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# State Plan for 2024 – 2028: 2-Year Modification

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## Vocational Rehabilitation state plan overview

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each state must submit a Unified or Combined State Plan to the Secretary of the U.S. Department of Labor that outlines a four-year strategy for the state’s workforce development system. The publicly funded workforce development system is a national network of federal, state, regional, and local agencies and organizations that provide a range of employment, education, training, and related services and supports to help all job-seekers secure good jobs while providing businesses with the skilled workers they need to compete in the global economy. States must have approved Unified or Combined State Plans in place to receive funding for core programs. WIOA reforms planning requirements, previously governed by the Workforce Investment Act of 1998 (WIA), to foster better alignment of federal investments in job training, to integrate service delivery across programs and improve efficiency in service delivery, and to ensure that the workforce system is job-driven and matches employers with skilled individuals. One of WIOA’s principal areas of reform is to require states to plan across core programs and include this planning process in the Unified or Combined State Plans. This reform promotes a shared understanding of the workforce needs within each state and fosters development of more comprehensive and integrated approaches, such as career pathways and sector strategies, for addressing the needs of businesses and workers. Successful implementation of many of these approaches called for within WIOA requires robust relationships across programs. WIOA requires states and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified or Combined State Plans.

The Vocational Rehabilitation (VR) services portion of the Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

## Vocational Rehabilitation state plan subsections

### Input of the State Rehabilitation Council (SRC)

#### WIOA state requirement

All VR agencies, except for those that have an independent consumer-controlled commission, must have a State Rehabilitation Council (SRC) that meets the criteria in section 105 of the Rehabilitation Act.

#### Agency response

The designated State agency has established a State Rehabilitation Council.

#### WIOA state requirement

In accordance with Assurance 3(b), please provide information on the current composition of the council by representative type, including the term number of the representative, as applicable, and any vacancies, as well as the beginning dates of each representative's term.

#### Agency response

<b>Council representative</b>	<b>Current term number/ Vacant</b>	<b>Beginning date of term Mo./Yr.</b>
Statewide Independent Living Council (SILC), Brooke Wilson	2	10/25
Parent Training and Information Center, Amy Geoffroy	1	12/25

<b>Council representative</b>	<b>Current term number/ Vacant</b>	<b>Beginning date of term Mo./Yr.</b>
Client Assistance Program, Corinne Schram	1	03/23
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency), Katie Miranda	1	04/25
Community Rehabilitation Program Service Provider, Jennifer Cassidy	2	03/24
Business, Industry, and Labor, Ed Cortez	2	01/24
Business, Industry, and Labor, Bridget Dazey	2	10/23
Business, Industry, and Labor, Brian Sacre	2	03/25
Business, Industry, and Labor, Nicholas Kaasa	1	03/22
Disability Advocacy Groups, Ann Chakwin	1	03/25
Disability Advocacy Groups, Melaney Grenz	1	04/25
Current or Former Applicants for, or Recipients of, VR services, Julie Silberman	1	11/25
Section 121 Project Directors in the State (as applicable), Susie Calhoun	5	03/25
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA), Shava Feinstein	2	03/25
State Workforce Development Board, Jennifer Rice	1	08/25

<b>Council representative</b>	<b>Current term number/ Vacant</b>	<b>Beginning date of term Mo./Yr.</b>
VR Agency Director (Ex Officio), Keith Ozols	1	02/24
Developmental Disability Services Partner (state)	Vacant	

### WIOA state requirement

If the SRC is not meeting the composition requirements in section 105(b) of the Rehabilitation Act and/or is not meeting quarterly as required in section 105(f) of the Rehabilitation Act, provide the steps that the VR agency is taking to ensure it meets those requirements.

### Agency response

The SRC coordinator has recruited a current VR customer and is still recruiting with an ongoing effort with special attention to age, type of disability and other diversity needs of the council. The Workforce Talent Development Board (WTDB) position has been filled with a member of the Higher Education and Coordination Committee which is aligned with the WTDB. The State of Oregon added a position for Office of Developmental Disabilities and that one is vacant at this time, although Matt Serres, who is a former SRC member and is now staff for the Oregon Developmental Disabilities Commission participates on an ad-hoc level, so the SRC still has connections to the I/DD community. Jennifer Cassidy was in the CRP position and has had a change in career status and is still holding that position. The coordinator is in the process of recruiting a job developer to fill that position, and then Jennifer would remain on as an advocate until her term is over.

### WIOA state requirement

In accordance with the requirements in section 101(a)(21)(A)(ii)(III) of the Rehabilitation Act, include a summary of the council’s input (including how it was obtained) into the State Plan and any State Plan revisions, including recommendations from the council's annual reports,

the review and analysis of consumer satisfaction and other council reports. Provide the VR agency's response to the council's input and recommendations, including an explanation for the rejection of any input and recommendations.

## Agency response

### **SRC input 1**

The SRC recommends that the State Plan strategies to address the goals and priorities are written in a way that is Specific, Measurable, Achievable, Relevant and Time-bound (SMART). When reviewing the last State Plan, this committee felt that there were many goals that were not definable, measurable or trackable. The SRC would like to have a formal mechanism for tracking the goals, know who is assigned to monitor these goals, and receive reports as they are available but no less than annually on how the goals are being implemented and if they are successful and what are the barriers and possible solutions if they are not.

### **Agency response**

The VR program agrees that having Specific, Measurable, Achievable, Relevant and Time-bound (SMART) goals is a valuable mechanism to evaluate effectiveness in project implementation and programmatic change. The program started working with the Rehabilitation Services Administration (RSA) on our Corrective Action Plan from our recent monitoring visit, and the program committed to utilizing a SMART approach to addressing each of the areas of that plan. Those SMART goals are posted on VR's intranet site, so all staff have access to the SMART goals and their progress. The VR program agrees to use this same approach with the goals, and specifically with the strategies that will be set to accomplish the larger goals of the State Plan. Additionally, the program will provide the SRC with updates no less than annually. Because this State Plan will cover the next four years, and because the program is currently working on the Corrective Action Plan with RSA, it would not be prudent to include within this plan some elements of the SMART process. For example, establishing beginning dates for each goal will need to be timed and sequenced when appropriate and when sufficient resources and staff capacity is available for a successful implementation of the strategies.

## **SRC input 2**

Consistent practices across the state. This means that each branch is functioning similarly. Staff, customers and contracted providers would have the same experience regardless of which VR branch they are working in or accessing services from.

### **SRC recommendations**

- Consistent staff training on updated VR policy manual, at least annually.
- Updated staff training on customer service that include person-centered practices.
- Ensure consistent evaluation of meaningful customer contact according to VR policy.
- Standardized file review practices that are adopted statewide and trained to in each VR branch.
- Data collection will become more consistent with a standardized file review process that records and gathers data.
- Standard training for all staff based on information gathered from the file and service review.
- Standardized training for new staff.
- Create, fund and implement a service quality review process as part of the Consumer Satisfaction Survey conducted by the SRC. This survey should go out automatically to customers and contracted providers at certain points in the process to make sure the customer is being served well before exiting or closing their case.
- Manager review standardization: The RSA report indicates there is an expectation that branch managers review cases. It was stated that each office has its own process and tools for doing file reviews and onboarding. There is an expectation that branch managers also conduct reviews. However, each office has its own process and tools for conducting service record reviews and onboarding new staff.

## **Agency response**

The VR Program agrees to establish consistencies in practices across the state. To accomplish this, the program will standardize training for VR staff and establish statewide procedures to align service delivery across the state.

Additionally, the program will formalize statewide comprehensive quality assurance and file review processes to ensure adherence to policy. Reviews will be conducted at the local branch level and at a statewide level. The quality assurance team and other appropriate VR staff will work with the SRC's Evaluation and Recommendations Subcommittee to review the Consumer Satisfaction Survey and other data to develop recommendations based on customers' experience. We have submitted review questions and policies to RSA as a response to our monitoring findings. We are in process of developing communication and training plans.

As themes are discovered, the quality assurance team will work with the training and leadership teams to develop appropriate interventions and trainings to address any non-compliance issues. The quality assurance team will also review and share with agency and direct service leadership, training staff and policy staff to ensure findings are addressed.

Addressing the findings will be a combined effort between the Policy, Training and Direct Service units to ensure that there is consistent statewide service delivery. Initially, the Policy and Training units will work together to develop new policies and supporting processes that will address identified issues. The development of these new policies and supporting processes will be completed with input from advisory workgroups made up of direct service staff that will be directly impacted by these changes. The next step will be for the Training unit and the Direct Services unit to develop the trainings with a similar advisory workgroup made up of direct service staff.

Once the new policies and supporting trainings are completed then the Training unit will first train all the local Branch Managers who supervise all the Direct Service staff. This will be an opportunity for all VR Leadership to be trained at the same time, to resolve any confusion and to make any final revisions to the policy or training. Once this step is completed the Training unit will roll out a statewide training plan to ensure that all appropriate staff receive the

updated training for the consistent application of the new policies, processes, and service delivery.

The VR program recognizes the need for consistent practices leading to consistent experiences throughout the state; however, there may be some variation due to local branch realities. One example might be the use of specialized caseloads in some areas.

### **SRC input 3**

Increase communication that is representative of a customer-centered approach that includes communications that are disability-specific and culturally and linguistically appropriate.

- Communication between counselor and customer should be trauma-informed, non-violent, empowerment-based and using motivational interviewing techniques.
- Customer engagement: Create possible plan for VR to contact customer more frequently. For example, contact could be every 30 days using multiple modalities. Supervisors or management should review all cases before closure.
- Customers have expressed a mix of responses about satisfaction with virtual appointments. Steps should be taken to use the customers' preferred method and frequency of contact and learn what works best for them and why. Virtual appointments should be at the request of the customer and/or members of their team, not for the convenience of the program staff.

### **Agency response**

The VR program agrees with the SRC. RSA's recently released TAC 24-01 reinforces this approach and states that the best way to engage and build trust with customers is to maintain meaningful and sustained engagement with them throughout the VR process. The VR program will develop policies and practices to set clear guidelines for staff on how to engage with customers and respond to customer's needs in a timely manner.

#### **SRC input 4**

The SRC recommends that VR develops a defined menu of some of the individual services that could help customers overcome their functional limitations. The list would help customers and contractors determine what services can be requested, required or supported. Additionally, VR should update definitions of “supported employment” to include Individual Placement Support (IPS) services, customized employment and supported employment services, in order to align with regulatory definitions. Supported Employment Services are “on-going support services that begin at intake, continue with engagement, Individualized Plan for Employment (IPE), Job Search/Job Development and Follow-Along services, which may include job coaching.”

#### **SRC recommendation**

- Update policies, procedures and provide all-staff training on these updated supported employment policies.

#### **Agency response**

VR has recently updated its website with “Examples of services you can get” in the “[What Kinds of Services Can I Get](#)” section. Because each IPE is individualized, and the potential list of services needed to address an individual’s barriers to employment is vast, it would be difficult to create a comprehensive list of potential services. The agency agrees that staff could benefit from training on informed choice to be able to truly be a partner in developing each IPE with appropriate services. The program is finalizing the informed choice policy and will develop training for staff.

#### **SRC input 5**

The SRC recommends VR provide a more robust post-secondary education plan to youth and adults that supports their areas of interest and follows VR customers’ journey towards high wage jobs and self-employment opportunities.

- Continue to prioritize and track the completion rate of secondary education opportunities for youth and adults through the Inclusive Career Advancement

Program (ICAP) and other training opportunities such as internships, work-based learning, apprenticeships, trade school and certifications.

- Introduce students of all ages with disabilities to assistive technology and other accommodations earlier in their school/career experience.
- Encourage VR staff to attend Individualized Education Plan (IEP) meetings and explore career development with students, families and support people.

### **Agency response**

The VR program agrees that there are opportunities to create more robust supports for customers and potentially eligible individuals who are seeking post- secondary education and training. The program also agrees that assistive technology can be a vital support to assist access and completion of post- secondary training programs.

Currently VR is developing new contracts for the delivery of Pre-Employment Transition Services (Pre-ETS). These contracts will provide clarity around delivering post-secondary exploration for those potentially eligible students and eligible VR customers who can receive Pre-ETS. Secondly, VR has recently updated the Post-Secondary Education Policy to streamline the process and to provide more authority to counselors to approve plans that include post-secondary education and training services.

The VR program is committed to deepening the relationship with programs that provide assistive technology and will provide tools and guidance for staff about how to access and use these tools. The VR program is encouraged by the early results from the Inclusive Career Advancement Program, the Disability Innovation Grant-funded program that partners VR with community colleges across the state to create career pathways for VR customers. VR commits to continue investing in all of these efforts and seek other best practices in supporting people with disabilities in post-secondary education.

### **SRC input 6**

The SRC recommends VR expands services with the Centers for Independent Living, etc. around benefits planning.

**Agency response**

The VR program agrees that additional resources would benefit the Centers for Independent Living and the Work Incentive Network of benefit planners in Oregon. The VR program will continue to seek additional funding through the Oregon Legislative process. Additionally, the program will seek to identify other resources with other governmental and non-governmental programs that could co-fund these services. The VR program also will commit to partnering with the Centers for Independent Living to identify other funding streams that the centers could pursue to diversify their funding streams for a more sustainable budget.

**SRC input 7**

To better partner with VR in a timely and effective manner, the SRC requests that the VR program work with the SRC to create engagement processes such as timelines and communication strategies for projects that the two entities are required collaboratively to complete. These projects include, but are not limited to, the State Plan, the Comprehensive Statewide Needs Assessment and the Consumer Satisfaction Survey. Council members request timely notifications of project activities to create sufficient subcommittee workplans that allow for thoughtful feedback by SRC members. This will translate to improved project outcomes, regardless of who is managing these projects.

**Agency response**

The VR program agrees to collaborate with the SRC on shared projects like the State Plan, Comprehensive Statewide Needs Assessment and Consumer Satisfaction Survey. The program will assign VR staff to participate in each of the SRC’s subcommittees to ensure good communication and resources to accomplish shared goals. Additionally, the program proposes that members of the SRC and VR leadership convene a workgroup to develop a long-range timeline of upcoming projects to establish transparent beginning and end dates for upcoming projects.

### **SRC input 8**

Support increasing the response rate to the Consumer Satisfaction Survey by partnering with other organizations that serve culturally diverse VR customers.

### **SRC recommendation**

- To assist with disseminating the Consumer Satisfaction Survey in rural areas and among diverse racial and ethnic groups in Oregon, the SRC recommends VR partner with providers who speak languages other than English and provide culturally specific services.

### **Agency response**

The VR program is supportive of the goal to increase the response rate of culturally diverse populations. While the Customer Satisfaction Survey is one of the primary responsibilities of the SRC, the program commits to partnering with the SRC in this effort.

One forum for this activity would be the existing Evaluation and Recommendations Subcommittee, although there will be other opportunities for the program to support the SRC.

### **SRC input 9**

Contracted service providers have expressed technical difficulties and long wait times using the OregonBuys system. Further, Workday poses its own barriers to contractor success.

### **SRC recommendation**

- Make sure that a VR support liaison is available to assist contractors' use with both of these systems. This can ensure smooth application processes, decreased wait times and Workday system efficiencies.

### **Agency response**

The VR Program agrees that the OregonBuys and Workday systems can be a barrier for some providers. These systems are not under the authority and administration of the VR program;

therefore, the program is limited in what change can be made. With that understanding, VR is committed to advocating for greater supports provided by OregonBuys and Workday to current and potential providers trying to navigate those systems. Additionally, the VR Administration and Contracts teams will continue to assist current and potential providers to the greatest ability within our authorized role as a program using the OregonBuys and Workday systems.

### **SRC input 10**

Increased capacity and diversity for services in rural areas. VR partners have said there is a scarcity of program-supported ways to ensure customers have the full range of program provisions enjoyed by customers in more urban areas. Partners articulate creativity in developing relationships and opportunities for customer success and would like more support from VR in consider outside-the- box alternatives.

### **Agency response**

The VR program agrees that there is a need in some areas across the state for additional service providers and for multilingual and culturally responsive service providers. The program is committed to increasing services providers and investing in cultural competency training for VR staff to help the program meet the needs of diverse populations and rural communities across the state. This will be explored through traditional and new and innovative “out-of-the-box” methods.

Some of the resources the program is investing in to meet these goals is to partner with the ODHS Office of Equity and Multicultural Services and its community engagement team to seek out culturally diverse community-based organizations that could provide VR services. Additionally, VR’s Youth Team is developing contracts and opportunities for culturally diverse community-based organizations to provide those earliest interventions in a culturally responsive manner to best serve individuals seeking VR services.

## **SRC Order of Selection input**

VR Director met with the SRC co-chairs on January 31, 2025, to introduce and begin consultation about the need to explore an Order of Selection (OOS). On February 7, 2025, the VR Director presented on the need to implement OOS. He described what OOS is, why it would be used, and what the different OOS priority categories are. Additionally, the presentation included the financial realities that have led to VR to pursue using OOS and some of the efforts implemented to control costs. VR's Director invited OOS discussions and consultation with the SRC to continue in SRC subcommittee meetings, ad-hoc SRC meetings and with individual SRC members.

VR attended and presented at a series of sub-committees to consult on OOS:

- The SRC Executive Team met with VR leadership on the following days: February 28, March 28, and April 4
- The SRC Budget and Policy committee met with VR staff on the following days: March 10, March 24, and April 14
- The SRC Legislative Sub-committee met on April 3, 2025 with VR leadership to talk about possible requests for additional funds to help mitigate OOS needs.

There was also a full SRC meeting that occurred on March 21, 2025, on the budget and administration of OOS, including OOS policies.

April 1, 2025: VR held a public meeting for revisions to the PY 2024 State Plan, and communicated its intention to implement an OOS, and reviewed changes to OOS policies.

At these various meetings, data and context was shared highlighting the need for OOS. This included showing OOS rationale such as costs increasing, showing that VR has been flat funded, showing that the number of customers in plan is at a 10-year high. VR highlighted how the budget would be negative if an OOS was not implemented at the earliest point possible. Additionally, VR walked through what the proposed rule and policy changes were and highlighting that with the exception of adjusting the definition of priority category two to

match RSA feedback and 34 C.F.R. § 361.5(c)(30), the other changes were to bring clarity to existing rules that had been developed with the SRC.

Originally at the full SRC quarterly meeting on February 7, 2025, VR presented that there was a hope to enter an OOS by April 1, 2025, but that that might be too soon to happen. Later, after the February 28, 2025, Executive committee meeting VR communicated it would be targeting May 1st and has used that target date since then. From the beginning of conversations around OOS VR communicated to the SRC that the need was for all priority categories to be closed.

VR policy staff shared drafts of the OOS rules and policy drafts with the SRC Policy committee and requested comments. Many comments were received. Some of these were clarification questions regarding the implementation of an OOS, but others were suggestions to help clarify language or location of sections. There were no SRC requests for substantive changes that are allowable by federal law or rule that were denied.

Various responses and inputs from the SRC:

- There were many responses regarding the need for an OOS and the timing.
- There were many questions regarding the impact to customers and partners.
- There were suggestions have additional resources and partnerships that could assist potential customers receive assistance (Oregon Office of Developmental Disabilities Services, WorkSource centers, schools, etc.)
- There were many questions regarding the administration of the waitlist and how names come off the list. One SRC member felt that too many of our customers are categorized in priority category 1 and that the agency should consider either adding more categories or adjusting the definition of most significant disabilities. There was no consensus from the SRC to formally make this recommendation, so no changes were made at this time.
- Members of the SRC recommended that VR should continue to build relationships with other programs within the public workforce system to ensure VR clients that are placed on the waitlist can receive employment related services. Additionally,

members of the SRC recommended that VR continue to partner with local school districts to ensure students with disabilities can continue to receive Pre-Employment Transition Services and other VR services for those students with individualized plans for employment (IPEs).

VR agrees that it will be extremely important to maintain and strengthen relationships with other programs in the public workforce system. VR also agrees to committing to expanding relationships with the Oregon department of education and local school districts throughout the state.

All of these efforts are in addition to work that was done in 2020 around OOS. At that point the SRC and VR agreed to using three priority categories, what the definition of those categories are, and to use the exception for immediate risk of losing employment.

### **SRC 2026 mid-point input**

The State Rehabilitation Council has reviewed the previously submitted SRC Inputs in the State Plan from 2024-2028. Workgroups were held on January 8th and 15th and then the Evaluation and Recommendation Sub-Committee finalized the evaluation on January 20, 2026, to create these recommendations with Jennifer Rice, Chair of the subcommittee taking lead. A vote was held on January 22, 2026, to approve these updates to the SRC inputs. A quorum was met, and motion passed with a vote of 10/15 voting members approving the below recommendations.

### **SRC recommendations category 1 - SMART goals and formal tracking**

- Create and share an accessible, simplified version of the dashboard for SRC members; updated quarterly.
  - **Agency response:** VR agrees to this recommendation; VR has been working on quarterly dashboard with the SRC regarding the data elements and the dashboard format. This will be finalized over the next few quarters.
- Share the outcomes and tracking of previously developed SMART goals and strategies for the State Plan with the SRC.

- **Agency response:** VR will provide outcomes and updates for the previously developed SMART goals and strategies annually after the close of the Program Year.

### **SRC recommendations category 2 - Consistent practices across branches**

- Share Quality Assurance schedules, manager review metrics, and data around case transfers between offices and internally with SRC.
  - **Agency response:** VR will share Quality Assurance final reports and lists of proposed reviews within the quarterly SRC report. VR does not currently have a way to track data around customer transfers. VR has recently updated policies and procedures to improve consistency and customer service when case transfers occur. VR will evaluate the best way to identify improvements and communicate those to the SRC.
- Address inconsistencies (in training, QA, and onboarding) across branches and capture them to achieve consistency and alignment, including performance indicators and milestones. Share this data with SRC.
  - **Agency response:** VR agrees that it is important to address policy and procedure inconsistencies and has already implemented many quality assurance changes since the PY 24 – 27 state plan was initiated. Regular reports are produced with recommendations for various VR units. These review reports will be shared with the SRC.
- Share Dispute Resolution data with the SRC, including common themes, percent successful vs unsuccessful resolution, percent going to hearings, and outcomes. For repeat complaints against VR staff, share processes for how admin escalates concerns, requirements for staff training, or intervention and evidence that interventions result in improved practice by VR staff.
  - **Agency response:** VR will share dispute resolution data with that SRC as previously agreed to yearly. This will be based on the RSA – 722 Dispute Resolution report. This report includes the components listed. VR recommends

the SRC schedule time for VR's Dispute Resolution manager and a Client Assistance Program representative. VR will not be sharing staff member specific information because that would have HR ramifications.

- Create and share processes that demonstrate VR's commitment to protecting clients who share their concerns from retaliation by VR staff when they use dispute resolution or provide public comment
  - **Agency response:** Customers are provided information about the Client Assistance Program and VR Dispute Resolution so that VR can ensure there is an appropriate process to address customer concerns.

### **SRC recommendations category 3 - Customer-centered communication**

Improve communication during intake/eligibility in these areas:

- Process and procedure: (e.g., "what happens next," timelines, how to reach staff).
  - **Agency response:** VR agrees with the recommendation that processes and procedures should be improved. The agency is already in the process of updating these communication tools to account for recent changes such as implementing Order of Selection.
- Trauma-informed and client-informed communication:
  - Review the intake/eligibility workflow to ensure it centers client needs (choice, transparency, pacing, consent).
    - **Agency response:** VR agrees that it is important to have intake and eligibility process to be centered around client needs and timely. VR has made changes to how intakes and eligibilities are processed. These changes are reviewed regularly to evaluate for continuous improvement opportunities. VR has already seen dramatic improvements on the time from first customer's first contact with VR to application and steady improvement to get the eligibility rates to previous outcomes.
  - Train/refresh staff on trauma-informed practices and apply them consistently.

- **Agency response:** ODHS has a contract with Trauma Aware Oregon and VR will explore ways to include trauma-informed practices in our counseling and service delivery.
- Eligibility and service clarity:
  - Clearly communicate what made a client eligible for services.
    - **Agency response:** VR agrees it is important that customers understand what made them eligible. VR will proceed to make sure customers understand the impact of their eligibility determination including why they were determined, what the impact of that eligibility determination is, and make information and referrals as appropriate.
  - Provide a written eligibility summary (paper or digital) that clients can keep and develop a clear process on communication about extensions.
    - **Agency response:** VR agrees that communication around eligibility is essential. All clients receive an eligibility letter upon eligibility determination. That letter also provides contact information for how to proceed if they disagree with the eligibility determination or the priority category they are assigned to. At this point in the process customers also receive information on the waitlist process and are given information and referral that is appropriate to them. These expectations of staff are clearly described in procedures.
  - Require verification: obtain a client signature confirming they understand and agree with the assessment/eligibility determination.
    - **Agency response:** VR is following RSA requirements around eligibility determination. During this process customers are provided with information on how to appeal the decision and offer an opportunity to meet with VR staff.
  - Clearly tell clients what they are eligible for (services/programs) in plain language.

- **Agency response:** VR is not able to do this. Federal regulations are clear that eligibility determinations should not be based on what services are needed. This would also not be appropriate during Order of Selection when the customer's realities may change by the time their name is removed from the waitlist, and they begin IPE development.
- Communication quality:
  - Track and report on communication quality metrics besides only speed (missed calls, unanswered messages, clarity of explanation).
    - **Agency response:** VR is not able to track and provide this information. However, VR has adopted ODHS' customer service policy that addresses timely response to customers.
- Follow client preference for virtual vs. in-person meetings
  - Ask and document the client's preferred meeting format at first contact.
    - **Agency response:** VR has a procedure that honors the customer's preferred meeting format for intake and eligibility.
  - Offer in-person options and ensure IEU can meet in-person when preferred.
    - **Agency response:** Procedures state that customers are to be provided the option between in-person or virtual for completing intake and eligibility. Every office has a plan to address when a customer requests an in-person intake and eligibility. For some offices the solution will be for a customer to come to a VR office and use VR equipment to meet with someone from that branch complete intake and eligibility.
- Integrate Client Satisfaction Survey results into Quality Assurance Practices
  - Communicate what thresholds are (e.g., if satisfaction drops below X, initiate review and work collaboratively with SRC to address consistent results).

- **Agency response:** Once Client Satisfaction Survey results can be reviewed by the program, VR will work with the SRC to integrate results into the quality assurance, training, and policy development practices.
- Close the loop by reporting what changes were made based on feedback.
- **Agency response:** Customer feedback is reviewed and used to identify areas for improvement, inform quality assurance actions, and guide program adjustments, helping ensure concerns are addressed and improvements are made.

#### **SRC recommendations category 4 - Defined service menu and supported employment**

- Add examples and/or success stories for each type of service on the website to help clients understand what is possible
  - **Agency response:** VR will continue to post success stories for customers, potential customers, and partners to aid in understanding how VR can help them achieve career goals. VR will not post all services and / or a success of each possible service because that approach does not factor in the individual nature of services and that customers don't require the same services to achieve individual career goals.

#### **SRC recommendations category 5 - Post-secondary education supports**

- Report quarterly to SRC on education support: requests, approvals, denials and pending requests.
  - **Agency response:** VR has a policies and procedures for how to handle requests for services including Notice of Proposed Action (NOPA) processes that are required when services are denied. Additionally, the natural process of identifying a job goal and the services needed to achieve that job goal often includes discussions of possibilities that may or may not rise to an actual request.
- Share approval/denial framework (criteria, decision steps, and who approves).

- **Agency response:** VR will share the framework for how post-secondary service requests are processed.
- Explain VR’s plan for working with colleges after the ICAP grant ends (partnership approach, points of contact, and next steps).
  - **Agency response:** VR recognizes the importance of having a plan for when the ICAP grant ends and is currently exploring options. VR’s recommendation is that the VR ICAP program present at an upcoming SRC quarterly meeting to explain VR’s path forward after ICAP ends.
- Track and report explicit metrics for:
  - IEP-related participation rates in education/training.
    - **Agency response:** Currently there is not a method to collect this information. Additionally, VR procedures are that VR VRCs attend IEPs as scheduling permits. This may not always be possible because VR does not control the scheduling these meetings and multiple IEP meetings may be scheduled at the same time or at different schools.
  - Assistive technology exposure/use (definitions + how it’s measured).
    - **Agency response:** VR will provide the SRC with procedure manual definitions for assistive technology. VR is working to improve the tracking of provision of services, including for assistive technology, when provided by VR staff, purchased, and through comparable services and can share that when available.
  - Order of Selection impact on education support.
    - **Agency response:** VR tracks education support and participation rates and will be tracking how those participation rates change as Order of Selection is in place.
- Confirm policy/practice for career transitions: how VR supports clients who can’t continue in their trained field due to disability and need retraining.

- **Agency response:** VR policy and practice continues to support career transitions for individuals who are unable to continue in their trained or previous field of work due to disability. VR provides academic and vocational training services, including retraining in a different occupation when a disability prevents continuation in a prior career. These career transition services are designed to support successful employment outcomes and often contribute toward measurable skill gains (MSG) and credential attainment (CA), which are required VR program performance measures.
- Ensure training/education options are available for clients needing updated skills, including those with older degrees or outdated training.
  - **Agency response:** For current customers they should reach out to their VRC and go through a plan amendment process and these services can be added when required for their IPE goal. For individuals who are not current customers they would apply for services and then explain these needs during the IPE planning process.
- Provide client-facing guidance/support for navigating education and training: choosing programs, admissions/registration steps, financial requirements, and available “supported education” services.
  - **Agency response:** VR had documents such as these, but they are no longer used because of the level of individuality for each customer and situation. VR continues to provide essential services through counseling and guidance.
- Provide data linking education attainment to employment outcomes (e.g., credential earned vs. employment rate, wages, retention)
- **Agency response:** VR will provide data addressing this recommendation that is available at closure. Post-closure data is not available to meet the retention portion of this recommendation.

### **SRC recommendations category 6 - Centers for Independent Living and WIN benefits planner expansion**

- The SRC recommends VR expands services with the Centers for Independent Living around benefits planning.
  - **Agency response:** The VR agency agrees to seek opportunities to expand benefits services for Oregonians. While additional funding was not approved through a Policy Option Package (POP) during the most recent legislative “long session”, VR continues to pursue strategies that strengthen benefits services, build capacity among benefits planners, and support the delivery of high-quality benefits services statewide.

### **SRC recommendations category 7 - SRC requests the development of a communication plan**

Establish a formal SRC–VR partnership process that outlines how VR will engage the SRC early and consistently in planning, implementation, and decision-making.

- Create a joint SRC–VR workgroup with a clear purpose, scope, membership, and meeting schedule to coordinate shared priorities and resolve issues efficiently.
  - **Agency response:** VR agrees to this recommendation and will work with the SRC to develop a time limited workgroup to address needs on share projects (i.e. State Plan, Comprehensive Statewide Needs Assessment, and the Consumer Satisfaction Survey).
- Standardize VR participation in SRC subcommittees by assigning one designated VR staff member per subcommittee with a clearly defined role and responsibilities.
  - **Agency response:** VR agrees to this recommendation and has already identified several staff members to participate in existing subcommittees. VR will work to clearly defined roles and responsibilities for these staff.
- Adopt a clear communication and transparency plan that includes regular updates, decision points, and explanations of how consumer input was considered and used.

- **Agency response:** VR has been providing the SRC with in depth quarterly reports outlining programmatic updates. Over this time the program has consistently responded to requests from the SRC to include data and other elements into these reports. OVR will continue, in good faith, working with the SRC to provide information that can advance the mission of the SRC and VR. OVR will begin to document how consumer input was considered and used in communications with the SRC.
- Establish and share defined timelines and project roadmaps for major initiatives, including clear start and end points, milestones, and when SRC feedback is needed.
  - **Agency response:** VR agrees to this recommendation and will work with the SRC to develop a project management plan to address needs on share projects (i.e. State Plan, Comprehensive Statewide Needs Assessment, and the Consumer Satisfaction Survey).
- Improve continuity and knowledge retention by maintaining shared documentation (project summaries, decisions, and next steps) to support transitions when SRC members term off or positions are vacant.
  - **Agency response:** VR agrees to this recommendation and will work with the SRC to develop reference materials and other tools to support the operations of the SRC when members cycle off and new members join.
- Co-develop accountability measures (e.g., tracking follow-through on commitments, timelines, and feedback loops) to strengthen shared understanding and improve outcomes for consumers statewide.
  - **Agency response:** VR commits to working with the SRC on providing updates and information on the program’s projects and their timelines. We will keep the SRC informed of progress and use this information to support shared understanding and improved outcomes statewide.

### **SRC recommendations category 8 - Increase response rate to the Consumer Satisfaction Survey**

- Share CSS QR code and link with community partners in addition to clients to distribute to their clients.
  - **Agency response:** VR believe there is an incredible amount of benefit from CSSs. VR agrees that it is important to enhance the quality of the CSS. It is important to coordinate improvements with ORRAI to be able to utilize the expertise that they have. This assistance will be particularly useful in identifying best practices to improve survey participation rates such as the number of questions and identifying participants to complete the surveys.
- Provide an incentive to branches for helping people complete CSS.
  - **Agency response:** VR encourages working with ORRAI as described above to identify the best practices for this recommendation.
- Develop a process by which VR case managers reach out to clients served each month to promote CSS.
  - **Agency response:** VR encourages working with ORRAI as described above to identify the best practices for this recommendation.

### **SRC recommendations category 9 - Contracts frustrations with OregonBuys and Workday processes**

- Provide data to SRC on number of active VR contractors in OregonBuys and Workday and rate of growth/decline in available job placement contractors since the OregonBuys requirement was made, July 2021. Provide one time to analyze if there has been change.
- **Agency response:** VR agrees to this request and provide the data to the best of the agency's ability.

## **SRC recommendations category 10 - Service equity: Increase capacity and diversity of services in rural areas**

- VR to report quarterly on specific approaches tried to grow service providers and cultural competency to support diverse populations.
  - **Agency response:** As part of the quarterly SRC reports, the VR program will report on specific strategies to build cultural competency among service providers and improve culturally responsive outreach and service delivery for diverse populations.
- Report biannually on OOS impact on diverse population participation in VR services.
  - **Agency response:** VR agrees to this recommendation.

## **Comprehensive Statewide Needs Assessment (CSNA)**

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of the VR services needs of individuals with disabilities residing within the State.

### **WIOA state requirement**

Provide an assessment of the VR services needs of individuals with the most significant disabilities and their need for Supported Employment.

### **Agency response**

Oregon VR conducted a Comprehensive Statewide Needs Assessment (CSNA) in FFY 24. This CSNA was contracted with San Diego State University (SDSU – Interworks). This CSNA was conducted in partnership with the State Rehabilitation Council and included surveys, in-person forums, and individual interviews. Oregon VR has begun coordinating program changes with the Oregon Commission for the Blind (OCB), including around services for businesses. OCB and Oregon VR are on the same cycle for when the CSNA is due and will partner with OCB on production of some parts of the CSNA.

These are the executive summary findings from SDSU:

- VR is encouraged to continue to explore ways to increase and improve transportation options for individuals with disabilities in Oregon. VR can explore the creation of transportation task forces in rural counties/communities or use transportation network companies to identify options available and solutions for developing additional transportation resources.
- VR may consider identifying opportunities for key state-level and local partners to meet to strategize the expansion of individualized placement and support and fidelity-based, customized employment programs in Oregon.
- VR is encouraged to investigate the National Supported Employment Community of Practice facilitated by the Center for Innovative Training in VR at George Washington University. Representatives from VR systems nationwide learn together and benefit from shared problem-solving opportunities.
- VR may consider providing Supported Employment training for all staff and contracted providers to increase the use of this model where appropriate. This training should include the essential elements noted by nationally recognized groups like the Association of People Supporting Employment First (APSE) and Association of Community Educators (ACRE).
- VR may consider exploring new SE vendors in rural areas through pilots on unique reimbursement models to start building a network of qualified VR providers for these services.
- VR can explore options to ensure that all staff have access to and knowledge of affordable housing resources for their customers, including the 211 searchable database, affordable housing lists published by Oregon
- Housing and Community Services, supportive housing under section 811 for people with disabilities and community action agencies. VR should collaborate with other state agencies to develop a cross-agency task force to formulate targeted plans to address these gaps.

## WIOA state requirement

Provide an assessment of the VR services needs of individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program.

## Agency response

In 2024 Oregon Vocational Rehabilitation conducted a Comprehensive Statewide Needs Assessment. Below are the executive summary findings related to serving minorities and individuals who have been unserved or underserved by the VR program.

While not statistically vastly different from the majority population, there are potential service delivery gaps based on population data discrepancies.

However, a statistical analysis comparing ACS population statistics to VR enrollment demonstrates ODHS VR is serving a higher proportion of Native/American Indian, Black/African American, and Pacific Islander and lower proportions of White, Asian, and Hispanic/Latino populations.

- VR is encouraged to enhance the environment and culture of inclusion in the offices across the state.
- VR is encouraged to review the feasibility of creating disability or process- specific VR counselors to focus on outreach and increased services for the unserved and underserved population groups identified in the needs assessment process.
- VR may want to collaborate with state-level and local services and resources for aging Oregonians and potentially develop a working group to address this unique population.
- VR may want to expand staff training in Cultural Brokering and Disabilities and Culture to identify gaps and design solutions to develop culturally inclusive and proficient practices within VR based on state and region- specific needs.

- VR may consider the points recommended by the WIOA related to individuals living in rural areas as an unserved population and develop a specific workgroup to establish an improvement plan. The workgroup would include rural residents, rural business leaders, Tribal VR representatives and contracted providers.
- ODHS may consider establishing new partnerships and building on current partnerships with community organizations not typically engaged with VR but embedded in communities, such as cultural centers, places of worship, foster care agencies, homeless shelters, food banks, and community centers. These efforts could increase awareness of their services and build trust within these underserved communities.
- VR is encouraged to continue to recruit and hire additional bilingual staff to increase their ability to communicate with minority populations.
- VR is encouraged to provide training on trauma-informed care for all staff. Motivational interviewing, intersectionality, and cultural responsiveness, and how these elements impact individuals with disabilities.

### **WIOA state requirement**

Provide an assessment of the VR services needs of individuals with disabilities served through other components of the workforce development system.

### **Agency response**

Oregon VR conducted a Comprehensive Statewide Needs Assessment (CSNA) in 2024 through a contract with San Diego State University (SDSU) - Interworks. A portion of the CSNA focused on serving individuals with disabilities through components of the workforce development system. Some items of note:

- Oregon workforce system includes collaboration of VR staff serving on each of the nine workforce boards
- VR partners with local leadership teams that serve on business sector workgroups and work to meet business needs in communities across the state.

- VR engages with programs and partnering agencies in education and resource for individuals with disabilities in the workplace.

VR partnerships with other components of the Oregon workforce system have provided access for individuals with disabilities through shared workforce resources that include joint trainings, outreach to community and inclusive hiring events.

Additionally, SDSU provided the following points as part of the Executive Summary of the CSNA:

- VR is encouraged to reach out to the Oregon WorkSource across the state and to identify opportunities for training center staff on effectively working with individuals with disabilities.
- VR is encouraged to develop a plan for creating and facilitating disability awareness training for Oregon WorkSource staff. VR and WorkSource should explore cross-training opportunities where staff in both systems can learn from each other. Mutually attended events will contribute to networking, rapport-building and resource sharing.
- VR is encouraged to explore co-locating VR and WorkSource offices or assigning designated staff at each WorkSource office — and vice-versa — whenever possible.
- VR should seek to broaden collaborative practices highlighted by the Center for Advancing Policy on Employment for Youth and other national centers. An essential resource on advancing partnerships with WIOA Title I programs includes [Unlocking the Potential of Title I](#).
- VR is encouraged to co-create a resource guide and training for Oregon Workforce Partners and VR to provide to businesses about hiring, training, accommodating and retaining employees with disabilities.
- In partnership with the Oregon WorkSource, VR should seek to implement Integrated Resource Teams for customers served by the more extensive Workforce Development System. This team approach has proven to assist with leveraging

resources and increasing positive outcomes through shared planning and service delivery. More information can be found at [Workforce GPS](#).

### WIOA state requirement

Provide an assessment of the VR services needs of youth with disabilities, including students with disabilities and their need for Pre-Employment Transition Services. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services and the extent to which such services are coordinated with transition services provided under IDEA.

### Agency response

In 2024 Oregon VR contracted with San Diego State University (SDSU) – Interworks to conduct a Comprehensive Statewide Needs Assessment. Some education related aspects of the CSNA and how we serve youth are:

- VR engages in significant outreach to youth and students with disabilities and their family and support systems in a variety of ways. First, VR staff does outreach about Pre-ETS and the full continuum of VR Transition Services to statewide audiences at the following events: VR Inservice, Council for School Administrators annual Special Education Conference, Oregon Statewide Transition Conference, FACT Parent and Training annual parent transition planning institute. VR also provides outreach to schools locally through attendance at professional development events in schools, parent nights and career fairs.
- Our approach is simple: communicate regularly and honestly, be an accessible partner in through necessary changes. While VR has been in a time of transition with our school partners as we modernize our youth services delivery systems and contracts, our teaming and collaboration with the SEA and LEAs has yielded interest in and application for Pre-ETS contracts at a stable rate; 59 contracts in over 200 schools across Oregon.

- Our MOU with OCB, ODE and ODDS explicitly outlines increased efforts to share cross agency information in a variety of settings, including at school trainings around collaborative transition planning. Regional cross agency teams are building local implementation plans to address increase outreach.
- There are, always. We are currently investigating ways in which we can provide outreach to our incarcerated students and their families, as well as houseless students and their families in non-school environments such as through community resource centers.
- Our cross-agency transition plan, facilitated by the National Technical Assistance Network on Transition (NTACT) has a goal to increase family engagement, and will first be listening and learning about the interest in families across Oregon to engage in mentorship before we'd initiate such a project.
- VR is intentionally moving toward Pre-ETS as a service available to the widest number of students possible instead of concentrated programming for a select few. This coming year will be our baseline year from which we will determine approaches which may be scaled out.
- VR has a strong partnership with FACT, Oregon. FACT's mission is to Empower Oregon families experiencing disability in their pursuit of a whole life by expanding awareness, growing community, and equipping families. Every employee of FACT is a peer, meaning they are a direct familial support for an individual who experiences disability. FACT has been the State of Oregon's contracted parent and training organization since 2012. A representative from FACT serves on our NTACT statewide cross agency transition team and contributes to our goals and state plan. VR will continue to develop and strengthen our partnership with FACT in the pursuit of identifying families, resources and events which can support and mentor families as they progress through the continuum of VR services.

Below is the executive summary from the CSNA related to serving youth:

- VR is encouraged to engage in significant outreach to youth and students with disabilities throughout the state to effectively mitigate the challenges cited related

to accessing the Youth Transition Program, Summer Youth Employment Program, and the transition to adult VR services. These challenges occurred following RSA's monitoring of Oregon VR where RSA required Oregon VR to discontinue the above programs and reconstitute how youth are served.

- VR would benefit from re-establishing and nurturing relationships with the local school districts in Oregon.
- VR is encouraged to explore the opportunity to contract with additional vendors to provide Pre-Employment Transition Services.
- VR is encouraged to create outreach tools and make resources accessible to navigate for families.
- VR is encouraged to formulate an outreach plan to transition staff and families to ensure all students with disabilities have access to information about VR services.
- VR is encouraged to identify “mentor families” who could provide peer support to new families.
- In partnership with Oregon Department of Education, VR is encouraged to establish Model Transition Program sites where transition and Pre-ETS thrive. These MTPs could serve as a demonstration or mentor school for lower-performing schools. Schools in rural locations should receive technical assistance to demonstrate the same practices adapted to their setting.
- VR is encouraged to promote post-secondary education training for youth in transition. There is room for growth in the number of individuals supported by the agency in higher education programs, and youth in transition are an important focus in this area. The existence of the Individual Career Advancement Program (ICAP) funded by RSA can be further leveraged to advance this work and expand beyond the state's community college system.
- VR is encouraged to continue to provide self-advocacy skills instruction for students with disabilities. This area of strength for the agency can be enhanced by developing and implementing a peer mentoring program in Oregon. One

possibility is an online peer mentoring program available through [PolicyWorks](#). A vital component of this mentoring program is the development of self-advocacy skills in youth and students with disabilities.

## WIOA state requirement

Identify the need to establish, develop or improve community rehabilitation programs in Oregon.

## Agency response

In 2024 Oregon VR contracted with San Diego State University (SDSU) – Interworks to conduct a Comprehensive Statewide Needs Assessment. Some service gaps were identified around: customized employment, youth/transition services, Job Placement Service Contract Overview, and benefits planning. As part of this process Oregon VR has begun identifying joint trainings to provide with community rehabilitation programs (CRPs) and VR staff to improve services.

Below is the executive summary from SDSU related to community rehabilitation programs:

- VR is encouraged to partner with CRP groups and organizations like APSE (Association of People Supporting Employment First), OSECE (Oregon Supported Employment Center for Excellence/IPS (Individual Placement and Support), and others, to assess gaps and needs in the field and co- develop a strategic plan for attracting professionals to the state's CRP and VR positions.
- VR is encouraged to engage in cross-training opportunities with contracted providers using person-centered models, motivational interviewing, trauma-informed practices, and culturally responsive approaches.
- VR may consider expanding the Job Development Orientation Training series in alignment with nationally recognized groups, with evidence-based practice models, with standards related to providing high-quality employment services.

- VR is encouraged to develop Supported Employment and Competitive Employment providers for their consumers who need these services in areas with limited access to these services or other Community Rehabilitation Programs.

## Goals, priorities, and strategies

Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under section 107 of the Rehabilitation Act.

### WIOA state requirement

VR agencies must describe how the SRC, and the VR agency jointly developed and agreed to the goals and priorities and any revisions.

### Agency and SRC response

The SRC and VR agency worked in close partnership to prepare for and develop the goals and priorities for this combined state plan. VR partnered with the SRC in 2023 to help plan and prepare for a Comprehensive Statewide Needs Assessment (CSNA) and three forums: one for VR leadership, one for the SRC, and a public forum for partners, customers and staff. Both parties worked diligently to create in-person and virtual opportunities for customers, partners, and staff to share their experiences, insights, and ideas for improvement within the VR program. The SRC and VR promoted the public forum in Spanish and provided interpreters. Additionally, an electronic survey, available in English and Spanish, was used to gather input from those who could not attend or were not comfortable speaking up in a public forum. The CSNA was completed on January 10, 2024. The results of the CSNA, forums, and survey were compiled and reviewed for consistent themes that were used to inform the goals and priorities of this plan. Themes identified were consistent across all findings. Some of

the themes identified in the CSNA that informed the goals established in this plan are related to helping customers explore education and training programs.

Some other comparable benefits, services and consumer needs identified in the CSNA were affordable housing resources, services for aging Oregonians and ways to address a paucity of rural transportation. The SRC and VR are committed to developing a list of resources that can be housed and updated on the internal “Staff Tools” website to address these needs.

Continuous efforts will be made by VR and the SRC to partner in the accomplishment and tracking of these goals and priorities.

We agree with the SRC that prioritizing post-secondary education is important so that our customers will be able to focus on careers. That is why we have a strategy on how to increase customer participation in post-secondary education. Additionally, Oregon VR has already incorporated a new program, ICAP (Inclusive Career Advancement Program), that helps facilitate customers into career focused post-secondary services.

### **WIOA state requirement**

Identify measurable goals and priorities in carrying out the VR and Supported Employment programs and the basis for selecting the goals and priorities (such as the CSNA, performance accountability measures, SRC recommendations, monitoring and other information). As required in section 101(a)(15)(D), (18), and (23), describe under each goal or priority, the strategies or methods used to achieve the goal or priority, including as applicable, description of strategies or methods that:

- Support innovation and expansion activities;
- Overcome barriers to accessing VR and Supported Employment services;
- Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post-secondary education, employment and Pre-Employment Transition Services); and

- Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.

## Agency response

### **Goal 1: Do a great job assisting customers.**

VR will reach this goal through the following strategies:

- Create processes to hear directly from customers about how VR could improve.
  - Support the SRC in completing the Consumer Satisfaction Survey and use the data to develop new strategies to reach diverse groups.
  - Develop a process for customers to give immediate feedback on VR services, including youth services.
- Do a better job explaining VR services and processes to current and new customers.
  - Create an updated video that explains VR services for people who don't know about VR.
  - Create materials to help explain VR process and activities.
  - Work with partners that have trusted relationships with the disability community, including youth, to share information about VR services.
  - Train VR staff to use assistive technology and devices to communicate with customers.
- Communicate with customers in their preferred language, format and style.
  - Make sure all written communication materials for customers are in plain language.
  - Create outreach materials and methods in a format that works best for the audience.
  - Translate client documents into their language.

- Make standard VR forms available in different languages and formats.
- Make outreach materials available in different languages and formats.
- Speed up the process of getting services.
  - Once a person applies, speed up the time it takes for them to become eligible.
  - Once someone is eligible, speed up the time it takes to start meeting with their VR Counselor to create an Individualized Plan for Employment.
  - Give decision-making power to the right people so decisions can be made faster. Review and update policies to re-assign decision authority where needed.
- Help customers explore education and training programs.
  - Review and update policies to remove barriers.
  - Look to the Inclusive Career Advancement Program (ICAP) team for ways the program could further support customers in accessing training for high-demand fields.
  - Increase the number of students getting Pre-Employment Transition Services (Pre-ETS) throughout the state.

**Goal 2: Make and improve partnerships.**

VR will reach this goal through the following strategies:

- Strengthen partnerships with Workforce Partners to serve more people.
  - Look for opportunities for Workforce Partners to provide employment services to customers.
  - Share data with Workforce Partners to track outcomes and avoid duplicating efforts.
  - Collaborate with Workforce Partners on opportunities to share information about VR in community settings.

- Identify organizations that have relationships in rural areas and with underserved communities — Black communities, people of color, Indigenous communities and other culturally specific communities.
  - Partner with ODHS Communications and the Office of Equity and Multicultural Services to identify new organizations, create communication materials and identify outreach opportunities to share information about VR.
- Develop a process for customers to share feedback about their experience working with VR's contracted service providers.
- Make sure customers and partners are included in creating policies that help VR to be effective.
  - Conduct regular reviews of the VR Policy Manual and Oregon Administrative Rules (OAR) with program partners and contractors to make sure policies are current and that they eliminate barriers to effective service delivery.
  - Ask for input on policy changes from the SRC, which represents the needs and concerns of VR customers. This review will take place every two weeks when the SRC Policy Committee meets.
  - Ask for input on rule changes from the Rules Advisory Committee, which advises VR on how its rules affect people with disabilities.
- Continue to invest in training for contracted providers in order to provide professional, consistent services throughout the state. Topics will include:
  - Contract trainings specific to job placement services providers.
  - Building new skills to help customers.
  - Meeting national standards and following best practices.
  - Psychosocial communication accommodations — communication techniques assist in engaging with people with mental health conditions. Example techniques include motivational interviewing, trauma-informed care,

nonviolent communication, de-escalation techniques, collaborative problem solving, and addressing microaggressions.

- Build and maintain relationships with businesses.
  - Vocational Rehabilitation will expand and strengthen engagement with the business community by increasing outreach and training focused on employing people with disabilities. This includes increasing participation in statewide and local business events to share information about VR services, delivering presentations to businesses on disability in the workplace, and expanding the number of businesses served with disability-related resources and support services. Through these efforts, VR will enhance employer awareness, build inclusive workplace practices, and increase opportunities for individuals with disabilities.
- Work with the National Employment Team to have a unified approach to working with business customers.
- Coordinate with the Oregon Employment Department’s Business Services Team to share information about VR with businesses.
- Partner with the local workforce development boards to coordinate services and share resources.
- Bring on more contractors to provide services to youth with disabilities.
  - Create a fee-for-service contract for Pre-Employment Transition Services for youth and phase out current contract.
  - Bring on more contractors who can fill gaps in services. This includes contractors who can serve rural areas, who can work outside of school hours, and who have the language and cultural skills to work with diverse populations.
  - Bring on more contractors who can provide opportunities for students to get work experience year-round.

- Build relationships with schools, families and programs to serve more youth with disabilities.
  - Connect with families and students with disabilities about VR youth services to increase awareness.
  - Work with partners that have trusted relationships with families to share information about VR services.
  - Develop policy that specifically addresses youth-related topics and requirements.
  - Develop and implement training for staff and partners.

**Goal 3: Hire and keep diverse, well-trained staff.**

VR will reach this goal through the following strategies:

- Make VR offices across the state more welcoming to employees of diverse backgrounds.
  - Partner with the ODHS Office of Multicultural Services and the VR Service Equity Committee to put into action the ODHS Diversity, Equity, Inclusion and Belonging Plan.
  - Share information with new staff about how they can get involved with ODHS affinity groups, called Employee Resources Groups.
- Continue to recruit racially diverse and bilingual staff who reflect the demographics of Oregon to be effective in serving customers with various languages and cultures.
  - Conduct targeted outreach to colleges with diverse student bodies to encourage students to either apply for an internship or employment with Oregon VR.
  - Expand and refine recruitment and hiring practices to reach more applicants. Use ODHS resources that support and invest in a diverse workforce.

- Train VR staff to provide services in a way that is respectful of different cultures and disabilities.
  - Expand staff training in cultural brokering, a practice that helps people from different cultures understand each other.
  - Provide trainings for VR staff in psychosocial communication accommodations — communication techniques assist in engaging with people with mental health conditions. Example techniques include motivational interviewing, trauma-informed care, nonviolent communication, de-escalation techniques, collaborative problem solving, and addressing microaggressions.
  - Identify areas where further training is needed.
- Provide training and professional development opportunities for staff in all positions to provide professional and consistent practices across the state.
  - Train all staff on new and updated policies.
  - Train new staff, including new managers, on all policies and procedures.
  - Use data and case file reviews to develop training plans.
  - Train staff on expectations for how and how often they communicate with customers.
  - Train staff on how to move customers quickly through the VR eligibility process.
  - Create training on how to use the program’s case management system that keeps track of all VR customers and their progress.
  - Create training on fiscal management to help staff quickly authorize contracted services and approve invoices, and to make sure they are including the right supporting documents.
- Continue to develop and support Vocational Rehabilitation Specialists, who are experts in specific disabilities or program areas.

- Create a supportive system for interns by expanding support for supervisory staff.
- Start a formal mentoring program for direct service, program and non-management staff.
- Start a mentoring program for new staff to help them understand their role. Ideally this will improve performance and their job satisfaction.
  - Develop a mentoring program for staff with several years of experience to develop new skills or explore different areas of the program.

**Goal 4: Make sure our processes work well and we can effectively assist customers.**

VR will reach this goal through the following strategies:

- Create and put into action a thorough system of good internal controls, policies and procedures to make sure we follow federal rules and document requirements correctly.
  - Review and update required forms to make them easier and less time consuming for staff.
  - Conduct a review of existing policies and procedures to revise decision-making authorities where necessary in order to provide authority to appropriate levels and expedite service delivery.
  - Update the intake and application process to make accessing services simpler for customers.
- Move towards rapid engagement to reduce the number of customers who drop out prior to plan development.
  - Reduce the overall count of days from application to eligibility and eligibility to plan development.
- Provide ways for staff to provide input on the vision, goals and future direction of the program.

- Establish advisory groups that will have rotating membership to give opportunity for more participation. Examples include groups to advise on policy, Youth Services, and the case management system.
- Set up strong internal control for the federal grant award to make sure the program is managing the grant money properly, following all federal laws and meeting the terms of the grant.
  - Review internal controls annually. When authority updates occur, identify if we need to update, develop or discontinue any controls.
  - Develop appropriate training for new and updated internal controls.
  - Implement new internal controls and related procedures.
- Draft and implement a monitoring plan with a risk management component that evaluates financial, legal, security and brand risk in accordance with federal and state requirements. The plan will monitor expenses and case files to make sure we are following federal and state requirements.
  - Make sure there are appropriate internal controls to support this monitoring plan.
  - Communicate with staff on all aspects of the monitoring process and how it will be implemented.
- Draft policies, procedures and internal controls over contract monitoring that include monitoring policies and procedures; a monitoring schedule; and a risk management component that is compliant with the federal and state requirements.
  - Write applicable policies and internal controls.
  - Develop training for staff and contractors.
  - Update contracts as needed.
- Develop policies and procedures for how we collect and verify our data.

- Regularly update VR's case management system to keep it secure from bad actors and incorporate the latest features and improvements.
- Streamline data gathering procedures to improve staff efficiency and reduce administrative burden.
- Develop policies and procedures for how VR tracks customers who earn a credential for completing a training or education program.
- Conduct regular reviews of the VR Policy Manual to make sure policies are current and streamlined to eliminate barriers to effective service.
  - The Policy Advisory Committee will meet quarterly to review current policy and ensure artificial barriers to service are eliminated.
  - The Policy and Compliance team manager will host an “open office hour” monthly for staff to interact, ask questions or provide feedback and suggestions.
- Improve consistency of case practices by implementing a case review process to reduce findings and improve customer satisfaction.
  - Conduct quarterly, annual, and as-needed quality assurance case reviews to evaluate the quality of services provided.
  - A model for multi-office case service record reviews will be developed and implemented by the QA team to ensure accuracy of local level review data and to inform policy clarifications and training needs of the program.
  - Branch managers will conduct local level case reviews to assist with case-specific decision making, ensure compliance, and determine if adequate progress is being made for the customer.
  - Conduct an annual statewide survey with VR customers to determine levels of satisfaction with services provided.
- Provide customers with more support in becoming self-employed.

- Work with the policy team to simplify and clarify policy and processes for customers interested in pursuing self-employment, including supported self-employment.
- Provide ongoing training to VR staff on self-employment policy and processes.
- Create process for VR Workforce and Businesses team to better collaborate with VR counselors in matching customers to jobs that fit their goals and meet the needs of businesses.
  - Create a process for VR staff to request case consultation or direct support from the team.
  - Share information with VR counselors and contracted providers about opportunities for career seekers.
  - Provide VR staff, customers and partners with training and support on employment readiness skills that are industry specific.
  - Connect contracted employment service providers with businesses when an employment opportunity aligns with the customer's employment goal.

## **Evaluation and reports of progress: VR and Supported Employment goals**

### **WIOA state requirement**

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe progress in achieving the goals and priorities identified for the VR and Supported Employment programs.

### **Agency response**

The VR program goals and priorities established in the 2024-2027 Combined State Plan were as follows:

**Goal 1: Do a great job assisting customers.**

VR has made progress toward achieving this goal through its work on the following priorities:

- Create processes to hear directly from customers about how VR could improve.
  - The SRC worked to develop a [2025 VR Consumer Satisfaction Survey](#) which was launched in May 2025. The Office of Reporting, Research, Analytics, and Implementation (ORRAI) has created and manages the survey system. VR is anticipating a report from the SRC and ORRAI during the August 2025 quarterly meeting. Ongoing quarterly review of survey results will be conducted for continuous program improvement.
  - ODHS is currently establishing a real time survey for customers who come into ODHS offices. VR is working with them to roll this out in local offices as part of the pilot process. This will allow for real time feedback on how VR is doing with customer service.
- Do a better job explaining VR services and processes to current and new customers.
  - VR launched a new program video in April 2025. The program video is called, "[This is Vocational Rehabilitation](#)." The video is available from the external [Vocational Rehabilitation Services Homepage](#) by clicking the "Watch our program video" button.
  - VR has created a new Referral form that allows clients and partners to make easier referrals to VR as well as the document explains what is needed at the intake meeting to assure clients are prepared when arriving.
  - Staff have been trained on DocuSign to use for virtual intakes so that clients can be seen sooner and with ease of access.
  - Staff have also been trained in AwareSign to allow for ongoing communication and document signing.
- Communicate with customers in their preferred language, format and style.

- VR has developed a formal review process for its forms and brochures to verify that materials are written in plain language. Processes have been developed with program leaders to update forms that are not written in plain language. Information posted on VR’s external website was reviewed and updated by ODHS Communications for plain language and improved accessibility.
- VR is in the process of reviewing all documents and forms that go out to clients to ensure that all forms are in multiple languages and available for clients in their preferred language.
- Speed up the process of getting services.
  - VR has implemented and intake and eligibility process to reduce the time from referral to application which will have a direct impact on the times to eligibility and to plan development. This process has been successful in getting all client referrals scheduled for intakes within 30 days of referral.
- Help customers explore education and training programs.
  - With the successful implementation and support of the Inclusive Career Advancement Program (ICAP) DIF grant, VR has had over 650 enrollments in post-secondary education/training programs. Of these programs, students have completed 26,606 credit hours in 117 unique educational pathways statewide as of January 2026. The most common career pathways are welding, early childhood, peer support, and computer information sciences.
  - Updated policy on Post-Secondary trainings and have provided training to all staff in the agency on the new policy for education and training.
  - With the growth of those providing Pre-ETS within and on behalf of Vocational Rehabilitation, there’s been an increase in the delivery of the Pre-ETS Counseling on Post-Secondary Opportunities from 1635 July 2023-June 2024 to 2612 July 2024-June 2025.

**Goal 2: Make and improve partnerships.**

VR has made progress toward achieving this goal through its work on the following priorities:

- Strengthen partnerships with Workforce Partners to serve more people.
  - Vocational Rehabilitation successfully advanced its goal to increase workforce services by strengthening partnerships with Workforce partners. Compared to program year 2023, program year 2024 and 2025 demonstrated an increase in the number of VR customers who also sought and received services from Workforce partners, reflecting more integrated and coordinated service delivery.
  - This progress reflects the consistent and intentional collaboration between VR and Workforce partners, including regular joint meetings, increased on-site office presence, and cross-training opportunities. These efforts enhanced communication, improved referral processes, and increased staff awareness of available services, resulting in more customers benefiting from shared resources.
  - Outcomes can be monitored through data tracked in ORCA, specifically within referral source and comparable benefits fields. The data confirms improved utilization of workforce partner services by VR customers, demonstrating the effectiveness of strengthened partnerships and collaborative practices. As a result, this objective is considered successfully met, with a sustainable foundation established for continued interagency collaboration and expanded workforce service access in future program years.
  - VR leveraged workforce alliances to expand outreach to and serve more individuals in the community. Through ongoing collaboration, VR and workforce partners developed coordinated messaging and informational material for use in community settings, increasing awareness of VR services among workforce partner staff and participants.
  - As a result of these unified efforts, Workforce Partners increased the number of VR participants they served in program year 2024 and 2025 compared to program year 2023. Shared information, cross-agency communication, and

coordinated outreach activities supported more effective referrals and engagement of individuals who could benefit from VR services.

- Progress toward this goal was realized through regular partner communication, joint planning efforts, and shared use of community-based outreach opportunities. Data reflecting increased engagement of VR participants by workforce partners demonstrates the effectiveness of these strategies. This objective is considered successfully met, with strengthened interagency relationships and improved community awareness contributing to expanded access to services.
- Identify organizations that have relationships in rural areas and with underserved communities — Black communities, people of color, Indigenous communities and other culturally specific communities.
  - VR has hired Vocational Counselor Specialist for Rural Engagement and Tribal Services to assist with this goal. In their roles they will work closely with the local communities to establish relationships to better serve our clients and partner to serve tribal clients.
  - VR's Service Equity Council is partnering with the ODHS's Office of Equity and Multicultural Services to move forward with accessible service for clients of all populations statewide.
  - VR is strengthening our partnership with the Warm Springs Tribe. We were invited to table at a community event, Pi-Ume-Sha Days, in partnership with the mobile Worksource Van in order to connect with the students and families that were in attendance to share about Pre-ETS. We have open partnership with Tribal VRCs in sharing resources and opportunities around Pre-ETS curriculum and activities.
  - VR also attended two informational sessions held at Chiloquin High School in partnership with Central Oregon Disability Support Network and the Transition Network Facilitator aimed to spread the word about Pre-ETS availability and

how we can work in tandem with the Klamath Tribe to provide a culturally responsive, holistic approach to service delivery.

- Develop a process for customers to share feedback about their experience working with VR's contracted service providers.
  - This project has not begun and is dependent on other projects being finished first.
- Make sure customers and partners are included in creating policies that help VR to be effective.
  - The VR program has established a formal Policy Advisory Committee that reviews, provides feedback and helps develop all new policies and rules. This committee acts as a formal policy review process that ensures representation by members from every facet of our program. This includes HSAs, VRCs, Branch Managers and professional program staff. This group is responsible for ensuring input is provided on all new policies before they are implemented.
  - The State Rehabilitation Council has a formal standing Policy and Budget Advisory Committee. The Policy and Compliance team regularly meets with this subcommittee on a bi-weekly basis to discuss program policy changes as well as to solicit feedback and guidance on all proposed policy or rule changes.
  - The VR program is statutorily required to take all proposed rule changes to a Rules Advisory Committee. This committee then provides feedback and recommendations on all new rule revisions in a public forum. These recommendations are then reviewed by the VR program and if feasible, implements those recommendations into new policy prior to publication.
  - The intake and application process has been updated with a new referral form, a new service questionnaire and toolkit rolls that outline all of the process from referral to intake. This has allowed VR to reduce the time from referral to application to 30 days or less.

- With the intake and eligibility team now working on this process we have streamlined this process to be more efficient but due to OOS plan development has not been able to be determined as all individuals are currently going onto a waitlist.
- Policy team is working on revamping the Self-Employment process and VR has hired a Vocational Counselor Specialist for Self-Employment that will provide more support for VRCs in the agency to support clients in their goals of self-employment.
- Continue to invest in training for contracted providers in order to provide professional, consistent services throughout the state.
  - The job placement services contract training has been updated to match the amended contract. Evaluations will be provided upon completion of each training session. The job placement services contract training is provided virtually twice a month.
- Build and maintain relationships with businesses.
  - Vocational Rehabilitation will expand and strengthen engagement with the business community by increasing outreach and training focused on employing people with disabilities. This includes increasing participation in statewide and local business events to share information about VR services, delivering presentations to businesses on disability in the workplace, and expanding the number of businesses served with disability-related resources and support services. Through these efforts, VR will enhance employer awareness, build inclusive workplace practices, and increase opportunities for individuals with disabilities.
  - Vocational Rehabilitation continues to expand and strengthen relationships with the businesses by increasing outreach, education, and training focused on employing individuals with disabilities. VR delivers “Lunch and Learn” series to promote employer awareness and education on disability in the workplace, conducts business collaboration trainings, and participates in shared

workforce partnership trainings to strengthen ongoing engagement. Staff are increasing participation in statewide and local business events, conducting business tours, and providing presentations to employers on disability inclusion and available VR services. VR is also continuing to expand the number of businesses served with disability-related resources and support services. All business engagement activities are being tracked in ORCA through business services data. Through these ongoing efforts, VR is enhancing employer awareness, supporting the development of inclusive workplace practices, and increasing employment opportunities for individuals with disabilities.

- Work with the National Employment Team to have a unified approach to working with business customers.
  - Vocational Rehabilitation continues to collaborate with the National Employment Team (NET) to support a unified and coordinated approach to serving business customers. VR participates in ongoing NET-facilitated meetings to gain information on national business partnerships and to identify opportunities to leverage these relationships within Oregon. Through NET collaboration, partners across states share resources and information, strengthening coordination and enhancing the delivery of effective services to multi-state and national employers.
- Coordinate with the Oregon Employment Department’s Business Services Team to share information about VR with businesses.
  - In 2025, the Oregon Employment Department’s (OED) Business Services Team experienced significant changes, resulting in the reassignment of many Business Services staff. These changes impacted established collaborative practices between VR and OED, including joint business meetings and shared employer engagement. As a result, VR adjusted its approach to coordination, gaining a clearer understanding of which OED staff are assigned to direct business engagement roles and which serve in more generalist capacities.

- Looking ahead to 2026, VR plans to engage in intentional outreach with OED managers to strategize and strengthen coordination efforts with shared business partners. The VR Workforce Team continues to maintain access to iMatch, the statewide labor exchange system, which supports increased collaboration when serving dual customers shared by VR and OED
- Partner with the local workforce development boards to coordinate services and share resources.
  - Vocational Rehabilitation partners with local workforce development boards to coordinate services and share resources in support of employers and job seekers. VR has participated in Oregon workforce development board activities that include business outreach and education efforts, contributing expertise on disability inclusion and available workforce services. A key collaborative effort includes participation in the Customer Journey Mapping Initiative, an ongoing project designed to develop a comprehensive customer journey map. This initiative allows workforce partners to view state workforce services from the employer’s perspective, identify barriers and gaps in service delivery, and inform strategies to improve coordination and better support employer success.
  - Additional collaborative activities include VR’s involvement in local economic development efforts and partnership in community events, where VR serves as a resource on disability in the workplace. Through these efforts, VR continues to strengthen partnerships with local workforce development boards and enhance coordinated service delivery.
- Bring on more contractors to provide services to youth with disabilities.
  - Shifting toward focus to increase in-house given Order of Selection status; effort on pause.
- Build relationships with schools, families and programs to serve more youth with disabilities.

- We have a statewide plan for availability of services to students and youth across Oregon. Not only does the youth team have assignments that cover all counties in Oregon, but each branch now also has VRCs who are coordinating services to students and youth in partnership with our schools. We have also piloted innovative programs, such as Learn to Earn, with other youth serving WIOA programs. Finally, we are engaging in a DIF program awarded to the University of Oregon around increasing access to CTE programs of study in secondary and post-secondary students with disabilities in Oregon. The first region of focus includes Lane and Linn Counties, with expansion coming to Deschutes County in the coming years.

**Goal 3: Hire and keep diverse, well-trained staff.**

VR has made progress toward achieving this goal through its work on the following priorities:

- Make VR offices across the state more welcoming to employees of diverse backgrounds.
  - Oregon VR works closely with our OEMS department in ODHS to assist in ensuring that offices are set up to meet the diverse backgrounds of our staff. Oregon VR also communicates closely with Facilities as we explore new office space to make sure that these factors are explored.
- Continue to recruit racially diverse and bilingual staff who reflect the demographics of Oregon to be effective in serving customers with various languages and cultures.
  - The recruitment outreach strategy has been successfully completed and this project can now be closed, as Hiring Managers are working on a case-by-case basis to identify appropriate entities to market open recruitments—including national rehabilitation counseling programs, local community partners, chambers of commerce, and internship training programs—while also collaborating with local HR recruiters to schedule and hold information sessions; they are incorporating language access needs by listing language

proficiencies as required or preferred to strengthen resources that support a diverse workforce reflective of Oregon’s population, and the Internship Coordinator is providing connections and resources to programs while engaging in conversations about how those programs are increasing student diversity, which directly impacts the diversity of our hiring pools and enhances our ability to hire diverse staff.

- Train VR staff to provide services in a way that is respectful of different cultures and disabilities.
  - The VR program provides ongoing communication to staff and partners about the availability of upcoming training. The program has expanded opportunities for staff to receive professional development using a learning management platform (YesLMS) and by providing training during dedicated local branch meeting times.
  - VR has developed a Training Advisory Committee comprised of direct service staff, administrative staff, and SRC representation to discuss training development and provide feedback on materials in development. The committee is asked to specifically review content for diverse content and accessibility.
  - VR's Office of Equity and Multicultural Services (OEMS) representative provided a three-part tribal engagement series to administrative staff. A partnership with San Diego State has been established to assist VR in continuing to develop culturally responsive materials for topics on cultural humility.
  - The VR Project Management Office and Quality Assurance Manager met to review recommendations from the 2024 Comprehensive Statewide Needs Assessment (CSNA) and determined that all recommended training was provided to VR staff during program year 2024. The recommendations were addressed through VR trainings, YesLMS courses, and ODHS required annual training.

- Provide training and professional development opportunities for staff in all positions to provide professional and consistent practices across the state.
  - The VR executive team has developed a project request process to track all change and training requests. This process allows for training requests to be indicated as urgent, and a priority status for the project is assigned upon review. Requests are reviewed regularly with the VR Director and Deputy Directors, as requests are approved the VR Project Management Office communicates the details of the project to the assigned staff along with its priority and anticipated timeline for completion.
  - Requests for immediate training may come from the quality assurance review process. VR has included within its quality assurance protocols a link to the program’s project request form. The team will submit a project request when review data indicates a need for programmatic change or training.
  - The VR Policy Manual provides guidance on the requirement for frequency of customer communication. VR provides ongoing reminders to staff during training and in its written procedures that, minimally, substantive contact needed to occur and be documented every 30 to 45 days. This requirement has been incorporated into materials being developed for direct service staff onboarding. The Quality Assurance team will assess compliance with this requirement during the case review process
  - Training has been provided on the new Eligibility Process with a team of staff and additional training will be provide to all staff to ensure a clear understanding of Eligibility and the changes that have occurred with Priority assignment.
  - Implementation of the Referral Module went live this year with Training for all staff on use and understanding of the module.
- Continue to develop and support Vocational Rehabilitation Specialists, who are experts in specific disabilities or program areas.

- Established and sustained a VRS Community of Practice to support specialists as subject matter experts, strengthen role clarity, and promote consistent application of specialized knowledge across the state.
  - Strengthened collaboration and shared expertise among VRS by creating space to address complex disability- and program-specific issues, identify system gaps, and elevate field-informed solutions.
  - Used the Community of Practice to inform training priorities, ensuring training content reflects real-world practice, implementation challenges, and the needs of counselors and supervisors.
  - Clarified the role of VRS in supporting statewide training, including reviewing training content, providing consultation, and reinforcing learning after implementation.
  - Established shared goals for 2026, focused on deepening subject matter expertise, increasing consistency in technical assistance, and expanding VRS involvement in workforce development and training support.
  - Positioned VRS as a key workforce development resource, strengthening VR's capacity to deliver high-quality, equitable services to individuals with disabilities.
- Start a mentoring program for new staff to help them understand their role. Ideally this will improve performance and their job satisfaction.
    - VR has developed an Oregon Vocational Aspiring Leaders (OVAL) program to allow staff to develop skills in leadership and explore areas of the agency that they are not directly connected to for growth and understanding. There has been over 30 people that have graduated from the program since implementation.

**Goal 4: Make sure our processes work well and we can effectively assist customers.**

VR has made progress toward achieving this goal through its work on the following priorities:

- Create and put into action a thorough system of good internal controls, policies and procedures to make sure we follow federal rules and document requirements correctly.
  - A complete Internal Control manual has been created and approved by RSA. A regular schedule has been for creating for reviewing the existing internal control to see if it should change as well as to confirm internal controls were followed. A Quality Assurance manual has been approved by RSA and has begun implementation. Both the internal control evaluations and quality assurance reviews are reviewed and used to impact policies, procedures, and training.
  - Application to Intake process has been fully updated to ensure ease of access for clients. Through this updates VR has been able to get all client who are referred for services an intake appointment within 30 days of expressing interest. The Referral form has been developed and rolled out, the Service Questionnaire has been updated and rolled out for use and the Toolkit has been fully updated. The toolkit outlines the entire process from Referral through Intake with clear guidance and structure to the process.
- Move towards rapid engagement to reduce the number of customers who drop out prior to plan development.
  - This is currently a focus for the program and with the implementation of the intake and eligibility process we are anticipating seeing quicker access to intake which should lead to quicker eligibility decisions as well as plans being developed once removed from the waitlist. With the additional training on the eligibility process and the updates to the Aware system to streamline the priority and eligibility pages will assist in achieving this goal.
- Provide ways for staff to provide input on the vision, goals and future direction of the program.
  - The agency adopted a new model for developing the agency's state plan. This model included hosting sessions soliciting input from staff, the Service Equity

Council, Director's Advisory Council, VR managers, and VR Executives.

Additionally, regular updates are provided during all-staff broadcasts, Service Equity Council meetings, Director Advisory Council meetings, the Youth Collaborative Quarterly, and agency leadership meetings where staff can provide feedback related to progress on the goals and whether adjustments need to take place.

- Set up strong internal control for the federal grant award to make sure the program is managing the grant money properly, following all federal laws and meeting the terms of the grant.
  - Internal Controls have been written and approved by RSA and moved into an internal control manual. A schedule has been established for reviewing completion of the internal controls processes as well as evaluating whether the internal control needs to be updated.
- Draft and implement a monitoring plan with a risk management component that evaluates financial, legal, security and brand risk in accordance with federal and state requirements. The plan will monitor expenses and case files to make sure we are following federal and state requirements.
  - The quality assurance process has been communicated to program leadership, including branch managers. However, communication with direct service staff has not yet begun. This strategy will remain in progress during program year 2025.
- Draft policies, procedures and internal controls over contract monitoring that include monitoring policies and procedures; a monitoring schedule; and a risk management component that is compliant with the federal and state requirements.
  - VR has completed the development of a contract monitoring internal control which was reviewed and approved by RSA in February 2025. The program is currently working to finalize the associated contract monitoring policy for

implementation. This strategy will remain in progress during program year 2025.

- Develop policies and procedures for how we collect and verify our data.
  - Regular updates to the case management system are performed annually or as needed, in accordance with policy. These updates ensure accurate service coding, maintain data integrity, and support compliance with both regulatory and organizational standards. Each update follows a structured process that includes preparation, review, testing, validation, implementation, and post-implementation monitoring to verify accuracy and effectiveness. System Status as of December 16, 2025:
    - Production Environment
      - Version: 2025.1.1.1
      - Last Updated: June 21, 2025
      - Days Since Update: 178
    - Testing Environment
      - Version: 2025.1.1.1
      - Last Updated: September 22, 2025
      - Days Since Update: 85
    - Training Environment
      - Version: 2025.2
      - Last Updated: November 10, 2025
      - Days Since Update: 36
  - All environments are currently aligned with policy, and the system is up to date.
- Conduct regular reviews of the VR Policy Manual to make sure policies are current and streamlined to eliminate barriers to effective service.

- The VR program has established a formal Policy Advisory Committee that reviews, provides feedback and helps develop all new policies and rules. This committee acts as a formal policy review process that ensures representation by members from every facet of our program. This includes HSAs, VRCs, Branch Managers and professional program staff. This group is responsible for ensuring input is provided on all new policies before they are implemented. The committee met quarterly during program year 2024 to review draft policy revisions for delegated decision authority, as applicable.
- On the first Wednesday of every month, a VR Policy and Process Open Office Hour is hosted for any VR staff member to join. Questions from staff are addressed and resource is provided as appropriate. These office hours are well attended by staff and will continue for the duration of this State Plan period.
- Improve consistency of case practices by implementing a case review process to reduce findings and improve customer satisfaction.
  - The SRC worked to develop a [2025 VR Consumer Satisfaction Survey](#) which was launched in May 2025. The Office of Reporting, Research, Analytics, and Implementation (ORRAI) has created and manages the survey system. VR is anticipating a report from the SRC and ORRAI during the August 2025 quarterly meeting. Ongoing quarterly review of survey results will be conducted for continuous program improvement.
  - Specific, targeted reviews have occurred, and findings have been shared with leadership. These reports have identified parts of the agency that should be involved in fixing issues found through the review. Additionally, the agency has implemented a case review where supervisors review cases for each counselor to be able to provide coaching and support for their staff.
- Provide customers with more support in becoming self-employed.
  - VR provided staff with written self-employment procedures on the VR Procedure Toolkit in June 2025. Materials were reviewed by the Training Advisory Committee for staff input prior to implementation. The program's VR

Specialist for self-employment is working with the training team to develop an overview of the tools on the toolkit to present during branch professional development hours.

- Create process for VR Workforce and Businesses team to better collaborate with VR counselors in matching customers to jobs that fit their goals and meet the needs of businesses.
  - The Workforce and Business Services Request Form was developed to address the need for more efficient and effective collaboration and is actively in use. VR staff have access to the electronic form and can request services, provided by the VR Workforce and Business Team, for business customers or client services. These requests are tracked, and a dashboard was developed to show real-time data. A Workforce and Business Services process has been added to the VR Procedure Toolkit.
  - The VR Workforce and Business Team has been reporting Business Services in ORCA, which began January 2025. All business services provided by the Team are recorded in the Employer Module and data may be viewed by VR staff.

### WIOA state requirement

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe performance on the performance accountability indicators under section 116 of WIOA for the most recently completed program year, reflecting actual and negotiated levels of performance. Explain any discrepancies in the actual and negotiated levels.

### Agency response

<b>Performance indicators</b>	<b>PY 24 expected level</b>	<b>PY 24 negotiated level</b>	<b>PY 24 actual</b>
Employment (Second Quarter After Exit)	60.4%	60.4%	56.3%

<b>Performance indicators</b>	<b>PY 24 expected level</b>	<b>PY 24 negotiated level</b>	<b>PY 24 actual</b>
Employment (Fourth Quarter After Exit)	54.5%	56.5%	54.0%
Median Earnings (Second Quarter After Exit)	\$4,284	\$4,284	\$4,628
Credential Attainment Rate	45.9%	47.0%	44.4%
Measurable Skill Gains	29.5%	35.0%	51.9%
Effectiveness in Serving Employers	NA	NA	NA

### **WIOA state requirement**

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe the use of funds reserved for innovation and expansion activities (sections 101(a)(18) and 101(a)(23) of the Rehabilitation Act) (e.g., SRC, SILC).

### **Agency response**

VR uses a portion of our funds every year to provide innovative activities that allows us to expand our services in partnership with the SRC and State Independent Living Council.

Over the reporting period, the SRC partnered with the VR program in several ways, to uplift the voice of consumers of the program.

- The Consumer Satisfaction Survey was reimplemented. This started with an “in-house” attempt that led to council members realizing that more meaningful results

would be received if it was done thorough a third party that could disseminate the survey and provide an analysis of the results. The SRC and VR contracted with Western Oregon University to establish a baseline understanding of how VR customers were feeling about services.

- The results of this survey provided evaluations and inputs for the State Plan and matched other results from other tools around areas of success and areas that needed improvements.
- One of the SRC subcommittees developed and distributed a one-time vendor survey to learn about the needs and challenges of contracted providers and challenges so that VR could increase and retain contractors.
- The SRC and VR conducted many outreach efforts to add membership and representation of diverse populations on the council. Outreach efforts included inviting more people to SRC meetings, attending related conferences and meetings and spending time building relationships among communities served in VR.
- During the pandemic, the SRC held virtual meetings. The council was able to resume in-person quarterly meetings in May 2023 while continuing to offer a virtual attendance option. SRC members attended the VR in-service conference and combined the third quarterly meeting at the same time to save travel time and dollars, allowing council members to attend and present at the in-service as well as to network with staff and other community partners.
- Innovation: The SRC's Evaluation and Recommendation Subcommittee spent countless hours reviewing and analyzing relevant data from the program and results of the surveys to provide recommendations to increase and improve customer services.
- The legislative workgroup collaborated with other ODHS programs to hold events for National Disability Employment Awareness Month in October. The SRC invited Oregon Legislators to learn about how ODHS programs support people with disabilities around employment and to hear success stories.

During the reporting period, the State Independent Living Council (SILC) was provided \$295,587 in federal Innovation and Expansion funds, which were matched with \$80,000 in state general funds to support the SILC, consistent with the Act. The council collaborated with the VR program on various efforts, supporting distribution of VR program information to the disability community.

The SILC's Executive Director also served on the SRC and some of its subcommittees.

The SILC also collaborated with VR to improve the partnership, with special focus on transition services for youth — a core service of the SILC's Independent Living Program. The State Education Agency and VR also explored opportunities for a [Disability Innovation Fund - Pathways to Partnerships](#) grant, though neither had capacity to administer the grant. The SILC worked with the Administration for Community Living to assist in communicating with the RSA regarding possible other eligible grantees. Centers for Independent Living continue to consider other grant opportunities to support the project.

Funding of the SILC also supported two goals of the State Plan for Independent Living.

- Development of a statewide initiative to aid in youth leadership and training. This goal is still in progress. The SILC explored approaches used in other states for youth initiatives, expanded outreach to contacts able to help make connections with youth across the state and planned for hiring of SILC staff to lead a youth initiative within the Independent Living Program to prepare for implementation.
- Providing a statewide training conference for Oregon's Independent Living network. This was completed, with plans underway for a future conference. This was a highly valued opportunity by participants including the
- Independent Living Program service providers and the SILC. The conference included:
- Sharing in small groups with those in similar jobs (Work Incentive Counselors, Independent Living Specialists, administrators, board members, etc.)
- Training regarding:

- Innovative services
- Consistent data collection practices
- History of the Independent Living movement and the ADA
- Behavior health policy systems change
- Methods for collaboration with community colleges to foster students with disabilities as advocates
- Innovative ways to serve youth with disabilities and build community

## **Supported Employment services, distribution of Title VI funds, and arrangements and cooperative agreements for the provision of Supported Employment services**

### **WIOA state requirement**

Acceptance of Title VI supported employment funds.

### **Agency response**

The VR agency requests to receive Title VI supported employment funds.

### **WIOA state requirement**

If the VR agency has elected to receive Title VI funds, Section 606(b)(3) of the Rehabilitation Act, which requires VR agencies to include specific goals and priorities with respect to the distribution of Title VI funds received under section 603 of the Rehabilitation Act for the provision of supported employment services. Describe the use of Title VI funds and how they will be used in meeting the goals and priorities of the Supported Employment program.

### **Agency response**

In FFY 2025, Oregon VR General assumed Oregon's total Title VI Supported Employment Funds. This increased the base grant for VR general by \$46,800. Oregon General also

received \$109,913 in reallocation funds, increasing Supported Employment Funds to \$409,913 for FFY 2025. Title VI Supported Employment Funds for FFY 2026 are expected to be \$300,000. For FFY 2025, a cost per case of approximately \$4,990, we will be able provide services to approximately 82.2 Supported Employment customers using Title VI funds. For FFY 2026 and a cost per case of approximately \$4,990, we will be able to provide services to approximately 60.1 supported employment customers. The number of individuals receiving Supported Employment services is much larger than this number; approximately 2,180 participants will receive supported employment services funded with Title I funds in FFY 2025; and 1,684 participants in FFY 2026.

### **WIOA state requirement**

Supported employment services may be provided with Title 1 or Title VI funds following placement of individuals with the most significant disabilities in employment. In accordance with section 101(a)(22) and section 606(b)(3) of the Rehabilitation Act, describe the quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities; and the timing of transition to extended services.

### **Agency response**

Extended services are ongoing support services and other appropriate services identified, needed and agreed upon in the IPE. Extended services are provided once the participant is stable on the job and no longer needs VR services to maintain employment.

- An extended service provider is the entity that provides extended services when VR services are no longer needed for job performance.
- An example of extended services would be job coaching services paid for by Medicaid waiver services through County Developmental Disability Programs, brokerages or mental health agency funding.

Note: This was previously termed “long-term support services” through VR. Resources for extended services could include, but are not limited to:

- County developmental disability services
- Mental health agency funding
- Social Security work incentives
- Co-worker natural support systems
- Family members, friends
- Oregon income cap trust fund

Extended services may only be funded by VR for youth with the most significant disabilities for up to four years, or until the individual turns 25 and no longer meets the definition of a youth with a most significant disability, whichever comes first.

- For example, a youth with a most significant disability who requires extended services but is not eligible for Medicaid waiver services is not eligible for extended services when they are age 25.
- The counselor must identify another source of extended services for the youth to ensure there is no interruption of services.

Note: VR may not provide extended services to an individual who is not a youth with a most significant disability.

The VR counselor coordinates with the appropriate case management entity to transition the customer to extended supports.

Any youth considering the possibility of seeking employment in a sub-minimum wage setting must receive documented counseling in accordance with all provisions outlined in [Section 511 of the Rehabilitation Act](#).

VR works closely with other state agencies whose populations benefit from VR Supported Employment services. VR, the Department of Education, and the Office of Developmental Disability Services work together with the state's Employment First program to ensure that individuals who experience Intellectual and/or Developmental Disabilities receive coordinated and sequenced services that meet their employment needs.

This multi-agency collaboration operates under the guidance of Executive Order 15-01 and the Lane v. Brown Settlement, actively working to ensure that policies and services are aligned in a way that makes sense for transition-age students as well as adults seeking services. The VR/Office of Developmental Disabilities Services (ODDS) Collaborative Agreement was updated in September 2018 and continues to guide the close relationship of the two agencies.

VR has a close relationship with Oregon Health Authority's Behavioral Health programs to ensure that individuals accessing VR's services who are also working with mental health programs across the state get access to quality Individualized Placement and Support (IPS) services.

VR continues our collaboration with the Oregon Supported Employment Center for Excellence (OSECE) that oversees the fidelity of the 37 programs that currently offer IPS services in the state. VR continues to work with OSECE to expand the availability of these services across Oregon.

In 2022, VR amended the 2018 Job Placement Services contract. Joint certification and coordinated training continue to make it easier for VR-funded providers of Job Placement and Support Services to continue to provide employment support services to customers when handoffs occur between agencies. VR currently has more than 140 providers under contract through our amended Job Placement Services Contract.

VR continues to systematically identify areas of the state where capacity issues exist to assure that training is available in those areas. Recruitment of providers in these areas continues to be a priority.

VR also participates in an ODHS rural stakeholders group designed to explore opportunities to expand service delivery in rural Oregon as well as in the ODHS Native American Policy Workgroup to increase service delivery and cooperation with the Nine Tribes of Oregon.

VR has also established a higher service categorization tier for those VR customers identified as having the most significant disabilities. This tier includes paying providers an increased rate for providing job development services as well as other incentives for serving this

population. VR and ODDS, in cooperation with the Oregon Home Care Commission, continue to develop job coach capacity through the use of Personal Care Attendants.

### **WIOA state requirement**

Sections 101(a)(22) and 606(b)(4) of the Rehabilitation Act require the VR agency to describe efforts to identify and arrange, including entering into cooperative agreements, with other state agencies and other appropriate entities to provide Supported Employment services. The description must include extended services, as applicable, to individuals with the most significant disabilities, including the provision of extended services to youth with the most significant disabilities in accordance with 34 CFR 363.4(a) and 34 CFR 361.5(c)(19)(v).

### **Agency response**

VR works closely with other state agencies whose populations benefit from VR Supported Employment (SE) Services. VR, the Oregon Department of Education, and the Office of Developmental Disabilities Services work together with the Employment First program to ensure that individuals who experience Intellectual and/or Developmental Disabilities receive coordinated and sequenced services that meet their employment needs. This multi-agency collaboration operates under the guidance of Executive Order 15-01, actively working to ensure that policies and services are aligned in a way that makes sense for transition-age students as well as adults seeking services. The VR/ODDS Collaborative Agreement continues to guide this relationship.

VR also has a close relationship with OHA Behavioral Health programs to ensure individuals who access VR's services, who are also working with mental health programs, get access to quality Individualized Placement and Support (IPS) Services when appropriate.

VR continues our collaboration with the Oregon Supported Employment Center for Excellence (OSECE) that oversees the fidelity of mental health programs that offer IPS services in Oregon. VR continues to work with OSECE to expand the availability of these services.

In addition to aligning policies and service sequences, VR is working with OHA Behavioral Health and ODDS to ensure that our certification requirements for service providers are in

alignment. Joint certification and coordinated training continue to make it easier for VR-funded providers of Job Placement and Support Services to continue to provide employment support services to customers when hand-offs occur between agencies. VR currently has more than 140 providers under contract through our Job Placement Services Contract.

VR continues to systematically identify areas of the state where capacity issues exist to ensure training is available. Recruitment of providers continues to be a priority.

Additionally, VR is working with several community colleges to explore the possibility of a career pathway program that will train future service providers in a curriculum jointly developed with these community colleges.

## **Annual estimates**

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year.

## **WIOA state requirement**

In accordance with 34 CFR § 361.29(b), estimates for next Federal fiscal year— FFY 2025 (October 1, 2024 to September 30, 2025) and FFY 2026 (October 1, 2025 to September 30, 2026).

## Agency response

### FFY 2027

Priority category	No. of individuals eligible for services	No. of eligible individuals expected to received services under VR program	Costs of services using Title I funds	No. of eligible individuals not receiving services
Priority 1 - Most Significantly Disabled	6655	3779	\$15,705,524	2876
Priority 2 - Significantly Disabled	3345	790	\$3,283,240	2555
Priority 3 - Not Significantly Disabled	1614	217	\$901,852	1397

## WIOA state requirement

In accordance with 34 CFR § 361.29(b), annual estimates must include estimates for next federal fiscal year for the Supported Employment Program (October 1, 2025, to September 30, 2026).

## Agency response

### FFY 2027 projections

Priority category	No. of individuals eligible for services	No. of eligible individuals expected to receive services under Supported Employment program	Costs of services using Title I and Title VI funds	No. of eligible individuals not receiving services
Priority 1 - Most Significantly Disabled	2995	1701	\$7,069,356	1294

## Order of Selection

### WIOA state requirement

For agencies that have defined categories, describe the justification for the order.

### Agency response

Over the past four years VR has seen a dramatic increase in the overall number of Oregonians receiving services under an individualized plan for employment. VR has more individuals with an Individualized plan for Employment than any time in the past ten years. The client services and numbers served for the last five years are: FFY 2020 \$27,935,666 for 9,571 participants (\$2,918.79 per participant); FFY 2021 \$27,881,263 for participants 8,219 (\$3,392.29 per participant); FFY 2022 \$27,032,380 for 7,721 participants (\$3,501.15 per participant); FFY 2023 \$29,270,236 for 7,792 participants (\$3,756.45 per participant); and FFY 2024 \$34,619,047 for 9,023 participants (\$3,836.76 per participant). At the peak number of customers in FFY 2020, VR was on the verge of needing to be in OOS. With the decrease in the number of participants

because of COVID, the need for implementing an OOS faded. Now that number of participants has increased, and VR is projecting an increase in VR eligible individuals from FFYs 2025 to 2026, an OOS is needed. Additionally, the cost per case has gone up over the last five years.

Simultaneously VR has seen a significant increase in new spending associated with serving VR participants as described above. In addition to the costs listed above for services provided in IPE VR spent \$3,385,453 on 4,290 potentially eligible students in FFY 2024 for a per student cost of \$789.15. VR went through the process of conducting a fiscal forecast and conducting an analysis and plan for cost containment measures. Throughout this time of caseload growth and increasing costs VR was exploring cost saving measures. In early 2024 VR started to migrate to a paperless program that would reduce costs associated with physical resources (buying less paper, ink, etc.), physical archiving and maintenance of client files. VR additionally utilized emerging technology like digital signatures (avoid mailing and client transportation costs) and virtual meetings (save on staff travel costs) to enhance programmatic efficiencies and reduce costs. The VR has determined that it will need to establish and implement an Order of Selection.

VR conducted an inventory of the existing contracts with community-based organizations and determined which purchased services could be phased out, reduced, brought in-house or delivered through no-cost, similar services. Some of those contracts were reduced or canceled to contain costs in the first quarter of 2025. The two biggest contract cancellations are with Easter Seals (ending April 2025) that will save \$1,500,000 and youth contract changes totaling \$1,819,863 that occurred throughout FFY 2025. An assessment of staff resources and other long-term Cost Containment Measures were also considered as part of the cost containment process. Notably VR will be shifting to more In-House services vs. Purchased Services and ending or reducing some contracts for individuals with an individualized plan for employment. Two examples of services we have trained staff to bring in-house are: consultation between VRCs and doctors around medical documentation when we have staff on hand who can provide this support (provided for 444 cases at cost of \$160,000) and contracted career exploration (provided to 1,713 participants at a cost of \$1,200,000). We are estimating that we will see a 75% reduction in the use of consultation which will save

approximately \$120,000 and a 50% reduction of contracted career exploration which it is estimated will save \$600,000. Additionally, VR will be increasing use of services and benefits available through collaboration with the Public Workforce System throughout Oregon. One example of this effort is that VR has been collaborating with the statewide Oregon Workforce Talent Development Board on develop policies and guidance for Co-enrollment Requirements for WorkSource Oregon Programs. Additionally, each of the local area VR Branch Managers that are board members on one of the nine Local Workforce Development Boards meet quarterly to discuss best practices in cross-agency collaboration to increase services available to VR consumers. These Workforce System changes were implemented in policy in April 2025. VR has also been in frequent communication with the DSA to see additional supports for the program moving forward.

Remaining budget available as of March 21, 2025 (assuming additional GANs will be received):

- FFY 2024 VR \$3,646,734 (Pre-ETS) carryover
- FFY 2024 Reallotment \$2,299,564
- FFY 2025 VR \$28,114,924 (includes CPIU \$3,723,407)
- FFY 2025 Pre-ETS \$6,516,108
- FFY 2025 SE \$138,752
- SFY 2025 State General Funds \$1,186,590 (remaining balance) Non-federal share
- SFY 2025 State Other Funds \$4,235,693 remaining balance Non-Federal share.  
Applies to MOE only

Total available funds \$46,138,365

Projecting to continue serving 6,438 participants (5,737 priority category 1, 401 priority category 2, and 300 priority category 3) that will be in IPE at the time of implementing OOS through the rest of FFY 2025 after the implementation of OOS. Additionally, VR expects to serve 4,973 participants (4,432 priority category 1, 309 priority category 2, and 232 priority category 3) in FFY 2026.

Projected costs:

- FFY 2024 Pre-ETS \$3,646,734
- FFY 2025 Pre-ETS \$6,516,108
- Payroll, Services and Supplies (S&S) Cost Allocation \$30,143,188
- Reduced participant cost with closed waitlist \$16,788,650
- Total projected costs (\$57,094,680) – Total available funds (\$46,138,365) = Deficit (\$10,956,315)

Deficit through 9/30/2025 - \$10,956,315

FFY 2026 Deficit - \$4,685,937.15

FFY 2026 Budget:

- FFY 2026 VR \$43,440,721 (includes \$6,516,108.15 Pre-ETS reserve)
- FFY 2026 SE and Supported Employment Transition Services (SETS) \$253,200
- SFY 2026 State General Fund \$22,450,000 (Governor’s recommended budget)

Total available funds \$66,143,921

Projected Costs:

- 2026 Pre-ETS \$6,516,108.15
- Payroll, Services and Supplies (S&S), Cost Allocation \$52,825,892
- Reduced participant cost \$11,487,858
- Total projected costs (\$70,829,858.15) – Total available funds (\$66,143,921) = Deficit (\$4,685,937.15)

With all immediate and future cost containment measures factored into the forecasting model, VR will still need to implement an order of selection. The order of selection ensures current VR participants with individualized plans for employment can continue to be served without interruption through the management of the wait list for new applicants who are

determined eligible and assigned to a disability priority category that is closed. All Priority Categories will be closed on June 14, 2025.

There were many ways that the public was consulted during the process heading to Order of Selection implementation. Some examples include:

- January 31, 2025 – VR leadership met with the State Rehabilitation Council chair and vice-chair to consult on the need for Order of Selection.
- February 4, 2025 – VR leadership presented to all VR staff on the need for Order of Selection.
- February 7, February 28, March 10, March 21, March 24, March 28, April 3, April 4, and April 14, 2025 – VR leadership and staff held a series of meetings with the whole SRC or its various sub-committees to consult on various aspects of implementing Order of Selection: the need for Order of Selection, the rules and policies of Order of Selection, and considerations for the agency to consider to ensure Order of Selection impacts Oregonians with Disabilities to the least extent possible.
- February 7, 2025 – VR sent communication about Order of Selection to partners and providers.
- February 13, 2025 – VR leadership discussed Order of Selection at the Oregon State Independent Living Council quarterly meeting.
- February 18, 2025 – VR leadership present on Order of Selection at the quarterly Workforce System meeting.
- February 20, 2025 – VR leadership conducted consultation with Oregon AIVRS programs.
- February 24, 2025 – VR leadership began a series of meetings with state legislators.
- April 1, 2025 – VR hosted a public meeting to discuss moving to Order of Selection, updating our State Plan, and changing our rules and policies.

At this point VR does not expect to remove any names from any category's waitlist during Federal Fiscal Year 2025 and 2026.

## WIOA state requirement

Describe the order (priority categories) to be followed in selecting eligible individuals to be provided VR services ensuring that individuals with the most significant disabilities are selected for services before all other individuals with disabilities.

## Agency response

### Priority categories

On and after the effective date of the Order of Selection, VR will conduct fiscal analyses on a monthly basis to determine if it can serve individuals with most significant disabilities on a wait list by date of application fully opening one priority category at a time and serving new applicants with most significant disabilities before opening the second priority category for individuals with significant disabilities on the wait list and then new priority category 2 applicants significant disabilities. Individuals in the third priority category and on the waitlist will be served by date of application after categories I and II are opened. VR shall only provide services, within available funding and in the following order of priority, based on the individual's date of application and the priority category to which they are assigned:

- All persons assigned to Priority Category One will be served first, in the order of the eligible individual's date of application; and once there is no wait list and the category is fully open then,
- All persons assigned to Priority Category Two will be served second, in the order of the eligible individual's date of application; and once there is no wait list and the category is fully open then,
- All persons assigned to Priority Category Three will be served third, in the order of the eligible individual's date of application once Priority Categories 1 & 2 are open.

- If the Program establishes an Order of Selection, in these instances, individuals receiving Social Security benefits under title II or title XVI of the Social Security Act and presumed eligible and to be an individual with a significant disability may be on waiting lists (34 CFR 361.36(c)(3)). Individuals receiving Social Security benefits under title II or title XVI of the Social Security Act are assigned to Category Two unless additional documentation supports their placement in Category One.

### **Process for assignment of priority categories**

- To determine an eligible individual's priority under an Order of Selection, VR:
  - Shall use the data gathered in the assessment of the individual's eligibility for Program services.
  - May require the individual to provide additional information or participate in trial work experiences or other evaluations, if the Program counselor determines it is necessary to assign an accurate priority category to the individual.
- VR shall not consider the following factors in the Order of Selection:
  - Duration of residency provided the individual is present in the state. The state may not require residency as part of the eligibility for services.
  - Type of disability.
  - Age, sex, race, color, national origin.
  - Source of referral, type of expected employment outcome.
  - The need for specific services except as provided for in OAR 582-100-0021.
  - Anticipated cost of services; or
  - Income level of the individual or individual's family.

### **Requirements for assignment of priority categories**

- Priority Category One. VR shall assign an individual to priority category one if the individual:

- Has been determined eligible for services under 34 CFR 361.42.
- Has a severe mental or physical impairment that seriously limits three 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
- Is expected to require multiple vocational rehabilitation services over an extended period in order to achieve or maintain a successful employment outcome.
- Priority Category Two. VR shall assign an individual to priority category two if the individual:
  - Has been determined eligible for services under 34 CFR 361.42.
  - The individual has severe mental or physical impairments that seriously limit 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; and
  - The individual is expected to require multiple vocational rehabilitation services over an extended period in order to achieve or maintain a successful employment outcome.
- Priority Category Three. VR shall assign all other individuals who have a physical or mental impairment that results in an impediment to employment, can benefit in terms of employment from the provision of VR services, who do not qualify for the other priority categories and who have been determined eligible for services under 34 CFR 361.42, to priority category three. VR shall:
  - Provide notice to an applicant regarding their eligibility for Program services under Oregon Administrative Rules Chapter 582, Division 20, and
  - If determined to be eligible, the individual's assignment to a priority category and notification of placement on a wait list, if applicable.

- VR shall provide the eligible individual a copy of the Dispute Resolution Rights related to their priority category under an Order of Selection pursuant to OAR chapter 582, Division 20.

### **WIOA state requirement**

Explain the VR agency's goals for serving individuals in each priority category, including how the agency will assist eligible individuals assigned to closed priority categories with information and referral, the method in which the VR agency will manage waiting lists, and the projected timelines for opening priority categories. NOTE: Priority categories are considered open when all individuals in the priority category may be served.

### **Agency response**

VR's goal is to utilize the Order of Selection to stabilize available fiscal resources with the goal of being able to serve all Priority Categories as soon as possible. While the VR is in an Order of Selection the program will utilize Information and Referral services to leverage the public workforce system in Oregon to assist job seekers. An individual whose service priority is closed at the time of eligibility determination will be placed in Delayed (wait list) status. The VR counselor will not proceed with IPE preparation until the client is removed from Delayed status. While a counselor will meet with a client in this situation to provide Information and Referral services, this activity will generally occur at the time of the eligibility determination and will be documented by case note. It will not occur in the context of an IPE.

VR will use its case management system to manage waiting lists while in the Order of Selection. VR's plan to move out the order of selection will be a combination of regular monthly fiscal forecasting and the management of existing caseloads. This will include the management of potentially eligible students receiving Pre-ETS. With the utilization of the Order of Selection VR will ensure that all current Oregonians with Individualized Plans for Employment can be served without interruption through the management of the wait list for new applicants. As fiscal resources are available VR will begin to release applicants from the waitlist prioritizing those individuals with most significant disabilities first, completely opening

priority category one prior to serve all individuals including those on the wait list and new applicants prior to serving the next priority category.

### **WIOA state requirement**

Has the VR agency elected to serve eligible individuals outside of the order of selection who require specific services or equipment to maintain employment?

### **Agency response**

Yes, OVRS has elected to serve eligible individuals outside of the order of selection who requires specific services or equipment to maintain employment.

## **Waiver of statewideness**

### **WIOA state requirement**

The State Plan shall be in effect in all political subdivisions of the state; however, the Commissioner of the Rehabilitation Services Administration may waive compliance with this requirement in accordance with section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 CFR 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 CFR 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate “not applicable.”

### **Agency response**

Not applicable.

## **Comprehensive system of personnel development**

In accordance with the requirements in section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals.

### **WIOA state requirement**

Analysis of current personnel and projected personnel needs including:

- The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to customers;
- The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and
- Projections of the number of personnel, broken down by personnel category, who will be needed by the VR agency to provide VR services in five 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.

### Agency response

<b>Personnel category</b>	<b>Number of personnel employed</b>	<b>Number of personnel currently needed</b>	<b>Projected number of personnel needed in 5 years</b>
VR Program Total Positions	275	295	295
VR Counselors	129	142	147
VR Specialists	16	21	21
Pre-ETS Coordinators/ Transition Service Coordinators/Youth Contract Coordinator	10	11	12
Administrative Specialists/Office Assistants	68	77	82
Workforce and Business Staff	13	14	16
Administrative Managers (Program and Direct Service)	10	10	10
Central Administration Staff	25	28	34

### WIOA state requirement

Ratio of qualified VR counselors to clients.

## Agency response

The total 129 budgeted VR counselors and 16 budgeted VR Specialists (145 total) provided necessary service delivery to clients during the following state fiscal years (SFY):

SFY 2020: 14,984 customers were served

- Staffing ratio: 1 VR Counselor and VR Counselor Specialist per 103 customers

SFY 2021: 12,240 customers were served

- Staffing ratio: 1 VR Counselor and VR Counselor Specialist per 84 customers

SFY 2022: 11,695 customers were served

- Staffing ratio: 1 VR Counselor and VR Counselor Specialist per 87 customers

SFY 2023: 12,657 customers served (Projected)

- Staffing ratio: 1 VR Counselor and VR Counselor Specialist per 87 customers

## WIOA state requirement

Projected number of individuals to be served in five years.

## Agency response

The total VR caseload forecast projects 8,820 customers will be served in PY 2028.

## WIOA state requirement

Data and information on personnel preparation and development, recruitment and retention, and staff development, including a list of the institutions of higher education in the State that are preparing VR professionals, by type of program; the number of students enrolled at each of those institutions, broken down by type of program; and the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

### Agency response

Institute of Higher Education	Type of Program	Number of Students Enrolled	Number of Prior Year Graduates
Idaho State University	MS in Clinical Rehabilitation Counseling	20	5
Portland State University	MS in Clinical Rehabilitation Counseling	36	10
Portland State University	Graduate Certificate in Orientation and Mobility	29	19
Western Oregon University	MS in Rehabilitation Counseling	47	12
Western Washington University	MA in Rehabilitation Counseling	36	14

### WIOA state requirement

Data and information on personnel preparation and development, recruitment and retention, and staff development, including the VR agency’s plan for recruitment, preparation and retention of qualified personnel, which addresses the current and projected needs for qualified personnel; and the coordination and facilitation of efforts between the VR agency and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

### Agency response

Oregon VR continues to work closely with the graduate rehabilitation counseling programs at Western Oregon University and Portland State University as well as other graduate

rehabilitation counseling programs nationwide to attract a diverse, highly qualified applicant pool to work for our program.

These recruitment efforts include reaching out to interested graduate programs to provide practicum and internship sites for students working their way through the program. In the current 2023-24 academic year, VR received 17 applications for internships from students representing nine graduate academic programs; 13 were offered positions as interns, which resulted in nine students being placed in direct services offices working as Vocational Rehabilitation Counselor interns.

We have begun accepting applications for the 2024-25 academic year and have already received 13 applications from three graduate academic programs. So far, we have extended 10 offers for internships with eight students responding in agreement to intern with us next academic year. We anticipate receiving more applications and placements.

The VR Director's Stipend Program was discontinued in 2023 and has been replaced by paid temporary Vocational Rehabilitation Counselor Intern positions. This was done to benefit the students to grant them an employment relationship directly with our program, which removed a lengthy contracts process between our program and two in-state universities.

This has been positively received by our university partners and students. By creating temporary positions, we have been able to extend the opportunity to offer paid internship positions to students from any university. Previously the VR Director's Stipend Program was only available to students in our two in-state Rehabilitation Counseling programs.

Current universities we are working in collaborative partnership with include:

- Idaho State University
- Pacific University
- Portland State University (PSU)
- San Diego State University (SDSU)
- Southern Oregon University

- State University of New York at Buffalo
- Texas Tech University Health Science Center (TTUSHC)
- University of Alabama
- University of Massachusetts at Boston (UMB)
- Western Oregon University (WOU)
- Western Washington University (WWU)

Our program is designed to attract and support interns, as well as develop a rich and diverse pool of applicants for Vocational Rehabilitation Counselor positions. During this reporting period, VR was able to provide the VR Director's Stipend to five graduate interns during the 2022-23 academic year, with a total expenditure of \$72,000. This included three WOU students at a cost of \$43,200 and two PSU students at a cost of \$28,800.

Additionally, three interns did not receive the stipend because they were able to obtain full-time permanent VRC employment prior to starting internship and one who was a student from a graduate program without the VR Director's Stipend. Of these nine interns, 50 percent reported being a part of a BIPOC community and 62.5 percent disclosed experiencing disability.

Cooperative Agreements between VR and public universities (referred to as Interagency Agreements in Oregon) offering graduate degrees in Rehabilitation Counseling are developed and implemented prior to disbursement of stipend funds, which include a portion of the overhead costs for university staff who administer the funds.

During the current 2023-24 academic year, we have committed to spending \$85,680, which works out to be \$10,710 for each of the eight students at an average of \$17.85 per hour. Oregon's pay equity law allows students with additional training and work experience to receive a higher wage. The students represent the following schools: three from PSU, two from WOU and one student each from SDSU, TTUSHC, and UB. Of these eight, 50 percent reported being a part of a BIPOC community and 75 percent disclosed experiencing disability.

VR staff members continue to serve on Rehabilitation Counselor Education Advisory Councils for programs in the region at WWU, PSU, and WOU. Additionally, several program managers and VR Counselors participate in graduate level coursework and in mock interviews conducted with students. The VR Internship Coordinator, VR managers and several VR Counselors have also been involved in the selection process for incoming students at WOU and PSU for the past two years.

During the next 2024-25 academic year, we have committed \$149,940 for 14 students with the same cost per student, hourly rate and pay equity process as the 2023-24 academic year. The eight students from PSU and WOU who have secured internships for 2024-25 will be receiving these funds, with six remaining slots for additional interns. Of these eight future interns, half reported being a part of a BIPOC community and six disclosed experiencing disability.

### **WIOA state requirement**

Data and information on personnel preparation and development, recruitment and retention, and staff development, including a description of staff development policies, procedures, and activities that ensure all personnel employed by the VR agency receive appropriate and adequate training and continuing education for professionals and paraprofessionals:

- 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
- Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.

### **Agency response**

VR ensures employees are provided with the supervision and training necessary to deliver quality VR services. VR follows a formal training process for staff, partners, and providers. VR

provides an annual in-service training that informs staff of state and federal updates to policy, procedures, and program internal controls. VR provides an evaluation component to ensure that the training meets the staff's training needs and to ensure that there is knowledge gain. All trainings are listed in the VR Procedure Implementation Toolkit to connect, policy, procedure, and be an overall resource to our staff.

To increase training capacity and provide a more robust comprehensive training curriculum, the program has entered into training contracts with Cornell University and Western Washington University's Center for Continuing Education in Rehabilitation to provide ongoing clinical, foundational and developmental training to ensure staff remain current on best practices and the latest developments in rehabilitation counseling.

VR has also entered into Intensive Technical Assistance training agreements with all three Vocational Rehabilitation Technical Assistance Centers (VRTAC- QM Vocational Rehabilitation Technical Assistance – Quality Management, VRTAC-QE Vocational Rehabilitation Technical Assistance Center – Quality Employment, and NTACTION: National Technical Assistance Center on Transition). These agreements were completed to ensure compliance with all required training and staff development policies and procedures, and to offer increased opportunities for staff growth and advancement.

### **WIOA state requirement**

Data and information on personnel preparation and development, recruitment and retention, and staff development, including a description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency professional and paraprofessional personnel are adequately trained and prepared, including:

- 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.

## Agency response

VR uses an established set of standards to evaluate and select Vocational Rehabilitation Counselors (VRCs). These standards are based on a modified version of standards used by the State Workers' Compensation Division (WCD). The state's VRC classification is shared by WCD, the Oregon State Hospital, the Oregon Commission for the Blind and VR.

The Oregon VRC classification requires that VRCs possess at a minimum:

- A master's degree in Rehabilitation Counseling; or
- Certification from either the Commission on Rehabilitation Counselor Certification as a Certified Rehabilitation Counselor (CRC), or a Certification of Disability Management Specialists Commission as a Certified Disability Management Specialist D (CDMS), and six months full-time work experience providing vocational rehabilitation-related services; or
- A master's degree in Psychology, Counseling, or a field related to Vocational Rehabilitation, such as one that promotes the physical, psychosocial, or vocational wellbeing of individuals with disabilities, and 12 months full-time work experience providing vocational rehabilitation-related services, or
- A bachelor's degree in a related field, such as one that promotes the physical, psychosocial, or vocational wellbeing of individuals with disabilities, and three years of full-time work experience providing vocational rehabilitation-related services to individuals with disabilities. There is no direct work experience substitute for the bachelor's degree requirement.

VR continues to have a goal that all employees classified as VRCs will hold a master's degree in Rehabilitation Counseling or a closely related field. VR will continue to seek counseling staff with master's degrees, but VRC candidates with an appropriate bachelor's degree and related work experience may be hired.

## WIOA state requirement

Data and information on personnel preparation and development, recruitment and retention, and staff development, including a description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency professional and paraprofessional personnel are adequately trained and prepared, including:

- 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.

## Agency response

VR continues to support staff who have attained the Certified Rehabilitation Counselor (CRC) credential through not only ensuring that all eligible training sessions are pre-approved for Continuing Education Units (CEUs), but by also paying for renewal fees and online training courses through the Commission on Rehabilitation Counselor Certification.

Additionally, for staff who are eligible to apply to take the CRC examination, VR covers the cost of the testing fees, preparation materials and the University of Wisconsin-Stout CRC Preparation Course. Currently, 67 VR staff have CRC credentials; 50 of these are practicing VR Counselors, nine are branch or regional managers stationed in the field and the remaining eight are former VR Counselors who are now working in the Administration Unit.

The program expects that all staff members will participate in appropriate professional development activities and continuing education opportunities. This expectation includes keeping up with the most recent advances and best practices when working with individuals with specific disabilities; staying up to date with best practices overall; and maintaining an updated understanding of the evolving labor market in their area.

Relationships have been developed with the regional economists and workforce analysts employed by the Oregon Employment Department's Research Department to ensure that

staff have the information and training they need to understand the labor markets in their area. VR is establishing robust relationships with Labor Workforce Development Boards so that VR staff have an increased understanding of their local sector strategies.

### **WIOA state requirement**

Method(s) the VR agency uses to ensure that personnel are able to communicate in appropriate modes of communication with or in the preferred language of applicants or eligible individuals who have limited English speaking ability.

### **Agency response**

#### **Hiring and retaining staff**

VR focuses on hiring and retaining staff proficient in languages other than English to meet the communication needs of applicants and eligible individuals. In January 2024, VR had 21 staff who have passed mandatory language proficiency testing in American Sign Language, Amharic, Bosnian, Persian, Serbian-Croatian and Spanish. In specific geographic areas and for specific caseloads, VR engages in targeted recruiting for job applicants with specific language skills. Staff who took proficiency testing, but did not pass the first attempt, may study and receive supports to improve skills for a second attempt after at least six months of study and practice.

#### **Contracted services**

VR staff who are not fluent in the preferred language of a participant have access to, and training in, the use of approved contractors approved for onsite, remote and telephonic services. Contracted language access services include spoken language interpreting, ASL interpreting and real-time captioning services.

#### **Document translation**

To further support the communicate needs of participants, VR translated all customer-facing forms and outreach materials in five common languages: Arabic, Russian, Simplified Chinese, Spanish and Vietnamese. Content of program materials are written at an eighth grade

reading level in plain language. We are working to implement rapid customer-specific translations for documents such as Individualized Plans for Employment and Notice of Proposed Action letters. All documents are available in alternate formats and languages upon request. Customer-facing forms, outreach materials and written messages include this boilerplate accessibility language with a call to action for making a request: "You can get this document in other languages, large print, braille or a format you prefer free of charge."

### **Accessible meetings**

VR, other programs in Oregon Department of Human Services, Oregon Health Authority, and the Office of Information Systems engaged with the Microsoft Accessibility Team to ensure the software platform is accessible for individuals who use ASL interpreters and Communication Access Real-time Translation (CART) services. VR staff have access to Zoom for Government to meet the needs of Deaf and Hard of Hearing participants and other Oregonians with disabilities who require ASL or text-based accommodations until accessibility in Microsoft has been achieved.

### **Community of practice**

Spanish-speaking VR counselors began meeting in 2023 to improve communications, services and outreach to Spanish-speaking communities. This group is modeled on VR's long-standing Rehabilitation Counseling with Deaf and Hard of Hearing community of practice.

### **WIOA state requirement**

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.

### **Agency response**

VR coordinates personnel development with the Oregon Department of Education (ODE) as outlined in our combined Cooperative Agreement among the Office of Developmental Disabilities (ODDS), Oregon Commission for the Blind (OCB), and Oregon Department of

education (ODE). This agreement is current through June 30, 2028, and is publicly available on each agency's website. It is used as the foundation of shared goals outlined in Oregon's NTACT State Team's annual plan. The NTACT State Team is made up of members from VR, ODE, ODDS, OCB, Career Technical Education, and FACT (Oregon's parent training organization). Annually, each May, this team creates shared transition- related goals to which each organization contributes. The work of the Transition Collaborative is carried out by subject matter experts (SMEs) within each organization or through contract services. Our statewide team of SMEs meet quarterly, and regional teams meet monthly to carry out objectives of our statewide transition plan.

## **Coordination with education officials**

### **WIOA state requirement**

In accordance with the requirements in section 101(a)(11)(D) of the Rehabilitation Act describe plans, policies, and procedures for coordination between the designated state agency and education officials responsible for the public education of students with disabilities, that are designed to facilitate the transition of the students with disabilities from the receipt of educational services in school to the receipt of vocational rehabilitation services, including pre- employment transition services.

### **Agency response**

#### **Plans**

The Oregon Transition Collaborative is a statewide group made up of representatives from VR, ODE, OCB, ODDS, Career Technical Education, and FACT (parent training organization) that creates and implements an annual plan. This plan addresses shared transition topics intended to facilitate a more streamlined and accessible process of moving youth and families from school- aged services to adult services.

## **Policies**

Both Oregon Administrative Rule Division 150 – Transition Services, and VR’s policies explicitly address the need for coordination between agencies to ensure access to transition services without duplication or reduction of responsibility from any one agency.

The OARs address:

- 582-150-0002 Purpose
- 582-150-0005 Definitions
- 582-150-0015 General Provisions for Students and Youth with Disabilities in Transition
- 582-150-0030 Pre-employment transition services
- 582-150-0040 Program application and eligibility for students and youth for individualized transition services
- 582-150-0045 Individualized plan for employment (IPE) for student or youth
- 582-150-0050 Group Transition Services
- 582-150-0065 Required program service records for students receiving Pre-Employment Transition Services or transition coordination
- 582-150-0070 Customer Assistance Program information
- 582-150-0070 Use of funds reserved for Pre-Employment Transition Services (Pre-ETS)
- 582-150-0075 Limitations
- 582-150-0080 Restrictions
- 582-150-0100 Reservation for Pre-ETS
- OAR 582-150-0200 Pre-ETS rate setting

VR's Youth Services Policy addresses:

- Definitions specific to student and youth with disabilities

- Pre-ETS
- Pre-ETS required activities
- Who can receive Pre-ETS
- Pre-ETS coordination
- Frequency of contact with students receiving Pre-ETS
- Transition services
- Youth with disabilities no longer in school
- Contracted services for youth in transition
- Individualized Plan for Employment (IPE) for students or youth with disabilities
- Employment outcome within the IPE

### **Procedures**

VR coordinates personnel development with the Oregon Department of Education (ODE) as outlined in our combined Cooperative Agreement among the Office of Developmental Disabilities (ODDS), Oregon Commission for the Blind (OCB), and ODE. This agreement is used as the foundation of shared goals outlined in Oregon's Transition Collaborative's annual plan. The Transition Collaborative is made up of members from VR, ODE, ODDS, OCB, Career Technical Education, and FACT (Oregon's parent training organization). This team creates shared transition-related goals to which each organization contributes. The work of the Transition Collaborative is carried out by subject matter experts within our organizations or through contract services through a series of conferences, training events, regional collaborative meetings and side-by-side technical assistance.

### **WIOA state requirement**

In accordance with the requirements in section 101(a)(11)(D) of the Rehabilitation Act describe the current status and scope of the formal interagency agreement between the VR agency and the state educational agency. Consistent with the requirements of the formal interagency

agreement pursuant to 34 CFR 361.22(b), provide, at a minimum, the following information about the agreement:

- Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services;
- Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under section 614(d) of the Individuals with Disabilities Education Act;
- The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services;
- Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals;
- Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and
- Assurance that, in accordance with 34 CFR 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.

## Agency response

The current formal Cooperative Agreement among VR, the Oregon Department of Education (ODE), the Office of Developmental Disabilities Services (ODDS), and Oregon Commission for the Blind (OCB) is active until June 30, 2028. Within this agreement, all parties mutually agree to the following:

- To meet regularly to address systems, policy, practice and funding issues that facilitate or negatively impact the transition of youth with disabilities from school to work or post-secondary education.
- To foster innovation in transition program design and service delivery strategies between VR, OCB, ODDS and school districts (Local Education Agencies, or LEAs).
- To use a consistent message when sharing information with local VR, OCB, ODDS offices and school districts.
- To post this agreement on their respective websites or in a location readily available to agency staff.
- To align policy and practice at the state and local level, in order to facilitate the seamless transition of youth with disabilities from school to work or postsecondary education; minimize redundant services; and maximize resources in both systems.
- To develop and provide common trainings and professional development opportunities to improve transition and employment results.
- To mutually develop and distribute notices, memorandums, and other information regarding transition to agency and community partners.
- To give timely notice to agency and community partners of all proposed changes to rule or policy that relate to youth transition.
- To collaborate toward meeting the unique needs of school districts and VR, OCB, and ODDS offices, and facilitate seamless transition for students with disabilities from a free and appropriate public education to the provision of vocational rehabilitation services.

- To assign qualified staff positions to facilitate and support linkages among transition activities and outcomes provided by school districts, VR, ODDS, and OCB.
- To identify criteria for determining and assigning the financial and programmatic roles and responsibilities of each agency for the provision of Pre-Employment Transition Services and transition services to students with disabilities. The criteria may include:
  - Purpose of the service
  - Customary service
  - Eligibility for services

It is the goal that VR staff attend or provide information to students and families at IEP meetings, or other transition planning meetings. At the same time, in order to maximize the capacity of our statewide network, and using the communication channels of Oregon's Transition Collaborative, each partner agency informs one another of updates to policies, procedures, new initiatives and priorities, and most critically the initial points of access. Partner agencies plan and participate in collective shared learning events twice each year so that each agency has accurate and current information to share with students, families, community partners and respective agency staff across our multiple settings. Collectively, we commit to making clear the points of contact who are available so that we are all able to share the basic information and route our consumers to each agency with specific questions.

Vocational Rehabilitation collaborates and coordinates with our educational partners in many ways. VR provides information on Pre-ETS to the Oregon Department of Education and local education entities to distribute to students, family members, guardians or their representatives. VR staff attend meetings for the development of an Individualized Education Plan (IEP) when given timely notice of invitation, with appropriate consent and as resources allow. As part of our partnership, education staff provide information and referrals regarding VR and ODDS services. It is a shared goal that each of our agencies develop respective plans (Individual Plans for Employment, Individual Education Plans, Individual Service Plans) that strategically align to maximize services without duplication for our shared youth customers.

The following is a summary Oregon's coordinated transition services:

**VR Pre-Employment Transition Services** are the earliest set of services available for students with disabilities who are eligible or potentially eligible for VR services. These services are short-term, based on the student's needs, and help students identify their career interests. Designed to be an early start at job exploration for students with disabilities, services include Job Exploration Counseling, Work- Based Learning Experiences, Counseling on Post-Secondary Opportunities, Workplace Readiness Training and Instruction in Self Advocacy.

- Population served: young people ages 14-21 who are enrolled in school and eligible or potentially eligible for VR.
- Funding source: 15 percent reserved from annual VR program's federal allotment.

**VR Transition Services** are outcome-oriented services that promote movement from school to post-school activities, including post-secondary education, vocational training and an employment outcome in competitive integrated employment or Supported Employment, including customized employment. These services provide for further development and pursuit of career interests with post-secondary education, vocational training, job search, job placement, job retention, job follow-up and job follow-along services. Services may include job development, job coaching, clothing, course fees, license fees, follow-up and follow along services. Pre-ETS can be a transition service when students have an active Individual Plan for Employment with VR.

- Population served: Young people ages 14-24 who are in plan with VR. This can include youth who do not qualify for Pre-ETS because they are not in school.
- Funding source: VR client service dollars; state agencies cannot charge against the 15 percent reserve unless the transition service is provided as a Pre-ETS.

VR holds the financial responsibility for both of these services and are provided by VR staff, or through VR authorized contracts.

- VR staff include Pre-ETS Coordinator, Youth Service Coordinators and VR Counselors.

- Contracted services only include Pre-ETS.

**Individuals with Disabilities Education Act (IDEA) Transition Services** are the financial responsibility of ODE and local districts. They represent a coordinated set of activities designed to be a results-oriented process for improving the academic and functional achievement for youth as they move from school to post-school activities, including postsecondary education, vocational education, integrated employment and independent living. The purposes of IDEA include ensuring that all children with disabilities have available to them a free appropriate public education that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment and independent living. Transition services under IDEA refers to a coordinated set of activities for a child with a disability and is based on instruction, related services, community experiences, development of employment, and other post-school, adult living activities. Funding for special education in Oregon is provided through state and federal funding sources.

**Oregon Developmental Disabilities Services (ODDS) long-term services:** ODDS hold the financial responsibility to provide the following long-term services: job coaching, benefits counseling, employment path services, small group, day support activities, on the job attendant care, career development planning, transportation and professional behavior services. In addition, services to youth may include pre-employment support for long-term job coaching. In certain circumstances, ODDS may provide other services as needed to complement services from other funding streams such as transportation, professional behavior services and attendant care or personal assistance.

- Population served: people with Intellectual and Developmental Disabilities.
- Funding source: Medicaid and ODDS-funded Home and Community- Based Long Term Care Services.

Procedures for outreach to and identification of students with disabilities who need transition services and Pre-Employment Transition Services include the following:

- We promote outreach to and identification of students with disabilities who are in need of transition services or transition planning (including Pre-ETS) beginning as early as 14 years old. Outreach to these students includes a description of the purpose of the VR program, eligibility requirements, application procedures and scope of services that may be provided to potentially eligible and eligible individuals. Outreach methods can include sharing brochures, posting to social media channels, and attending events such as back-to-school nights, group orientations and transition events.
- Agencies will obtain, when necessary, a release of information from parent or guardian to assist in coordinating services.
- VR informs ODE of policies or procedural changes that may impact the eligibility of students with disabilities for VR and OCB services and the provision of services, so that ODE can disseminate such material to school districts and the state's directors of Special Education.
- VR and OCB inform and refer students to Tribal VR in the identified service delivery area to receive culturally relevant services so the student can make an informed choice about the services that they are eligible for and can receive. VR and OCB inform eligible students that they have the choice to work with VR, Tribal VR, or OCB separately or collectively.
- Upon request from the district or ODE, VR provides technical assistance on how VR identifies potentially eligible students for services from VR or OCB and how to work with VR or OCB in the provision of transition services including Pre-Employment Transition Services.
- VR determines eligibility for VR or OCB services and provides VR services to eligible school-aged students with disabilities when referred by the district.
- Upon request, VR works with ODE, ODDS and other agencies through a variety of training activities to identify and plan transition strategies for students with disabilities requiring long-term support after a young person completes VR or OCB time-limited services.

- VR inform district, students and their parents of the availability of the Customer Assistance Program, a dispute resolution program available to VR and OCB customers and participants in rehabilitation programs receiving federal funding.
- VR provides training to all VR Counselors and qualified staff on their role in providing outreach activities to students with disabilities to include those receiving special education or 504 services in their schools, or those with an otherwise documented disability.
- VR provides consultation and technical assistance — using alternate means for participation when necessary, such as video or conference calls — to the schools to prepare students with disabilities for career opportunities.
- Upon request, VR participates in transition planning with schools to facilitate the development of IEPs for students with disabilities.
- VR assures that IPEs are developed for students within 90 days of being determined eligible for VR services.
- VR and OCB office staff are encouraged to collaborate in local community planning and implementation efforts that are focused on the transition of students with disabilities from school to postsecondary outcomes.
- VR and OCB provide one assigned VR employee to serve as point of contact for each district.
- Upon request, VR provides information to the ODE State Advisory Council on Special Education to assist in the development of the council's annual report to the Superintendent of Public Instruction.

As of July 1, 2023, Oregon prohibits the use of subminimum wage employment. As of January 2025, Oregon no longer allows Section 14c certificates.

Transition services and Pre-Employment Transition Services will not occur in settings where subminimum wages are paid.

Oregon Revised Statute 653.033 eliminated all subminimum wage options effective June 30th, 2023.

This legislative mandate effectively removed the option for subminimum wage employment statewide after June 30, 2023. Prior to this law going into effect, a phaseout of subminimum wage employment statewide had been put into effective as part of the Lane v. Brown Settlement agreement, with all employees earning subminimum wage being monitored by both the VR Program and the Oregon Office of Developmental Disabilities (ODDS).

The Oregon Department of Education was an active participant in the Lane v. Brown Settlement and was fully engaged in partnership with VR and ODDS to identify, reduce and to provide education for students and youth participating in subminimum wage employment prior the elimination of subminimum wage statewide on June 30, 2023.

## Coordination with employers

### WIOA state requirement

In accordance with the requirements in section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

### Agency response

#### VR services

Given the needs of our customers and business community, a robust employer engagement model is required to be successful. VR Counselors, along with a dedicated VR workforce and business team, provide education and resources to employers to assist in meeting their individual employment demands through hiring qualified individuals with disabilities. In addition, VR contracts with qualified job placement service providers to identify individual

employment, assessment and training opportunities for those who require these customized services to become gainfully employed.

VR is fully integrated into the Oregon workforce development system. By leveraging opportunities with other workforce partners, VR increases competitive integrated employment opportunities for Oregonians with disabilities.

VR will:

- Engage the workforce development system and the business community through intentional, targeted outreach, relationship and partnership building.
- Coordinate with Oregon Commission for the Blind (OCB) for services and training to businesses.
- Engage with the National Employment Team (NET) for a unified approach to working with business customers.
- Collaborate with the Employment Department’s Business Services Team members around the state on joint services to business.
- Partner with the local workforce development boards (LWDB) to coordinate services and leverage resources.
- Research and communicate opportunities for customers including on-the- job training, paid work experiences, internships and apprenticeships with businesses.
- Participate in and coordinate local employer recruitment events and career fairs.
- Contract with providers to facilitate employment events and activities for individuals with disabilities.
- Provide training to contracted job placement and partner providers.
- Leverage Memorandums of Understanding with local agencies regarding employment and career exploration opportunities.
- Provide training and consultation to business on disability awareness and accommodations in the workplace.

- Identify and engage external organizations that may not currently be a workforce partner.
- Participate in local area business events to increase disability awareness and knowledge of VR services.
- Engage businesses by promoting local area internships for individuals with disabilities.
- Be a resource on non-degree credentials, including certificates, industry certifications, apprenticeship certificates, and occupational licenses with CTE, workforce, and businesses to build an inclusive and skilled future workforce.
- Use labor market information in designing strategy for employer and industry engagement.
- Inform business partners on hiring incentives and resources to support businesses employing, supporting, retaining and promoting qualified talent with disabilities.
- Use data collection methods to track and guide business engagement and services to business.

All employer coordinated activities include youth with disabilities.

VR will work to ensure that coordination with employers continue to include opportunities for youth with disabilities. These opportunities will include expanding Work Based Learning Experiences and Career Exploration with businesses.

VR has direct service youth and workforce teams that provide services to youth. VR staff are informed about these services through frequent contact in local VR offices, in VR office meetings, events shared in VR communications, through invitation with partner collaboration meetings, in ongoing youth and workforce presentations and training and in joining community outreach, business tours and inclusive hiring events with employers.

### **Services to business**

Services include, but are not limited to:

- Connection to skilled talent to address workforce needs,
- Tips, tools, information, and resources to promote disability inclusion in the workplace.
- Training on a variety of topics related to disability in the workplace.
- Partnering on all-ability hiring events.
- Empowering businesses through professional networking and educational opportunities.
- Visit VR's [Services to Business](#) page for additional information.

## Interagency cooperation with other agencies

In accordance with the requirements in section 101(a)(11)(C) and (K), 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 to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following.

### WIOA state requirement

State programs (designate lead agency(ies) and implementing entity(ies)) carried out under section 4 of the Assistive Technology Act of 1998.

### Agency response

Access Technologies, Inc. (ATI) serves as the Implementing Entity for the Oregon Statewide AT Program; providing all state level and state leadership activities as mandated by the Assistive Technology Act of 1998, as amended. ATI has entered into an administrative agreement with Oregon's lead agency (the Oregon Department of Human Services [ODHS]). This administrative agreement sets forth the 10 activities that must be conducted by ATI on behalf of ODHS and the system of oversight to be provided by ATI's Board of Directors. ODHS has

assigned a project officer to oversee the administrative agreement, and who will meet with the president of ATI quarterly to discuss activities and the implementation of this state plan.

### **WIOA state requirement**

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

### **Agency response**

VR has not entered into agreements with programs carried out by the Under Secretary for Rural Development of the U.S. Department of Agriculture.

### **WIOA state requirement**

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

### **Agency response**

In Oregon the Oregon Employment Department (OED) partners with nine Local Workforce Development Boards to engage and provide substantial services to out-of-school youth throughout the state. Oregon VR works closely with each of the local boards and OED to ensure that there are statewide and local partnerships with VR to support this population. To accomplish this VR has assigned a branch manager to be a member of each of the nine Local Workforce Development Boards (LWIB). Additionally, VR has managers and staff that are members of the board's Local Leadership Teams (LLTs). Oregon's workforce boards LLTs drive workforce innovation, enhance training programs, and align workforce development with regional economic goals. While VR managers serve as board members, they can strategically plan for services to address local needs for out-of-school youth and the LLTs operationalize programs and activities that the board has established.

While each of the nine regions covered by the LWIBs are responding to local economic opportunities and challenges they support locally driven decisions and programs. OED, LWIBs and VR partner on services for out-of-school youth to meet those local needs at the integrated

one-stop service centers co-operated by OED and the LWIBs and through the contracted services for out-of-school youth administered by the LWIBs. This high level of coordination at the strategic and operational level provides VR the opportunity to coordinate services for VR youth with disabilities who are also out-of-school and who could benefit from these services.

### **WIOA state requirement**

State use contracting programs.

### **Agency response**

VR uses the Statewide Office of Contracts and Procurement to memorialize service delivery arrangements using cooperative agreements and contracts with entities outside of the statewide workforce development system.

VR is part of the Oregon Department of Human Services, which has established a “buy decision” matrix requiring that state use vendors be evaluated on a priority basis for providing offered services to all state agency programs.

Additionally, the VR program has in place a policy and procedure for working with vendors that are part of the State Use Program as well as for evaluating their worksites for potential customer placement purposes.

All employers operating under an “Oregon Forward” contract (the established Oregon State Use program name), will be evaluated on a case-by-case basis to determine the suitability of VR customer placement, and assist the vendor if the location is deemed to not meet the criteria for job placement under the guidelines for Community Integrated Employment.

### **WIOA state requirement**

State agency responsible for administering the State Medicaid plan under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.).

## Agency response

In Oregon, the Oregon Health Authority (OHA) is the agency that administers the State Medicaid Program. Through a series of Inter-Governmental Agreements and Memorandums of Understandings the Oregon Department of Human Services is established as the agency that operates the Medicaid programs and waivers. VR has not entered into separate agreements with OHA outside of our parent agencies agreements. VR does collaborate with the individual programs that administer the waivers.

Medicaid has many programs that aid in the development and ongoing support of competitive and integrated employment. These programs and services include:

- IPS (Individual Placement and Support) services assist individuals with severe and persistent mental health in their employment goals.
- EASA (Early Assessment and Support Alliance) serves youth who have early symptoms of psychosis by providing outreach, treatment, education and employment services.
- EPD (Employed Persons with Disabilities) program provides or continues to provide medical coverage and long-term services to people with disabilities, who may qualify, who are working or want to work.
- In Oregon, Office of Developmental Disabilities Services provides benefits information and referral services under the Medicaid waiver.

## WIOA state requirement

State agency responsible for providing services for individuals with developmental disabilities.

## Agency response

VR and the ODHS Office of Developmental Disabilities Services (ODDS) have focused their work since the 2016 State Plan submission and 2018 updates to achieve the outcomes set forth in Executive order 13-04, which was updated in Executive Order 15-01. These Executive Orders emphasize with more clarity the state's Employment First policy. Additionally, the State

of Oregon has recently settled a lawsuit that calls for increased integrated employment opportunities for individuals with intellectual and developmental disabilities (I/DD). VR, ODDS, Oregon Department of Education (ODE) and the I/DD service delivery system have a working relationship that shares information, leverages and braids funding and encourages joint case management of joint customers. VR will continue to collaborate with ODDS, ODE, and I/DD service delivery system to maximize funding, streamline processes, and meet the competitive and integrated employment goals of individuals with intellectual and developmental disabilities.

VR, ODE and ODDS:

- Collaborate on trainings for consistency and quality in curricula used for VR, ODDS and ODE staff throughout Oregon. This is accomplished through agency conferences such as the VR In-Service, ODDS Case Management Conference, and ODE's Regional Transition Conferences. Interdisciplinary staff from all partnering agencies are invited and cross trained on techniques to further collaborate on shared goals.
- Have ongoing and regularly scheduled Employment First steering committee meetings that lead to collaborative actions by VR, ODDS, and ODE.
- Coordinate policy and innovation meetings that are co-led by VR, ODDS, and ODE staff to facilitate these collaborative actions. The three programs review and discuss all new or newly revised policy to assure alignment across agencies.
- Conduct education and transition meetings to discuss pertinent issues for students who have transition plans.

VR works closely with our partner, the Oregon Developmental Disability Services (ODDS), to provide comprehensive services to Oregonians with Most significant Disabilities to ensure employment opportunities within competitive integrated settings (CIE). We do this through several cooperative efforts; these include weekly meetings between VR and ODDS leadership to discuss ongoing collaborative strategies and to staff difficult cases if needed.

Additionally, VR has several counselors that are assigned primarily I/DD caseloads. These individuals work closely with the ODDS regional employment specialists, as well as partnering with the County Developmental Disability Services Case Managers, and our brokerage personal agents to help ensure that the individuals DD plan and goals are in alignment with the services being provided by VR and that employment occurs in settings that meet the requirements for CIE.

VR works closely with ODDS to evaluate employment in settings that may not meet the requirements for competitive integrated employment. If a client with most significant disabilities is dually enrolled in both VR and ODDS, a team from both programs will visit a worksite if questions arise about the competitive nature of the employment opportunity. VR works closely with the Oregon Resource Association (ORA), the non-profit support group for our providers, to help address issues that may make a worksite incompatible with CIE. Through these efforts, VR has a robust system in place to help ensure all Oregonians with most significant disabilities are provided with substantial opportunities to gain employment in truly integrated settings.

Oregon also has a strong statewide Employment First network. VR is active in both the statewide and local Employment First groups and uses these forums to partner with providers and support groups dedicated to working with individuals with most significant disabilities, as well as connecting with client advocacy organizations and other local/regional services.

Lastly, Oregon has a very strong Project Search program dually managed by VR and ODDS. These Worksites enable clients with most significant disabilities to experience employment opportunities in several different settings and with strong supports to enable them to develop skills that lead to greater independence, competitive wages, and employability.

### **WIOA state requirement**

State agency responsible for providing mental health services.

### **Agency response**

Oregon Health Authority (OHA) Behavioral Health regulations govern county mental health organizations that provide Supported Employment services. Vocational Rehabilitation (VR) contracts with county mental health programs for job placement services, offers contract opportunities to share Social Security Administration Ticket to Work revenue with partnering mental health programs, and provides benefits planning services through the Work Incentives Network (WIN).

In 2025, VR hired a dedicated Vocational Rehabilitation Counselor Specialist position focused on Mental Health. This position coordinates outreach and training efforts to strengthen collaboration between VR and mental health programs. By improving understanding, access, and support across partner systems, these efforts aim to increase employment outcomes in integrated settings at competitive wages for Oregonians with the most significant disabilities.

### **WIOA state requirement**

Other Federal, State, and local agencies and programs outside the workforce development system.

### **Agency response**

American Indian Vocational Rehabilitation Services programs in Oregon: There are nine federally recognized tribes in Oregon. Currently five of those tribes have a federally funded American Indian Vocational Rehabilitation Services (AIVRS) programs. VR has MOUs with each of these tribes to ensure a coordinated set of services and activities to support tribal members. In addition to these five AIVRS programs, the VR Director meets with all nine of the tribal leaders' council quarterly to discuss ways that VR can help support tribes with AIVRS programs and tribes that do not have these programs.

### **WIOA state requirement**

Other private nonprofit organizations.

## Agency response

VR works in partnership with multiple non-profit agencies. These include:

- **Job Placement Contractors:** VR works with many community-based programs, commonly known as Community Rehabilitation Programs or CRPs, to provide an array of employment services for VR clients. These job placement and retention services are vital to successful outcomes for VR clients. VR counselors work directly with clients and these Job Placement Contractors to deliver person centered services that will, ideally, lead our clients to the optimal level of employment described in their Individualized Plan for Employment. Oregon VR also partners and collaborates with Oregon Resource Association (ORA) that is a professional membership association that supports Job Placement Contractors statewide. VR attends quarterly meetings with ORA to provide program updates and to problem solve with their membership to ensure a high level of collaboration. Oregon VR also attends ORA's annual conference and VR invites ORA members and all Job Placement Contractors to VR's annual In-Service for cross-training opportunities.
- **Other Community Based Organizations:** VR also partners with other Community Based Organizations that are not traditionally considered CRPs because they provide employment services to a larger population that just individuals that experience disabilities. As Oregon VR is intentionally trying to expand its network of employment service providers the program has broadened its outreach efforts to recruit more non-profits and other service providers to start providing Pre-Employment Transition Services during the summer months that are focused on Work-Based Learning Experiences.
- **ATI (Access Technology Inc.):** Program staff from ATI work with consumers, service providers, state agencies like VR, private industry, legislators, and other interested individuals to facilitate the development of a statewide system to provide AT services. This includes an AT Device Loan Library, Training and Technical Assistance, and Financing Resource for AT. Centers for Independent Living: Each of the five core Independent Living Services are provided by the seven Centers for

Independent Living (CILs) in various locations throughout Oregon. CILs are private, non-profit organizations run by people with disabilities. Services are provided through a peer mentoring model. The five core services that VR commonly refer clients to receive at the CILs are: information and referral; independent living skills training; peer counseling; individual and systems advocacy; and life transition assistance (related to youth leaving secondary education, or individuals transitioning to or remaining in the least restrictive living environment).

- **Northwest ADA Center:** VR has partnered with the NW ADA Center on developing trainings for VR staff. The ADA Center offers resources and support that can be crucial for employment and accessibility for VR clients.

## 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, 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:

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

of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 C.F.R. 76.140.

- **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:
  - The establishment of the designated State agency and designated state unit, as required by section 101(a)(2) of the Rehabilitation Act.
  - Either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.
  - 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. 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).
  - As applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.
  - As applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
  - Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. The requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.
  - All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.
  - The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.

- 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.
- The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).
- The submission of reports as required by section 101(a)(10) of the Rehabilitation Act.
- **Administration of the Provision of VR Services:** The designated State agency, or designated State unit, as appropriate, assures that it will:
  - Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.
  - 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.
  - Provide the full range of services listed in section 103(a) of the Rehabilitation Act, as appropriate, to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.
  - Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.
  - Comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.

- 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.
- Provide vocational rehabilitation services to Native Americans who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.
- 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 sections 101(a)(14) and 511 of the Rehabilitation Act.
- 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. With respect to students with disabilities, the state has developed and will implement strategies to address the needs identified in the assessments and strategies to achieve the goals and priorities by the state to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
- Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25), and 113).
- Shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
- Program Administration for the Supported Employment Title VI Supplement to the State plan: 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.
- 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.

- Financial Administration of the Supported Employment Program (Title VI): The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(H) and (I) of the Rehabilitation Act.
- The 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.
- Provision of Supported Employment Services: The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.
- The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation

Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act , which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.

## Certifications

States must provide written and signed certifications that:

- Oregon Vocational Rehabilitation, is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by title IV of WIOA, and its State Plan supplement under title VI of the Rehabilitation Act;
- In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, Oregon Vocational Rehabilitation agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;
- As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency or the designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the administration of the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan, 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;

- The designated State unit, or if not applicable, the designated State agency has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement, and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c);
- The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.
- All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.
- The Oregon Vocational Rehabilitation Director 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;
- The Oregon Vocational Rehabilitation Director has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;
- 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.

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**Oregon Department of Human Services**

Vocational Rehabilitation

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