency may be able to serve as few as 900 individuals in the first year of implementation.

If that is the case, we expect employment outcomes to decrease proportionately. In the past 5 years the agency had an average of 158 employment outcomes, and the expectation would be that under an order of selection the number of employment outcomes would decrease to around 105 in a year.

The agency has not had consistent access to wage data for participants two and four quarters after program exit, so it is unclear what impact the OOS might have for those measures. It would be expected that if fewer individuals exit, there will be a smaller number of individuals earning wages at the second and fourth quarter after exit. However, with a smaller number of individuals exiting services, a result may be that the proportion of individuals earning wages after program exit might remain stable or increase. Even if it does, the expectation is that fewer individuals will receive necessary comprehensive vocational rehabilitation services, and fewer individuals with visual disabilities may enter the workforce as a result.

D. THE TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER.

Historic five year data shows the following average timelines of case services:

- Immediate priority - an individual who requires immediate goods and services to retain a current job at risk due to visual disability: Nine months

- Historic data is not available to distinguish timelines among priority one and priority two categories. As a whole, case timelines approximate 4 years on average

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

Services will continue for all clients who are already receiving services under an approved IPE prior to the implementation of order of selection.

Individuals who are determined eligible but have not developed a completed individualized plan for employment (at the time of implementation of the Order of Selection) are assigned to a priority category based on functional limitations to employment due to visual and other disabilities.

If the assigned category is closed, or is not fully open for provision of services to all within the category, the individual's case will be placed on a wait list until the resources are available to provide the full range of vocational rehabilitation services.

When the order of selection is in effect, eligible individuals will be assigned to one of three categories:

- Immediate priority (current job at risk)
- Priority one (most significantly disabled)
- Priority two (significantly disabled).

Eligible individuals categorized within the immediate priority require immediate goods and services to retain current employment at risk due to disability, and will be served first as resources allow. If the agency can only serve some but not all within the category, priority will be given chronologically based on date of application.

Eligible individuals determined within the priority one category demonstrate three or more functional limitations to employment due to visual and other disabilities that require substantial services over time. If the agency can only serve some but not all within the category, priority will be given chronologically based on date of application.

Eligible individuals determined within the priority two category demonstrate one or two functional limitations to employment due to visual and other disabilities that require substantial services over time. If the agency can only serve some but not all within the category, priority will be given chronologically based on date of application.

Students with a disability can be impacted by an order of selection when they are applying for individualized services. Students with a disability have the potential to benefit from the career exploration services through the Pre-Employment Transition

Services funds, which do not have a wait list, and may simultaneously apply for individualized vocational rehabilitation services, where a case may be placed on a wait list. The agency offers a progressive set of career exploration services, and agency intent is to engage every student in these pre-employment transition services before the student is determined eligible for individualized VR services. In this way, the agency will ensure that the pre-employment career exploration services are not interrupted even if a student's case is placed on a wait list for individualized services. While there are some complications in funding, such as providing necessary transportation for a student to take part in a pre-employment career exploration activity (a fault of how federal regulations over-proscribed how the career exploration dollars might be spent), the agency will attempt to mitigate these obstacles to fully engage the student in these career exploration activities. The agency's intent is that the OOS will not negatively impact the career exploration experience for students with visual disabilities.

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.

DSB will implement an immediate priority category to serve new applicants who meet eligibility criteria of at least significantly disabled, and who require immediate service or tools required to maintain their current job.

The immediate services or tools required to maintain the current job will be provided under this immediate priority. Once the immediate services or tools are provided and the job is stable, any further service provision requires being placed on the wait list and served in the priority and order for the significance of disability of the individual.