

Oregon 2024-2028 WIOA Combined State Plan 2-Year Modification – March 16, 2026

FOR PUBLIC COMMENT

Introduction and Background

This document contains additions and modifications to [Oregon's 2024-2028 WIOA Combined State Plan](#). Unless specifically called out, the original plan submitted remains accurate and valid. Some specific language has been revised, but most of the modifications included below are additions reflecting changes that have occurred since the original plan was submitted and/or those addressing the U.S. Department of Labor Training and Employment Guidance Letter (TEGL) No. 07-25 - Modification Requirements for Workforce Innovation and Opportunity Act (WIOA) State Plans for Program Years (PYs) 2026 and 2027.

The public is invited to provide comments and recommendations for additional or revised information during the 30-day public comment period March 16 through April 14, 2026.

Comments must be submitted by email to: Clay Martin, clay.martin@hecc.oregon.gov

Comments will be reviewed and addressed as appropriate within the modification. The

recommended modification will be considered by the Oregon Workforce and Talent

Development Board for revision and approval at their April 15, 2026 Executive Committee

meeting. The approved modification is expected to be submitted by April 30, 2026.

Oregon's Economic and Workforce Analysis

Existing Demand

Existing industry and occupational demand, including education and skill requirements, is best measured by Oregon's Job Vacancy Survey. In 2024, job vacancies returned to pre-pandemic levels, which is where they remained in 2025. Oregon's private employers reported 58,500 job openings at any given time in 2025. This was essentially unchanged from the 57,800 job openings seen in 2024.

A typical job vacancy in Oregon tended to be for a permanent, full-time position, regardless of the total volume of vacancies. In 2025, 80% of job vacancies were for full-time positions and nearly all (93%) were for permanent positions. One-third of job vacancies (33%) required education beyond high school in 2025. This was a slight decrease in job vacancies requiring education beyond high school in 2023 and 2024. The average hourly wage for job vacancies in 2025 was \$26.72.

Despite the decrease in job vacancies requiring more education beyond high school, 63% of vacancies required some amount of previous experience. One-third of job vacancies required

education beyond high school in 2025 but that varied widely among industries. While more than half of professional scientific, and technical services (73%) and transportation warehouses and utilities (54%) job openings required education beyond high school, few openings among leisure and hospitality (3%), natural resources and mining (10%), and retail trade (13%) required education beyond high school.

In 2025, health care and social assistance reported the most vacancies of any industry (16,100), nearly three times as many vacancies as the next highest industry, retail trade (5,800). These two sectors were followed by leisure and hospitality (5,400) and construction (5,100). Alone, private health care and social assistance accounted for over one-fourth of all vacancies. All industries reported at least 1,000 vacancies, except for natural resources and mining (750) and information (350).

Employers were hiring for a wide variety of jobs; they reported vacancies for nearly 350 different occupations in 2025. Top occupations across the economy included personal care aides (5,100); heavy and tractor-trailer truck drivers (2,300); and retail salespersons (2,100).

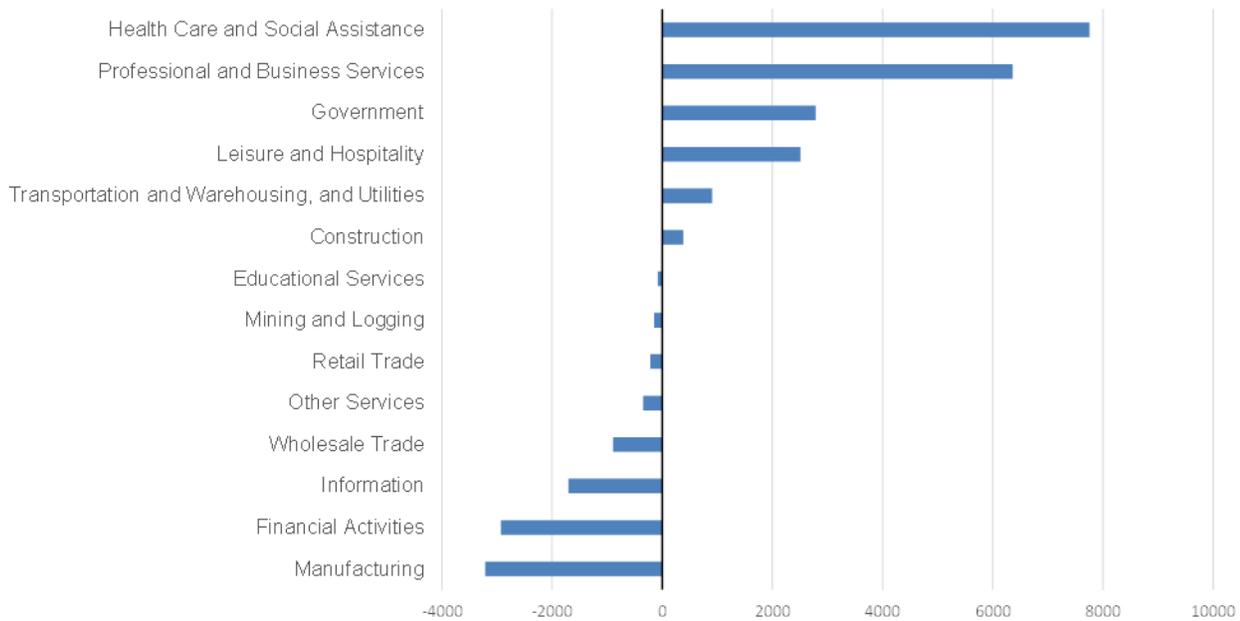
Emerging Demand and Employers' Needs

Graph 1 shows the projected net annual job change from 2025 to 2026 in Oregon. Looking at the year ahead, the Oregon Office of Economic Analysis (OEA) forecasts a return to slow job growth in 2026. OEA expects Oregon employers to add 11,400 jobs to nonfarm payrolls between 2025 and 2026. That's a growth rate of 0.6%, or an average gain of about 950 jobs per month. This would still be slow growth by historical standards, but would be well above the losses of 2025, or the smaller annual gain of 5,600 jobs in 2024.

The largest employment gains between 2025 and 2026 are expected to occur in private health care and social assistance (+7,800 jobs) and professional and business services (+6,400). These represent the industry sectors with the greatest anticipated emerging hiring demand in Oregon. OEA anticipates the largest job losses – and weaker labor demand – occurring in manufacturing (-3,200), financial activities (-2,900), and the information sector (-1,700).

Graph 1. Expected Job Changes by Industry Sector Over the Year Comparing 2025 to 2026.

Expected Annual Job Changes by Industry Sector, 2025-2026



Source: Oregon Office of Economic Analysis, February 2026

In the longer term, projections by the Oregon Employment Department indicate that Oregon will average 14,000 job openings each year due to economic growth between 2024 and 2034. These job openings are a net gain from new or expanding businesses adding jobs in Oregon.

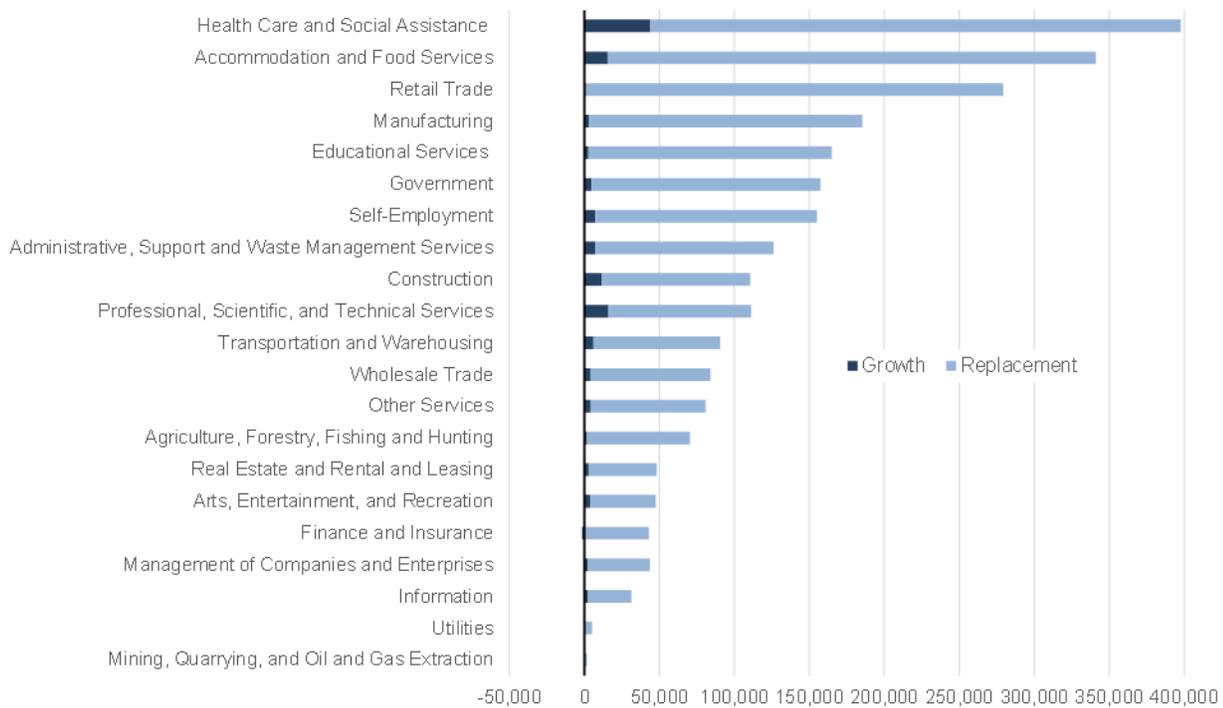
As workers progress in their careers, they may change occupations. This creates additional job openings when they leave that can be filled by someone new to the occupation who may need training to fill that opening. Also, when a worker reaches the end of their career, they leave the labor force, again creating an opening that may require a trained worker to fill it.

We use the phrase “replacement openings” for the total number of job openings due to workers leaving the labor force, largely due to retirements, or making major occupational changes. Far more workers are needed to fill replacement openings – 2.4 million, or an average of almost 244,000 per year – than for “growth openings” that are due to net job growth. Even in some industries and occupations with little anticipated net job growth, replacement openings can be numerous.

Projected growth and replacement job openings by industry are shown in Graph 3. Health care and social assistance will have the most openings through 2034, but of the nearly 40,000 expected openings each year, 89% will be due to replacement needs. In fact, most job openings across industries will be from replacements as more workers enter retirement. As the labor force continues to age, replacement openings are likely to become more numerous and the associated need for training is likely to grow.

Graph 2. Projections for 2024-2034 Job Openings by Industry in Oregon.

2024 - 2034 Projected Openings by Industry in Oregon



Source: Oregon Employment Department

Employment and Labor Market Trends

In 2025, Oregon employers lost 3,300 jobs (-0.2%) from nonfarm payrolls. The only other years with annual job declines since 1990 were those with recession-related losses. The annual average loss in 2025 follows a small annual gain of 5,600 jobs in 2024. That means Oregon only netted a total gain of 2,300 jobs over the course of the past two years.

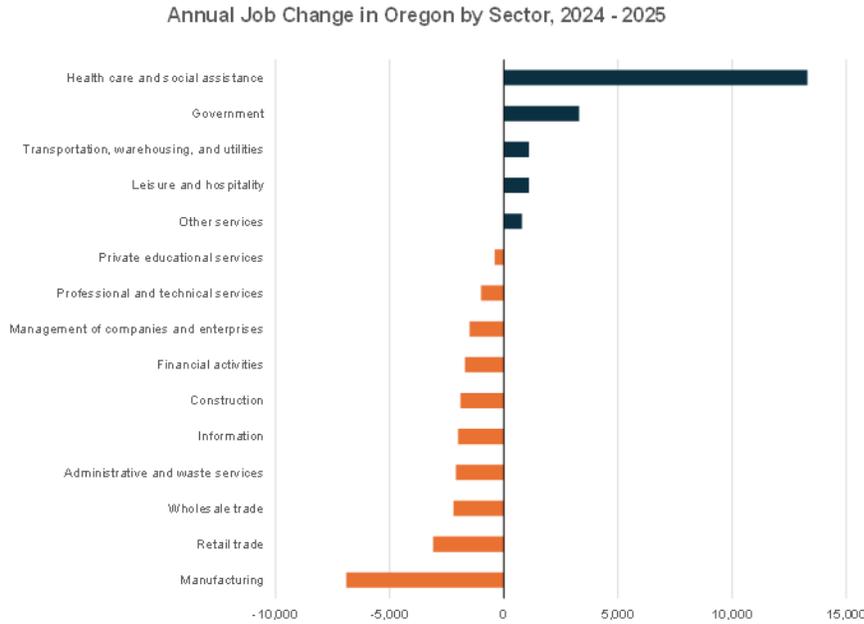
Employment trends have differed notably among various sectors of Oregon’s economy. Between 2024 and 2025, the job gains Oregon had were highly concentrated in private health care and social assistance. This one sector alone added 13,300 jobs between 2024 and 2025, a gain of 4.4%. This made health care and social assistance the one outstanding sector in terms of employers’ labor demand in Oregon.

Government added 3,300 jobs (+1.0%) in 2025. Three-fourths (or 76%) of the public-sector gains occurred in local government, which includes public K-12 education, community colleges, public universities, as well as city, county, and regional public services. Local government hospital payrolls also fall in the local government category.

Meanwhile, some sectors of Oregon’s economy had notable job losses in 2025. They included manufacturing, which lost 6,900 jobs (-3.7%) between 2024 and 2025, and retail

trade, which dropped by 3,100 jobs (-1.5%). Wholesale trade declined by 2,200 jobs (2.8%) over the year; administrative and waste services dropped 2,100 jobs (-2.1%); and the information sector declined by 2,000 jobs (-5.6%). All other broad sectors of Oregon’s economy changed by less than 2,000 jobs between 2024 and 2025.

Graph 3. Average Annual Employment Change in Oregon by Sector, 2024 – 2025.

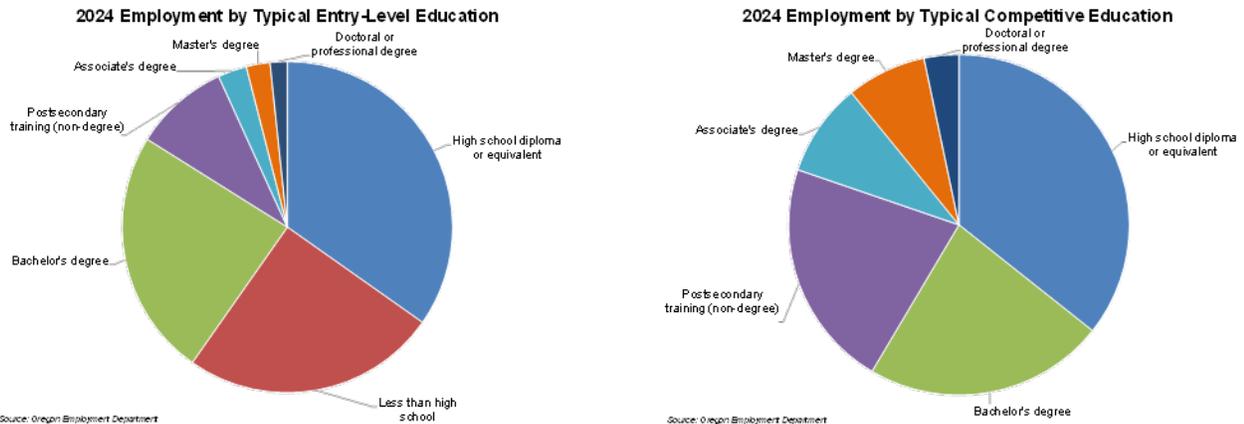


Source: Oregon Employment Department, Current Employment Statistics

Education in the Workforce

In 2024, three out of five jobs in Oregon typically required a minimum of a high school education or less. However, to be more competitive candidates for jobs in Oregon, three out of five actually required some sort of education or credential beyond high school.

Graph 4. Typical and Competitive Education Levels for Oregon Jobs in 2024.

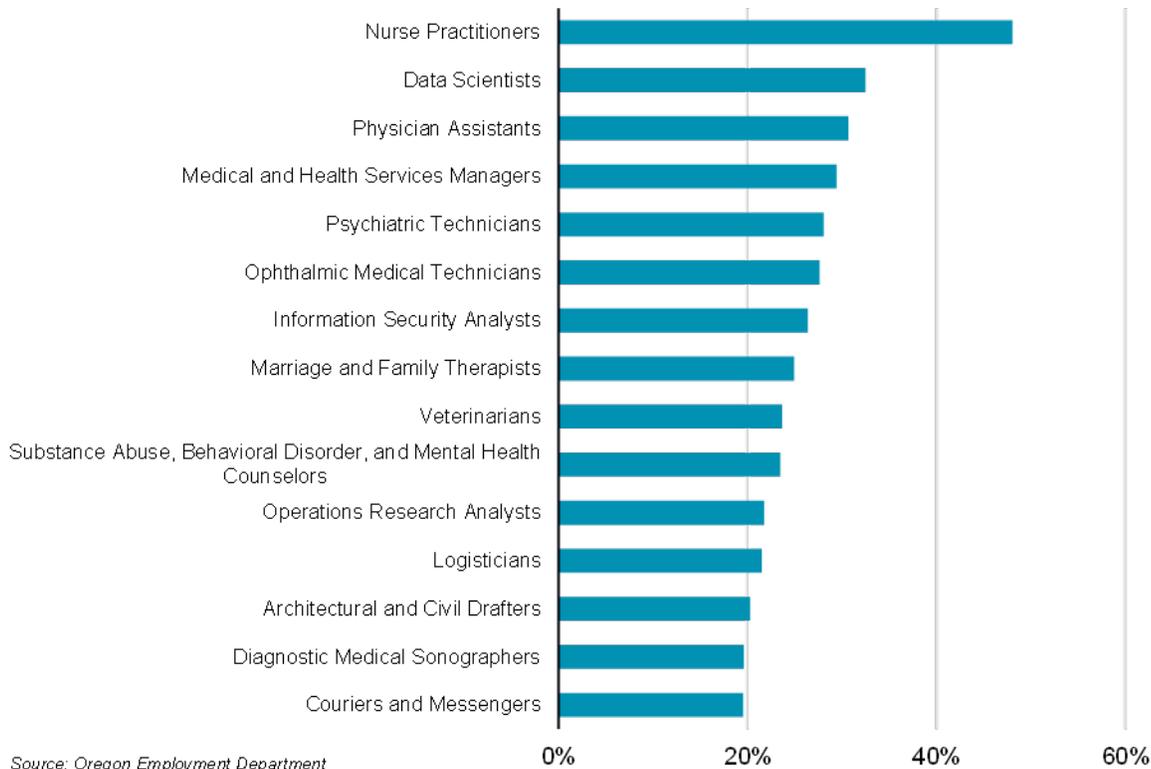


Between 2024 and 2034, occupations that require a master's degree are projected to be the

fastest-growing group in Oregon, followed by associate's degree occupations, and doctoral or professional degree occupations. Health care occupations and those associated with health care (including mental health and animal health) account for nine of the 15 fastest-growing occupations. Computer and mathematical occupations comprise three of the 15 fastest-growing occupations.

Graph 5. Occupations with the Fastest Projected Growth Rate in Oregon, 2024 – 2034.

Fastest-Growing Occupations, 2024-2034



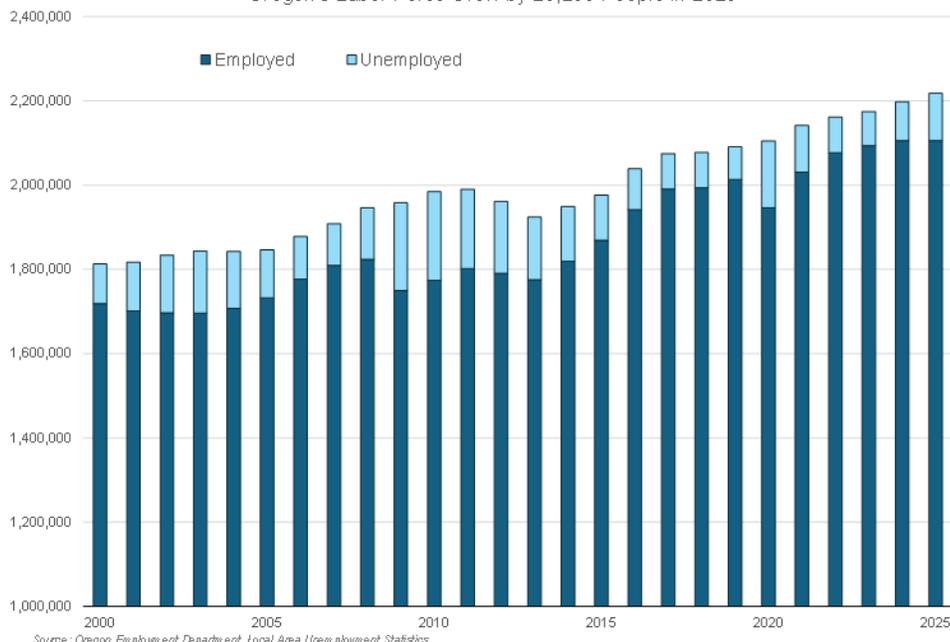
Unemployment and Labor Force Trends

Oregon continued to see slow labor force growth in 2025. Oregon added 20,200 people (0.9%) to the labor force between 2024 and 2025. That was comparable to labor force gains in Oregon each year since 2022, and faster growth than the pre-pandemic years of 2018 (0.1%) and 2019 (0.6%).

The main difference in labor force trends between 2025 and the pre-pandemic period is that in 2018 and 2019, employment was rising and unemployment fell. In 2025, all of Oregon’s labor force gains were due to rising unemployment. Oregon’s labor force gains totaled 20,200 between 2024 and 2025. The number of Oregonians who were employed either on a company payroll, on a farm, on contract or were self-employed was essentially unchanged, while unemployment rose by 20,200.

Graph 6. Employment and Unemployment in Oregon’s Labor Force, 2000 – 2025.

Oregon's Labor Force Grew by 20,200 People in 2025

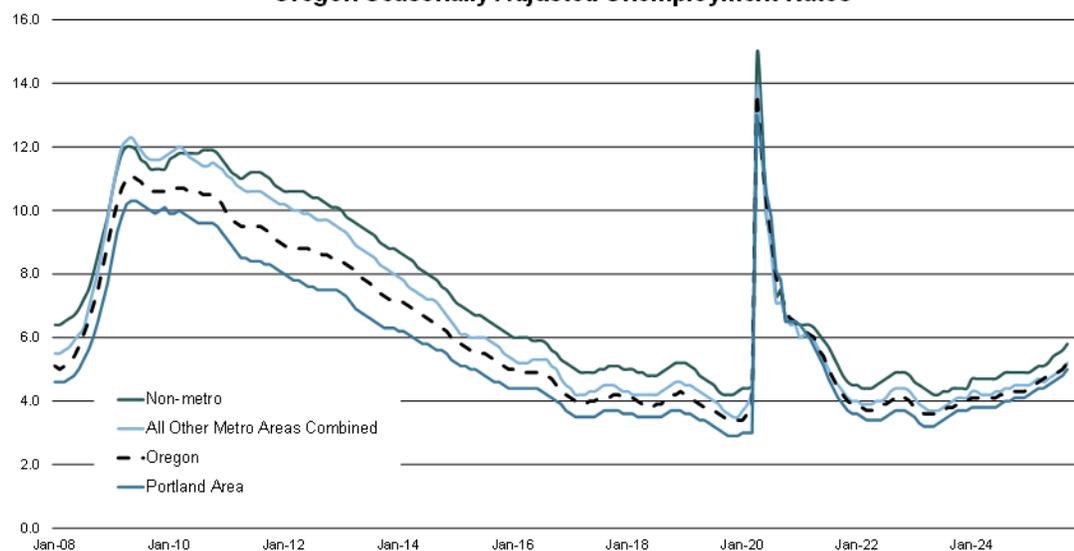


Unemployment trends have been similar across metropolitan and rural areas of Oregon. Unemployment rates rose across the combined metropolitan and non-metro counties alike in 2024 and most of 2025. Unemployment rates generally leveled off across the combined metropolitan and non-metro areas at the end of 2025.

Graph 7. Seasonally Adjusted Unemployment Rates for Oregon's Metropolitan and Non-Metro Areas, 2008-2025

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Oregon Seasonally Adjusted Unemployment Rates



The Bureau of Labor Statistics publishes monthly unemployment rates for all 389 metropolitan areas in the U.S. In December 2025, unemployment rates varied widely among the nation's 389 MSAs. Decatur, AL and Huntsville, AL had the lowest rates at 1.9%. El Centro, CA had the highest at 18.6%.

Unemployment rates in Oregon's MSAs were generally higher than other metro areas. Corvallis had Oregon's lowest rate at 4.4%, which was 0.6% above the median unemployment rate for all U.S. metros of 3.8%. Oregon's metros with more elevated rates included Portland-Vancouver-Hillsboro (4.9%), Salem (4.9%), Bend (5.0%), Eugene-Springfield (5.0%), Albany (5.3%) and Medford (5.5%). Grants Pass had the highest unemployment rate of Oregon's MSAs at 6.8%. Only around 4.1% of other metro areas had higher rates in December.

Opportunity/Challenges for Facing Workforce Needs

Oregon's economy faces many of the same demographic challenges seen across the nation, such as the aging of the workforce and baby boomer retirements. In the 1990s, one out of every 10 jobs in Oregon was held by a worker age 55 and older. By 2024, one out of every four jobs in the state was held by a worker at least 55 years old.

Population growth has driven labor force growth in recent years. This is a result of natural increase (births minus deaths) and to a larger extent, net in-migration from other states and areas. While Oregon has historically been a leading state in terms of population growth, that trend changed in recent years.

U.S. Census Bureau estimates show Oregon's population declined by 12,800 between 2021 and 2023. Population growth turned positive again in 2024 (+39,000). Still, that means Oregon only averaged a gain of 8,700 residents each year, which is quite slow by historical standards.

Estimates from Portland State University's Population Research Center show a loss of 6,700 residents in 2021, then a return to growth each year since. The difference in 2024 between the two sets of population estimates stands at 14,000. Despite the differences between these estimates, they tell a similar story: Oregon's population growth has slowed notably, and had outright declines in recent years for the first time since the 1980s. If Oregon's labor force does not grow amid stagnating population, that can affect the state's job growth potential in the future.

Greater labor force participation among existing residents – or greater use of remote workforce living elsewhere – could offset some population slowdown or decline in the state. Oregon's labor force growth was solid following the pandemic recession. In 2025, the size of the labor force averaged 2.2 million people, a 6% increase from the pre-pandemic level of

2.10 million in 2019.

Labor force participation may be a recent boost despite slower overall population growth. At 63.2%, Oregon's labor force participation rate was slightly higher at the end of 2025 than in January 2020 (61.1%) before the pandemic recession. The state's labor force participation rate has risen slightly despite demographic pressures and slower population gains and was also slightly above the U.S. participation rate (62.4%) at the end of 2025.

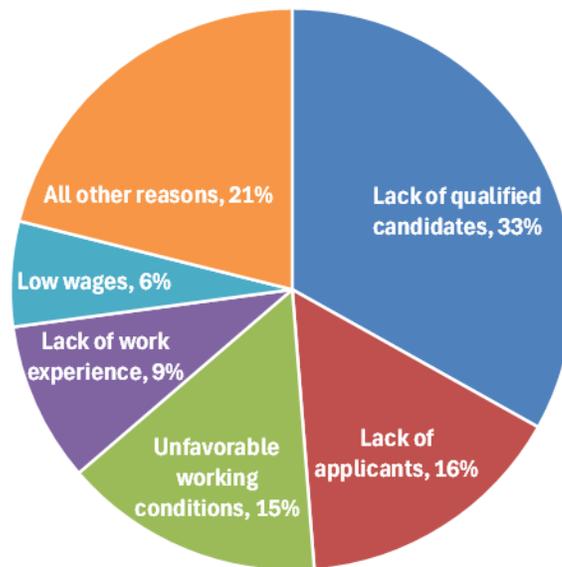
Difficulty Filling Job Vacancies

Slower population and labor force gains can be a potential source of difficulty for employers' ability to fill all their job vacancies. As unemployment rose over the past couple of years, and the number of job openings stayed relatively steady, employers' primary challenges filling job openings have evolved.

At any given time in 2025, Oregon's private employers had almost 58,500 job vacancies. Of those, more than half (31,800 or 54%) were cited by employers as difficult to fill. In 2025, the most commonly cited reason for difficulty filling job openings was a lack of qualified candidates. That means for one-third (or 9,300) of all hard-to-fill job vacancies, employers were look for some mix of education, knowledge, and experience that was hard to find among job applicants. Another 4,400 (or 16% of all) hard-to-fill job openings had a lack of applicants in 2025. That meant employers had too few or no job seekers applying for their vacancies. Prior to the pandemic recession, one out of five (20%) of all job openings with private employers were reported as hard to fill due to a lack of applicants.

Graph 8. Difficult-to-Fill Oregon Job Vacancies by Reason in 2025.

Employers' Primary Reason for Difficulty Filling Oregon Job Vacancies in 2025



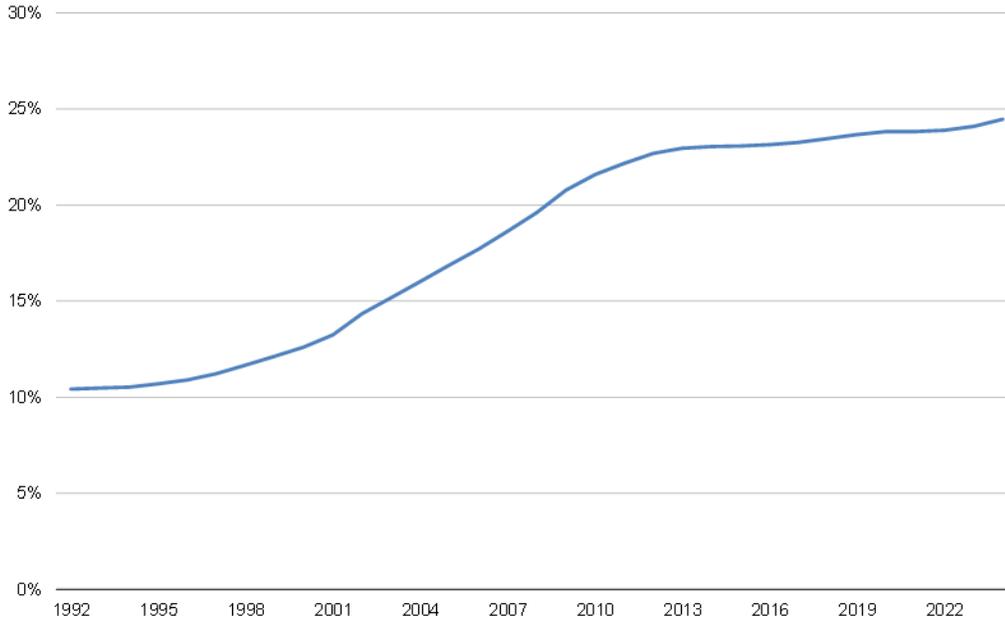
Source: Oregon Annual Job Vacancy Survey

Workers with Barriers - Older Workers

Baby boomers have dramatically changed the age structure of Oregon's workforce. In the early 1990s, about 10% of all jobs in Oregon were held by workers ages 55 and older. By 2024, that share increased to 24%. The entire Baby Boomer Generation, born 1946 to 1964, is now 55 and older. Although they are more likely to be in the labor force than previous generations were at ages 55 and beyond, the 55+ age group still tends to have a significantly lower labor force participation rate than workers ages 25 to 54.

Graph 9. The Share of Oregon Workers Who are 55 or Older between 1992 and 2024. Nearly One out of Four Workers in Oregon is 55 or Older.

Nearly One out of Four Oregon Jobs Held by Workers Ages 55 or Older



Source: Oregon Employment Department and U.S. Census Bureau, Quarterly Workforce Indicators

The number of workers in Oregon who were 55 years and over totaled 478,000 in 2024. Of those workers, more than 165,000 were 65+ years old, and working past the legacy age of retirement.

Older workers can be found in jobs in all industries, of course, but some industries have a large concentration of older workers. The relatively young accommodation and food services sector has 18% of jobs held by workers ages 55 and over. By contrast, one out of three jobs (33%) in the mining and quarrying sector are held by workers 55 and older. Although natural resources, utilities, and real estate have higher concentrations of older workers, they employ fewer workers than many industries and are expected to require relatively fewer replacement workers. Some employers in industries with a large number of workers 55 years and older may struggle to a greater degree to find enough workers if they don't plan ahead.

Health care (both private and public) stands out for the size of its aging workforce, with 78,000 workers ages 55 and over. Other industries with a large number of workers nearing retirement age include manufacturing (49,000 workers), retail trade (49,000), and private and public educational services (40,000). Employers in these and in all other industries need to plan for how they are going to attract replacement workers, especially for jobs that require significant training.

Rural areas in Oregon also have a large concentration of older workers. In fact, the only counties with a smaller share of older workers than the statewide average are Washington County (23%), Multnomah County (23%), Union County (23%), and Deschutes County (23%).

Workers with Barriers - Long-Term Unemployed

Long-term unemployed are those who have been unemployed for at least six months. Over the past two decades, the number of Oregonians who were unemployed long term has been as low as 11,000, and as high as 102,000 following the Great Recession.

The longer an unemployed worker remains unemployed, the less likely they are to find a steady full-time job, and the more likely they are to leave the labor force. Researchers have found that long-term unemployment can lead to a decline in the workers' knowledge, skills, and abilities, making it harder for them to qualify for available jobs. Other studies show that employers discriminate against the long-term unemployed, making it less likely for an unemployed worker to receive an interview. These barriers to employment exist even in a strong economy.

The total number of unemployed Oregonians has been rising recently, averaging 30,000 in 2025. That's up from an average of 19,000 in 2024. Aside from the pandemic recession, the last time long-term unemployment was more than 30,000 was in 2014.

Workers with Barriers - Race and Ethnicity

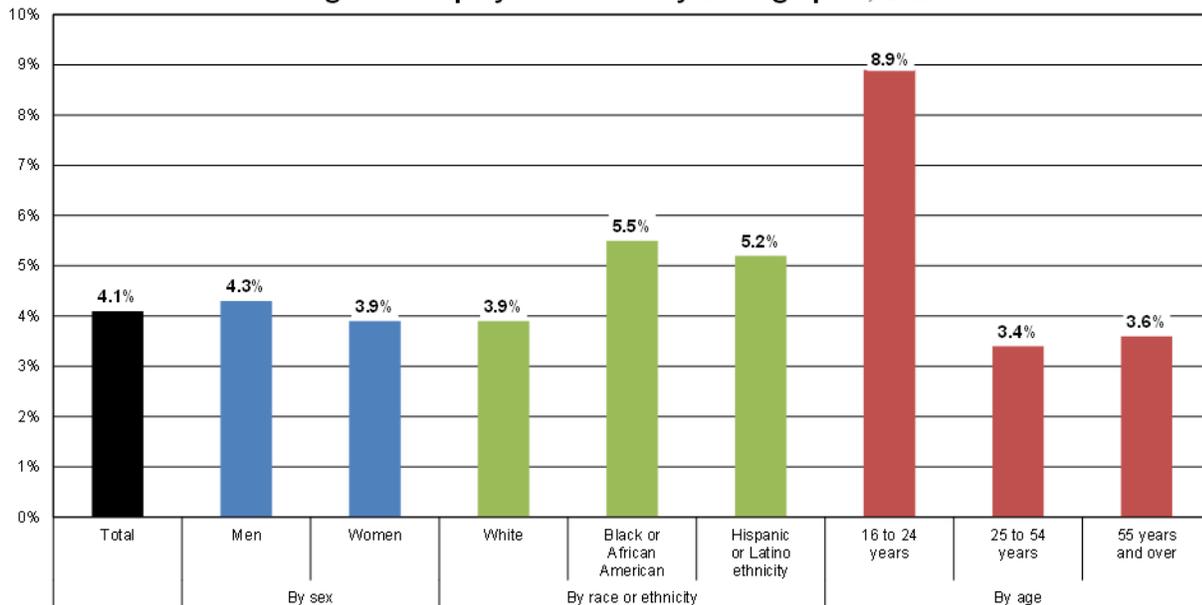
Oregon's population has become more racially diverse over the last two decades, but continues to have a much larger share of the population reporting their race as "white alone" than the national average. In 2024, the white alone category accounted for 73% of Oregon's population, compared with 60% of the population across the U.S. The Asian population accounted for 5% of all Oregonians, Black and African American Oregonians accounted for 2% of the state's population, and other races made up the remaining 20%.

Oregon's population has also grown more ethnically diverse, as seen in the growth of the Hispanic population over the last two decades. By 2024, Hispanics and Latinos made up 16% of Oregon's population. This compares with 20% of the U.S. population, indicating that Oregon still has a small Hispanic population relative to the national share.

Unemployment rates remained relatively low in 2024, but varied notably for some demographic groups by race and ethnicity in Oregon. Overall, Oregon's unemployment rate was 4.1% in 2024. Unemployment rates were notably higher for workers ages 16 to 24 (8.9%), as well as for Black or African American workers (5.5%). These higher rates of labor underutilization may indicate workforce challenges and opportunities to reduce mismatches between unemployed workers and hiring demand.

Graph 10. 2024 Annual Average Unemployment Rate by Race and Ethnicity for Oregon.

Oregon Unemployment Rates by Demographic, 2024



Source: Current Population Survey, <http://www.bls.gov/lau>

Updated State Strategic Vision and Goals

Introduction

The Oregon Workforce and Talent Development Board's (WTDB's) vision is **equitable prosperity for all Oregonians**, as defined in the [2025–2026 WTDB Strategic Plan and Scorecard](#). To achieve this vision, the WTDB empowers Oregon's workforce and employers by informing and shaping an inclusive, coordinated training and education system responsive to employer and worker needs. The Board advances Oregon through education, training, jobs, and careers by:

- Leading and communicating a long-term vision for Oregon that anticipates and acts on emerging needs.
- Partnering with workforce, education, and training organizations, including Local Workforce Development Boards (LWDBs).
- Advising the Governor and Legislature on workforce policy and plans.
- Aligning workforce policy, resources, and services with employers, education, training, and economic development.
- Identifying barriers, providing solutions, and avoiding duplication of services.
- Providing accountability among public workforce partners.

- Sharing best practices and innovative solutions that are scalable statewide and across multiple regions within the entire workforce system.

To realize the WTDB's vision, the Strategic Plan identifies four Imperatives that guide statewide workforce development alignment and action:

1. An inclusive workforce system that advances equitable prosperity.
2. Strategic alignment of systems and partners toward shared workforce goals.
3. Clear understanding of and improved use and impact of the workforce system.
4. Accountable workforce system leadership.

These imperatives are mutually reinforcing, establishing the foundation for a coordinated, equitable, and outcomes-driven workforce system.

Equity and inclusiveness remain vital themes. The WTDB's vision recognizes that many Oregonians – particularly priority populations, individuals with barriers to employment, and rural communities – have historically experienced inequitable access to opportunities. Despite sustained efforts, significant work remains to expand access and ensure equitable outcomes in workforce services, programs, and training. Closing equity gaps requires a systemwide commitment across state, regional, and local partners.

The workforce system's size and complexity can itself create barriers to access, navigation, and accountability. WorkSource Oregon (WSO) has made progress toward integrated service delivery, yet system users and partners continue to express that the system can be difficult to understand and navigate. The WTDB embraces a broad definition of the workforce system – consistent with emerging national frameworks – that positions a high-performing state workforce board as a leader across education, training, and workforce to drive statewide, sustainable improvement in customer outcomes.

Improving customer outcomes also requires strong alignment among business, education (including K–12, community colleges, and universities), economic development, and workforce development partners. As the system expands to include broader partners and strategies, opportunities to invest in underserved and underrepresented populations also expand. Public–private partnerships are particularly critical. Sector partnerships, industry consortia, and other partnership models are central strategies for addressing rapidly changing workforce needs and for tackling cross-cutting challenges such as childcare, housing, and transportation.

The WTDB comprises strategic leaders who are uniquely positioned to advise the Governor

on aligning education, training, and workforce development systems. The Board monitors the workforce system to ensure effectiveness, efficiency, accountability, and continuous improvement. Through its leadership, the WTDB's imperatives drive action toward a focused set of Shared Workforce Success Goals and Board Performance Metrics that shape system strategy statewide. These goals emphasize key actions including:

- Closing skills gaps in Oregon's priority industry sectors.
- Holding WorkSource Oregon partners accountable to performance measures.
- Influencing positive youth and student outcomes across education and workforce pathways.

Partner Efforts to support the 2025–2026 WTDB Strategic Plan and Scorecard

Higher Education Coordinating Commission, Office of Workforce Investments (Title I of WIOA)

Support for Vision, Mission Imperatives

The Adult, Dislocated Worker, and Youth programs support the WTDB's Vision, Mission, and Imperatives by being core drivers of Oregon's public workforce system. WIOA Title I programs deliver career and training services through WorkSource Oregon, with priority of service for veterans, low-income, public assistance recipients, and basic-skills-deficient adults, and 14 required youth program elements that emphasize work experience and pathways to credentials.

Oregon's Combined Plan frames a sector strategies/career pathways approach, integrated across Title I and other core partners, to meet employer demand and improve workforce and training outcomes statewide.

Support for Performance Metrics

Title I programs support the WTDB's Imperatives and Board Performance Metrics through a combination of program design and service delivery strategies, innovative initiatives, and ongoing data quality efforts including the tracking of outcomes.

At the organization level, Oregon ensures that Title I providers and LWDBs have representation on WTDB committees to provide input on strategies, metrics, and related implementation efforts that align with WTDB priorities.

At the State and local levels, Title I programs are prioritizing ITAs, OJT, and incumbent worker training in priority sectors named in Oregon's Combined Plan, using sector-targeted

supportive services (transportation, tools, childcare) to remove participation barriers in priority industries, and using training funds (ITAs, OJT, apprenticeships, transitional jobs, incumbent worker training) to prioritize programs aligned with Oregon's priority industry sectors.

From a data perspective, Oregon's Title I programs will analyze WIOA's primary indicators, disaggregated (employment rate Q2/Q4, median earnings, credential attainment, measurable skill gains) for targeted groups and can include youth work experience participation as a lead indicator to help support the WTDB's Board Performance Metrics and continuous improvement efforts.

Oregon Employment Department, Workforce Operations Division (Title III of WIOA - Wagner-Peyser/MSFW/TAA/ Veterans)

Employment Services Modernization

The Oregon Employment Department's Modernization Program is a multi-year initiative focused on transforming the agency's business processes and core technology systems. The first phase of the Modernization Program, completed in 2024, was the replacement of systems supporting payment of Unemployment Insurance benefits and Paid Leave Oregon benefits.

The next phase of the Modernization Program is to replace the computer systems supporting the delivery of employment services and administration of federal workforce programs. Tentatively scheduled for completion in 2027, the Workforce Modernization Project will replace aging systems supporting the following programs: WIOA Title I Adult, Dislocated Worker and Youth; WIOA Title III Wagner-Peyser (employment services); Jobs for Veterans State Grants; Trade Adjustment Assistance for Workers; Reemployment Services and Eligibility Assessment (claimant reemployment); and SNAP (Supplemental Nutrition Assistance Program) Training and Employment.

Modernizing core information technology systems and business processes will ensure the state can continue to provide services to Oregonians and Oregon businesses today and be prepared to respond to emerging future needs. Current legacy systems are outdated and do not easily support personalized and updated services, such as online self-service options and mobile-friendly applications. They are also somewhat constrained and inflexible, making it difficult to adapt to changing business, state, and federal requirements and to share data securely between workforce partners.

The Workforce Modernization Project is an opportunity for WSO to better serve and connect with its customer base. A modernized platform will expand the reach of the WSO brand by having a relevant look and feel and enhanced tools to help customers in their job search. A

new system will also offer enhanced data collection and customer tracking, which will allow WSO to better understand a customer's journey to employment and demonstrate the ways in which re-employment services make a difference in people's lives.

OED Analytics

The Oregon Employment Department's Analytics Team is refreshing the agency's public facing dashboards, located on the Oregon.Gov website [here](#). This page currently provides the public with a Performance dashboard, and an Information Dashboard. Neither Workforce Operations nor WorkSource Oregon is included in the Performance dashboard. With the implementation of the Cisco telephony platform in summer 2026, WO/WSO will have access to phone and live-chat data to share in this space. Metric details are still being determined by the Executive Team and WO leadership. It is anticipated that Cisco data will be ready for publishing by September 2026. This move increases data transparency and accountability with the public and highlights the agency's commitment to customer service excellence and continuous improvement.

Oregon Workforce Leadership – Accountability and Feedback Loop

The Oregon Workforce Leadership (OWL) group was established in September 2024 to provide a communication loop and accountability between local leadership teams (LLTs) and state-level decision makers, with the goal of standardizing WorkSource Oregon (WSO) operations and addressing gaps or challenges in a collaborative way. The OWL group meets monthly and, when possible, prior to OED/OWI/OWP State Leadership meeting to allow the OWL Chairs to communicate the most current and relevant information to leadership. The OWL group launched a Customer Feedback Mechanism in January 2026 in all workforce areas except Mid-Valley, which had already contracted with an external vendor to provide a feedback mechanism. The mechanism is housed in OED's Smartsheet Gov platform and was established to meet the customer feedback mechanism requirement outlined in the WorkSource Oregon Operational Standards. Questions on the survey form were agreed on by OWL. OED maintains the survey, the associated raw data repository, and reports and dashboards needed by each center and area to communicate results and trends. OED also maintains access to this information for both OED users and WSO partner users.

Aligning Title I and Title III Administration and Funding Within OED

In early 2026, Oregon's Governor Kotek approved a plan to move the administration and funding of WIOA Title I programs from the Higher Education and Coordinating Commission to OED. Currently, each Local Workforce Development Board receives different amounts of state and federal discretionary funding, has different priorities, and places different requirements on their one-stop operators. This often results in different levels of partner integration within WSO centers throughout the state and referral processes that vary based

on where a customer lives. The transition of WIOA Title I to OED is scheduled to start July 2026.

Title I and Title III serve the same customer base and Oregon is one of the few states where both titles are not administered by the same agency. Aligning these programs under the same agency will provide Oregon with one voice and vision within the Workforce System for WIOA Title I and put the customer at the center of service delivery. A single administrator will allow for better connections across partnerships, allowing one funder to mandate certain types of collaboration and ensure that services are not duplicated across organizations. It will also create efficiencies and reduce administrative costs as both titles perform similar and often overlapping work such as evaluating program effectiveness, preparing federal reports, conducting data validation, and interpreting federal requirements for data collection and program administration. Ultimately, a reduction in spending on administrative oversight and program administration leaves more dollars for participants.

Upgrade OED Telephone Platforms in the WSO Centers

In 2026, Workforce Operations plans to upgrade its telecommunications platform, which serves most of the WSO centers. This new platform will provide more visibility into customer contact reasons and trends for data analysis and program management. It also supports value-add features such as live chat, text, and on-demand video calls. These new features will expand service accessibility for the customer by providing alternative contact methods beyond a phone call or in-person visit.

Continue Focusing on Under-Resourced and Under-Represented Communities

A key aspect of WIOA is to help those with significant barriers connect to employment. In alignment with that charge, Workforce Operations has increased its presence in correctional institutions to serve adults in custody pre-release; expanded the network of SNAP Employment and Training providers across the state; instituted pre-recession planning, drawing on lessons learned from COVID and the Great Recession, to ensure WSO is positioned to serve customers during an economic downturn; and initiated formal evaluations of its claimant reemployment and SNAP E&T programs with outside entities with the goal of strengthening service delivery and improving performance outcomes for participants.

Mobile American Job Centers (Mobile Vans)

In spring 2026, WSO is deploying three Mobile American Job Center Vans, equipped with Wi-Fi and workstations, across the state to enhance service delivery to Oregon's underserved and under-resourced communities, particularly in rural areas. Through the vans, individuals can register in the state's labor-exchange system, access online job boards and workforce information, receive basic career services, and connect with reemployment and training

programs that address barrier removal and provide needed benefits such as WIOA Title I and SNAP Training and Employment. Receiving services through a Mobile American Job Center Van is not intended to be a one-time event, but rather a chance to build a relationship that makes a difference in an individual's path to employment.

Increasing Access to Education and Training in Correctional Facilities

In January 2026, Oregon received a grant to join the inaugural cohort of Jobs for the Future's (JFF) [Fair Chance to Advance \(FC2A\)](#) State Action Networks, a new initiative to help states expand high-quality postsecondary education and workforce pathways for individuals with histories of incarceration. Over the next four years, Oregon—along with Kansas, Maine, and North Carolina—will receive up to \$2.1 million in funding and technical assistance valued up to \$1.8 million from JFF and the Coleridge Initiative, a nonprofit organization working with governments to ensure that data are more effectively used for public decision-making.

In Oregon, a cross-agency team, led jointly by the Higher Education and Coordinating Commission, Department of Corrections, and Oregon Employment Department, will bring together leaders in Oregon who will work with JFF's Center for Justice and Economic Advancement to address persistent barriers that limit economic opportunities for Oregonians with records and their families. Nationally, more than 70 million people—roughly one in three adults—have some type of criminal record, and emerging analyses suggest a similar share of Oregon residents are justice-impacted, underscoring both the scale of the challenge and the opportunity for fair-chance education and employment strategies. Oregon plans to unify inter-agency data systems to guide decisions, strengthen reporting, and expand education-to-employment pathways, including sustaining and growing in-prison WSO reentry centers as a core bridge from custody to community.

Oregon Department of Human Services – Vocational Rehabilitation and the Oregon Commission for the Blind (Title IV of WIOA - Vocational Rehabilitation)

Support for Vision, Mission Imperatives

Vocational Rehabilitation (VR) and the Oregon Commission for the Blind (OCB), collectively title IV of the Workforce Innovation and Opportunity Act (WIOA), advances the Workforce Talent Development Board's (WTDB) 2025–2026 Strategic Plan and Scorecard by directly operationalizing the state's vision of a skilled, inclusive workforce where all Oregonians can contribute to and benefit from economic prosperity. VR and OCB expand equitable access to employment by supporting individuals with disabilities, one of Oregon's most underrepresented talent populations, to prepare for, secure, and retain competitive, integrated employment. Through individualized services, assistive technology, and coordinated career pathways, VR and OCB help ensure that talent development efforts reach people who have historically faced systemic barriers, reinforcing the Plan's equity-centered

vision.

In alignment with the WTDB mission to build a demand-driven and industry-responsive workforce system, VR and OCB partners closely with employers, workforce boards, community colleges, and training providers to align services with current and emerging labor market needs. VR and OCB's employer engagement strategies, such as work-based learning, customized employment, and on-the-job training, support businesses in meeting talent needs while creating meaningful career opportunities for job seekers with disabilities. These efforts advance the Strategic Plan's emphasis on sector strategies, skills-based hiring, and work-based learning as drivers of economic growth.

VR and OCB also advances the WTDB imperatives related to system integration, accountability, and measurable outcomes. By co-enrolling participants in the workforce system, leveraging shared performance measures, and using data to inform continuous improvement, VR and OCB strengthen cross-agency alignment and contributes to Scorecard outcomes such as increased labor force participation, credential attainment, and wage growth. Collectively, Oregon VR and OCB's focus on equity, employer partnership, and results-driven service delivery supports the WTDB's 2025–2026 goals to build a more inclusive, resilient, and talent-rich economy for the state.

Support for Performance Metrics

Vocational Rehabilitation (VR) and the Oregon Commission for the Blind (OCB), collectively title IV of the Workforce Innovation and Opportunity Act (WIOA), support accomplishment of the Workforce Talent Development Board's (WTDB) 2025–2026 performance metrics by increasing labor force participation among individuals with disabilities, a population that has historically experienced lower employment rates. Through individualized career planning, skills training, and supportive services, VR and OCB help participants enter or re-enter the workforce and remain employed. These efforts directly contribute to Board metrics focused on employment rates, labor force attachment, and reductions in disparities across demographic groups.

VR and OCB also advances WTDB metrics related to credential attainment, skills development, and career pathway completion. By partnering with community colleges, apprenticeship programs, and industry-recognized training providers, VR and OCB support participants in earning postsecondary credentials aligned with high-demand occupations. VR and OCB's integration of youth transition services, work-based learning opportunities, partnering internships and pre-apprenticeships, and on-the-job training, supports measurable gains in skills acquisition and completion rates reflected in the Scorecard.

In support of performance metrics tied to employer engagement and system effectiveness,

VR and OCB collaborate with businesses to meet workforce needs while promoting inclusive hiring practices. Employer partnerships that result in job placements, job retention, and wage progression for VR and OCB participants contribute to Board measures related to job quality, earnings, and retention. Additionally, VR and OCB's co-enrollment and data-sharing practices with workforce system partners strengthen performance accountability and help demonstrate progress toward WTDB's shared outcomes for a more inclusive and high-performing workforce system.

Oregon Department of Human Services – Self-Sufficiency Programs (SNAP Employment and Training Programs)

Support for Vision, Mission Imperatives

The needs of Oregonians are constantly changing and the Oregon Department of Human Services (ODHS) SNAP Employment and Training (E&T) service array in FFY 2026 continues to evolve to meet the needs of SNAP E&T participants. The SNAP E&T service array available to SNAP participants has been developed to help them expand their employability through enhancing and matching their skills with the needs of employers in Oregon. Oregon's expectation is each SNAP E&T Provider's SNAP E&T service array focuses on the Sector Strategies identified by the local Workforce Boards. Ongoing availability of both in-person and virtual services by our community-based service providers continue to open opportunities needed by Oregonians to go back to work and continue to provide skill enhancement opportunities.

Oregon continues to evolve the E&T programs as part of our ongoing investment in Oregon's economy and communities. These investments continue the building of a continuum of services in partnership with key stakeholders engaged in the Workforce Innovation and Opportunity Act (WIOA). Oregon provides SNAP participants, who are unemployed or underemployed, opportunities to lift themselves out of poverty while strengthening the workforce system. Employers benefit from the number of individuals who are more fully trained and prepared for employment.

Another goal Oregon has in fulfilling our mission is focusing on skill enhancement training, employment matching and monitoring of outcomes. These focuses are part of the road map out of poverty. Participants have demonstrated a need for this strategy of incremental training to move into better jobs. Training opportunities are tailored to the needs of the workforce and are responsive to employer's needs. Oregon focuses on Trauma-Informed Care and Person-Centered Design when working with each individual.

Support for Performance Metrics

Oregon's SNAP E&T Program partners with the Oregon Employment Department (OED) for

the usage of their iMatchSkills tracking software. Based on the logic built by ODHS, this software has enabled SNAP E&T providers to verify SNAP E&T eligibility and appropriateness upon registration of the participant. It also serves to track service components, case management, and outcomes for the SNAP Training and Employment Program (STEP) and Able-Bodied Adults Without Dependents under 14 (ABAWD) programs. iMatchSkills ensures duplication of services does not happen and provides an opportunity for SNAP E&T Providers to collaborate and build upon each other's services, which offers all available services to the SNAP E&T participant. ODHS continues to work with OED to enhance the software to obtain needed data to meet reporting requirements.

ODHS was awarded a federal grant to improve how data is collected, inputted, and used across the SNAP E&T program. In partnership with OED and Seattle Jobs Initiative, this three-year data project is helping to address, identify, and remedy the difficulties to assess disparities in service delivery, enrollment, participation, and outcomes because there is a lack of consistency in program data. The project will result in a shared data culture, language alignment, and basic building blocks, including a data dictionary and business glossary, to build and implement an equity service action plan and strategies to better reach underserved communities. This will provide SNAP E&T and its partners the quantitative and qualitative data they need to identify equity gaps in service delivery and ways to close these gaps.

Oregon continues to choose to track outcomes in the SNAP E&T Annual Report, related to completion and wages for SNAP E&T service components anticipated to serve 100 or more participants. Oregon is committed to continually assessing the impact of SNAP E&T services on participant's economic mobility and remains confident that all components, including educational components, can be measured in this manner because obtaining experience, job search support, and training or professional education/credentials in turn relates to employment and wage gains. Based on the data and information analyzed, Oregon will discuss these outcomes with SNAP E&T Providers, highlight those positive outcomes, and support providers in designing their services to focus on those high-impact service components.

Oregon Department of Human Services – Office of Aging and People with Disabilities (Senior Community Service Employment Program)

Support for Vision, Mission Imperatives

SCSEP supports equitable prosperity for all Oregonians by providing services that help participants prepare for and obtain meaningful employment in their communities. This is achieved through outreach and training opportunities specifically designed to assist unemployed older adults successfully achieve unsubsidized employment. SCSEP services are integrated with other employment programs, contributing to an inclusive and coordinated training system that is responsive to the needs of Oregon's workforce and employers.

SCSEP serves as a strategic partner within Oregon’s workforce network by promoting the experience, knowledge, and skills that older workers offer. Through training and community service opportunities, SCSEP participants refine their skills to increase value for potential employers around the state while simultaneously supporting their own economic self-sufficiency.

Support for Performance Metrics

In support of US Department of Labor efforts to more fully integrate the program with WIOA, SCSEP reporting will continue to move into closer alignment with other WIOA programs, streamlining data sharing within Oregon’s workforce network. Since the initial Combined State Plan was filed, SCSEP has transitioned from a stand-alone performance reporting system to the shared Workforce Integrated Performance System (WIPS), allowing for greater alignment and integration with other workforce programs.

SCSEP is also committed to increasing board and partner understanding of gaps in system awareness, including limited understanding of the value SCSEP and older workers offer to Oregon’s employers. The program will support efforts to increase awareness of SCSEP services for both employers and job seekers to strengthen the workforce system as a whole.

Updated Career Technical Education Content

Priority Activities - Work-Based Learning

WIOA aims to create job-driven centers that focus on work-based learning, industry-recognized/postsecondary credentials, Integrated Education and Training (IET), career pathways, and enhanced connections to registered apprenticeship. Career Connected Learning, including work-based learning (WBL) and other innovative strategies that can help individuals understand more clearly what it is like to work in a certain industry or company, is important to both improve learning outcomes and to help individuals with career exploration. Career Connected Learning in Oregon is a framework of career awareness, exploration, preparation, and training that is both learner-relevant and directly linked to professional and industry-based expectations. WBL is structured learning in the workplace or simulated environment that provides opportunities for sustained interactions with industry or community professionals that foster in-depth firsthand experience of the expectations and application of knowledge and skills required in a given career field.

Work-Based Learning (WBL) is a priority in [Oregon’s CTE State Plan](#). WIOA program representatives were engaged in the development of the CTE State Plan, and closer alignment of the CTE State Plan and this WIOA Combined State Plan is anticipated in the future. Within the broad category of WBL, pre-apprenticeship and registered apprenticeships

are a key priority. Key strategies to increase WBL are supported by community colleges and include cooperative work experience as part of CTE programs, IETs, internships, practicums, and health care clinicals.

Support for Job Seekers Activity

UI claimants are a priority population for receiving re-employment services. Most Unemployment Insurance (UI) claimants are required to attend an in-person orientation with Employment Services staff. This process includes a one-on-one meeting with a workforce representative who reviews the customer's registration to ensure a quality profile for job matching, provides an overview of workforce services and training programs, provides customized labor market and career information for informed decision making, and refers the customer to reemployment and training services including job-finding workshops as appropriate. State analyses indicate that early intervention with claimants results in a significant saving in UI benefit payments.

Another important population group served by WSO is SNAP recipients. Oregon has a large population of SNAP recipients. On average, roughly 600,000 people in over 300,000 households are served annually through the SNAP program in Oregon. This population group includes low-income families and individuals, the elderly, and people with disabilities. SNAP recipients are eligible to participate in the SNAP Employment and Training (SNAP E&T) program.

Participants in the SNAP E&T program receive a one-on-one orientation to the employment and training services available through WSO, including the SNAP Provider Network, which includes the Oregon Employment Department (OED), WSO partners and community-based organizations that receive SNAP E&T funding.

OED staff serve SNAP participants through a case management model of customer service which includes an orientation, assessment and the development of an individualized case plan. The plan is developed in partnership with the participant and lays out employment goals and next steps for a successful job search. SNAP participants are also eligible for support services to assist with transporting, clothing, tools, training and other job-finding expenses. Following placement, participants are then eligible for retention services to help ensure a successful and positive transition to employment. Retention services may include one-on-one coaching or support services as described above

Adult Education and Family Literacy Act (WIOA Title II) providers also connect participants to Benefits Navigators and the SNAP E&T programs. Benefits Navigators support participants by connecting them to resources such as housing, food, clothing, and supports for other things such as childcare and transportation. All identified elements of barriers to employment.

Workforce Development Activity Strength

[Oregon's CTE State Plan](#), responding to the authorization of the Strengthening Career and Technical Education for the 21st Century Act (Perkins V), addresses the need for the state to strive to align the work across agencies and departments. It integrates with the broader priorities and goals in other Oregon plans to orchestrate collective effort and investment in Oregon's future. The CTE State Plan was built in alignment with the principles, commitments, and priorities laid out in the Future Ready Oregon Plan, Oregon's K-12 Education Plan, the Higher Education Coordinating Commission's Strategic Priorities, the Workforce and Talent Development Board's Strategic Plan and Joint Priorities, and the Oregon STEM Education Plan.

Even though career and technical education programs are not a part of Oregon's Combined State Plan, there is a joint commitment in the CTE State Plan to ongoing dialogue and partnership among offices and teams implementing the many interwoven strategic initiatives across the state. This commitment is shared in the workforce development system and is expected to result in further alignment, continuous communication, mutually reinforcing activities, and shared measurement of outcomes, and work toward cross-agency funding opportunities. Finally, the CTE State Plan has a strong focus on career connected learning—a framework of career awareness, exploration, preparation, and training that is both learner-relevant and directly linked to professional and industry-based expectations.

Capacity for Workforce Development Activity

Oregon's workforce activities are enabled through strong and intentional partnerships that align work and leverage resources for greater efficiency and better outcomes. Examples include, but are not limited to, the following:

- The Workforce and Talent Development Board (WTDB) is intentionally large to bring a broad and diverse representation of business, education, community-based organizations, and others to shape strategic planning and decision-making.
- The WTDB includes local workforce development board representation as a voting member (who abstains as appropriate for potential conflicts). The WTDB and local boards are equal partners in the Continuous Improvement Committee (CIC) focused on the WorkSource Oregon system. The CIC is a legislatively mandated committee co-chaired and co-staffed by the WTDB and local boards.
- Agency and program leaders from Vocational Rehabilitation, the Higher Education Coordinating Commission, Oregon Employment Department, the Department of Human Services Self Sufficiency Programs, are the Workforce System Executive Team (WSET). WSET facilitates alignment of services and programs and leveraging

resources.

Oregon's workforce activities are carried out through an effective array of partners present in regions and communities across the state to best serve business and job seeker customers. Examples include, but are not limited to, the following:

- Nine local workforce areas that strongly reflect the unique economies and laborsheds in Oregon. These nine local workforce areas partner together into larger regions to address super-regional workforce issues such as the combined Portland Metro laborshed (including two local areas in Oregon and one in southwest Washington) and rural coastal economies (including three local areas).
- Thirty-six WorkSource Oregon (WSO) Centers throughout the state who also provide virtual access to staff and resources. This includes My WorkSource that allows users to manage a portfolio of employment related tools and activities online.
- 17 community colleges, offering a wide array of workforce related programs at campuses and centers throughout the state. Oregon community colleges offer career and technical education certificates and two-year degrees, customized workforce training programs designed to meet community needs, and degrees and coursework to transfer to a four-year university..
- Seven public universities – each with unique strengths and academic programs – serving the students of the state, the region, and beyond. Oregon's public universities offer a wide array of undergraduate and graduate programs, degrees, and credentials. In addition, Oregon has numerous private colleges and universities that offer a wide range of degrees and programs.
- Nearly 200 private career schools that provide a wide range of training options. Private career schools offer specialized training and certificates for learners with specific career goals in diverse fields.
- A multitude of career technical education (CTE) programs at the secondary and post-secondary level and a network of 13 Regional Science, Technology, Engineering and Mathematics (STEM) Hubs that cover all counties in Oregon. STEM Hubs empower their communities to build inclusive, sustainable, innovation-based experiences, creating opportunities for all students to fully contribute to an increasingly complex global society while addressing high-demand, competitive workforce needs through piloting programs, establishing best practices, and scaling successful approaches across the state.

- Business partnerships through Future Ready Oregon industry consortia in manufacturing, technology, and healthcare, through independent consortium initiatives in clean energy and green technology and semiconductor manufacturing, and through local workforce development boards industry sector strategies.

Work-Based Learning Strategy

WIOA aims to create job-driven centers that focus on career connected learning, work-based learning, industry-recognized/postsecondary credentials, career pathways, and enhanced connections to registered apprenticeship. Career Connected learning, including work-based learning and other innovative strategies that can help individuals understand more clearly what it is like to work in a certain industry or company, is important to both improve learning outcomes, including development of essential employability skills and to help individuals understand their options through career exploration. Work-Based Learning (WBL) is a priority in [Oregon's CTE State Plan](#). WIOA program representatives were engaged in the development of the CTE Plan, and closer alignment of the CTE Plan and this WIOA Combined State Plan is anticipated in the future.

Career Connected Learning in Oregon is a framework of career awareness, exploration, preparation, and training that is both learner-relevant and directly linked to professional and industry-based expectations. WBL is structured learning in the workplace or simulated environment that provides opportunities for sustained interactions with industry or community professionals that foster in-depth firsthand experience of the expectations and application of knowledge and skills required in each career field. Within the broad category of WBL, pre-apprenticeship and registered apprenticeships are a key priority. Key strategies to increase WBL are supported by local workforce development boards and community colleges, and include on-the-job training, pre-apprenticeships, registered apprenticeships, cooperative work experience as part of CTE programs, internships, practicums, and health care clinicals. WBL is focused on sustained interaction with business and industry, skill-attainment verification, and, when appropriate, earning of academic credit, and. In addition, Integrated Education and Training (IET) models within Oregon's Title II Adult Basic Skills programs contain a variety of career preparation and WBL components and are designed to help Oregonians transition to employment. IETs are aligned with certificate and degree programs that support local area sector strategies.

A key component of the Registered Apprenticeship is structured WBL. In Oregon, registered apprenticeship historically has been almost exclusively focused in construction and, to a lesser degree, industrial manufacturing or utilities. That is changing. In recent years, Oregon created new registered apprenticeships in health, education, and informational technology occupations. Oregon plans to continue the expansion of the registered apprenticeship model in these areas and others. Because Oregon focuses on locally driven strategies and on being

responsive to employer needs, there are many opportunities to expand registered apprenticeship to new businesses throughout the state, using LWDB industry sector strategies. A recent collaborative success-story is the first ever [youth registered apprenticeship in the Hillsboro School District](#).

Career Pathways Strategy

Under WIOA, [career pathways](#) are a critical element of academic programming for Title II, Adult Education and Family Literacy Programs, one of the six core programs of the Act. Title II providers have both programmatic and performance-based outcomes related to career pathways.

Oregon has long been a leader in a community college–based initiative focused on building Career Pathway credit bearing certificates at the colleges. A strong coalition of colleges have worked together to build a Pathways Alliance which has supported the implementation and continuous improvement of Career Pathways within the colleges. Career Pathways stackable certificates are developed in collaboration with employer representatives and are approved at the state level based on local labor market information and other criteria. Career Pathways are often aligned and embedded within career and technical education programs. The other key component to Oregon career pathways programs is intentional case management and support services to support retention and completion.

As Local Workforce Development Boards (LWDBs) work to expand career pathway options for unemployed and underemployed Oregonians, a variety of approaches may be utilized, depending on local needs and resources. These options are represented on the graphic that summarizes what career pathways mean in Oregon, and the variety of options that may be included in a career pathways strategy.

Oregon has adopted the following working definition of post-secondary Career Pathways: Career pathways are sequences of high-quality education, training, and services connected to industry skill needs. Career pathways have multiple entry and exit points that allow individuals to achieve education and employment goals over time. Career Pathways may include apprenticeships, on the job training, industry recognized credentials, non–credit training and certificates, credit certificates and degrees. Part of this effort will be to move towards a wider inclusion of career pathways in our Title II, Adult Basic Education, and English language acquisition classes, through the Integrated Education and Training model, as well as building new career pathways through apprenticeship programs.

All programs will be designed to expedite transitions from unemployment to employment, from underemployment to better employment, or, as in the case of displaced workers, from one industry to the next. Each LWDB will be addressing targeted populations as they build

career pathways. Outreach to these targeted populations will be expanded. LWDBs will align their career pathways to their sectors, working with industry to establish trainings that are aligned with business needs. Business will benefit by having a pipeline of workers into their industries that are well trained and work ready.

Adult Basic Education

The Office of Community Colleges and Workforce Development (CCWD) and local area Adult Basic Education (ABE) service providers will fund allowable activities under the Adult Education and Family Literacy Act (AEFLA). Local providers will align Title II activities with local area plans, such as sector strategies, Career and Technical Education (CTE) and Career Pathways Programs. These adult basic education and literacy activities will also be coordinated across the core programs and partners through one-stop center participation, referrals, and co-enrollment where feasible.

An important goal for Title II Adult Basic Skills service providers will be to improving access to, and completion of, post-secondary credentials. This will require collaboration with local partners including CTE, Career Pathways, SNAP Training and Employment Program (STEP), Benefit Navigators, and other student services and supports. CCWD, as the Title II agency at the state level, will collaborate with local Title II providers to support this goal, through investment of leadership funds and other activities. An important means to address this goal will be continued expansion of integrated education approaches. These include programs such as Integrated Education and Training (IET), Vocational English as a Second Language (VESL), Oregon Adult College and Career Readiness Standards (OACCRS), and the Oregon Adult English Language Proficiency Standards (OAELPS), as well as other programs developed in response to local needs. Local Title II providers will be encouraged to explore bridge programs, leverage resources, engage partners, and blend funding to support services that result in transition to post-secondary education. Local Title II providers will work with the state and local boards to clearly define career pathways across the state that promote transition of adult education students into industry-recognized credentials, licenses, and portable stackable certificates.

Postsecondary Education and Training Attainment Alignment

Oregon House Bill 2311 (2017), codified in Oregon Revised Statute (ORS) 350.018 directed the Higher Education Coordinating Commission (HECC) and the Workforce and Talent Development Board (WTDB) to establish a statewide educational attainment goal for adult Oregonians separate from 40-40-20. The HECC and WTDB convened the Adult Attainment Workgroup who recommended the following statewide adult attainment goal:

Oregon anticipates more than 120,000 additional jobs requiring postsecondary training or education between now and 2030. In order to meet this need, 300,000 additional adult

Oregonians should earn a new degree, certificate, or credential valued in the workforce during that time. Because Oregon has substantial attainment gaps among minority, low income, and rural Oregonians, the state will also commit to reducing those attainment gaps by half during the decade.

The HECC adopted the Workgroup's recommended Adult Attainment Goal in November 2018. The Goal applies to adults 25 to 64 years old who are not currently enrolled in a high school equivalency program, an institution of higher education, or another postsecondary training program.

House Bill 2311 aligned state statute with how the 40-40-20 goal has been most commonly understood since its inception: as reflecting the need to improve P-20 educational outcomes for today's younger learners, ensuring that they enter adulthood ready and able to succeed in Oregon's economy and civic life. At the same time, HB 2311 reinforced the state's commitment to ambitious educational outcomes for working-age adult Oregonians. This new Adult Attainment Goal is aligned with career trajectories, education interests, and job opportunities.

As Oregon examines these goals and prepares for the goals of the future, Oregon's attainment goals have and will continue to provide a focal point for investment for both existing and new federal, state, and local funds. In addition, they inform the pursuit of current and future competitive public and private grants.

Additional Partner Engagement

Title II providers in Oregon are currently community colleges and the Oregon Department of corrections, which leverages the connection between adult education and literacy programs and postsecondary education and training programs. Oregon actively promotes transitions to postsecondary education through investment of state leadership funds into academic bridge programs such as Integrated Education and Training (IET), Vocational English as a Second Language (VESL), Oregon Adult College and Career Readiness Standards (OACCRS), and the Oregon Adult English Language Proficiency Standards (OAELPS), as well as other programs developed in response to local needs.

Title IV, Vocational Rehabilitation, and the Oregon Commission for the Blind, have MOUs with all 17 community colleges that include language around working with the college's disability services offices to ensure that our joint students get the services and accommodations they need to access educational opportunities.

Improving Access to Postsecondary Credentials

Community colleges offer a variety of workforce development services that are important to

the overall capacity of the state workforce development efforts. These include education and training such as adult basic skills, transfer pathways, non-credit certificates, Career and Technical Education credit certificates and degrees, continuing education, Registered Apprenticeship related training, customized workforce training, Integrated Education and Training, and stackable credentials. The development and expansion of credit-bearing Career Pathways certificates across the 17 community colleges has been a key strategy for enhancing the training and job skills of Oregon's workforce. Currently, the community colleges offer more than 400 Career Pathway certificate programs. These certificates are defined in state statute as being 12-44 stackable credit certificates with multiple on and off ramps that lead to a two-year Career and Technical Education degree. This means a working learner can continue to make progress toward a higher-level credential without losing time or money having to take classes that are required in the higher level credential but different from those in the Career Pathway certificate.

Colleges also offer multiple pathways for learners to earn industry-recognized certificates, and licenses or certifications. Many of these credentials are earned post program completion and include pathways to licensure through the related training required for Registered Apprentices. This pathway can include multiple credentials and licenses as an apprentice earns a Journey Card for completion of the apprenticeship, industry recognized credentials for skill attainment, a certificate or degree for completion of the related training, and a license, depending on the occupation. Other programs may support learners to earn industry recognized credentials as they progress to higher skill levels in a program. At completion, these students may have earned multiple industry-recognized credentials, a certificate or degree, and be prepared for licensure as appropriate for the occupation.

An important goal for Title II Adult Basic Skills service providers is improving access to and completion of post-secondary credentials. CCWD, as the Title II agency at the state level, will collaborate with local Title II providers to support this goal, through investment of leadership funds and other activities. An important means to address this goal will be expansion of integrated education approaches. These include programs such Integrated Education and Training (IET), Vocational English as a Second Language (VESL) Oregon Adult College and Career Readiness Standards (OACCRS), and the Oregon Adult English Language Proficiency Standards (OAELPS), as well as other programs developed in response to local needs. Local Title II providers will be encouraged to explore bridge programs, leverage resources, engage partners, and blend funding to support services that result in transition to post-secondary education. Local Title II providers will work with the state and local boards to clearly define career pathways across the state that promote transition of adult education students into industry-recognized credentials, licenses, and portable stackable certificates.

In Oregon, CTE Programs of Study are prioritized for Perkins V funding. These programs,

aligned from secondary through postsecondary, provide students with an articulated pathway from K-12 through a two-year degree. Some programs also award dual credit, enabling high school students to access college credit courses while still in high school and accelerate their progress in earning a postsecondary credential or degree.

Effective training often must go beyond classroom training to address all types of learners and provide hands-on experiences. Career Connected learning, including work-based learning and other innovative strategies that can help individuals understand more clearly what it is like to work in a certain industry or company, is important to both improve learning outcomes and to help individuals with career exploration. Work-Based Learning (WBL) is a priority in [Oregon's CTE State Plan](#). WIOA program representatives were engaged in the development of the CTE State Plan, and closer alignment of the CTE State Plan and this WIOA Combined State Plan is anticipated in the future.

Career Connected Learning in Oregon is a framework of career awareness, exploration, preparation, and training that is both learner-relevant and directly linked to professional and industry-based expectations. WBL is structured learning in the workplace or simulated environment that provides opportunities for sustained interactions with industry or community professionals that foster in-depth firsthand experience of the expectations and application of knowledge and skills required in a given career field. Within the broad category of WBL, pre-apprenticeship and registered apprenticeships are a key priority. Key strategies to increase WBL are supported by community colleges and include cooperative work experience as part of CTE programs, IETs, internships, practicums, and health care clinicals.

Overall, Oregon will leverage existing education and training resources across all six core programs and with other departments, including the Bureau of Labor and Industries (Apprenticeship and Training Division), Department of Education, Department of Human Services, and Business Oregon (Economic Development Department), Oregon's 17 community colleges, Local Education Service Districts, K-12 school districts, and providers on the state's eligible training provider list to improve the job-driven education and training system currently in place in the state.

Required Co-Enrollment of common customers in the Title I Dislocated Worker Program and the Trade Adjustment Assistance for Workers program will improve access to activities leading to recognized postsecondary credentials including Registered Apprenticeship certificates through journeyman. Trade Act provides the training funds and case management services, and Title I provides the much-needed wrap around services that leads to the adult learners/ student retention to improve upon the student success.

Finally, Oregon Department of Human Services' Office of Developmental Disabilities Services is leveraging ARPA (American Rescue Plan, 2021) funding to offer grants to

community colleges to implement a curriculum to recruit and train the public to become direct support and supported employment professionals to deliver employment and other services for people with disabilities. This is one of ODHS's capacity building strategies to address the direct support professional workforce crisis.

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT, DISLOCATED WORKER, AND
YOUTH ACTIVITIES UNDER TITLE I-B

ADULT PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the two years covered by the plan modification. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the two years of the plan modification.

While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level
Employment (Second Quarter After Exit)	69.4
Employment (Fourth Quarter After Exit)	67.8
Median Earnings (Second Quarter After Exit)	8,500.0
Credential Attainment Rate	73.1
Measurable Skill Gains	63.6
Effectiveness in Serving Employers	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the two years covered by the plan modification. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the two years of the plan modification.

While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level
Employment (Second Quarter After Exit)	68.0
Employment (Fourth Quarter After Exit)	66.1
Median Earnings (Second Quarter After Exit)	8,200.0
Credential Attainment Rate	66.3
Measurable Skill Gains	61.3
Effectiveness in Serving Employers	Not Applicable ¹

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the two years covered by the plan modification. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the two years of the plan modification.

While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level
Employment (Second Quarter After Exit)	65.0
Employment (Fourth Quarter After Exit)	62.9
Median Earnings (Second Quarter After Exit)	4,800.0
Credential Attainment Rate	54.0
Measurable Skill Gains	50.5
Effectiveness in Serving Employers	Not Applicable ¹

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

PROGRAM-SPECIFIC REQUIREMENTS FOR WAGNER-PEYSER PROGRAM
(EMPLOYMENT SERVICES)

All Program-Specific Requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

A. EMPLOYMENT SERVICE STAFF

1. DESCRIBE HOW THE STATE WILL STAFF THE PROVISION OF LABOR EXCHANGE SERVICES UNDER THE WAGNER-PEYSER ACT, SUCH AS THROUGH STATE EMPLOYEES, INCLUDING BUT NOT LIMITED TO STATE MERIT STAFF EMPLOYEES, STAFF OF A SUBRECIPIENT, OR SOME COMBINATION THEREOF.

All Wagner-Peyser services are provided by State merit staff.

2. DESCRIBE HOW THE STATE WILL UTILIZE PROFESSIONAL DEVELOPMENT ACTIVITIES FOR EMPLOYMENT SERVICE STAFF TO ENSURE STAFF IS ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS

Professional Development for our WorkSource Oregon Staff is a high priority for Oregon Employment Department (OED) Workforce Operations Leadership. Workforce Operations launched the WorkSource Oregon Training Team in 2018 creating 9 permanent positions. The team has evolved to meet the needs of today's customers. In 2023 we have 12 permanent positions located around the state, 7 Learning and Development Specialist 1s (LDS1s) who provide staff development in centers by region, and 5 Learning and Development Specialist 2s (LDS2s) who focus on instructional design and programs and systems training to keep up with the constant demands of change.

The purpose of the WorkSource Oregon Training Team – now called the Learning and Development Team – is to ensure staff receive up-to-date onboarding and ongoing training for our 36 WorkSource centers to support staff in doing their best work in serving our customers. Our approach to staff development is to one of lifelong learning and continuous improvement. We use multiple modalities from individual coaching to in person and virtual training, self-paced eLearning, blended learning, video, webinars, etc. We seek to provide a broad range of engaging staff development opportunities to support staff in staying current, upskilling, and excelling in their roles.

Beginning in 2024 we are implementing the Business Partner model for LDS1s serving their local centers. The Learning and Development team is stationed in WorkSource centers across the state where they can provide individualized coaching of staff and design trainings to meet the needs of that area. The trainers meet with local leadership to assess needs monthly and then engage in staff development training and activities in the centers. They also provide in-center support for major projects and initiatives including Frances UI training, Able Bodied Adults Without Dependents (ABAWD) training, Work Ready, and Taking Services Training. LDS1s also work closely with office leadworkers and support new center staff including Reemployment Services and Eligibility Assessment (RESEA, the federal claimant reemployment program) support.

Within WorkSource Oregon, our core curriculum consists of:

A Division Orientation to support division culture and support staff retention.

101 Series: An 8-week WSO New Hire Training series to successfully launch new center staff into their new careers. For new hires but open to all staff. Example topics include:

- Priority of Service
- WorkSource Oregon Standards
- Career Coaching (4-part series)
- Welcome Conversation (one-on-one meeting with new/returning customers) (2-part series)
- WorkSource Oregon Management Information System Basics (3-part series)
- Universal Access
- Meet the Federal and State Workforce Programs (11-part series)
- Supporting a Diverse Workforce
- Reemployment Services and Eligibility Assessment (3-part series)
- Job Seeker Workshops (5-part series)
- Working with Difficult Customers
- SNAP Training and Employment Program (2-part series)
- Resume and Interview Coaching (4-part series)

201 Series: Staff Development (open to all OED and WSO staff, those topics that apply are open to partner staff)

- WorkSource Oregon Management Information Systems basics for partners
- Able Bodied Adults Without Dependents
- Handling Complaints
- De-escalation Techniques
- Referrals and Recommendations
- Dependable Strengths
- Trauma Informed Care (open to partners)
- Job Listing Writing
- Motivational interviewing
- Arbinger: Outward Mindset (open to other divisions)
- Human Trafficking Awareness training (open to other divisions and partners)
- SNAP Training and Employment Program Refresher
- Data Literacy workshops

Current initiatives underway include developing the new WorkSource Oregon Standards training in collaboration with WorkSource Partners. These 2-day workshops will be delivered to all WSO staff and partners in person by region in 2024. These workshops will serve to foster relationships and understanding among those who provide wraparound services for our common customer.

Currently under development is a series of three “Services Transformed” training programs:

1. *Services Transformed for front line staff.* The focus is on reviewing staff-assisted services and their importance in case management and tracking outcomes. This course, launched in 2023, has increased the number of services taken and accurately recorded by WorkSource staff by 37%.
2. *Services Transformed for employees serving customers under the Supplemental Nutrition Assistance Program (SNAP) Training and Employment program.* The focus is on reemployment and training services and excellence in customer service.
3. *Services Transformed for Business Services staff.* This course will be in development in 2024. The goal is to improve service delivery and program outcomes by enhancing the relationship between Business Services staff and our Career Exploratory team members to reduce the time an unemployment insurance claimant spends looking for work. Another goal is to improve employer outreach and relationships.

In early 2024 WSO staff received training on the new unemployment insurance (UI) system, Frances. Training included assisting UI customers in WSO centers with navigating Frances to file initial and continued claims.

The Workforce Operations Division has a priority of using data to inform decisions. Learning and Development is partnering with OED’s Research Division to roll out a series of data literacy trainings at every level of the division. The goal is to increase staff’s comfort level in reading, interpreting, and using data to manage programs and inform work efforts. Data literacy trainings will continue through 2027.

Oregon’s governor has a statewide initiative of raising awareness of human trafficking. We know statistically that we are seeing customers in WorkSource centers who are being trafficked. As a result, we collaborated with the Department of Justice to put all our field staff and leadership through Human Trafficking Training to raise awareness, dispel myths and learn about local resources and partners. This started in 2023 and will continue with new hires each year. These trainings are available to other division staff and partners are also invited.

3. DESCRIBE STRATEGIES DEVELOPED TO SUPPORT TRAINING AND AWARENESS ACROSS CORE PROGRAMS AND THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING PROVIDED FOR EMPLOYMENT SERVICES AND WIOA STAFF ON IDENTIFICATION OF UI ELIGIBILITY ISSUES AND REFERRAL TO UI STAFF FOR ADJUDICATION

Employment Services Staff Trained to Identify UI Eligibility Issues

The WorkSource Oregon and Unemployment Insurance (WSO/UI) Connectivity Group includes management and line staff from both Employment Services and UI programs. Members of the group discuss issues that pertain to the shared UI customer and their overall experience with the system. The team also identifies potential training opportunities. Following the pandemic,

the WSO/UI Connectivity workgroup assisted in developing the UI Levels of Service which now guides the work that WSO staff carry out for claimants. This initiative was intended to take the pre-pandemic list of services provided and include some of the knowledge obtained and developed during the pandemic to create a more customer service-oriented environment. This initiative included development of training that is now part of the onboarding process for ES staff. Program coordinators from RESEA and STEP/ABAWD now provide monthly webinars to discuss relevant topics, answer questions, and provide opportunity to connect with both ES and UI staff.

This work is coordinated with OED's training team (a dedicated team that supports and trains WSO staff in the delivery of workforce services) to focus on developing, managing, and delivering the training solutions proposed by the WSO/UI Connectivity Group. ES and UI staff are co-trained on identifying potential UI eligibility issues and making appropriate referrals to UI staff and awareness of current programs and resources that support claimants in meeting their basic needs, seeking employment, and maintaining UI eligibility. Training and resources will continue to be updated as needed.

A work search assessment is completed for each claimant attending an initial Reemployment Services and Eligibility Assessment (RESEA) conversation (all unattached claimants are required to participate in the RESEA program as a condition of UI benefit eligibility). The purpose of the work search assessment is to review the claimant's reported work search activities for compliance with UI requirements. When potential issues are detected, they are sent to UI for review. Potential issues detected by staff outside of an RESEA conversation or subsequent RESEA interview are also sent to UI for review. Starting in December of 2025, an enhanced second intervention will replace the 'subsequent RESEA.' This new version, called RESEA 2, is part of an ongoing evaluation being conducted by Portland State University. The evaluation aims to assess whether claimants who participate in more intensive, targeted coaching sessions with Employment Services (ES) staff achieve improved employment outcomes. Instead of repeating many of the elements of the initial RESEA, this new enhanced version focuses on goal setting with the claimant and providing resources to improve employment outcomes faster. The evaluation study, set to conclude in 2027, will be published with the final analysis and findings.

B. EXPLAIN HOW THE STATE WILL PROVIDE INFORMATION AND MEANINGFUL ASSISTANCE TO INDIVIDUALS REQUESTING ASSISTANCE IN FILING A CLAIM FOR UNEMPLOYMENT COMPENSATION THROUGH ONE-STOP CENTERS, AS REQUIRED BY WIOA AS A CAREER SERVICE

Meaningful Assistance to UI Customers through WorkSource Oregon Centers

Front line staff in WorkSource Oregon (WSO) centers will receive special training to help guide customers in filing for unemployment insurance benefits and to connect them with appropriate resources to address questions and issues related to their unemployment claim. Resources to assist customers in centers include access to the online claims system, phones for connecting with UI staff and claiming weekly benefits, pamphlets and brochures regarding UI information, and several online videos addressing frequently asked UI questions such as how to file an initial claim for benefits, how to report weekly earnings, and how to report work seeking activities. Employment Services staff and partner staff in WSO centers also maintain the ability to email or

call UI program staff in the UI Contact Center and in the UI Operations and Program Support Unit to get direct assistance to help customers when necessary.

An updated WorkSource Oregon website (www.worksourceoregon.org) makes it easier for claimants to find relevant information about how to file a claim and find a local WorkSource center. Claimants who choose to visit a WSO center in-person can do so without an appointment, while those seeking a virtual meeting can schedule it using an online scheduling tool. The website also features a new video that explains the process in under 5 minutes and sets expectations for the period of time immediately following the initial claim filing.

To assist with meaningful access, the WorkSource Oregon website (www.worksourceoregon.org) and Unemployment Insurance website (<https://unemployment.oregon.gov>) have been professionally translated into 11 languages, following the agency's Language Access Procedure and Equity Framework. In addition, the state's Online Claim System allows for new claims to be started in Spanish, Russian, and Vietnamese in addition to English. WorkSource Oregon centers also employ a high number of bilingual employees and are trained in working with customers with disabilities to ensure that they receive equitable access to our services. Staff also have access to telephone and video interpreters and contract interpreters as needed to assist customers.

C. DESCRIBE THE STATE'S STRATEGY FOR PROVIDING REEMPLOYMENT ASSISTANCE TO UI CLAIMANTS AND OTHER UNEMPLOYED INDIVIDUALS

Strategy for Providing Reemployment Assistance to UI Claimants

Recognizing the importance of the Reemployment Services and Eligibility Assessment (RESEA) program in connecting claimants – particularly those from underserved population groups, including those facing barriers to employment such as low-income individuals, English language learners, individuals without housing, and individuals with disabilities – with reemployment services and its impact in shortening the duration of UI claims, the Oregon RESEA program continues to require that all unattached claimants participate in RESEA. Prior to 2021 only those identified as most likely to exhaust benefits were selected. This change has allowed the state to serve a significantly larger and more diverse pool of customers.

The initial RESEA interview, in accordance with USDOL guidelines, is conducted one-on-one, either in-person or through video conferencing. Those identified as most likely to exhaust benefits are selected for a subsequent RESEA interview.

The RESEA interview focuses on assessing the claimant's job-finding needs; providing just-in time reemployment services; the provision of customized labor market and career information; connecting them to other workforce services and programs as appropriate, such as the Supplemental Nutrition Assistance Training and Employment program, Jobs for Veterans State Grants program, and WIOA Title I Adult and Dislocated Worker programs; developing a reemployment plan; and conducting an assessment of UI benefit eligibility to include a review of the two most recent weeks of reported work search activities. Potential issues detected are referred to UI for adjudication.

Customers selected for RESEA have the option of an in-person interview or a virtual interview with staff. Customers may schedule virtual appointments online through the WorkSource Oregon website or by contacting a center directly. Scheduling an appointment is not required as

drop-in customers continue to be served, but is a tool to be used when it works best for the customer. RESEA program staff work to connect claimants, after completion of their initial RESEA interview, with critical support services available through WSO partner programs such as SNAP Training and Employment, WIOA Title I programs for career and training services, and regional Business Services staff for enhanced job matching and placement assistance including job development.

In 2024, OED entered into an Intergovernmental Agreement with Portland State University (PSU) to conduct an evaluation of the state's Reemployment Services and Eligibility Assessment program as required by U.S. DOL. The evaluation will study the effectiveness of a redesigned RESEA second interview. This new approach is a more customer centric intervention, with staff focusing on the claimant's job seeking strategies, resume support, job matching, and referrals to reemployment and training services as appropriate. To support this approach, OED has created a new reemployment plan for staff to complete and provide to the claimant. Developed with input from front-line RESEA staff, unemployment insurance program technicians and OED's training team, the plan allows staff to document mutually agreed upon next steps and reemployment strategies as discussed with the claimant. Staff begin delivering the redesigned second RESEA interview December 2025. This marked the start of the formal evaluation period which will run for approximately one year, after which PSU will complete the final evaluation report, expected in 2027.

Strategy for Providing Reemployment Assistance to Other Individuals (non-Claimants)

New and returning customers are offered a one-on-one appointment with staff (also known as a "Welcome Conversation"). The goal is to provide a meaningful, customer-centric experience for the customer. In the appointment, staff review, assist with, or conduct basic registration requirements; provide additional information about services related to a customer's identified goals; provide customized labor market information; refer customers to other workforce programs as relevant and necessary, such as WIOA Title I Adult and Dislocated Worker, Jobs for Veterans State Grants, and Supplemental Nutrition Assistance Training and Employment; and provide guidance on next steps based on a customer's needs, interests, and goals. During and after a one-on-one, staff are required to identify, articulate, and document a customer's next steps.

WorkSource Oregon Operational Standards

Reemployment services in the WorkSource Oregon centers are guided by the *WorkSource Oregon Operational Standards*. Developed in 2017 and updated in 2023, the Standards provide a basic level of guidance to help ensure minimum requirements are met and standardization exists around operations and service-delivery in WorkSource Oregon centers, while providing flexibility to meet local needs. The Standards also encourage sustainable efforts to annually assess, and continuously improve area standards as the economy and local needs change. Standard state guidance and local standardized processes helps ensure that everyone is working collaboratively towards the same goals. Standards also help keep staff and leadership teams accountable and focused on improvement opportunities, while eliminating duplication and fragmented processes. A copy of the Standards can be found [here](#).

Following are several key provisions of the Standards. First, all WSO centers will offer access to staff-led Talent and Development Workshops to teach essential employability skills for work

readiness including (at a minimum): Résumé Development, Basic Computer Skills, Interviewing Skills, Networking/social media, and essential employability skills. Second, all customers referred to employers as part of WSO recruitment activities will go through a process of skills validation. And third, all WSO centers will maintain a level of technology that is sufficient to ensure access for remote customers to WSO services and access for customers to WSO partner programs not physically located in the center.

D. DESCRIBE HOW THE STATE WILL USE W-P FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN W-P AND UI, AS APPROPRIATE INCLUDING THE FOLLOWING:

1. COORDINATION OF AND PROVISION OF LABOR EXCHANGE SERVICES FOR UI CLAIMANTS AS REQUIRED BY THE WAGNER-PEYSER ACT;

Coordination of and provision of labor exchange services to UI claimants as required by the Wagner-Peyser Act

Wagner-Peyser Act Funds to Support UI Claimants

In Oregon, UI claimants are required by law to complete registration with the state's employment service and attend an in-person or virtual orientation interview with Employment Services (ES) staff at one of the WSO centers. This activity is to be completed within several weeks of filing their claim. During the orientation and in subsequent meetings, UI claimants requiring assistance in seeking work receive the necessary guidance and counseling to ensure they make a meaningful and realistic work search from ES staff. ES staff also provide counseling, testing, occupational and labor market information, assessment, and referrals to employers for UI claimants and refer information to UI staff about UI claimants' ability or availability for work, or the suitability of work offered to them. Lastly, ES staff refer issues to UI staff for investigation when they identify people that may not be applying for suitable work when directed to, accepting offers of suitable work or actively seeking work, among other potential UI eligibility issues they may identify.

Oregon's UI program provides referrals to and application assistance for training and education programs with regard to the Training Unemployment Insurance (TUI) program and the Trade Readjustment Allowance (TRA) program. Eligible customers are referred to WSO center locations to help determine best matches for labor market, career goals, and educational institutions. Information about the programs is also provided to customers through public service announcements, press releases, recorded messages on call center phone lines, hard copy brochures, posters, mailers, digital displays, social media, and website messaging.

All unattached claimants filing an initial UI claim are notified by letter of the requirements to register with the state's labor-exchange system and meet with staff to complete enrollment activities, referred to as the Welcome Process, as a condition of benefit eligibility. Claimants have 14-days from notification date to complete the Welcome Process. At the time of notification, a flag is added to the individual's unemployment claim for the week in which enrollment activities must be completed. If a person attends timely, the flag is inactivated and no stop is placed on the claim. If the person fails to attend by the due week, that week, once claimed, will be placed in suspense.

The OED, through specific federal funding, conducts Reemployment Services and Eligibility Assessment (RESEA) interviews for all unattached claimants. This initiative is an important

element of the agency’s strategy to help claimants become reemployed and address the issue of long-term unemployment. RESEA also helps to prevent and detect benefit overpayments. If selected for an initial RESEA, it is completed as part of their Welcome Process. RESEA claimants receive an overview of unemployment benefit eligibility and weekly work search requirements, which helps to avoid unintended overpayments during the course of their claim. Potential issues discovered that may affect the claimant’s eligibility for benefits are referred to unemployment insurance for review. RESEA claimants are also provided a “work search advisory and reemployment plan” that identifies eligibility requirements and work seeking activities specific to each claimant, including one or more job search activities or “Next Steps” that are mutually agreed upon with staff.

RESEA claimants may be selected for a second RESEA interview if they remain unemployed and continue to claim benefits. During this second interview, staff can review the claimant’s work search advisory and reemployment plan from the initial RESEA, refer the claimant to appropriate resources and services, and assess the claimant’s ongoing eligibility for unemployment benefits. Potential eligibility issues detected are referred to unemployment insurance for review.

2. REGISTRATION OF UI CLAIMANTS WITH THE STATE’S EMPLOYMENT SERVICE IF REQUIRED BY STATE LAW;

Registration of UI claimants with the State's employment service if required by State law.

Registration of UI Claimants

In Oregon, all unattached UI claimants are required by law to complete registration with the state’s employment service system (ORS 657.15 – Benefit Eligibility Conditions). To support this effort, basic demographic and contact information is passed from the UI system to the ES system when an initial claim is filed. This initiates the process for claimants to become registered in the state’s labor-exchange system (iMatchSkills). It also supports co-enrollment across core and partner programs administered through WorkSource Oregon.

Staff work with unattached claimants to gather additional information to ensure the registration reflects the type of work the claimant is seeking. A quality registration helps ensure the claimant is matched to suitable job listings by staff and employers using the state’s labor-exchange system (iMatchSkills).

3. ADMINISTRATION OF THE WORK TEST FOR THE STATE UNEMPLOYMENT COMPENSATION SYSTEM, INCLUDING MAKING ELIGIBILITY ASSESSMENTS (FOR REFERRAL TO UI ADJUDICATION, IF NEEDED), AND PROVIDING JOB FINDING AND PLACEMENT SERVICES FOR UI CLAIMANTS; AND

Administration of Work Test and Making Eligibility Assessments

As part of the agency’s Work Test, claimants are notified of their rights and responsibilities when filing an initial claim for unemployment benefits, including a written notice of their monetary determination and work search expectations. Staff in WorkSource Oregon (WSO) centers are trained in issue detection and referral procedures. Staff are also trained how to address potential issues with claimants and help them identify solutions, including agency resources and services, to overcome potential barriers to receiving unemployment benefits.

Providing Job Placement Services for UI Claimants

As mentioned earlier, all unattached claimants are selected for participation in the Reemployment Services and Eligibility Assessment (RESEA) program. This program is the key component of OED's claimant reemployment strategy. Each year the program serves upwards of 50,000 plus claimants, helping them connect with critical reemployment and training services available through WorkSource Oregon and partner programs. A discussion of the RESEA program and the placement services made available to claimants through WorkSource Oregon centers, is covered in Section C. "Describe the State's strategy for providing reemployment assistance to UI claimants and other unemployed individuals."

4. PROVISION OF REFERRALS TO AND APPLICATION ASSISTANCE FOR TRAINING AND EDUCATION PROGRAMS AND RESOURCES.

Provision of Referrals to Training Programs and Other Resources

During the initial "Welcome Conversation" (one-on-one meeting) with staff, referrals to training and education programs and WIOA resources are provided to claimants as relevant and appropriate to the individual's needs and career goals to include job finding workshops and networking activities, skills assessment activities, SNAP Training and Employment, Vocational Rehabilitation, and Adult and Dislocated Worker programs. Staff also demonstrate how to access labor market information and career information to make informed choices.

Many WorkSource Oregon centers have staff from various programs co-located onsite, so referrals are often a matter of a "warm hand-off" to a different staff person – and more offices are moving towards the co-located staff model described by WIOA and the WSO Operational Standards. Additionally, all physical locations feature electronic methods for referrals to partner programs and other organizations and resources.

To facilitate staff referral of claimants to workforce programs, those eligible for the SNAP Training and Employment program and the Jobs for Veterans State Grants program are identified through a flag placed on their registration in the state labor-exchange system, iMatchSkills. The system also flags customers who are potentially eligible for Trade Act benefits as affected workers.

In addition, claimants identified as Migrant and Seasonal Farmworkers through the WSO registration process, are also flagged in iMatchSkills. This facilitates the referral of customers to workforce programs dedicated to serving MSFWs such as the National Farmworkers Jobs Program.

Claimants interested in accessing WIOA Title I services are referred to the local provider, who will work with the individual to assess their occupational and career goals and potential eligibility for WIOA Adult and Dislocated Worker programs, including other programs, such as WIOA Youth. (Claimants are co-enrolled in Adult and Dislocated Worker programs when a qualifying Title I service is received.)

Of note, Oregon has a program that allows UI claimants to attend school while receiving regular UI benefits. Open to individuals who have lost their jobs and are not likely to return to their previous industries, the Training Unemployment Insurance (TUI) program removes the work search requirements while claimants attend school full time. The TUI program is designed for short-term training (including associate degrees, but not transfer degrees), or it may be used for

vocational training. Information about the TUI program is shared with claimants when filing for UI benefits.

Oregon also has a program that allows claimants to engage in self-employment activities while claiming benefits. Through the Self-Employment Assistance (SEA) program, claimants keep their business proceeds in addition to their full weekly benefit payment. Work-search requirements are also waived while working full time on self-employment activities. Like the TUI program, SEA is for individuals who are not likely to return to their previous industries. Information about SEA is shared with eligible claimants when filing for UI benefits. WSO staff also promote the program to eligible claimants during the RESEA interview (eligible claimants have an SEA flag placed on their iMatchSkills registration).

E. AGRICULTURAL OUTREACH PLAN (AOP). EACH STATE AGENCY MUST DEVELOP AN AOP EVERY FOUR YEARS AS PART OF THE UNIFIED OR COMBINED STATE PLAN REQUIRED UNDER SECTIONS 102 OR 103 OF WIOA. THE AOP MUST INCLUDE AN ASSESSMENT OF NEED. AN ASSESSMENT NEED DESCRIBES THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

1. ASSESSMENT OF NEED. PROVIDE AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

Agricultural Outreach Plan (AOP)

Farmworker shortages and the H-2A Program

Agricultural employers continue to note that there seem to be fewer U.S. workers to help with the harvest and are increasingly utilizing the H-2A Temporary Agricultural Worker Program to meet the need for seasonal labor. Oregon Employment Department (OED) Migrant Seasonal Farmworker (MSFW) outreach staff report growers are concerned that such factors as the aging of the agricultural workforce and pending retirements and the abundance of jobs in other sectors offering competitive wages, such as manufacturing, food service, and construction are diminishing the availability of agricultural workers (of note, Oregon has one of the highest minimum wage rates in the country).

While the overall age of agricultural workers may be aging, OED believes it important to note that many farmworkers work into their 60s and 70s.

According to an article published by the U.S. Department of Agriculture, the H-2A visa program has grown rapidly in recent years as domestic workers find jobs outside agriculture and fewer newly arrived immigrants seek agriculture jobs. The report also notes that nationally, "The U.S. Department of Labor certified around 370,000 temporary jobs in fiscal year (FY) 2022 under the program, more than 7 times the number certified in 2005 and double the amount in 2016." (source: H-2A Temporary Agriculture Job Certifications Continued to Soar in 2022)

Of note, employers are required to give hiring preference to domestic farmworkers when supplementing their agricultural workforce through the H-2A program. One of OED's longstanding goals has been and will continue to be connecting domestic farmworkers with

agricultural employers as appropriate. More information about the H2A program can be found [here](#).

Assessment of farmworker needs

According to the Oregon Occupational Safety and Health (Oregon OSHA) registry there are 400 registered labor housing camps in Oregon, housing an estimated 10,000 farmworkers and their family members, according to the Oregon Law Center (source: “*Oregon farmworkers say they're 'being missed' from task force on agricultural housing*” – Statesman Journal). Unfortunately, many of Oregon’s migrant labor camps experience habitual issues including isolation, reduced access to services, 24-hour eviction notices, and excess heat during peak months of harvest. The department remains committed to working with Oregon Human Development Corporation (OHDC), and other advocacy and enforcement agencies, to report violations and improve housing conditions for agricultural workers.

According to Oregon Employment Department Migrant Seasonal Farmworker Outreach staff, common needs identified for farmworkers include:

- Access to training opportunities, particularly Title 1 Adult and Dislocated Worker programs, for career advancement and promotional opportunities;
- Access to reemployment and career services through Oregon’s one-stop centers;
- Financial support while in training or career transition;
- Access to the internet and other technologies;
- Access to transportation, especially in rural areas;
- Access to affordable healthcare;
- English as a second language classes;
- Access to worker rights and legal services; and
- Access to safe and affordable housing.

According to the Farmworker Needs Assessment report, commissioned by OHDC and completed by Colibri Consulting in 2022, farmworker needs identified most frequently by MSFWs include:

- Employment Justice (workplace health and safety improvement, worker exploitation, discrimination and sexual harassment reduction, income and benefits improvement),
- English classes,
- Translation services,
- Information access (lack of internet and computer access),
- Legal assistance, and
- Affordable housing

Other needs identified in the report include:

- Transportation,
- Utility costs,
- Affordable childcare,
- Mental health counseling,
- Access to healthy food,
- Affordable housing,
- Job training,
- Access to healthcare,
- Safety from domestic violence,
- Education support for children,
- Internet access,
- Learning to read and write well,
- Connecting with people in the community, and
- Parenting classes

Housing needs remain acute

According to a 2023 study of farmworker housing, sponsored by the Oregon Housing and Community Services Department (OHCS), there are an estimated 66,269 farmworker households in Oregon, most of which need affordable housing that is not currently available. The study, titled “Cultivating Home: A Study of Farmworker Housing in Hood River, Marion, Morrow and Yamhill Counties in Oregon,” is available here. Key findings of the study are below; not listed, but included in the study, are recommendations for addressing these issues.

- 32% of farmworker households in Oregon and Washington live in poverty, compared to the national estimate of 14% for the general U.S. population.
- Farmworkers earn very low incomes. The average farmworker family in Oregon earns \$20,000 to \$24,999 per year, which is between 25 and 37 percent of the median family income for the general population.
- Many of the farmworkers interviewed in the study described poor housing conditions.
- Rental application requirements also prevent farmworkers from being able to access private rental housing.
- One in four farmworkers interviewed said they wanted to own their own homes but face barriers.
- Farmworkers need resources to help them find housing. Farmworkers requested information on available and affordable housing be published somewhere, or to have help from an organization or liaison to help them find and obtain housing.

- Employers face many barriers to providing farmworker housing. Employer barriers include high cost, difficulty meeting labor housing regulations, and difficulty with local permitting and zoning requirements. Employers who provide farmworker housing usually provide it for free to their workers in addition to their wages.
- Insufficient data about the number of farmworkers and their incomes makes it impossible to reliably quantify the need for farmworker housing.

Addressing the unique workforce needs of farmworkers

Many of the unique workforce needs of MSFWs are addressed by the Oregon Employment Department, which administers the Employment Service (ES) under title III of the Workforce Innovation and Opportunity Act (WIOA), and Oregon Human Development Corporation (OHDC), which administers the National Farmworker Jobs Program (NFJP) under WIOA section 167.

OED provides reemployment and career services, to include job-matching and connecting participants with other workforce programs offering training and supportive services such as the Supplemental Nutrition Assistance Program (SNAP) Employment and Training program, and WIOA title I Adult and Dislocated Worker programs. NFJP provides career services, training, and housing services. They also help participants acquire skills needed to obtain, retain, and advance in agricultural jobs or start new careers. OHDC, in addition to administering the NFJP, also provides housing assistance and supports farmworkers with rental and utility assistance, emergency shelter, household costs, and more.

OED operates 37 WorkSource Oregon (WSO) centers across the state, while OHDC provides NFJP career and training services in the following eight locations:

- OHDC Hood River, Hood River County;
- OHDC The Dalles, Hood River County;
- OHDC Woodburn, Marion/Polk/Yamhill Counties;
- OHDC Klamath Falls, Klamath/Lake Counties;
- OHDC Hermiston, Umatilla County;
- OHDC Ontario, Malheur County;
- OHDC Gresham, East Multnomah/Clackamas Counties; and
- OHDC Hillsboro/Beaverton, Washington County.

Through a memorandum of understanding (MOU), updated in 2023, OED and OHDC work collaboratively to improve the delivery of services and employment outcomes for MSFWs and their eligible dependents. Under this agreement, NFJP staff assist customers in the completion of a full registration in the state's labor-exchange system, iMatchSkills, to facilitate job matching and the receipt of reemployment services. NFJP staff also advise MSFWs on the Complaint System, administered by OED. Similarly, OED staff work to actively refer MSFWs to NFJP providers for career and training services to include housing assistance. And finally, OED and OHDC coordinate, whenever possible, joint outreach efforts to MSFWs in areas where they work, live and congregate. Outreach services are critical to promoting workforce services, including the Complaint System, to MSFWs and their families.

Identifying and addressing language needs of farmworkers

This is done primarily through our customer registration portal for employment services, where customers can select their preferred language. For customers seeking one-on-one assistance, staff work to determine their language needs as part of the intake process (commonly referred to as the “Welcome Conversation”). If bi-lingual staff are not available to assist the customer in their preferred language, staff have immediate access to a language line and both video and telephone interpretation services. The Department plans to consider advanced capabilities to gather language preference data from customers as part of the Workforce Modernization Project.

2. AN ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE MEANS: 1) IDENTIFYING THE TOP FIVE LABOR-INTENSIVE CROPS, THE MONTHS OF HEAVY ACTIVITY, AND THE GEOGRAPHIC AREA OF PRIME ACTIVITY; 2) SUMMARIZE THE AGRICULTURAL EMPLOYERS’ NEEDS IN THE STATE (I.E. ARE THEY PREDOMINANTLY HIRING LOCAL OR FOREIGN WORKERS, ARE THEY EXPRESSING THAT THERE IS A SCARCITY IN THE AGRICULTURAL WORKFORCE); AND 3) IDENTIFYING ANY ECONOMIC, NATURAL, OR OTHER FACTORS THAT ARE AFFECTING AGRICULTURE IN THE STATE OR ANY PROJECTED FACTORS THAT WILL AFFECT AGRICULTURE IN THE STATE

Top labor-intensive crops

According to the Oregon Department of Agriculture, Oregon cultivates over 225 unique crops each with a dynamic labor demand. Based on production value, the top labor-intensive crops in Oregon are: fruit crops (e.g. apples, cherries, and blueberries) grown primarily in the Columbia Gorge and Willamette Valley regions with labor demand peaking June to September; vegetable crops (e.g. onions, rhubarb, and sweet corn) grown primarily in Northeast Oregon and the Willamette Valley regions with labor demand peaking July to October; greenhouse and nursery stock grown primarily in the Willamette Valley with labor demand peaking in March to September; Christmas trees grown primarily in the Willamette Valley with labor demand peaking in October to December; and hemp grown statewide with labor demand peaking in August to November.

Agriculture continues to be one of Oregon's multi-million dollar industries and is a chief contributor to the Oregon economy. The top agricultural commodities in Oregon are wine grapes, pears, and hazelnuts. Other commodities are hay, wheat and potatoes. The geographical agricultural regions for these crops are Eastern Oregon, the Columbia Gorge, Southern Oregon, and the Willamette Valley. Tree fruits are harvested in July through December, and blueberries in July through August. Vegetables, such as onions and corn, are harvested from August through December. Greenhouse plants are grown and sold primarily from March through September, and Christmas trees are tended to and harvested from July through November.

Needs of agricultural employers

Employers struggle finding domestic workers who want to work in agriculture. To meet this demand, applications for the H-2A Foreign Labor Certification Program have increased significantly, from 47 in FY 2016, to 103 in FY 2019, to 175 in FY 2023. The OED Foreign Labor

Certification program estimates that employers have requested to bring in upwards of well over 10,000 foreign workers since 2016.

For more information on scarcity in the labor force, see Section 1, Assessment of Need.

Employers are also required to provide H-2A foreign and corresponding domestic workers with housing when conditions of the contract are met for travel distance from their place of residence. The Oregon Occupational Safety and Health Administration (OSHA) will conduct the first housing authorization and consultation, and the State Workforce Agency (SWA) will conduct housing consultations in subsequent years as authorized. Housing consultations conducted by OED have increased significantly in recent years, from 64 in 2018 and 88 in 2019, to 235 in 2021 and 372 in 2022.

Oregon's new agricultural overtime requirements (HB 4002)

In April 2022, then-governor Kate Brown signed into law House Bill (HB) 4002, Oregon's farmworker overtime bill. The intention of HB 4002 is to ensure that farmworkers are being paid fairly, just as any other worker, for all of the hours they have worked. The bill requires agricultural employers to pay certain workers for overtime hours worked and creates a refundable personal or corporate income tax credit for employers for a percentage of wages paid as overtime pay to agricultural workers for calendar years 2023 through 2028. The impact of this bill on Oregon agricultural employers is not fully known. During legislative hearings in 2022, many employers expressed concern that the bill may result in reduced hours and lost wages for farmworkers and impact the number of farms able to operate in Oregon. While little is known as to the long-term impacts of similar legislation passed in other states, a report titled *Potential Impacts of Overtime Laws for U.S. Crop Workers* by Alexander E. Hill and Trenton K. Tanabe from Colorado State University, suggest that the effect of these laws will depend on how employers respond. The report can be found [here](#).

OED will monitor the impacts of HB 4002 and stands ready to assist both agricultural employers and farmworkers, as appropriate, who may be impacted by this legislation. This includes coordinating with other agencies as appropriate, such as the Oregon Bureau of Labor and Industries (BOLI).

3. AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS MEANS SUMMARIZING MIGRANT AND SEASONAL FARM WORKER (MSFW) CHARACTERISTICS (INCLUDING IF THEY ARE PREDOMINANTLY FROM CERTAIN COUNTRIES, WHAT LANGUAGE(S) THEY SPEAK, THE APPROXIMATE NUMBER OF MSFWS IN THE STATE DURING PEAK SEASON AND DURING LOW SEASON, AND WHETHER THEY TEND TO BE MIGRANT, SEASONAL, OR YEAR-ROUND FARMWORKERS). THIS INFORMATION MUST TAKE INTO ACCOUNT DATA SUPPLIED BY WIOA SECTION 167 NATIONAL FARMWORKER JOBS PROGRAM (NFJP) GRANTEES, OTHER MSFW ORGANIZATIONS, EMPLOYER ORGANIZATIONS, AND STATE AND/OR FEDERAL AGENCY DATA SOURCES SUCH AS THE U.S. DEPARTMENT OF AGRICULTURE AND THE U.S. DEPARTMENT OF LABOR (DOL) EMPLOYMENT AND TRAINING ADMINISTRATION

Approximate number of MSFWs in the state

The most recent and highly used enumeration study on the number of MSFWs in Oregon comes from Mallory Rahe, PHD, Oregon State University Extension Service. Updated in 2018, this study

estimates that during the peak seasons, which includes reforestation under the Migrant Seasonal Protection Act, there are 60,000 seasonal workers and 30,000 migrant workers, for a total of 90,000 MSFWs. The number of H-2A foreign workers has started to replace a portion of the domestic workforce on a seasonal basis, as immigration slows, and more farmworkers retire or choose to leave the industry altogether. According to a May 2021 report published by the U.S. Citizenship and Immigration Services (*H-2A Nonimmigrant Temporary Agricultural Trends Report*), in Fiscal Year 2020 there were over 1,427 H-2A workers petitioned in Oregon. According to the same report, there were 959 in FY 2018 and 1,250 in FY 2020.

In FY 2023, OED estimates that there were roughly 3,600 petitioned H-2A workers in Oregon. OED believes that this number will continue to increase annually, in addition to the reforestation H-2B workforce based predominantly in Southern Oregon.

(Note: OED was not able to obtain estimates of total MSFWs in the state during peak and low seasons.)

The Oregon Bureau of Labor and Industries (BOLI) manages the licensing process for farm and forest labor contractors, of which there are more than 1,100 licensed contractors as of February 6, 2024, according to BOLI.

OED outreach staff report that employers that provide good housing for their workforce often find their employees return the next season, while employers that have substandard housing for farmworkers are generally in a continuous struggle to find labor to meet their harvest demands.

The most stable farmworker workforce in Oregon is the nursery industry. Oregon is one of the three top nursery producing states in the country and employs over 22,000 workers on a permanent/seasonal basis (source: <https://oregonfresh.net/education/oregon-agriculture-production/oregon-nursery-industry/>). Oregon's nursery industry also includes two of the state's top agricultural commodities and is a driving force in the state's economy. Other top agricultural commodities produced in Oregon are the expanding vineyard industry, hops, blueberries, strawberries, apples, pears, cherries, grass-seed, onions, and hazelnuts (source: <https://www.oregonfarmbureau.org/oregon-agriculture>).

Characteristics of farmworkers

The following farmworker characteristics come from the National Agricultural Workers Survey, 2019-2020, prepared for the U.S. Department of Labor, Employment and Training Administration, by JBS International, Inc. Below are several key findings as they relate to serving MSFWs and providing workforce services.

- Two-thirds of farmworkers said that Spanish was the language in which they were most comfortable conversing (62%), 25 percent said English was, 6 percent said both Spanish and English, 6 percent said more than one language (excludes Spanish/English bilingual), and 1 percent reported an indigenous language.
- Thirty-two percent of workers reported that they could speak English "well," and 29 percent said, "not at all." Thirty-one percent reported that they could read English "well" while 40 percent said, "not at all."
- The average level of formal education completed by farmworkers was ninth grade. Four percent of farmworkers reported having no formal schooling, and 35 percent reported

completing the sixth or a lower grade. Twenty-two percent of farmworkers said they completed grade 7, 8, or 9, and 26 percent said they completed grade 10, 11, or 12. Fourteen percent of farmworkers reported completing some education beyond high school.

- Farmworkers' mean and median personal incomes the previous calendar year was in the range of \$20,000 to \$24,999. Eight percent of workers earned less than \$10,000; 20 percent said they had personal incomes of \$10,000 to \$19,999, 30 percent had personal incomes of \$20,000 to \$29,999, and 32 percent reported that their total personal income was \$30,000 or more. Five percent of farmworkers reported not having worked at all during the prior calendar year.
- About 20% of families were below the poverty income level.
- Thirteen percent of farmworkers reported that they or someone in their household had received some form of benefit from a contribution-based program in the previous 2 years (contribution-based benefits include disability insurance, Unemployment Insurance, Social Security, and veterans' pay); 63 percent said someone in their household had received some form of benefit from a needs-based program in the previous 2 years (need-based benefits include financial assistance through programs such as Temporary Assistance for Needy Families, general assistance, and publicly provided housing or medical and nutritional assistance such as Medicaid, Special Supplemental Nutrition Program for Women, and Supplemental Nutrition Assistance Program).

The following farmworker characteristics are from the Farmworker Needs Assessment report, commissioned by OHDC and completed by Colibri Consulting in 2022.

- Most Farmworkers (around 92%) in Oregon and Washington are Latinx and over three quarters of them were born in Mexico.
- Among these Farmworkers, 72% don't speak English well, while just 26% of Latinx and 6% of all Oregonians don't speak English well.
- An undetermined, though notable number of Oregon Farmworkers are from Indigenous communities in Mexico or Guatemala, and many are not fluent or literate in English or Spanish. (Some studies estimate that 40% of all migrant farmworkers are Indigenous and that during harvest seasons they make up 20-30% of all Oregon farmworkers.)
- 9% of Oregon farmworkers and family members have a disability, as compared to 14% of all Oregonians.
- Most Oregonians are U.S. citizens, but less than a third of farmworkers have citizenship.
- An estimated 14% of Oregon farmworkers are undocumented — 12,000 people according to the Migration Policy Institute.

Indigenous languages spoken by farmworkers

While the predominant language of the Hispanic/Latino MSFW workforce is Spanish, a number of indigenous languages are also spoken by an undetermined number of farmworkers. These languages include Acateco (Akatek), Akateko, Amuzgo, Chol, Chuj, Cora, Hiuchol, Kaychiquel,

Mam, Mixteco, Mixteco Alto, Mixteco Bajo, Nahuatl, Popti, Purepecha, Q'Anjobal, Q'eqchi, Quiche (K'iche), Tlapaneco, Trique, Yucatec Maya, and Zapoteco. The most frequently identified languages included: Chuj, Mam, Mixteco, Zapoteco (Marion County); Quiche; Umatilla County (Morrow County): Mam, Q'Anjobal, Quiche (Umatilla County); Chuj, Mixteco, Q'Anjobal, Q'eqchi, Quiche (Washington County). (source: Farmworker Needs Assessment report, OHDC)

The majority of WorkSource Oregon offices are staffed with at least one individual who speaks Spanish, and a few offices employ staff who speak another language, the most common being Russian and Vietnamese. If staff are not available to assist a customer in their preferred language, language line interpreters and video translation services are readily available to WSO staff.

Farmworker complaints

Frequent farmworker complaints reported to OED include not being paid or paid incorrectly, safety conditions, inadequate housing issues, sexual harassment and fear of retaliation by employers if they speak up about issues.

4. OUTREACH ACTIVITIES

The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:

Responses to this section start with e. 4. A.

A. CONTACTING FARMWORKERS WHO ARE NOT BEING REACHED BY THE NORMAL INTAKE ACTIVITIES CONDUCTED BY THE EMPLOYMENT SERVICE OFFICES

Outreach activities

In October 2023, USDOL announced its annual list of significant MSFW states (the 20 states with the highest estimated year-round MSFW activity) and each state's designated significant MSFW one-stop centers (centers in which MSFWs account for ten percent or more of the annual participants or the administrator determines they must be included due to special circumstances such as an estimated large number of MSFW in the service area).

Oregon remains a significant MSFW state, with the following centers identified as significant offices:

- Albany
- Beaverton/Hillsboro
- Gresham
- Hermiston
- Klamath Falls
- McMinnville
- Medford

- Ontario
- Oregon City
- Pendleton
- Salem
- The Dalles
- Woodburn

Federal guidance mandates that significant MSFW states have full-time, year-round staff to conduct outreach duties to MSFWs. To meet this requirement, Oregon employs 12 full-time bi-lingual outreach staff stationed throughout the state. Staff in these positions devote 100 percent of their time to outreach activities.

The primary role of outreach staff is to conduct especially vigorous outreach to farmworkers in all service areas, including where they live, work, and gather. Outreach staff focus on educating farmworkers about workforce services and benefits available through local WSO centers and partner organizations, making quality referrals to MSFWs seeking reemployment and training services, and advocating for the Complaint System to ensure that MSFWs are aware of their legal protections. They also build relationships with workforce partners and educate them about the MSFW program through on-site visits, attending staff meetings, and making presentations. Of note, Oregon has a population of farmworkers who require information in indigenous languages to effectively learn about workforce services, and outreach staff work to ensure those language needs are met.

OED will also coordinate education and outreach efforts with other governmental agencies as relevant and appropriate such as Oregon Occupational Safety and Health Division (OSHA), Oregon Housing and Community Services, and the Oregon Ombudsman's offices.

A new, more strategic outreach model

The COVID-19 pandemic and other environmental states of emergency have highlighted longstanding systemic inequities in the workforce system for marginalized and underserved communities, including MSFWs. To address these gaps, also a concern raised by the State Monitor Advocate (SMA), and better align the program with federal and state goals to examine and enhance services to customers with barriers, the state in 2023 restructured its MSFW outreach efforts through a new, more strategic business model.

Under this updated model, full-time MSFW outreach specialists now report directly to an MSFW Outreach manager rather than their local WSO center manager. The outreach manager oversees, and is responsible for, outreach staff and their activities, to include meeting federal program goals and other performance metrics as identified. The state believes this new business model and reporting structure will enhance communication, sharing of information and best practices among outreach staff; provide for more streamlined and consistent communication between outreach staff, WSO center managers and the SMA; improve the sharing of program data and outcomes with WSO center managers and other stakeholders; and enhance integration efforts with other workforce programs that provide career and training services, such as WIOA Title I Adult and Dislocated Worker, Apprenticeship, and SNAP Training and Employment (STEP),

including those positioned to meet the unique workforce needs of MSFWs such as OHDC and Oregon Law Center.

Outreach activity for Program Years 2019 to 2024

PY 2019: 25,522 contacts

PY 2020: 34,253 contacts

PY 2021: 26,651 contacts

PY 2022: 40,836 contacts

PY 2023: 31,861 contacts

PY 2024: 35,854 contacts

Outreach goals for Program Years 2024 to 2027

The goal is to contact the majority of MSFWs in the state each program year, which equates to roughly 45,000 contacts annually. Unfortunately, the state did not meet its outreach goal of 45,000 contacts in PY 2024. The main factor impacting performance was the hiring of new outreach staff who had to complete extensive onboarding (training) activities and thus could not perform at an optimum level for a significant portion of PY 2024. Contributing factors include geographic barriers, challenges in coordinating meeting sites, and reluctance of MSFWs to attend community gatherings given current immigration enforcement policies.

B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH STAFF.

Training and technical assistance for MSFW outreach staff

As part of their onboarding experience, outreach staff receive instruction from the OED training team regarding WorkSource Oregon programs and services, the WSO Standards, and Workforce Innovation and Opportunity Act programs, and the Complaint System. The MSFW Outreach manager provides training on outreach services, sexual harassment, and other programs and initiatives. The State Monitor Advocate provides training on the Monitor Advocate system.

In addition, all MSFW outreach staff, as part of their onboarding, attend a series of classes that focus on the fundamentals of providing services to job seekers and employers. Below is the core curriculum, which may fluctuate based on agency priorities and strategic initiatives, information technology changes, and other factors.

WSO New Hire Core Curriculum Training

New staff from around the state participate in local office activities and virtual meetings to increase skill and understanding of OED philosophies, programs, and processes. The experience is coordinated by one trainer, and various trainers lead sessions that include subject-matter experts and program managers.

Welcome Conversation e-learnings

These are a series of short e-learning modules available for all WorkSource Oregon staff to build skills related to the Welcome Conversation (one-on-one conversations with new and returning customers).

WorkSource Oregon Management Information Systems (WOMIS) Basics

This introductory, multi-day course provides an overview of the Wagner-Peyser Employment Services program and the Workforce Innovation and Opportunity Act, and also covers confidentiality, creating a quality labor-exchange (iMatchSkills) registration for staff and employers, helping customers navigate the labor-exchange system and match to jobs, creating job listings, job matching and referral, employer outreach, and more.

An Introduction to QualityInfo

This training helps staff coach job seekers in identifying labor market information to make informed decisions regarding job search, occupational training, salary ranges, occupational outlook, and more.

To help staff understand the dynamics of the agricultural worker community and know how to build trust and confidence with workers, OED will offer cultural competency training for outreach staff and others serving MSFWs. OED plans to develop and deliver this training over the next biennium.

Technical assistance for outreach workers includes annual MSFW statewide training. This multi-day training (conference) focuses on the availability of training opportunities for MSFWs, partner collaboration (such as the NFJP, Title I, and local service providers), supportive service in the community, employment service Complaint System, and providing a summary of farmworker rights, legal protections, and conditions of employment.

Job seeker intake, registration and job placement assistance

To help MSFW outreach staff and frontline WSO staff identify MSFWs, the state labor-exchange system (iMatchSkills) displays an MSFW indicator in the job seeker's registration profile. Staff can also search for MSFWs using the MSFW indicator alone or in conjunction with other delimiters such as last contact date, local office of assignment, assigned staff, and services received by other programs such as SNAP Employment and Training.

MSFWs referred to local WSO centers for job-placement assistance complete an intake process that includes registration in the state labor-exchange system (iMatchSkills) and a one-on-one meeting with staff that includes an assessment of needs, an orientation to workforce services and programs to include use of the state's electronic job board, and the provision of labor market and occupational information. Staff also provide reemployment assistance such as help with creating resumes, cover letters and interviewing. This includes assistance in applying for and filling out employment applications for positions listed with WSO. Staff also refer customers to appropriate and relevant WIOA title I partner agencies and to the local area National Farmworker Jobs Program (NFJP) for reemployment and training services as appropriate.

All customers visiting a WSO Center are offered one-on-one assistance with using agency computers to include registering for work. In addition, many WSO partners around the state offer computer skills assessment to include training in the use of computers for job search and related activities.

OED policy requires a customer's labor-exchange registration to support their qualifications (work experience, education, skills, etc.) for the job to which they are being referred by staff. If a

customer's registration is not current, staff will assist them in updating their registration to ensure their qualifications match that of the job listing.

OED also educates agricultural employers about the responsibilities they have to workers, makes job placement services available, and provides training on accessing the Agricultural Recruitment System (ARS) that includes regular agriculture listings and H-2A job listings. This training helps staff work with employers, who increasingly need compliance support to navigate the H-2A application process which can be administratively complex. OED is also conducting wage and practice surveys to assess real-time agricultural working conditions to better determine requirements for H-2A job listings, and to help employers recruit workers (OED will try to complete these surveys by the end of 2024 as resources allow). In the next four years, OED expects a continued increase in the number of H2-A applications submitted by agriculture employers. This will require more frequent and coordinated field visits to the workers that will be working alongside Oregon domestic MSFWs by the SMA, MSFW outreach staff, and partner organizations. OED plans to begin conducting compliance reviews on H-2A contracts, tentatively scheduled to start in Program Year 2024.

C. INCREASING OUTREACH WORKER TRAINING AND AWARENESS ACROSS CORE PROGRAMS INCLUDING THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING ON IDENTIFICATION OF UI ELIGIBILITY ISSUES

Increasing outreach worker training and awareness of Unemployment Insurance program

WSO staff receive specialized training in various aspects of the unemployment insurance program to assist claimants. Key training includes such topics as filing an initial unemployment insurance claim, providing a customized Reemployment Services and Eligibility Assessment program conversation (claimants required to seek work as a condition of UI benefits are directed to complete an RESEA meeting with staff), and recognizing UI eligibility issues to help prevent overpayments.

To facilitate communication between Employment Services (ES) and UI divisions and help strengthen partnerships for improved service delivery to shared customers (including MSFWs), OED established the "WorkSource Oregon and Unemployment Insurance Connectivity" workgroup. In place for over a decade, this group meets quarterly to facilitate communication about all levels of service delivery (policy to operations) affecting WorkSource Oregon or Unemployment Insurance, and recommend changes in policy, procedure, and operations to Division Directors of Workforce Operations, Workforce Innovation and Opportunity Act partners, and Unemployment Insurance, respectively, to better serve shared customers.

D. PROVIDING STATE MERIT STAFF OUTREACH WORKERS PROFESSIONAL DEVELOPMENT ACTIVITIES TO ENSURE THEY ARE ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS

The following core curriculum courses are available to OED MSFW outreach staff.

Facilitating Career Development

This course provides individuals with relevant skills and knowledge to assist others in planning careers and obtaining meaningful work. Staff receive in-depth training in the areas of career

development in the form of 120+ class/instructional hours, provided by a nationally trained and qualified instructor using curriculum created by the National Career Development Association.

A-COACH Approach Program

This program provides staff with the knowledge, skills, tools, and actions they need to develop a COACH Approach – a conversation style that is successful at building strong relationships, improving results, and helping people achieve their goals.

SNAP Employment and Training Success

This course highlights the benefits of the SNAP E&T program in helping customers access reemployment and training services.

RESEA Fundamentals

This course covers key Reemployment Services and Eligibility Assessment (RESEA) concepts to include the initial RESEA Welcome Conversation and subsequent RESEA Conversation. Topics include developing a work search advisory and reemployment plan.

Trauma Informed Care

This course is an effort to build internal knowledge and competency around Trauma Informed Practices.

Motivational Interviewing

This course focuses on helping staff become a helper in a customer's change process and express acceptance of our customers, their experience, knowledge, and solutions.

MSFW Annual Training

An annual, statewide training for all staff involved in the MSFW program. Developed by and for staff in the MSFW program.

Foreign Labor Certification Program Orientation

This orientation is required before staff can obtain the authority to refer on Foreign Labor Certification Program (FLC) job listings.

MSFW Job Service Complaint System

The purpose of this training module is to provide staff a high-level overview of the Job Service Complaint process with specific focus on how it relates to Migrant and Seasonal Farmworkers.

Culture Matters: Managing Unconscious Bias

This highly interactive half-day workshop is designed to help individuals enhance their cultural awareness and understand the effect of unconscious bias on workplace performance. Practical strategies for improving performance when working across cultures will be given. Participants draw upon research-based findings to improve their self-awareness and to develop the first steps to relating and working with cultural intelligence.

All OED field offices will collaborate with workforce partners and service providers to leverage training services for MSFWs. Partners include Oregon Human Development Corporation

(OHDC)/National Farmworker Jobs Program (NFJP) grantee of Oregon. OED will also have an ongoing cooperative Memorandum of Understanding (MOU) with OHDC to provide access to the job seeker registration system, as well as connecting them to local office workforce planning. Other partners include WIOA Title I providers, universities, local community colleges, special programs funded to serve MSFWs, High School Equivalency Programs (HEP), community development farmworker housing associations, Centro Cultural, migrant health clinics, migrant education programs, Migrant Head Start, farmworker legal services, and other farmworker advocacy organizations.

E. COORDINATING OUTREACH EFFORTS WITH NFJP GRANTEES AS WELL AS WITH PUBLIC AND PRIVATE COMMUNITY SERVICE AGENCIES AND MSFW GROUPS

OED remains committed to conducting outreach activities to reach unknown populations of MSFWs that need to be informed of their legal protections, the Complaint System, and the services available to them through Oregon's WSO centers.

OED is also conducting outreach activities with its Section 167 partner, Oregon Human Development Corporation (OHDC), local interest groups, employer groups through employer and worker forums, and farmworker support groups as possible, and appropriate.

The State Workforce Agency (SWA) signed a Memorandum of Understanding (MOU) with Oregon Human Development Corporation (OHDC)/National Farmworker Jobs Program (NFJP) in 2023 to facilitate MSFW registrations in the state labor-exchange system (iMatchSkills) to increase access to reemployment and training services under WIOA. Under a separate data sharing agreement, NFJP staff are granted access to the state labor-exchange system for providing reemployment services such as registering and updating customer records, matching and referring customers to job listings, and accessing wage data to help determine NFJP eligibility.

The State Monitor Advocate will continue to work with business organizations, community service providers, and other workforce partners to explore opportunities for strengthening partnerships to improve outreach. Historically this type of work, which often involves presentations to partner agencies or meeting one-on-one with program staff, has been met with positive response. The Monitor Advocate looks forward to continuing this collaborative work that is critical to the success of the MSFW program.

WorkSource Oregon (WSO) staff work closely with the training resources available through the National Farmworker Jobs Program (NFJP) to make co-enrolled MSFW training and education referrals. Other training resources specifically for migrant workers include, but are not limited to: Oregon State University College Assistance Migrant Program (CAMP), Chemeketa Community College – College Assistance Migrant Program, Portland Community College – College Assistance Migrant Program, Oregon Migrant Leadership Institute, University of Oregon High School Equivalency Program (HEP), Chemeketa Community College High School Equivalency, High Desert Education Service District Program, and Portland Community College High School Equivalency Program (HEP).

Agencies that the SWA partners with to serve MSFWs and provide education and legal assistance include:

- National Farmworker Jobs Program;

- Community Colleges;
- College Assistance Migrant Program (CAMP);
- Statewide Migrant Head Start;
- Oregon Childhood Development Corp, MSFW State Childcare;
- Farmworker Program of Legal Aid Services of Oregon,
- Oregon Law Center;
- Equal Employment Opportunity Commission;
- Oregon Bureau of Labor and Industries;
- U.S. Department of Labor, Wage and Hour;
- U.S. Department of Justice;
- Centro Cultural; and
- Portland Mexican Consulate.

5. SERVICES PROVIDED TO FARMWORKERS AND AGRICULTURAL EMPLOYERS THROUGH THE ONE-STOP DELIVERY SYSTEM

Describe the State agency's proposed strategies for:

A. PROVIDING THE FULL RANGE OF EMPLOYMENT AND TRAINING SERVICES TO THE AGRICULTURAL COMMUNITY, BOTH FARMWORKERS AND AGRICULTURAL EMPLOYERS, THROUGH THE ONE-STOP DELIVERY SYSTEM. THIS INCLUDES:

I. HOW CAREER AND TRAINING SERVICES REQUIRED UNDER WIOA TITLE I WILL BE PROVIDED TO MSFWS THROUGH THE ONE-STOP CENTERS

II. HOW THE STATE SERVES AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH SERVICES

MSFWs are recognized in WorkSource Oregon (WSO) centers as a targeted population group, with additional focus to deliver effective and equal access to the full range of workforce services. Federal regulations require that MSFWs receive workforce services on a quantitatively proportional and qualitatively equivalent basis as those provided to non-farmworkers. Using an integrated service delivery model (as outlined in the WSO Standards document), all customers will be offered a comprehensive menu (available in English and Spanish) of skill enhancement products, including, but not limited to, occupational training. In addition, staff at WSO centers will use a variety of tools to attempt to match the job seekers' skills, interests and abilities with available high wage, high demand jobs in their current labor market area, or in other areas if desired. The integration of services with WIOA partners, including WIOA Title I service providers, is intended to increase the quality of services, focus on skill and talent development of both unemployed and current workers and, on a system-wide basis, increase the wages, job retention and job advancement of Oregonians.

Employment center staff are expected to refer MSFW customers to local WIOA Title-I service providers for career and training services, as appropriate to their occupational goals. This business model supports an integrated service delivery approach to serving customers. Title-I service providers work with individuals to assess their occupational and career goals and potential eligibility for WIOA Adult and Dislocated Worker programs, including other programs, such as WIOA Youth.

In addition to improved customer outcomes, more efficient and effective customer service is expected from the systematic coordination of federal workforce services. Finally, more efficient use of resources, and elimination of program duplication from enhanced integration are also expected to improve the use of limited and declining funding. Designated MSFW outreach staff within each workforce area will continue to work with local management and staff to keep focused on service delivery and equity outcome goals regarding MSFWs.

Customer outcomes are measured by the federal MSFW performance measures (quantitatively proportionate services that include the following categories: Referred to Jobs, Provided Workforce Services, Referred to Support Services, Career Guidance, and Job Development); increased placements of MSFWs through local Business Services Teams, which provide enhanced recruitment and referral services for employers in targeted sectors; increased numbers of MSFW registrations that are complete and current in the state's labor exchange system, iMatchSkills; and finally, anecdotal evidence obtained through MSFW outreach staff and OHDC partner staff.

Training resources through the broader workforce system are also of interest to agricultural employers. Employers have identified that increased skills are needed for many agricultural opportunities, whether for supervisory positions or to meet the changing mechanization and technology requirements of the industry. WSO staff will work to increase placement results through more effective identification of skills that agricultural employers are seeking.

Integrating WIOA and Wagner-Peyser services is an advantage to agricultural employers and their access to the workforce system. In particular, locally designed employer services teams will have responsibility for connecting local employers to WSO centers. To the extent agricultural employers connect with the workforce system individually or industry wide, job seekers will be better informed about available jobs, needed skills and training options related to agriculture, and the workforce system will be more informed about and responsive to the workforce needs of agriculture.

The most important business service WSO provides is connecting employers to qualified candidates. Business services are responsive to business and workforce needs of the local area, how these align with local sector strategies, and protocols to access recruitment processes and other services. All WSO centers will provide appropriate recruitment and other business services on behalf of employers (to include agricultural employers), including small employers, in local areas. Business services include: recruitment services, customized training, incumbent worker training, and job postings.

Business services are continually evolving and improving. At the start of 2013, WorkSource Oregon began offering an enhanced business services model to more effectively meet the workforce needs of the business community. Employers select this option when they want a deeper partnership with their business services staff member. To build a successful

relationship, WSO staff begins by conducting on-site employer visits prior to the start of the recruitment, to better understand the business culture and the business recruitment needs, which allows staff to refer qualified candidates in a timely manner with an increased level of success. The employer then has a smaller, more highly qualified applicant pool, which saves them time and money.

This model has proven successful in building high-functioning business services teams, which serve as a single point of contact for businesses. In turn, this has helped improve communication and coordination of service delivery between workforce partners and allowed for more streamlined and targeted placement of WorkSource Oregon customers to include MSFWs, veterans, claimants, dislocated workers and other special populations. This model has also helped local areas align business services efforts and ensure that workforce investment activities meet the needs of businesses and support economic growth in each area. Enhanced communication, coordination and collaboration among businesses, economic development, service providers, business team members, and the local Boards will help leverage and align collective resources.

An example of helping connect MSFWs with employers is the work started in 2019 between the Monitor Advocate and the WSO Business Services Program Coordinator. Through this partnership, local Business Services Teams have increased collaboration with MSFW outreach staff to facilitate the referral of MSFWs to the Business Services Teams for enhanced job placement assistance. These teams develop relationships with businesses and work closely with them through the entire recruitment process. These teams also focus on filling job listings in the local sector strategy.

Activities that offices may pursue to facilitate recruitment for agricultural listings include handing out and collecting applications for work, scheduling interviews, and providing space at a specific field office for the employer's interviews. Staff may also assist workers with the actual application, help with translation at interviews when needed, and re-contact workers referred for an interview. This follow-up activity can produce more reliable recruitment results for the employer and the agency, helping to see that available workers are hired for needed employment. Staff will also use historical information on monthly employment patterns to identify opportunities for workers to effectively move from one local grower to another or be available for referral on any agricultural listing approved for recruitment of non-local workers.

OED will continue to promote membership on local and state workforce boards, and to meet agricultural business owners and other business owners who see limited English proficient MSFWs and others as potential employees. This will help raise awareness of training needs within agriculture for MSFWs to reach higher levels of education, and may open new options for securing training funds from within and outside the workforce system.

MSFWs will be encouraged to go to WorkSource Oregon (WSO) centers to receive the full services offered to all job seekers. MSFWs who are not fluent in English receive one-on-one interviews with staff for registration and job referrals. Staff that are not bilingual in the language of the job seeker are to seek interpreter services, including in indigenous languages, through the department's contracted interpreter service, or with the assistance of the coordinator of the Limited English Proficiency (LEP) program. Other MSFWs are to be offered assistance in registration to assure quality registrations are completed. Staff assistance is available to all MSFWs for learning the OED computer job match system and for using English

and Spanish websites for looking at available jobs and learning about other workforce services. OED Employment Specialists will also assist MSFWs in filling out applications for job listings registered in the OED labor-exchange system.

The majority of MSFWs registered with OED, consistent with the overall farmworker population, require services to be provided in Spanish. Services and resources identified and promoted through the workforce system will include access to and referral of MSFWs to all WIOA service program providers, and specifically Oregon Human Development Corporation's National Farmworker Jobs Program (NFJP) in areas of the state in which they operate. Information about services from community partners, including food, clothing, housing, transportation, medical, social and legal assistance, will also be a continuing referral. With significantly increased concerns over an adequate labor supply for Oregon agriculture, WSO expects its labor exchange system will become a critical resource for agricultural employers.

In response to the pandemic, WSO centers closed to in-person traffic in spring 2020 and did not fully reopen to the public until summer 2021. During this period, technology enhancements and staff training were phased in to support the delivery of services in a virtual format. These include video conferencing software for use with external customers; a new WSO website that greatly improves customer access to the menu of reemployment and training services in twelve languages; an online appointment tool that allows job seekers to make virtual appointments with staff available in twelve supported languages, and automated emails to inform job seekers of their registration status and encourage customer engagement with WSO staff.

In addition, the state's Online Claim System in 2021 was expanded to allow for new claims to be started in Spanish, Russian, and Vietnamese in addition to English. A new contract was also established for vendors to provide telephonic interpretation services, which expanded the number of languages available to meet customer demand.

Training and Employment Notice 10-23: Wagner-Peyser Act Staffing final rule

A note regarding U.S. DOL Training and Employment Notice (TEN) 10-23, published November 24, 2023. This TEN announces the release of the Wagner-Peyser Act Staffing final rule. The merit staffing final rule also strengthens the provision of services to migrant or seasonal farmworkers (MSFWs) and enhances the protections afforded by the Monitor Advocate System and the ES and Employment-Related Law Complaint System (Complaint System). The state is in compliance with all operational/programmatic requirements as outlined in TEN 10-23.

B. MARKETING THE EMPLOYMENT SERVICE COMPLAINT SYSTEM TO FARMWORKERS AND OTHER STAKEHOLDERS

Outreach staff actively promote awareness of the Complaint System to MSFWs. This includes helping MSFWs navigate the Complaint System and, whenever possible, helping to resolve complaints at the local level, often with the assistance of the SMA. All complaints are logged and reported to USDOL as provided in federal guidance. In addition, staff provide MSFWs with information regarding worker rights through information sharing sessions and flyers.

C. MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM FOR U.S. WORKERS (ARS) TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

MSFW outreach staff continue to be trained on the Agricultural Recruitment System (ARS) by the Monitor Advocate and Foreign Labor Certification (FLC) Program Coordinator. Currently,

outreach staff provide USDOL ARS brochures to employers when marketing services to agricultural employers.

6. OTHER REQUIREMENTS

A. COLLABORATION

Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

All OED field offices will collaborate with workforce partners and service providers to leverage reemployment and training services for MSFWs. Partners will include Oregon Human Development Corporation (OHDC)/National Farmworker Jobs Program (NFJP) grantee of Oregon. OED will also have an ongoing cooperative Memorandum of Understanding (MOU) with OHDC to provide access to the job seeker registration system as well as connecting them to local office workforce planning. Other partners include WIOA Title I providers, universities, local community colleges, special programs funded to serve MSFWs, HEP language classes, community development non-profit farmworker housing associations, Centro Cultural, migrant health clinics, migrant education programs, Migrant Head Start, Farmworker Program of Legal Aid Services of Oregon, and other farmworker advocacy organizations.

The SWA will also continue to work with the Oregon Occupational Safety and Health Organization (OSHA), the Oregon Health Authority, the Mexican Consulate, and the California State Monitor Advocate to address the workforce needs, including housing, health and workplace safety concerns for the MSFW population in Oregon. Of note, the SWA has active MOUs with the Mexican Consulate and the Oregon Health Authority. OED is also working to establish an MOU with the Idaho State Monitor Advocate to coordinate service delivery for MSFWs living in border communities.

WorkSource Oregon signed a four-year MOU with OHDC/NFJP in 2023. This collaboration includes their providers training alongside WSO staff in yearly training events. Their providers also attend WSO meetings to educate WSO staff on NFJP career and training services, including housing assistance available through OHDC. NFJP staff also have access to the state's labor-exchange system (iMatchSkills) to register customers for workforce services, provide referrals to job listings, and track services provided to MSFWs. Oregon's WIOA partners will be included in regional and local planning to ensure MSFW customers are considered in their program service provisions. WSO staff currently work closely with the training resources available through the NFJP.

While MSFWs are recognized as a targeted population and receive equitable workforce services at the State Workforce Agency (SWA), further integration of the WIOA Title I services for MSFWs is an opportunity, particularly for youth. As more H-2A job listings come into Oregon, more domestic MSFWs are being displaced and Title I employment and training services could benefit many of these impacted workers. To facilitate this connection, promoting and referring domestic MSFWs to WIOA Title I providers will be encouraged at all local WSO centers.

Improving access to and enrollment of MSFW customers with Title I employment and training services will remain a priority for Oregon's MSFW program in program years 2024-2027. One opportunity to improve this connection is for OED management to meet with state workforce boards and WIOA Title I providers to address how to provide services to both domestic MSFWs and agricultural business owners who see MSFWs as potential employees. An awareness of the rights and services that MSFWs should receive under WIOA Title I needs to be explored, discussed and a recruitment process consistently implemented.

B. REVIEW AND PUBLIC COMMENT

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.

The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

The state's NFJP grantee, other appropriate MSFW groups, public agencies, agricultural organizations, and other interested employer organizations were given an opportunity to comment on the AOP. Below is the list of organizations from which feedback and suggestions were solicited. Also included are comments received and our responses to those comments.

- Columbia Gorge Fruit Growers
- Farmworker Program of Legal Aid Services of Oregon
- Oregon Association of Nurseries
- Oregon Bureau of Labor and Industries
- Oregon Department of Agriculture
- Oregon Farm Bureau
- Oregon Human Development Corporation

- Pineros y Campesinos Unidos del Noroeste (PCUN)
- US Department of Labor, Wage and Hour Division

The following comments were received by the Oregon Bureau of Labor and Industries. Our comments are in italics.

On Pages 5 – 6, section on HB 4002, include mention that OED will coordinate with Oregon Bureau of Labor and Industries (BOLI) to assist agricultural employers and farmworkers, as appropriate, who may be impacted by this legislation.

On Page 6, paragraph 1, update this paragraph to include that BOLI has verified the number of labor contractors: The Oregon Bureau of Labor and Industries (BOLI) manages the licensing process for farm and forest labor contractors, of which there are more than 1,100 licensed contractors as of February 6, 2024, according to BOLI.

OED Response

The Department agrees to add mention that OED will coordinate with BOLI to assist agricultural employers and farmworkers, as appropriate, who may be impacted by HB 4002. It will also update the section regarding the number of labor contractors as you requested.

The following comments (summarized) were received by Oregon Human Development Corporation. Our comments are in italics.

OHDC requests the AOP be updated to reflect nine OHDC offices instead of 10.

OHDC requests additional farmworker needs be added to Section 1, Assessment of Need. These include affordable housing, internet access, learning to read and write well, connecting with people in the community, and parenting classes.

OHDC requests removal of the following language related to the potential impact of HB 4002.

- At one extreme, employers could take actions so that all employees work below the overtime hours threshold. In this case, current workers would take a pay cut and work fewer hours. Possible mechanisms to accomplish this include adopting labor-saving technology, reducing overall production or production of labor-intensive crops, relocating to other states or countries, or hiring more workers (Martin 2017).
- At another extreme, employers could make no changes to their operation and maintain their current workforce size and hours. In this case, workers would earn more money while employers would face higher payroll costs.

OHDC requests the following comment be added to the AOP.

When MSFW referrals are made to OHDC, OED should have a specific section for tracking those referrals. On iMatch, the OED can create a section to refer farmworkers to WIOA section 167 providers or federally funded training programs. By creating a referral process, both parties will be able to facilitate a more efficient referral process. In 2022, OED established 40,836 contacts, and OHDC would be an important component in serving some of these farmworkers.

OED Response

The Department agrees to update the number of OHDC offices to nine and to add additional workforce needs identified by OHDC.

The Department agrees to remove the two bullets related to the 'extremes' of HB 4002 as noted in the referenced report.

The Department agrees that it would be helpful to have a shared system to track referrals between OHDC and OED. While the Department believes this comment out of scope for the AOP, it will consider this system update. Please know that the Department is looking to modernize its labor-exchange system, and being able to track referrals between OHDC and OED will be explored as a business requirement for this future system.

Unless otherwise noted, the following comments were received by Farmworker Program of Legal Aid Services of Oregon and Pineros y Campesinos Unidos del Noroeste (PCUN). Our comments are in italics.

SECTION 1. ASSESSMENT OF NEED. PROVIDE AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

Assessment of Unique Needs of Farmworkers

We object to the department starting this section with a focus on the needs of employers rather than the needs of agricultural workers. While there has been an increase of H-2A foreign workers in Oregon, they still constitute a small percentage of Oregon's agricultural workforce. Thus, the department's focus should remain on the seasonal and migrant workers who provide almost all of the agricultural work in Oregon. We ask the department to note that Oregon is part of a robust migrant stream. Workers have come and continue to come from California and other states to work in Oregon for decades. The availability of these workers must be measured. We ask the department to recognize its own obligation to determine whether workers who live in Oregon and other states are available to perform the agricultural work in Oregon. While OED recognizes that workers may go work elsewhere due to more competitive wages, the department fails to note that employers may be able to better recruit workers with better housing, better work conditions and more competitive wages in this section. We object to the department's comments about generations electing not to do agricultural work. When there is a shortage of doctors or administrative assistants, we do not ask why their children are not following their parents in certain work. While the overall age of agricultural workers may be aging, we ask the department to note that many farmworkers work into their 60s and 70s and that the law prohibits discrimination on the basis of age. We also ask the department to note that Oregon has much fewer H-2A workers than other states.

We support the department's recognition that part of OED's obligation is to connect local workers with H-2A jobs.

OED Response

- *We appreciate your comment regarding the order in which the Department chooses to answer the questions and will consider this suggestion in future revisions of the AOP.*
- *Please know that the Department is committed to serving all MSFWs, working to connect them with resources and services as appropriate, including job listings, whether they are part of the domestic workforce or not. As such, the Department believes that a discussion of the migrant stream is out of scope.*
- *The Department lacks data to support general statements about employers being able to attract more workers by offering better housing, better working conditions and more competitive wages. If supporting evidence can be found, the Department will consider incorporating it in future revisions of the AOP.*
- *The Department agrees that comments about generations electing not to do agricultural work should be removed and will remove this statement from the AOP.*
- *The Department agrees that mention of farmworkers working into their 60s and 70s is important and will add this statement to the AOP. However, the Department believes general comments about labor laws such as age discrimination are not necessary, and are out of scope for the AOP.*
- *Thank you for acknowledging the Department's work connecting local workers with H-2A jobs. This important work is made possible in part through partnerships with OHDC and other organizations serving MSFWs.*
- *The Department believes a discussion comparing the number of H-2A workers in Oregon to those in other states is out of scope, as the AOP is focused on Oregon's labor market and outreach activities.*

Addressing unique workforce needs

We ask the department to add more detail to this section. While we recognize the importance of the services provided by OHDC to the agricultural worker community, we ask the department to identify and share what are the unique needs of farmworkers and what is the plan to meet those needs. For example, what kind of job training is needed and how will it be provided? Is there a plan to address literacy needs? What kinds of training do agricultural workers want?

We support the department's recognition of the need for language services to serve Indigenous language speaking agricultural workers. We ask the department to say how it will identify whether workers need these language services and then how the department will provide them.

We also need more details as to how the department will work with others to meet the identified needs: transportation, technology assistance, training, health care, mental health counseling, day care, etc.

OED Response

- *The Department believes it has addressed the unique workforce needs of farmworkers in sufficient detail, to include how it will meet those needs.*

- *The Department agrees that additional information regarding the specific workforce needs of farmworkers, such as training, would be helpful. As such, the Department will consider incorporating additional information based on internal conversations and consultations with workforce partners in future revisions of the plan.*
- *The Department agrees to add information to the AOP as to how it will identify whether workers need services in additional languages and how those customers will be served. This is done primarily through our customer registration portal for employment services, where customers can select their preferred language. For customers seeking one-on-one assistance, staff work to determine their language needs as part of the intake process (commonly referred to as the “Welcome Conversation”). If bi-lingual staff are not available to assist the customer in their preferred language, staff have immediate access to a language line and both video and telephone interpretation services. The Department plans to consider advanced capabilities to gather language preference data from customers as part of the Workforce Modernization Project, and will note that in the AOP.*

SECTION 2. AN ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE MEANS: 1) IDENTIFYING THE TOP FIVE LABOR-INTENSIVE CROPS, THE MONTHS OF HEAVY ACTIVITY, AND THE GEOGRAPHIC AREA OF PRIME ACTIVITY; 2) SUMMARIZE THE AGRICULTURAL EMPLOYERS’ NEEDS IN THE STATE (I.E. ARE THEY PREDOMINANTLY HIRING LOCAL OR FOREIGN WORKERS, ARE THEY EXPRESSING THAT THERE IS A SCARCITY IN THE AGRICULTURAL WORKFORCE); AND 3) IDENTIFYING ANY ECONOMIC, NATURAL, OR OTHER FACTORS THAT ARE AFFECTING AGRICULTURE IN THE STATE OR ANY PROJECTED FACTORS THAT WILL AFFECT AGRICULTURE IN THE STATE

The following comments related to Section 2 were received by PCUN. Our comments are in italics.

Oregon’s new agricultural overtime requirements (HB 4002)

It is important for the department to note and include in this section the intention behind HB 4002 (2022). In 2022, PCUN and other farmworker advocates worked to ensure that farmworkers were paid overtime just as any other worker. For too long farmworkers have been denied rights other workers have been afforded. The intention of HB 4002 is to ensure that farmworkers are being paid fairly for all of the hours they have worked. We believe it is important to provide context in this section if the Department is including a section about employers having concerns or their opposition to the bill. **(NOTE: This comment regarding HB 4002 was submitted by PCUN, not Farmworker Program of Legal Aid Services of Oregon).**

OED Response

The Department agrees that context around the intention of HB 4002 is important and will update this section accordingly.

SECTION 3. AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS MEANS SUMMARIZING MIGRANT AND SEASONAL FARM WORKER (MSFW) CHARACTERISTICS (INCLUDING IF THEY ARE PREDOMINANTLY FROM CERTAIN COUNTRIES, WHAT LANGUAGE(S) THEY SPEAK, THE APPROXIMATE NUMBER OF MSFWS IN THE STATE DURING PEAK SEASON AND DURING LOW SEASON, AND WHETHER THEY TEND TO BE

MIGRANT, SEASONAL, OR YEAR-ROUND FARMWORKERS). THIS INFORMATION MUST TAKE INTO ACCOUNT DATA SUPPLIED BY WIOA SECTION 167 NATIONAL FARMWORKER JOBS PROGRAM (NFJP) GRANTEES, OTHER MSFW ORGANIZATIONS, EMPLOYER ORGANIZATIONS, AND STATE AND/OR FEDERAL AGENCY DATA SOURCES SUCH AS THE U.S. DEPARTMENT OF AGRICULTURE AND THE U.S. DEPARTMENT OF LABOR (DOL) EMPLOYMENT AND TRAINING ADMINISTRATION

Assessment of Farmworker Needs

We support the department's recognition of the needs identified in the OHDC study and OHCS Housing Study. We encourage OED to support additional studies of the agricultural worker population.

In particular, we support the department's understanding of the critical link between the provision of good quality housing and recruitment of workers. We support the department's recognition of the need for better migrant housing and more affordable community-based housing options. We ask the department to state how it will work with other agencies to meet these needs.

OED Response

- *The Department appreciates your comments regarding our recognition of farmworker needs identified in the OHDC study and OCHS Housing Study. We also support additional studies of this nature.*
- *The Department supports collaboration with other agencies focused on meeting the housing needs of farmworkers. This work includes sharing information to help inform agencies as to the housing needs of MSFWs and to build relationships for the referral of MSFWs for housing assistance. The Department will consider adding additional details about this work in future revisions of the AOP.*

SECTION 4. OUTREACH ACTIVITIES

e. 4. A. Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices.

While we support the department's move to having full-time outreach workers, we encourage the department to hire more than 12 people. We do not think that 12 people is enough to conduct the robust outreach needed to reach agricultural workers across Oregon. This is especially true due to the distances that must be traveled and the amount of trust building work that is needed to serve the agricultural worker community.

We ask the department to include more detail regarding how the department will support MSFWs' work including flex time, support for travel, and provision of technology to allow them to communicate with workers and reach the department's databases while conducting outreach.

We ask the plan to include more details on the plan to serve Indigenous language speakers. We encourage the department to hire staff who speak Indigenous languages.

We applaud the hiring of the new outreach worker manager. We think this will provide improved support of the MSFWs. This support is needed to reduce turnover and build capacity.

We encourage the inclusion of what coordinated education and outreach efforts will occur with other governmental agency partners such as OR-OSHA, OHCS, Ombuds office and other agencies.

OED Response

- *The Department will consider your request to hire additional staff for outreach work, but does not believe this consideration should be added to the AOP at this time.*
- *The Department believes details regarding flex time and support for travel are out of scope for the AOP.*
- *The Department will consider adding information about the use of technology for outreach workers to communicate with workers and track activity in future revisions of the AOP.*
- *The Department has and will continue to serve Indigenous language speakers using established resources, which include the use of telephone and video interpretation services. Please note that the Department also conducts outreach with other agencies, such as OHDC, which employ staff that speak Indigenous languages.*
- *The Department appreciates your recognition of the need for staff who speak Indigenous languages and will take this into consideration.*
- *Thank you for recognizing and supporting the hiring of an MSFW Outreach Manager.*
- *The Department agrees that outreach with other agencies that support farmworkers is important and will add a statement about coordinating outreach with OR-OSHA, OHCS, Ombuds Office, and other agencies as appropriate.*

e. 4. B. Providing technical assistance to outreach staff. Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the Employment Service and Employment-Related Law Complaint System (“Complaint System” described at 20 CFR 658 Subpart E), information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

We ask the department to ensure that cultural competency training is provided to MSFW staff. As discussed above, it is critical that MSFW staff understand the dynamics of the agricultural worker community and know how to build trust and confidence with workers. This needs to be a central part of the training.

Also, please note that our program’s correct title is: Farmworker Program of Legal Aid Services of Oregon. **(NOTE: This comment was submitted by Farmworker Program of Legal Aid Services of Oregon, not PCUN).**

Job seeker intake, registration and job placement assistance

We encourage that OneStop staff are trained on completing registrations for agricultural workers and completing job referrals. There needs to be Spanish speaking staff available promptly when agricultural workers come to the office. They need to be able to understand how

to characterize the particular kinds of experiences that farmworkers have. They need to be able to make referrals by telephone and text. We encourage the department to make referrals to those agricultural workers whose information may not be current, but is in the system. When agricultural workers come to OneStop offices, staff need to assess the workers' computer skills before sending them to a computer to do a particular task. Staff may need to provide detailed assistance to help an agricultural worker do a full work search. One Stop staff may need to be open evening and weekend hours to serve agricultural workers and at satellite locations to be able to meet the needs of agricultural workers.

We appreciate the mention that the department is conducting prevailing wage and practice surveys. As the department knows, the Legal Aid Services of Oregon has been advocating for the department to conduct these surveys for years. The results of these surveys are critical for the department to adequately conduct its work to evaluate the H-2A job orders and determine if they are in compliance. Workplace conditions will continue to deteriorate if these surveys are not completed. We ask the department to include a specific timeline as to when these surveys will be conducted and completed. We ask the department to successfully complete these surveys for key industries by the end of 2024.

OED Response

- *The Department agrees that cultural competency training is important. The Department offered this training several years ago and will look to update it for outreach staff and others serving MSFWs.*
- *The Department apologizes for using the incorrect name and will update the AOP as appropriate.*

OED Response to comments related to Section 4, Job seeker intake, registration and job placement assistance

- *Please know that all WSO staff receive extensive training on completing registrations and making job referrals. The Department agrees to review and update this training as appropriate to ensure it meets the current needs of agricultural workers.*
- *The Department has internal procedures for serving customers in languages other than English. Staff are trained in these procedures, which include the use of telephone interpretation services and video interpretation services.*
- *The Department will review internal training to ensure staff are able to characterize the particular kinds of experiences that farmworkers have.*
- *Staff can make job referrals by phone. Unfortunately, the Department's current technology infrastructure does not support job referrals by text. The Department is looking to modernize its labor-exchange system, and serving customers via text has been identified as a business requirement for this future system.*
- *Department policy requires a customer's labor-exchange registration to support their qualifications (work experience, education, skills, etc.) for the job in which they are being referred by staff. Staff routinely update customer registrations when making job referrals to ensure their qualifications match that of the job listing. The AOP will be updated to reflect this policy.*

- *All customers visiting a WSO Center are offered one-on-one assistance with using agency computers to include registering for work. Please know that many WSO partners around the state offer computer skills assessments to include training in the use of computers for job search and related activities. The AOP will be updated to reflect staff assistance with using agency computers and the availability of computer skills training.*
- *The Department appreciates feedback regarding alternative hours and satellite locations for WSO Centers and will take this into consideration.*

OED response to comments related to Section 4, Wage Surveys

- *Thank you for acknowledging the Department's work to complete the wage surveys. We understand the importance of these surveys and will try to complete them by the end of 2024 as resources allow. The AOP will be updated to reflect this timeline.*

e. 4. C. Increasing outreach worker training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues.

We support the MSFWs participation in efforts to improve Equitable Access to Unemployment Insurance. In our experience, many agricultural workers are reluctant to apply for unemployment insurance due to barriers in how to apply and lack of knowledge of the system. The new FrancesOnline program will not be easily accessible to many agricultural workers. We ask that OneStop staff help support workers understanding how to apply and assist workers in the application itself if needed. We also ask that the department help conduct public education to help decrease the fear of “public charge” in accessing benefits. We also ask the department to take care in language regarding “fraud” in applications. This language can create a chilling effect dissuading workers from applying.

OED response to comments related to Section 4, Awareness Across Core Programs Including the UI Program

- *Thank you for supporting the Department's efforts to improve the Unemployment Insurance system. The Department also appreciates your feedback regarding agricultural workers' reluctance to apply for UI due to barriers including how to apply and lack of system knowledge. Please know that in 2022 the Department received more than \$4.5 million in grant funding from the United States Department of Labor (DOL) to address disparities in access to unemployment insurance (UI). Through the grant, the Department created the Equitable Access to Unemployment Insurance (EAUI) unit. The mission of the EAUI unit is to advance equity by taking a proactive approach to understanding and resolving unemployment access barriers faced by underserved and underrepresented communities. The unit does that through expanding awareness about Unemployment Insurance, increasing customers knowledge about UI processes and systems, and removing barriers to these systems and processes. Please note that the grant and the EAUI unit is addressed in the AOP.*
- *OED staff in WSO centers across the state have completed extensive training in preparation for the rollout of Frances Online (the state's new UI system) to assist customers in creating an account, claiming benefits, and accessing and utilizing available self-service options.*

Please note that the AOP addresses WSO staff receiving specialized training in various aspects of the UI program to assist claimants.

- *We appreciate your concerns regarding the fear of “public charge” in accessing benefits and the use of language regarding “fraud” in applications. These concerns will be shared with UI leadership.*

SECTION 5. SERVICES PROVIDED TO FARMWORKERS AND AGRICULTURAL EMPLOYERS THROUGH THE ONE-STOP DELIVERY SYSTEM

We support the training of One-Stop staff in best practices in serving agricultural workers. We ask that you share in the plan the number of Spanish speaking staff that the department has at each One-Stop center. We also ask that the plan include training that staff will receive in how to serve agricultural workers.

Regarding use of the ARC, we ask the department to ask employers to use this system to recruit workers before they use the H-2A program. **(NOTE: This comment regarding the ARC was submitted by Farmworker Program of Legal Aid Services of Oregon, not PCUN).**

To improve your hiring data, we encourage the plan to include what type of follow up MSFWs and One-Stop staff will provide to agricultural workers after referrals are made to H-2A jobs and after applications are submitted to H-2A jobs.

We appreciate the listing of the different activities MSFWs will conduct to connect Oregon agricultural workers with jobs, including job fairs and H-2A job listing promotion. We especially support more robust completion of registrations for agricultural workers. For those H-2A job listings that include work at different farms, we encourage MSFWs to determine if all of the former employees of all of the different farms have been informed of the job opportunity with the new umbrella H-2A employer. We also encourage MSFW staff to ensure that the job descriptions listed in H-2A job orders reflect the work that is actually being performed.

We also ask you to provide additional detail on any projected reductions in funding and how the department will respond to such reductions.

OED Response

- *Thank you for your recognizing the importance of having Spanish speaking staff in the One-Stop centers. The Department will consider sharing the number of Spanish speaking staff in each One-Stop center in future revisions of the AOP.*
- *The Department agrees to review its training for new staff and make necessary updates to ensure it adequately covers serving agricultural workers, and to include that training plan in future revisions of the AOP.*
- *Per federal guidelines, the Department follows up with job seekers referred to H-2A job listings within 72 hours to confirm the status of their application. This will be added to the AOP.*
- *Regarding your statement about encouraging MSFWs to determine if all of the former employees of all of the different farms have been informed of the job opportunity with the*

new umbrella H-2A employer, please know that this activity is out of scope for the Department per regulation.

- You included the following statement: “We also encourage MSFW staff to ensure the job descriptions listed in H-2A job orders reflect the work that is being performed.” Please know that field visits conducted by MSFW outreach workers include verifying that H-2A work being performed is within the scope of the job duties. Any inconsistencies are to be reported by staff to the FLC Coordinator.*
- The Department believes comments about current and projected funding levels are out of scope for the AOP.*
- You mention “Regarding the use of the ARC, we ask the department to ask employers to use this system to recruit workers before they use the H-2A program.” The Department believes you meant the Agricultural Recruitment System (ARS), not ARC. If so, we agree and actively promote the ARS to employers before they use the H-2A program.*

SECTION 6. OTHER REQUIREMENTS

We encourage the department to improve its service counts as there are 60,000 seasonal agricultural workers in Oregon. We believe that the department can do better for farmworkers in Oregon and that it can provide more than 184 referrals to job listings. We ask the department to set and share specific goals for each MSFW and each OneStop office.

OED Response

- The Department will evaluate service counts and job referrals to MSFWs in relation to non-MSFWs and provide additional information as relevant and appropriate in future iterations of the AOP.*
- The Department will consider your recommendations to set and share specific goals for each MSFW and One-Stop Office.*

C. DATA ASSESSMENT

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

The table below shows whether the state met performance for each equity category in Program Years 2021 through 2024.

Equity Category	PY 2021
Career Guidance Provided	Yes
Job Development Contacts	Yes
Staff Referrals to Job Listings	No
Supportive Service Referrals	Yes

Equity Category	PY 2021
Reportable Services	Yes

Except for Staff Referrals to Job Listings in PY 2021 and Job Development Contacts in PY 2023 and PY 2024, the state otherwise met all federal MSFW equity indicators per 20 CFR 653.109 (g).

The state is pleased to report that, in PY 2022 and PY 2023, it met additional equity indicators (measured by U.S. DOL, but not included in 20 CFR 653.109 (g)) in the categories Referred to Federal Training, Referred to Other Federal or State Assistance and Providing UI Claim Assistance. Of note, additional equity measures for PY 2024 have not yet been published by U.S. DOL.

To address the deficiencies in equity measures noted above and to ensure ongoing, high quality workforce services are provided to MSFWs, OED leadership remains committed to continue emphasizing the importance of 1) addressing the needs of the agriculture employer base to improve the hiring of MSFW applicants, 2) increasing outreach to MSFWs to make them aware of WorkSource Oregon job services, 3) training outreach staff in job development services, and 4) referring MSFWs to the National Farmworker Jobs Program (NFJP), which focuses on non-agriculture vocational training services.

Services provided to MSFWs

Below are service counts by category that SWA staff provided to MSFWs in Program Years 2023 and 2024 as recorded in the state’s labor-exchange system, iMatchSkills.

Employment Service Activity	PY 23
Welcome Process Completed (One-on-One Intake)	986
*RESEA Welcome Conversation (One-on-One Intake for UI Claimants)	4,395
Next Steps Planning	4,662
Job Search Planning	2,115
**Job Search Workshop	272
Job Coaching	1,103
SNAP Training and Employment (STEP) Orientation	723
STEP Opportunity Plan Uploaded	763
Workforce Info Provided	2,621
Staff Referrals to Job Listings	417
Placements on Job Listings	149
***Obtained Employments	1,787

* *The Reemployment Services and Eligibility Assessment Welcome service is recorded when an unemployment insurance claimant attends an "RESEA Welcome Conversation." Attending RESEA Welcome is a condition of benefit eligibility.*

** *This category may exclude those attending workshops sponsored by workforce partners.*

*** *Count of job seekers employed 90 days after receiving a staff-assisted service.*

Of note, the number of MSFWs completing the Welcome Process in PY 2024 increased by 69 or 7% over PY 2023. This, along with the number of MSFWs completing a STEP Opportunity Plan (which indicates enrollment in the voluntary STEP program) holding relatively steady in Program Years 2023 and 2024, is a positive indicator of ongoing efforts by OED staff to connect MSFWs with reemployment and training services.

PROGRAM YEAR	2021	2021
Performance Metric	WP	MSFWs
Participants Served	86,790	2,101
Employment Rate 2nd Quarter After Exit	65.1%	63.0%
Employment Rate 4th Quarter After Exit	63.1%	58.0%
Median Earnings - 2nd Quarter After Exit	\$8,419	\$6,678

The lower Employment Rates 2nd quarter after Exit and 4th quarter after Exit for MSFWs as compared to statewide measures for all customers, are likely due to challenges such as lack of current and transferable skills, employment gaps, transportation, childcare, affordable and stable housing, and other factors disproportionately affecting underserved and underrepresented communities.

Note: This information is from the federal ETA-9169 annual Wagner-Peyser reports.

Note: Exit occurs when a participant has not received services from any DOL-administered program in which the participant is enrolled for at least 90 days.

D. ASSESSMENT OF PROGRESS

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

Assessment of Previous AOP for Program Years 2019-2022

The state completed the planned restructuring of its MSFW outreach program, a project started in 2021. The final step in this process was the hiring of an MSFW outreach manager. Stationed in OED's central operations unit, this position will supervise and coordinate the activities of twelve full-time MSFW outreach staff, strategically located throughout the state to support MSFWs and the agricultural business community. While much remains to be done to address

the workforce needs of MSFWs, the state believes this new, restructured program has positioned it to enhance service delivery and outreach to MSFWs, improve program communication with WSO centers, and further build on existing partnerships with other service provider such as OHDC to more effectively serve MSFWs and their families.

To some degree, the ability of the MSFW program to provide qualitatively equivalent and quantitatively proportionate services to MSFWs is impacted by Wagner-Peyser funding levels, which have remained relatively flat over time. Funding constraints limit the impact for all customers with significant barriers, in particular the underserved and hard to reach MSFW population.

Despite funding constraints, the following actions have been emphasized over the past four program years to bolster program outcomes: simple follow ups with MSFW clients following the initial intake and registration process, including job referrals; H-2A job listing promotion; job fairs and other recruitment activities targeting MSFWs; updated and complete MSFW registrations in the state's labor-exchange system for job-matching; and communication with agriculture employers regarding domestic MSFW referrals. The state remains committed to these actions.

Per federal guidelines, the Department follows up with job seekers referred to H-2A job listings within 72 hours to confirm the status of their application.

In PY 2018, the SMA identified that MSFWs were not receiving assistance in getting complete registrations in the state's labor-exchange system, a violation of the Judge Richey Court Order. MSFWs should be recognized in all WSO centers as a targeted population entitled to effective and equal access to the full range of workforce services. Federal regulations under the Judge Richey Court Order of 1974 mandate that MSFWs receive services on a quantitatively proportionate and qualitatively equivalent basis as those provided to non-MSFWs.

As a result of this reported violation, the SWA emphasized the importance of taking uniform, complete applications for each MSFW job applicant utilizing Employment Service offices, including a meaningful history of prior employment, training and education of the applicant and a statement of their desired training and/or employment goals, and utilize such applications in providing applicants with and referring them to available jobs, and training opportunities directed to upgrading job capabilities. The SWA is pleased to report that new processes and procedures fully implemented in PY 2020 to correct this violation have had positive results on the quality of MSFW registrations in the state's labor-exchange system, iMatchSkills.

In previous years, the SMA has noted that MSFW outreach staff and WSO field staff do not sufficiently update and promote H-2A job listings with higher paying wages to the local domestic workforce. To address this concern, WSO centers will continue to look for ways to ensure that those higher paying agricultural jobs are visible and accessible to walk-in customers.

The SMA in PY 2020 identified that MSFW outreach staff were being required to conduct H-2A housing consultations, a violation of MSFW outreach regulations. Per 20 CFR 653.107 (4), MSFW significant states must have full-time, year-round outreach staff to conduct year-round outreach duties. Following a corrective action filed by the SMA, MSFW outreach staff no longer conduct H-2A housing consultations.

E. STATE MONITOR ADVOCATE

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

The SMA has reviewed and approved this AOP but would like to add that the progress/goals that need to be adhered to regarding services to MSFWs in Oregon during the next two program years will hopefully not continue with ongoing complacency. Assurance that services be provided in a qualitatively equivalent and quantitatively proportionate manner need to be prioritized by the agency. The SMA would also like to reiterate that the State Workforce Agency is subject to the following staffing requirements under 20 CFR 653-111.

1. The SMA must implement and maintain a program for staffing significant MSFW one-stop centers by providing ES staff in a manner facilitating the delivery of employment services tailored to the special needs of MSFWs.
2. The SMA, Regional Monitor Advocate, or the National Monitor Advocate, as part of his/her regular reviews of SWA compliance with these regulations, must monitor the extent to which the SWA has complied with its obligations under paragraph (a) of this section.
3. SWAs remain subject to all applicable Federal laws prohibiting discrimination and protecting equal employment opportunity.

WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	Yes
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	Yes
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and	Yes
4. SWA officials: 1) Initiate the discontinuation of services; 2) Make the determination that services need to be discontinued; 3) Make the determination to reinstate services after the services have been discontinued; 4) Approve corrective action plans; 5) Approve the removal of an employer’s clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days; 6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs’ behalf (if the SWA so chooses); and	Yes

The State Plan must include	Include
7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.	
5. The SWA has established and maintains a self-appraisal system for ES operations to determine success in reaching goals and to correct deficiencies in performance (20 CFR 658.601).	Yes

WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the two years covered by the plan modification. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the two years of the plan modification.

While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level
Employment (Second Quarter After Exit)	68.2%
Employment (Fourth Quarter After Exit)	68.0%
Median Earnings (Second Quarter After Exit)	\$9,800
Credential Attainment Rate	Not Applicable
Measurable Skill Gains	Not Applicable
Effectiveness in Serving Employers	Not Applicable ¹

¹

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

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

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

Council representative	Current term number/ Vacant	Beginning date of term Mo./Yr.
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

Council representative	Current term number/ Vacant	Beginning date of term Mo./Yr.
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

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

Performance indicators	PY 24 expected level	PY 24 negotiated level	PY 24 actual
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

Personnel category	Number of personnel employed	Number of personnel currently needed	Projected number of personnel needed in 5 years
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

503-945-5880 or 877-277-0513

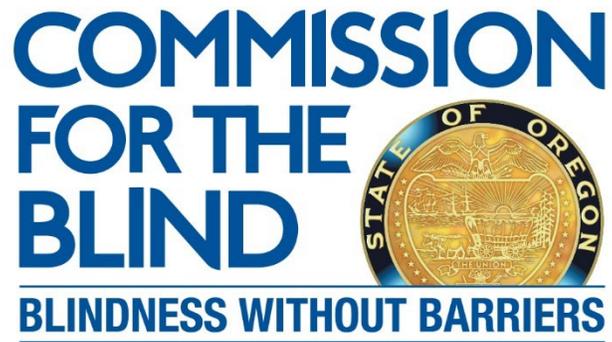
vr.info@odhsoha.oregon.gov

oregon.gov/odhs/vr

Oregon Commission for the Blind

Workforce Innovation and Opportunity Act State Plan

Program Years 2024 – 2027



January 2026

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State Rehabilitation Council

1. All VR agencies, except for those that have an independent consumer-controlled commission, must have a State Rehabilitation Council (Council or SRC) that meets the criteria in Section 105 of the Rehabilitation Act. The designated State agency or designated State unit, as applicable, has:
 - a. an independent State commission.
 - b. The Oregon Commission for the Blind (OCB) is an independent consumer-controlled commission with a Governor appointed State Board that provides governance and program guidance, and as such is not required to submit this section.

2. In accordance with Assurance (a)(1)(B), if selected, please provide information on the current composition of the Council by representative type, including the term number of the representative, as applicable, and any vacancies, as well as the beginning dates of each representative's term.
 - a. Not applicable. OCB is an independent consumer-controlled commission, and not subject to this section.

3. If the SRC is not meeting the composition requirements in Section 105(b) of the Rehabilitation Act and/or is not meeting quarterly as required in Section 105(f) of the Rehabilitation Act, provide the steps that the VR agency is taking to ensure it meets those requirements.
 - a. Not applicable. OCB is an independent consumer-controlled commission, and not subject to this section.

4. In accordance with the requirements in Section 101(a)(21)(A)(ii)(III) of the Rehabilitation Act, **include a summary of the Council's input (including how it 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.
 - a. The Oregon Commission for the Blind (OCB) is an independent consumer-controlled commission with a Governor appointed State Board that provides governance and program guidance. The commission reviewed and is in agreement with OCB's goals and priorities that were developed in response to the results of its 2020 Comprehensive Statewide Needs Assessment (CSNA), as well as detailed feedback from the 2023 CSNA. OCB's program specific portion of the Oregon Combined State Plan draft

submission has been reviewed and approved by the OCB Board of Commissioners without changes. Further, the OCB program specific portion of the state of Oregon has been informed and aligned with the Oregon Workforce Talent Development Board's Strategic Imperatives and Objectives as well as OCB's own Strategic Priorities. The commission understands and supports OCB's need to implement an order of selection due to a fiscal deficit beginning in February 2026. At that time all three priority categories will be closed. Per description G - October 3, 2025 – Agency leadership team met with the OCB commission board that oversees policy/oversight for the agency and received approval to proceed with plans for OOS. Note that OCB does not have an SRC.

b.

5. Provide the VR agency's response to the Council's input and recommendations, including an explanation for the rejection of any input and recommendations.
 - a. The Oregon Commission for the Blind procured, participated in, and oversaw the 2023 CSNA, and the development of OCB's portion of Oregon's WIOA PY 2024-2027 Combined State Plan. OCB's Board of Commissioners provided feedback on the development of agency goals and strategic priorities and is in agreement with all goals and strategies. No additional input was provided.

Comprehensive Statewide Needs Assessment (CSNA)

Comprehensive Statewide Needs Assessment (CSNA)

1. The VR services needs of individuals with disabilities residing within the State, including:
 - a. Individuals with the most significant disabilities and their need for Supported Employment:

The Oregon Commission for the Blind VR Program serves individuals who meet the legal definition of blindness (medical report documenting visual acuity of 20/200 or less, a visual field of 20 degrees or less, and those who are projected to become legally blind within two years of eligibility determination). All Oregonians who are legally blind are considered to have the most significant disabilities. This section will first review vision loss in Oregon and the greater country.

Estimating the number of Oregonians with legal blindness is not easy or straightforward. At best, we can extrapolate from the American Community Survey estimates for Oregonians who self-report experiencing “vision difficulty, even when wearing glasses.” The prevalence of “vision difficulty” in Oregon is 2.5%, which represents an estimated 104,473 Oregonians over the age of 16, or broken out by age group as follows:

Youth and students transitioning from high school to postsecondary education or employment experience vision loss with a low prevalence of 0.9% which impacts 7,779 young adults (under 18 years old).

Working age adults (18 to 64) experience vision loss with a prevalence of 2.0%, totaling 51,907 individuals

Older adults’ (65- 74) vision loss prevalence is 5.4% which consists of 44,787 adults

In general, it would be fair to say that Oregon’s population is aging and thus the percentage of non-working age adults is growing.

Vision Loss and Work:

In looking at national trends, 216,951 Americans who experience vision difficulties are unemployed within a larger population of 2,340,078 with vision difficulty. The difficulty with this comparison is that vision loss does not equate to legal blindness. There are an additional 1,863,703 citizens not in the

workforce who experience vision difficulties. Arguably, both the unemployed group and those not in the workforce could be served by a VR agency.

Estimated VR Target Population:

The following is a conservative estimate based on Oregonians with vision difficulty (based on 2024 ACS estimates of Oregonians with vision difficulty and 10% of Americans reporting vision difficulty and meeting unemployed definition):

Adults: 21 to 64 and Vision Difficulty: 51,907 Oregonians * 10% = 5,190.

For reference, the Oregon Commission for the Blind has provided services for 613 unduplicated individuals in PY20, 649 individuals in PY21, 681 individuals in PY22, 764 in PY 23, and 724 in PY24 through OCB's VR Program. Based on a simple regression, the VR program adds about 27 clients per year.

In summary, based on the growth of the program, the agency will no longer be able to meet the needs given its current funding level. The previous numbers support our later request for Order of Selection.

The next session focuses on the needs of individuals who would qualify for a Supported Employment case.

The following is an excerpt from the agency's 2023 CSNA:

Unfortunately, there is little research focused on individuals with vision loss who qualify as supported employment. The American Community Survey collects data on those that may qualify as supported employment by asking respondents to answer the question, "Because of a physical, mental, or emotional condition, do you have serious difficulty concentrating, remembering, or making decisions?" As with the question determining rates of visual impairment (Are you blind or do you have serious difficulty seeing, even when wearing glasses?), there is a chance for error as the survey does not measure severity of the condition, but it is the most reliable data currently available. Of those who answered affirmatively to the question above, 33.4% of Oregonians reported being employed in 2022. Oregon ranks 20th nationally in the employment rate of individuals with a cognitive disability (Disability Statistics 2022). The Case for Inclusion, a leading source for data and policy recommendations regarding the effectiveness of state Medicaid programs in serving people with intellectual and developmental disabilities (IDD), ranked Oregon 2nd in the country for its efforts to serve individuals with intellectual

and developmental disabilities (American Network of Community Options and Resource 2019). In 2019, Oregon was one of 13 states to have no individuals with intellectual and developmental disabilities living in institutionalized setting (American Network of Community Options and Resource 2019). In 2023, 57% of Oregonians with I/DD were working in integrated employment compared to just 20% nationally (American Network of Community Options and Resource 2023).

The Agency served 82 supported employment participants between 7/1/2020 and 6/30/2023. Of these, 29 (35%) continue to receive services as of the date of this report. The remaining 53 cases (64%) exited services in that time period. Of those 53 closed cases, 16 (50%) exited successfully.

Although national statistics are difficult to find, there is discussion of the disproportionate impact on supported employment individuals. Individuals with the most significant disabilities may have hybrid or remote work but it is believed to be rarer. Supported employment vocational rehabilitation participants often require an extensive team of in-person support from personal support workers and job coaches to succeed in employment. In addition to the tendency for supported employment individuals to work in-person, they then faced additional barriers as COVID had significant impacts on in-person support for these individuals. The contracted employment support vendors used by the Agency experienced great upheaval during COVID with trying to move as many tasks as possible to virtual and a higher rate of staff turnover. The rate of successful placements for the Agency's supported employment participants reflects the difficulty establishing stable employment.

Given the agency's request for Order of Selection, supported employment cases may consume a greater proportion of financial resources given the greater need for job developers and job coaches.

Overall OCB client feedback on VR services from the completed 2023 CSNA suggests there are several service areas which clients believe helped them find a job:

- Assistive Technology Skills Training
- Orientation and Mobility Training
- Vocational Counseling
- Working with a job developer
- Confidence building

The agency believes these five areas can continue to be an area of strength even with the possibility of going into order of selection.

The following recommendations are continued and applicable from the 2023 CSNA:

1. Providing Individualized Services

Participant respondents and vocational rehabilitation counselors indicated the importance of continued individualized services and recommended future considerations for further emphasis on tailored services. Participants spoke of instructors creating an “okay to fail” and self-paced approach to services. Most indicated already receiving this type of individualized service delivery and the Agency will continue to support this approach. Staff aspects of training center service delivery to better meet individual needs and circumstances of participants. These include alternative strategies to promote training attendance than what is currently in place. They also highlighted an interest in seeing disability and cultural needs being assessed to determine level of need and using this information to inform service delivery. Counselors would also like to revisit what is considered in determining a participant is ready to engage in training center instruction.

2. Awareness of Services

A general theme among participant respondents was awareness of services. The participant focus groups especially explored the challenges provided by a perceived lack of awareness. Generally, they would like better communication and more avenues through which to learn about services. Specific recommendations included a manual, a more informative website, and newsletters highlighting available services. The Agency has published materials available describing services, however it is noted that these materials need to be more widely and frequently circulated to participants.

3. Services to Potentially Unserved or Underserved Populations

3a. Ethnic and Racial Minorities

A theme throughout participant respondents was the importance of diversity, equity, and inclusion (DEI) training for Agency staff and vendors. Vocational rehabilitation counselors also expressed a desire for continued training in this area. The Agency has provided multiple mandatory DEI trainings over the years and will continue to make this training a priority. Staff would also like to make partnering with organizations serving these populations a priority yet

acknowledge limitations of time to establish these relationships and a lack of awareness of the existence of such organizations. The Agency may consider making this a priority through the help of vocational rehabilitation counselor interns or help of other staff with the bandwidth to do this outreach. The Agency will also be investing more in understanding the experience of immigrants in receiving vocational rehabilitation services. Staff also underscored the importance of recruiting staff that better represent the diversity of participants, which is a high priority for the agency as well.

3b. Rural Participants

A theme amongst participant respondents and staff was the importance of greater vendor choice and vendors with adequate availability to serve rural areas. This continues to be a barrier to employment. The Agency has invested resources in seeking vendors serving rural areas and will continue to do so. Transportation also continues to be an issue for rural participants and the Agency continues to assist participants in addressing these barriers as resources allow.

3c. Supported Employment

Two main themes presented themselves in the results of surveys and interviews. These are tailoring services to meet the needs of supported employment participants and developing relationships with other individuals and entities providing additional support. Specific recommendations from staff include adapting training curriculum that considers the specific needs of supported employment participants including those with behavioral challenges, intellectual and developmental disabilities, and severe and persistent mental illness. A vocational rehabilitation counselor also suggested the Agency designate a specific counselor to be a supported employment specialist. Developing relationships with other Agencies, vendors, and employers was also identified as needs of supported employment participants.

3d. Students under 24

Themes across responses from participants and vocational rehabilitation counselors included the need to identify strategies to engage students and youth more. An identified strategy for doing so include increasing participation in the Agency's Summer Work Experience Program (SWEPE), a several week work program in which youth participate in summer work experience for a variety of employers and engage in enrichment activities.

Business relations coordinators suggested students need more robust career exploration services as they identify their vocational goal.

4. Connecting Participants with other Social Service Support

Both participants and vocational rehabilitation counselors identified barriers to employment other than those related to vision loss. These were financial including housing and other unmet basic needs. Vocational rehabilitation counselors expressed a desire for more training on available public support and navigating those processes. They would also like to have an Agency staff member specializing in this support.

5. Staff Training and Collaboration

The need for additional and ongoing training for staff was mentioned often in interviews with staff. Two themes presented by staff include training on supporting potentially underserved or unserved groups. Diversity, equity, and inclusion and providing services to participants with multiple disabilities including mental health challenges were discussed in multiple interviews. Staff also expressed a need for training on innovations and trends in the labor market including technological advancements and emerging industries like careers in social media. Approximately 15% of participant respondents indicated staff training as a way to improve services overall.

6. Considering Labor Market Trends and Employer Needs

Over half of participant respondents indicated an employer's willingness to hire individuals with vision loss as a barrier to employment. Strategies for developing relationships with employers to increase successful participant employment outcomes included a focus on services provided to employers by the Agency. Employers were asked to identify services that are or would be helpful from a list of services offered by the Agency. Frequently chosen included help identifying accommodations, assistance analyzing position descriptions for accessibility, and worksite accessibility consultations.

7. Training and Recruiting Vendors

Major needs identified by participant respondents and staff regarding vendors providing vocational services are recruitment and vendor training. A lack of vendors providing services is a commonly known statewide problem. This is especially prevalent in rural areas. In addition to availability, the high turnover in service providers creates a strain on the Agency as they are constantly

orienting and training new vendor staff. Similar training as identified as important for staff was also identified as important for vendors. This includes DEI training and working with participants with multiple disabilities.

8. Conducting Outreach to Various Audiences

Outreach to all groups was deemed a need. This includes existing and potential participants, vendors, and employers. Specific groups including racial and ethnic minorities and those with mental health challenges were identified. The Agency continues to find ways to innovate in outreach strategies.

- b. Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program;

The first phase of analysis of the Oregon population compared with recently served clients, shows the Commission is moving towards successfully reaching Oregonians of various race and ethnic backgrounds. The following compares VR clients served in PY 2022 and PY 2023 to the 2023 U.S. Census Estimates of Oregon demographics:

Native American: Commission served 5%, Oregon population 2%

Asian: Commission served 5%, Oregon population 4.5%

Black or African American: Commission served 6%, Oregon population 3.4%

Pacific Islander: Commission served 1%, Oregon population 1%

White: Commission served 61%, Oregon population 71.1%

Hispanic: Commission served 15%, Oregon population 14.9%

Because clients can select more than one race, the OCB percentages do not add up to 100%.

This is the first time in recent history that under-served populations were served at least in proportion to the greater Oregon population statistics. The agency has taken many steps to close the gaps in serving racially underserved populations. Examples of action items the agency has embarked on include co-location in WorkSource offices with a racially diverse population, hiring a staff that more closely represents the population, and attending information fairs geared towards underserved populations.

The 2023 provided the following data points which help examine underserved populations as defined by RSA.

Of the 803 Oregon Commission for the Blind participants who were in an individualized plan for employment between 7/1/2020 and 6/30/2023, the proportion of participants of minority racial groups was higher than the proportion of the Oregon population of racial minorities at 18% of participants served. This includes those reporting a combination of white and minority races. Compared to Oregon's Hispanic population, the Agency served a smaller percentage (13%) than the percentage of Oregon's total population of Hispanic residents (14.4%).

Of the 375 case closures (participants may have multiple closed cases in times period) exiting services after developing an individualized plan for employment between 7/1/2020 and 6/30/2023, 173 (47%) cases resulted in an employment outcome. Of these 173 closures resulting an employment outcome, 18% (31) were considered racial minorities including those who indicated being of both white and minority race and excluding Hispanic. Of the 173 closures with an employment outcome, 13% (22) were Hispanic.

A total of \$432,800.00 was expended on post-secondary education for all participants between 7/1/2020 and 6/30/2023. Of all funds expended for financial assistance for education, the highest percentage went to participants not affiliated with any potentially underserved groups as identified by RSA (46%). Of the participant categories highlighted in the needs assessment (not considering students), the highest percentage of expenditures for post-secondary education were expended on supporting Hispanic participants (\$71,019.00, 16% of total expenditures) and participants in rural areas (\$74,278.00, 17%).

Sixty-seven percent (n=536) of all participants received Job Search and Employment Support services from 7/1/2020 through 6/30/2023. Seventeen percent of those receiving these services were racial minorities, 12% were Hispanic, 6% were students under age 22, 23% were rural, and 7% were supported employment. It is interesting to note that rural participants received these services at the highest rate among potentially unserved and underserved populations (23%).

Limitations: The Agency serves a smaller population than many other vocational rehabilitation agencies, therefore our survey population is limited. Though we had an average response rate of ~30%, that is a small number (178). Responses from potentially unserved or underserved populations are even more limited. Students under age 24 and supported employment participants each made up less than 15% of the sample. The samples are not big enough to compare to those that are not students or supported employment.

- c. Individuals with disabilities served through other components of the workforce development system;

It is uncommon that legally blind Oregonians are served through other components of the statewide workforce development system before receiving services from OCB.

WorkSource Oregon customers experiencing vision loss are not required to indicate whether or not they have a disability and may not self-disclose. This is recorded but not analyzed for types or severity of disability.

To prepare WSO partners to serve customers experiencing vision loss, OCB conducts regularly scheduled Disability Awareness, Disability Etiquette, and Assistive Technology demonstrations for WorkSource Oregon partners. This is ongoing work. Vocational Rehabilitation Counselors (VRCs), Business Relations Coordinators (BRCs), and Assistive Technology Specialists are co-located in WSO centers and staff regularly attend WSO meetings in order to facilitate information sharing.

Survey responses from the completed 2017 CSNA indicated accessibility to WSO systems as a significant barrier to uptake of services and resources. The 2023 CSNA suggested that only 10% of clients had been connected to a WSO office so there is more work to be done in this area.

Since 2023, OCB has added co-location in four WSO offices which brings the total to six.

OCB leverages relationships with Oregon's general Vocational Rehabilitation agency around appropriate referral and basic education about accessibility and serving clients with disabilities generally, in the context of the public workforce system.

It remains uncommon that legally blind Oregonians are served through other components of the statewide workforce development system before receiving services from OCB.

- d. Youth with disabilities, including students with disabilities and their need for pre-employment transition services. Include an assessment of the

needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under IDEA.

The third major program that supports the mission of OCB is “Supporting in-school youth who are blind as they transition from high school to further education, training and employment through the provision of pre-employment transition services.”

The following text was submitted with the initial 24-27 plan and is still applicable. The Transition and Employment First Officer is a position in the Agency that specializes in youth and supported employment services. Through various feedback mechanisms, this position was able to provide insights into what is working for this population. Youth receiving services provided by OCB indicated community created by the Agency – shared classes, casual interactions, and attending the Living with Blindness course – are important to their success of supported employment participants. In addition, providing services through Agency staff facilitates better service delivery as the Agency’s staff have a more thorough understanding of the individual. The work the business relations staff are doing to collaborate with employers to find opportunities for supported employment clients is essential. The Agency also participates in forums designed to better support these participants including the employment first policy and innovation training and technical assistance group. Counselors are encouraged to attend regional employment first meetings. The Agency has also received regular training from the regional employment specialists from the State of Oregon’s Office of Developmental Disability Services.

Youth and students’ survey responses indicate the highest priority needs are 1) basic employment needs around mobility, technology, and training; 2) learning to be your own advocate to get services you need; and 3) need additional time to adapt to new job workload

In the 2023 CSNA, participants were asked the question, “How can OCB better meet the needs of students and youth?” As a follow up to the question asking respondents to identify needs of students and youth, they were asked to identify strategies for improving services for this population. Most of the responses included ways to increase outreach, education, and training. One respondent suggested presenting on visual impairment in schools as students will be potential future employers of individuals with vision loss. One

respondent wrote, ““OCB Could be more involved with what students do. Having OCB visit schools to do assemblies on blindness could help teach the next generation who will be hiring the skills they need to interact with the blind in future. This could help eliminate feelings that a blind person can't do a job with demonstrations.”

Summer Work Experience Program (SWEP) cornerstone of services for students and youth: The Commission’s Summer Work Experience Program (SWEP) is a meaningful experience and a gateway for many youth to services from the Commission. Again referencing question 8 (How can OCB better meet the needs of students and youth?) on the CSNA one respondent wrote, “I think the agency is doing good in this area. The SWEP program is the best program we have for our students. I would like to see this grow larger in the future with more outreach.”

In response to this question however, one comment suggested that the agency could place a greater focus on staff training for those with direct client contact. The respondent asked for more blindness etiquette to help the students feel more at ease. The agency’s leadership team and commission recognize the importance of employing competent staff and are working with regional programs throughout the state to recruit Teachers of the Visually Impaired (TVIS) and other skilled staff for summer-based programming such as SWEP. The agency acknowledges that long time staff have retired and that some institutional knowledge has been lost. They are reevaluating how to best recruit, train, and support staff in SWEP direct service roles.

According to research on the characteristics of a “model program” for youth summer work experiences, successful programs are associated with more job-related services and fewer assessment and diagnostic services. Youth cost less to serve, and youth achieved significantly higher employment rates at case closure, although worked slightly fewer hours and earned less per week at closure.

These results signify implications for vocational rehabilitation practice with students and youth with disabilities, especially in the context of transition service requirements of the Workforce Innovation and Opportunity Act. Further, early work experiences for youth with visual impairment and enrolled in special education was associated with better employment outcomes later. However, the type of experiences matter a lot, for example, varied experiences and longer-term experiences are associated with better

employment outcomes later. This should especially be emphasized for youth with SSI, in addition to educating youth and their families about opportunities to retain benefits while working.

Recommendations: Continue efforts in line with WIOA goal to engage students earlier. Ensure sustainability of SWEP and refocus energy on building a strong program. Training for other staff on learning needs of students. The role of mentorship and positive role models cannot be underestimated. To summarize the most important themes from this section, the top strategic priority is to increase collaboration with schools/regional programs throughout Oregon and build on momentum of the agency's ongoing work.

OCB participates in the Transition Technical Assistance Network, which is a collaboration between OCB, the general VR agency, and Department of Education to provide a variety of Pre-ETS activities to students across Oregon. These include regional student summits, virtual statewide job clubs, person-centered planning, and engagement directly in schools. OCB also works with the TTAN to organize and put on the annual Oregon Statewide Transition Conference, which provides training and networking opportunities for educators and rehabilitation professionals serving students with disabilities. OCB regularly presents at this conference as well and recently hosted a networking/information session to increase awareness of the breadth of OCB's Pre-ETS and transition services.

OCB hosts a quarterly College Collaborative, whose goal is to provide increased collaboration and communication between OCB counselors and instructors, post-secondary disability services professionals, and ESD/Regional Program instructors. These meetings in part address perceived service gaps, developments in access technology, and organizational updates relevant to student educational and vocational outcomes. Providing these meetings virtually has increased attendance and allows for participation by individuals working with students in more rural areas to address the specific needs of those demographics.

OCB attends a variety of stakeholder meetings statewide, including county Employment First meetings that address the needs of students receiving long-term supports and ESD/Regional Program staff meetings to increase our level of collaboration with those professionals.

OCB works with employers and educational partners to learn about existing internship and training opportunities so counselors, clients, and families can

share and encourage participation of these opportunities. OCB also works with those partners to forecast potential accessibility barriers and to leverage OCB resources and expertise to address issues as appropriate.

OCB currently has agreements with eight educational service districts (ESDs) that provides funding for students with disabilities to receive pre-approved services. Two of these agreements are new within the past two program years and are both considered rural. The agency has a goal of continuing to add one agreement per program year with an emphasis on rural districts. The agreements help the youth build skills that will help make them ready for work by the time they are eligible for OCB services.

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

For individuals who need ongoing assistance in order to maintain a job, the Commission works with a variety of partners to provide supported employment. As a result, supported employment often requires more direct collaboration with community partners. The partners develop a team and plan of action including who is going to provide ongoing support. The goal for individuals is to be able to work in the community earning at least minimum wage.

A vital strategy for supported employment is the use of Community Rehabilitation Providers (CRPs): Job Coaches, and Job developers. Particularly for individuals with the most complex disabilities, a place- and- train model in which individuals spend time training on the job tends to lead to success. The Commission contracts with CRPs for specialized placement and job coaching functions specific to the CRPs expertise in those employment areas. In addition, there are specialized programs that provide services related to vision loss such as the Devers, Casey Eye Clinics, and the Blinded Veterans Association.

The Commission hires Job Coaches to work alongside the individual until the participant learns the job. Job Coaches may work constantly alongside the person or check- in a few times a day or weekly as needed. Generally, when Job Coaches are needed for the long term they are funded through the local county. Counties provide supported employment for those people who need support for the life of the job. In order to establish support, the Commission partners with the State's developmental disabilities programs in order to facilitate the initiation of the process.

We recognize that people experiencing multiple, significant disabilities often need support from multiple providers. This requires a great deal of coordination and oversight of service delivery.

Because there are very few specific blindness-related CRPs, the Commission works closely with agencies, organizations, and individuals throughout Oregon to make sure that individuals who are blind or visually impaired receive appropriate services, and that other organizations are able to either refer individuals to the Commission for service or to gain information needed from Commission staff in order to serve the individuals effectively and appropriately. The agency's Business Relations Coordinators provide twice/monthly check ins for CRPs to problem solve and share successes in order to provide active support. As well, the BRCs provide a training on the fifth Thursday of the month to CRPs in order to provide them blindness specific training.

In PY 18, OCB began to develop and deliver blindness and agency specific onboarding and training activities to all of OCB's contracted CRPs. This onboarding covers OCB resources, processes, policies and service delivery and has continued through PY23 and present. The onboarding also incorporates the perspectives, issues, and resources available to Oregonians experiencing vision loss. CRP staff are also invited to weekly, regionally specific Jobsville calls. Jobsville is a part of our Progressive Employment model where CRP's staff client cases with Vocational Rehabilitation Counselors, instructors, Business Relations Coordinators, and/or other relevant staff. This consistent opportunity for communication leads to enhanced communication and improved services.

CRP Training topics and activities included: Career Pathways, client and business partner staffing, WorkSource Oregon, Assistive Technology demonstrations, Progressive Employment, Business Profiles, and others. OCB Business Relations Coordinators consistently communicate with CRPs and potential CRPs around the state, educating them about OCB, Assistive Technology and adaptive techniques for independent living and employment skills. We also provide consultation and training around the importance of collaborating with our workforce partners whenever possible. OCB has continued all of these efforts through PY24. In PY24, OCB Business Relations Coordinators (BRCs) engaged in 90+ CRP training and support activities, throughout the state, with a strong focus on rural Oregon service providers.

Goals, Priorities, and Strategies

1. Describe how the SRC and the VR agency jointly developed and agreed to the goals and priorities and any revisions.

The Oregon Commission for the Blind does not operate under the direction of the State Rehabilitation Counsel, but rather operates as a board-driven agency/commission.

In 2024 OCB submitted a total of four goals divided between the VR and Supported Employment programs. Each goal had a number of progress indicators ($n > 45$). The agency later realized the amount of labor required to track, analyze, and positively impact change surrounding this data would not be possible. In this modification, the agency has reduced the number of overarching goals from eight to six between both the VR and Supported Employment programs since they were developed based on data points such as the CSNA. The number of progress indicators has been reduced to 18 which better captures the actual work and focus of the agency. These progress indicators better reflect the agency's priorities and bandwidth for following through on the goals. As well, given that Order of Selection is pending the agency has focused performance indicators on the most salient outcomes related to client employment and employer engagement.

OCB has and will review progress and adjust strategies on a quarterly basis. OCB currently connects these measured services to outcomes via the quarterly review process at a team and leadership level.

Goal 2: Increase Agency outreach and effectiveness of services to individuals and communities that would benefit from vocational rehabilitation services.

Measures suggested to gauge progress:

- Number of outreach and education activities in urban areas defined by ORH. Includes business and community activities.
- Number of outreach and education activities in rural areas defined by ORH. Includes business and community activities.

OCB will continue to review progress and adjust strategies on a quarterly basis. OCB will investigate performance tracking methodologies to connect these measured activities/services to outcomes.

Goal 3: Expand Pre-Employment Transition Services for students with disabilities who are potentially eligible or eligible for VR services.

Measures suggested to gauge progress:

- Number of potentially eligible cases
- Total number of ICAP participants
- Tracking number of regional pre-ETS contracts
- Number of agency sponsored pre-ETS sessions (including bootcamp and SWEP evening sessions)

OCB will review progress and adjust strategies on a quarterly basis. OCB will investigate performance tracking methodologies to connect these measured activities/services to outcomes.

Goal 4: Increase the capacity of Oregon's businesses to hire and retain Oregonians experiencing vision loss.

- Measures suggested to gauge progress:
- Median earnings - 2nd quarter after exit employment
- Effectiveness in serving employers
- Number of CRP Onboardings, group problem solving, and trainings (including 5th Thursdays)
- Instructors time spent in JT

OCB will review progress and adjust strategies on a quarterly basis. OCB will investigate performance tracking methodologies to connect these measured activities/services to outcomes.

Goal 5: 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

- Increase collaboration with school districts and regional programs to identify potentially eligible students for VR services

Goal 6: Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.

- Increase the number of job placements secured for OCB clients
- Develop and implement a standardized training program for job coaches to ensure consistent and effective supported employment services for VR program participants.

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

1. Support innovation and expansion activities

Priority

Increase Agency outreach and effectiveness of services to individuals and communities that would benefit from vocational rehabilitation services.

Measure

-Number of outreach and education activities in urban areas defined by ORH. - Includes business and community activities.

-Number of outreach and education activities in rural areas defined by ORH. Includes business and community activities.

- Number of CRP Onboarding, continued goal, and trainings (including 5th Thursdays)

- Develop and deliver WIOA-specific training to 100% of VR staff. The purpose is to enhance WIOA awareness among OCB VR staff and CRPs.

- Instructors time spent in JT

2. Overcome barriers to accessing VR and supported employment services

Priority

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

Measure

- Develop and implement a standardized training program for job coaches to ensure consistent and effective supported employment services for VR program participants.
- Monthly/timely WIOA updates, TA, and training from partners to internal team

3. 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

Priority

Expand Pre-Employment Transition Services for students with disabilities who are potentially eligible or eligible for VR services.

Measures

- Number of potentially eligible cases
- Total number of ICAP participants
- Tracking number of regional pre-ets contracts
- Number of agency sponsored pre-ets sessions (including bootcamp and SWEP evening sessions). In PY24, the agency sponsored 6 sessions dedicated to pre-ETS clients.
- Increase collaboration with school districts and regional programs to identify potentially eligible students for VR services

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

Priority

Implement the intent of the Workforce Innovation and Opportunity Act into agency work and processes

Measure

- Measurable Skills Gain
- Credential Attainment
- Median earnings - 2nd quarter after exit employment

-Effectiveness in serving employers

Increase the number of job placements secured for OCB clients.

Evaluation and Reports of Progress: VR and Supported Employment Goals

1. Progress in achieving the goals and priorities identified for the VR and Supported Employment Programs;

Oregon Commission for the Blind submitted four overarching goals for the PY24-27 WIOA state plan:

- 1) Implement the intent of the Workforce Innovation and Opportunity Act into its agency work and processes
- 2) Increase Agency outreach and effectiveness of services to individuals and communities that would benefit from vocational rehabilitation services.
- 3) Expand Pre-Employment Transition Services for students with disabilities who are potentially eligible or eligible for VR services.
- 4) Increase the capacity of Oregon's businesses to hire and retain Oregonians experiencing vision loss.

Although these goals have been adjusted in the modification, this report will provide a status update on the established goals for PY24. Eighteen of the goals will continue and thus the

Progress

The purpose of goal 1 is to operationalize the spirit of WIOA through new ideas and expanding our current offerings. The agency continues to focus on internal implementation through staff education and external implementation by forming connections with employers and WIOA partners.

Measures

Number of Jobsville Sessions 21 + 3 Fifth Thursday trainings

Urban and rural outreaches 640

Number of ICAP Trainings for OCB staff participate in 2

Number of Business partner OCB specific trainings

Modify case management to capture WSO #s; In PY24 the case management system was updated so counselors can select WorkSource Oregon as a special program.

Number of clients engaging with WSO office services – reporting on clients engaged with the WorkSource System launched late in PY24. At the time of this report, zero clients were marked as WSO in the case management system. The agency has not yet trained staff or set expectations around making the WSO designation in the case management system so this result was expected.

Measurable Skills Gain – Data for PY 2024 is in data collection period and is not yet available at the time of writing this report.

Credential Attainment Data for PY 2024 is in data collection period and is not yet available at the time of writing this report.

Wage growth Data for PY 2024 is in data collection period and is not yet available at the time of writing this report.

LLTs and RBSs - OCB staff are connected to WorkSource Oregon local leadership teams when capacity allows. OCB Vocational Rehabilitation Counselors and Business Relations Coordinators represent OCB interests at local leadership teams and participate in joint work groups whenever possible. This creates a conduit for information on services and resources available to OCB clients for skill development, industry credentials, and career pathway resources. It also works to develop capacity of workforce system partners to successfully provide services for OCB clients.

A significant intent of WIOA is in the elevation of business to a “dual customer” status. The Workforce Services team acts as a bridge for the business community and the public workforce system with OCB’s staff and clients. BRC staff are part of regional WorkSource Oregon (WSO) Collaborated Business Services Teams. These teams are composed of WSO partners and create a ‘single point of contact’ to simplify and streamline business interaction with Oregon Businesses. Partners educate each other about each organization’s goals and resources, and that information is shared with the potential business partner through a singular contact to create a simple way businesses can partner with the public workforce system. These ‘Collaborated Business Teams’ started in the Portland metro area, and OCB BRC staff are instrumental in rolling this model out to other areas in the state.

Monthly/timely WIOA updates, TA, and training from partners to internal team. At the monthly VR and Workforce team meetings WIOA updates are provided from several perspectives: policy updates, operational changes in the LLTs, WSO events, and labor market insights.

Capture WIOA six core performance measures in leadership quarterly target review – this work has largely been completed. The sixth WIOA performance indicator, is set to be reviewed once the data collection period has passed for PY24.

Goal 2: Increase Agency outreach and effectiveness of services to individuals and communities that would benefit from vocational rehabilitation services.

In PY22, OCB began to intentionally engage with opportunities to connect with individuals and communities that could benefit from VR services. For PY24 the agency measured this outcome by the number of outreach and educational activities which totaled 640.

The agency had also proposed measuring the number of urban and rural outreaches based on the needs of underserved clients. The case management system is not able to link outreaches in the employer module to client characteristics in the participant module. As a result of reporting limitations, the agency is no longer pursuing this measure.

Third, to support outreach to individuals and communities, OCB proposed measuring the number of facilitated meetings regarding progressive employment supports.

Attend all state level consumer groups – the agency has presence at both the ACB and NFB state level conferences. As well, there is a seat on the agency board for a consumer organization representative.

Goal 3: Expand Pre-Employment Transition Services for students with disabilities who are potentially eligible or eligible for VR services.

The Oregon Commission for the Blind is committed to expanding pre-ETS services for students with disabilities. This commitment is in line with the Workforce Talent and Development Board's focus on youth and preparing this population for work earlier in their academic and career journey. To measure progress in this area, the agency is tracking several metrics along with the corresponding PY24 data

Number of Potentially Eligible Cases.

Number of IPE's with Post Secondary Education Services

Tracking number of regional pre-ets contracts: OCB has seven contracts in place with ESDs for PY24. This is an increase from 3 in previous PYs.

Number of new partnerships in rural areas regarding regional contracts – Of the four new contracts, two are in rural areas of the state.

Measurable Skills Gain Credential Attainment – MSG data is not yet available for the full PY.

Number of new ICAP participants – OCB learned that the ICAP program will be sunseting and thus has not put any additional efforts into recruiting for this program since it is unlikely participants would be able to finish the degree by the time the program closes. However, at the time of writing this report, there were eight ICAP participants.

Number of agency sponsored pre-ets sessions

Expand summer work experience and pre-ets opportunities – OCB’s goal for PY24 was to expand the Summer Work Experience Program and this goal was largely achieved. This measure is uniquely qualitative in nature which produced a narrative response to this prompt. The Portland based program has been renamed to Emerging Leaders. Employer feedback on the Emerging Leaders was positive with 100% wanting to participate again. They requested to slightly modify the duties based on current needs but keep everything else the same. Participant feedback highlighted their growth in customer service, professional writing, and problem solving in the workplace. Further exploration revealed that as the program went on, participants depended less on their job coach and took more initiative to advocate for themselves and communicate needs with coworkers.

Similar to Portland, the Salem program also experienced a rebrand and was named Explorations. This program also had seven participants but not a residential component. Employer feedback was positive and reported that when faced with challenges, the SWEP program was able to assist with mitigating barriers. They requested information about their participant as soon as possible to make sure assistive technology could be tested and provided on day one. Participants reported gains in adaptive tech and work readiness skills. They described growing in their ability to function in a professional workplace and time management. Without this experience, participants would be entering the workforce unprepared and ill-equipped to compete in an integrated employment setting.

The agency described SWEP for PY24 as a success in terms of meeting the goal to expand pre-ETS services. In each program, students participated in evening and weekend enrichment programs related to blindness but also extra-curricular events such as blind soccer. Both the participant group and employers wished the program could be longer than six weeks.

Goal 4: Increase the capacity of Oregon’s businesses to hire and retain Oregonians experiencing vision loss.

This goal aligns with the State of Oregon’s Workforce Talent Development Board’s 2020 Strategic Plan Imperative to Increase the Understanding and Utilization of the System’

and Create a Culture of Equitable Prosperity. This goal aligns with OCB's goal of Exemplary Service and Effective Community Outreach and Education.

OCB proposed the following measures for PY 24-27 along with the corresponding progress:

Number of CRP Onboarding Trainings

Number of OCB disability awareness trainings provided to businesses

Instructors time spent in JT – on average, technology instructors on the Workforce team are spending about 15% of their time on activities directly related to job training for clients. For context, the agency measures instructors time spent in job training, direct service, and job development. These are the three activities that can have the largest impact on client employment outcomes. 15% can serve as a baseline measure and the judgment is neutral: if the time is not spent on job training, then the time is spent either directly serving clients or in job development. There is no inherent value in one activity over another, but rather responding to demands and making sense of the trends.

2nd quarter after exit employment – this measure will come directly from the PY24 dashboard when available.

Numbers of new Business partners

Numbers of repeat Business partners – this measure will come directly from the PY24 dashboard when available.

2. Performance on the performance accountability indicators under Section 116 of WIOA for the most recently completed program year, reflecting actual and negotiated levels of performance. Explain any discrepancies in the actual and negotiated levels; and

For PY24, these are the following targets and actual levels achieved:

Employment (second quarter after exit); 60.4%; 42%

Employment (fourth quarter after exit); 56.5%; 38%

Median Earnings (second quarter after exit); \$4,284; \$10,346.77

Credential Attainment Rate; 47%; 0%

Measurable Skill Gains; 35%; 48%

3. The use of funds reserved for innovation and expansion activities (Sections 101(a)(18) and 101(a)(23) of the Rehabilitation Act) (e.g., SRC, SILC).

OCB did not receive or spend funds specifically designated as reserved for innovation and expansion (I&E).

OCB has partnered with Oregon's general VR agency on a DIF project awarded in PY 2021 and will continue to do so.

OCB did not fund any portion of SILC activities using I&E funds in PY 2018-2023.

Supported Employment Services, Distribution of Title VI Funds, and Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.

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

The Oregon Commission for the Blind has elected to receive Title VI funds in the past as part of a grant share. Starting in PY25, the general agency (Oregon Department of Human Services, Office of Vocational Rehabilitation Services) will be the sole recipient of the funds. The following text describes the approach the agency has taken with Title VI funds up until PY25.

All OCB Vocational Rehabilitation staff are educated in the provision of supported employment services and understand the matters related to eligibility, vocational assessment, and creating vocational plans that address the need for on-going long-term support services.

OCB has identified and is regularly in process of securing additional qualified providers in local areas across the state to provide specialized Supported Employment services (such as job coaching, worksite assistive technology support and other retention services) that begin after client employment. Much of the Title VI Part B funding is utilized for performance-based coaching services provided by CRPs to support individuals who require long-term supports in able to work in integrated and competitive settings. OCB also provides training and technical assistance related to issues of blindness to all providers who express an interest in working with individuals who have the potential to achieve an employment outcome through Supported Employment.

The Oregon Commission for the Blind uses its Title VI, Part B funds to provide supported employment services to eligible individuals with the most significant disabilities, including youth with the most significant disabilities, for whom competitive employment in an integrated setting is their current vocational goal. These clients, because of the nature of their disability, often require extensive services. Specialized placement assistance, lengthened training periods and planning for ongoing support is often required in order for clients to be successful/stable on the job.

The following is the Oregon Commission for the Blind's history for distribution of supported employment resources. The program utilized the Title VI, Part B funds for case service funds for individuals with the most significant disabilities, including youth with the most significant disabilities, who require additional supports and long term support planning by a comprehensive rehabilitation team.

The target population was divided into three segments: 1. Individuals who are deaf- blind 2. Individuals with developmental disabilities in addition to blindness 3. Individuals with other significant disabilities such as traumatic brain injury in addition to blindness.

The full scope of services authorized for supported employment was provided to clients. Each client was evaluated individually to determine his or her eligibility and potential to engage in supported employment. Eligibility determinations were funded through the 110 Program. Supplemental assessments to determine potential for supported employment were authorized with Title VI B funds. The supplemental assessment were provided when a reassessment of the suitability of the placement was warranted, or when there was a change in the individual's medical condition.

If the assessment showed that the individual would require ongoing support to sustain acceptable work performance and maintain employment, supported employment was included in the services to be provided in the IPE. The IPE included collaboration and funding from other agencies or organizations that assist by providing the ongoing support services required. All post-employment services provided by the Commission for the Blind are time limited, up to four years.

The following services were provided by the agency for up to, but not exceeding, 24 months:

1. Intensive on the job skills training and other training to achieve and maintain job stability
2. Follow up services to reinforce and stabilize the job placement
3. Discrete post-employment services following transition that are unavailable from an extended services provider and that are necessary to maintain the job placement
4. Specialized technology devices and training
5. Follow up services such as regular contact with the employer, the individual, etc., to reinforce and stabilize the job placement
6. Facilitation of natural supports at the work site.

Necessary extended support was funded by the agency, but provided by other agencies to youth with most significant disabilities for a period of at least 4 years or until the individual turns 25 and no longer meets the definition of a “youth with a disability”.

Ongoing supports were provided by the agency from the time of job placement until the transition to ongoing support (up to but not exceeding 24 months). These services were needed to support and maintain the individuals with the most significant disabilities in supported employment.

Once the individual transitioned from agency vocational rehabilitation support, another agency or resource provided the ongoing support services.

For clients with developmental disabilities, vocational rehabilitation counselors coordinated with a program in Oregon that serves individuals with developmental disabilities. If the client is eligible, this program is the most likely resource for ongoing support for individuals who are legally blind in addition to developmental disabilities. This system uses brokerages that identify and coordinate services for the client.

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

The Oregon Commission for the Blind is not electing to receive any Title VI funds within the scope of the program years in this state plan; as such, All SE services will be paid for with VR110 monies. Oregon Commission for the Blind is still providing SE services, just not using SE funds to do so.

4. Sections 101(a)(22) and 606(b)(4) of the Rehabilitation Act require the VR agency to describe efforts to identify and arrange, including entering into cooperative

agreements, with other State agencies and other appropriate entities in order to provide supported employment services. The description must include extended services, as applicable, to individuals with the most significant disabilities, including the provision of extended services to youth with the most significant disabilities in accordance with 34 C.F.R. § 363.4(a) and 34 C.F.R. § 361.5(c)(19)(v).

The approach to entering agreements and partnerships with other agencies has not changed since the original PY24-27 submission. OCB provides Supported Employment services to individuals with disabilities co-occurring with visual impairment that make long-term supports necessary for the individual's success in maintaining integrated and competitive employment, including developmental disabilities, traumatic brain injury (TBI), and disabilities due to mental health.

OCB believes that all individuals are capable of integrated and competitive work with the right supports in place, and the state has over the years reduced options for sub-minimum wage employment. The new regulations requiring the agency to provide pre-employment transition services for eligible or potentially eligible students with disabilities before certification for sub-minimum wage work has had no impact on the agency, as this is the direction the state has been moving towards. A challenge for supported employment is that the comparable benefit resources available in Oregon State to provide extended long-term support services are limited. OCB works in collaboration with all available resources and partners on cases that have co-occurring disabling conditions that make long-term supports necessary. The OCB continues to work with employers and other natural supports to identify funding for long-term support services.

In Oregon, the Department of Human Services provides funding for extended services for individuals with the most significant disabilities. This funding is routed through county developmental disability agencies via a client's case manager, and is contracted for each individual through brokerages. These agencies work with the individuals and their social support systems to develop a plan for ongoing supports, which can be used for a variety of purposes, one of which are long term employment supports. Extended services for youth with most significant disabilities may also be funded through vocational rehabilitation resources, for up to four years, or until the individual turns 25 and no longer meets the definition of a "youth with a disability", whichever comes first.

Training and post-employment services that will lead to supported employment are provided by OCB. Supported Employment begins after job placement, any

services provided prior to placement are VR services, not supported employment services. Once the individual is transitioned from agency vocational rehabilitation support, another agency or resource provides extended services. Services we provide include: the provision of skilled job coaches who accompany the worker for intensive on the job training, systematic training, job development, follow up services, regular observation or supervision at the training site, rehabilitation technology, and other services needed to support the individual in successful employment.

Community Rehabilitation Providers (CRPs). OCB contracts with private, for- and not-for-profit Vocational Rehabilitation service providers for general and supported employment services. The most commonly purchased CRP services include: vocational evaluation, trial work experience, job placement and job retention. Vocational evaluation and trial work experience are VR services. On-going supports and job retention are part of supported employment activities. Any services provided prior to employment are VR services, after job placement, Supported Employment services are provided as needed. Community Rehabilitation Program providers are qualified through a Request for Application (RFA) process. All vendor staff must pass a federal background check and be vetted through our application process.

OCB also uses this RFA process for vendors who provide services such as Rehabilitation Teaching, Orientation & Mobility and Assistive Technology training. Prior to permitting direct-unsupervised access with agency participants, including supported employment participants, all vendors/providers of services are required to complete and pass background checks. In requiring both the technical qualification process and the criminal background check of providers, OCB has taken the necessary steps to ensure that when agency participants choose to utilize community providers, they can count on safety and quality services for our clients.

In addition, the OCB is included in the Integrated Work Plan for Individuals with Intellectual and Developmental Disabilities. The Oregon Department of Human Services (DHS) along with its many partners and stakeholders, strives to support the choices of individuals with intellectual and other developmental disabilities (I/DD) and their families within local communities by promoting and providing services that are person-centered and directed, flexible, inclusive and supportive of the discovery and development of each individual's unique gifts, talents and abilities. Oregon is committed to work toward service options that ensure people with I/DD have the opportunity to live lives that are fulfilling and meaningful.

Annual Estimates

1. Estimates for next Federal fiscal year—
 - a. VR Program; and

In 2022, the American Community Survey indicated 8.5% (n=106,224) of Oregonians experience vision difficulty. This number represents anyone potentially eligible for OCB services in VR, SE, or other programs. This will be the basis for FFY 2026 and FFY 2027 service projections of the potentially eligible pool of clients. However, simply experiencing vision difficulties will not qualify an Oregonian to receive OCB services so we believe this number to be inflated. Per [ORS 346.110](#), the State of Oregon defines blindness as “a person whose central visual acuity does not exceed 20/200 in the better eye with best correction or whose visual acuity, if better than 20/200, is accompanied by a limit to the field of vision to such a degree that its widest diameter subtends an angle of no greater than 20 degrees.” To determine FFY 2026 clients, we believe the best forecast is to use historical data, population growth rate, inflation, and chart those three numbers against the current service levels.

The State Oregon Office of Economic Analysis predicts a 0.67% population increase over the next two years. Assuming the percentage of individuals experiencing vision loss remains constant, the number of Oregonians who experience vision loss may be 106,935 in calendar year 2026.

The American Community Survey (ACS) is used by the Centers for Disease Control (CDC) as a tool for CDC vision-based initiatives.

The agency used the following historical data to demonstrate the fully loaded service cost percentage change each program year & projections for future Federal fiscal years (FFYs):

2022-2023: -24.0%
2023-2024: 16.8%
2024-2025: 12.3%
2025-2026: 12.3%
2026-2027: 12.3%
2027-2028: 4.2%

The above percentage increases demonstrate an average upward trajectory of costs year over year. The average includes one year of negative decline which can be attributed to the COVID pandemic and a slowdown in client services.

As well, the agency examined historical number of individual client VR eligibilities to plan:

FFY 21 #136

FFY 22 #157

FFY 23 #187

FFY 24 #194

A simple regression suggests approximately an additional 20 clients will need to be served next federal fiscal year (FFY 2026) and each subsequent year going forward. The number of clients serves as the foundation for future calculations which are fiscal in nature. The financial numbers, based upon increased participant count, will be used to justify a financial deficit. Future sections elaborate on the connection between participations and financial projects which lead to a deficit and the Order of Selection request.

For the previous FFYs, the following table shows the unique number of individuals served under an IPE (VR participants), the Year Over Year (YOY) increase, and projected YOY increase based on historical averages. We used the social security administration formulas. These projections are if the agency does not go into OOS.

Reporting Period		# of Unique Individuals Served*	Year Over Year Increase	% Increase Year Over Year
FFy2022	10/1/2021-9/30/2022	569		
FFy2023	10/1/2022-9/30/2023	623	54	9%
FFy2024	10/1/2023-9/30/2024	707	84	13%
FFy2025	10/1/2024-9/30/2025	769	62	9%
FFy2026	10/1/2025-9/30/2026	850	81	11%
FFy2027	10/1/2026-9/30/2027	943	93	11%

The following are projected costs for the current year, FFY 2026 (10/1/25 – 9/30/26)
 FFY 2026 Total of 850 eligible individuals.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
Priority 1 - Most Significantly Disabled	646 (850 * 76%) New eligibles.	646 open cases	\$15,634,376	56 – this aligns with the projections in description G
Priority 2 - Significantly Disabled	204 (850 * 24%)	0	0	204
Priority 3 - Not Significantly Disabled	0	0	0	0

The percentages in the tables below are explained in description G. In short, the agency calculated current client distribution as if OOS was in place and applied the same distribution to the future.

The cost of using Title I funds (\$15,634,376) was calculated based on FFY 2025 actuals. The average VR110 spend per client in FFY 2025 was \$17,652 for a total of \$13,574,203. The agency added 4.20% based on inflation averages along with guidance from the state fiscal office.

As the agency enters OOS and all categories are closed, open cases (n=681) will continue to be served, and individuals will be assigned to a priority category. No new VR eligible individuals will be served in FFY 2026. The agency proposes closing all categories on February 1, 2026.

Ending FFY 2026, the agency expects to serve 850 participants without OOS as explained in section G. With OOS being implement around February 1, 2026 the agency forecasts a total of 758 which is the current number of open cases. The agency does not anticipate opening any priority categories in FFY 2026 or FFY 2027.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
Priority 1 - Most Significantly Disabled	716 (943 * 76%) new eligible individuals	621 open cases	\$18,055,728	95 (716 eligibilities – 621 open cases = 95)
Priority 2 - Significantly Disabled	226 (943 * 24%)	0	0	226
Priority 3 - Not Significantly Disabled	0	0	0	0

The following are projected costs for FFY 27 (10/1/26-9/30/27)

The total cost of Title I funds (\$18,055,728) was determined based upon the forecast from FFY 2026. The agency added 4.10% based on inflation and guidance from the state fiscal office.

All three priority categories will remain closed in FFY 2027. The agency forecasts serving 621 VR participants in FFY 2027. This is based on serving 681 in the prior year and closing about 60 cases annually (681 – 60 = 621). [No new VR eligible individuals will be served in FFY 2027.]

Order of Selection

[X] The VR agency is implementing an order of selection with one or more categories closed.

- (1) For VR agencies that have defined priority categories describe—
(A) The justification for the order;**

Over the past 4 years OCB has seen an unprecedented increase in the overall cost of serving Oregonians and a steep increase in the number of clients served under an individualized plan for employment. The agency has more individuals with an Individualized Plan for Employment than any time in recent years. The cost per case (in the case management system) and the number of clients served for the past five years are:

PY 2020 \$2,877 per case x 613 participants; total \$1,763,601
PY 2021 \$1,930 per case x 649 participants; total \$1,252,570
PY 2022 \$2,166 per case x 681 participants; total \$1,475,046
PY 2023 \$2,900 per case x 764 participants; total \$2,215,600
PY 2024 \$4,248 per case x 724 participants; total \$3,075,552

These numbers alone do not tell the full story related to the costs of services in description F. The agency provided the per case cost and participant count to describe the trends happening.

The most recent five years of data show that the average case cost has increased by 14.9%. The drivers of this cost increase are related to the increase client spend such as contracted job placement services, technology, and overall costs in all services/products due to high inflation.

For the previous FFYs, the following table shows the unique number of individuals served under an IPE, the Year Over Year (YOY) increase, and projected YOY increase based on historical averages. The numbers were obtained using the social security administration formulas. These projections are if the agency does not go into OOS.

Reporting Period		# of Unique Individuals Served*	YOY Increase	% Increase YOY
FFy2022	10/1/2021-9/30/2022	569		
FFy2023	10/1/2022-9/30/2023	623	54	9%
FFy2024	10/1/2023-9/30/2024	707	84	13%
FFy2025	10/1/2024-9/30/2025	769	62	9%
FFy2026	10/1/2025-9/30/2026	850	81	11%
FFy2027	10/1/2026-9/30/2027	943	93	11%

Average case count increase is 11% year over year. The agency will use this case count average increase as part of the formular for OOS forecasting purposes.

With a five-year spending peak per participant in PY20, the agency considered the need to be in OOS. With the decrease in the number of participants because of COVID, the need for implementing an OOS faded. There are now three main factors influencing the decision for OOS: 1) the average year-over-year number of participants has increased; 2) the average cost per participant has increased 3) OCB is projecting an increase in VR eligible individuals from FFYs 2025 through 2027. Simultaneously, OCB has seen a significant increase in new spending associated with serving VR participants as described above.

In addition to VR clients, the agency also serves Pre-ETS clients mostly through the Summer Work Experience Program (SWEP) and contracts with the regional school districts. In PY 24 and PY 25, the agency spent \$56,925 and \$83,247 on SWEP, respectively.

OCB leadership conducted a fiscal analysis and forecast and executed a cost containment plan. Throughout this time of caseload growth and increasing costs, OCB implemented cost saving measures. In 2023 the agency changed to a paperless program that reduced costs associated with physical resources (buying less paper, ink, supplies, etc.), physical archiving and maintenance of client files. OCB additionally utilized emerging technology like digital signatures (to avoid mailing and client transportation costs) and virtual meetings (save on staff travel costs) to improve operational efficiencies and reduce all over-all costs.

The agency also undertook the following cost saving measures:

- Utilize information and referral and comparable benefits available in the community to meet client needs where available
- Maximize utilization of internal staff resources to serve clients prior to contracting out where feasible, without compromising quality or timely service delivery
- Utilize the Department of Administrative Services Chief Human Resources Office HR/Consultation for agency workforce management
- Evaluate services & supplies, including the outside vendors who provide them, for competitive pricing
- Delay recruitments to backfill vacancies
- Stop double-filling upcoming vacancies when a seated employee announces their decision to depart OCB
- Extend the useful life of certain IT items, i.e. laptops from 3 years to 4
- Review, reclassify, and reallocate costs to Pre-ETS that were charged to VR110. Rather than containment, this improves the management and utilization of our award.
- Conduct more thorough internal assessments to determine the assistive tools/technologies directly related to each client's employment goal.

While the above actions have been in place for several months, OCB has determined that it will need to establish and implement an Order of Selection.

Additionally, OCB will increase the use of services and benefits available through collaboration with the Oregon public workforce system. One example of this effort is that OCB is collaborating with the statewide Oregon Workforce Talent Development Board to develop policies and guidance for Co-enrollment Requirements for WorkSource Oregon Programs. Additionally, OCB has a representative on each of the nine Local Teams that meet at least monthly 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.

As of November 24, 2025, the agency was currently serving 681 participants (including Pre-ETS but not PE) as the agency requests to enter OOS. The agency will move all eligible employment retainment cases (in danger of losing employment) directly into service while in the OOS.

As of the date of data pull (11/24/25) the agency has the following clients who are in the pipeline:

Referral 17
 +Application 16
 +Eligibility 9

TOTAL 42

We project 10 additional closures by the end of the calendar year, which we have factored for the impact of holidays. Given the public engagement around entering the OOS, the agency anticipates 20 more applications by the end of the 2025 calendar year. The figures below are current as of the date of data pull.

The agency projects the following:

Projected clients on January 1, 2026

=681

-10 closures

+42 due to current pipeline

+20 Youth moving into plan from PE to plan

+25 influx of cases due to public education about OOS beginning

=758 total clients with an open IPE on January 1, 2026

These are the numbers we anticipate being on the waitlist or if we were not on the waitlist they would be served.

Projected clients served in FFY 2026 (10/1/25 – 9/30/26)

758 current open cases as of 1/1/26

+56 new cases based on historical percentage increase of 7.48%

-45 closures based on FFY 25 averages and client resistance to close during OOS

+ Average of 23 additional cases per year due to population growth

+ 58 clients in danger of losing employment

=850 total clients on 9/30/26 without OOS; equivalent to case count on 9/30/26

without OOS

For FFY 26, the total cost would be \$15,634,376 for VR110 funds.

The Oregon Commission for the Blind will not be spending any Title VI funds; the general agency will expend that award.

Projected clients served in FFY 2027 without OOS

850 Forecasted case count on 10/1/26

+46 new cases based on historical percentage increase of 7.48%. We are flat lining this number because OOS can decrease participants applying for VR.

+ 45 clients in danger of losing employment

+ 25 additional cases due to population growth

-60 cases due to closure (about 5 per month based on historical averages and client resistance to close to OOS)

=943 total clients served without OOS served during FFY 2027

For FFY 27, the total cost would be \$18,055,728 for VR110 funds.

The Oregon Commission for the Blind will not be spending any Title VI funds; the general agency will expend that award.

The total forecasted VR110 spend for FFY26 and FFY27 is \$33,690,104 without going into OOS. For reference, the agency's projected federal funds for the same period are \$22,116,930. Some of this gap will be covered with state general funds however, those funds also cover the expenses of other programs within the agency.

OCB used historical data in the case management system to forecast the percentage of clients that would go into each priority category. If previous years patterns hold true, 76% of clients would go into priority one and 23% into priority two. Zero clients will go into priority three. Given the eligibility requirements for OCB's VR services (legal blindness), all clients would fall into category one or two.

With all immediate and future cost containment measures factored into the forecasting model, OCB will still need to implement an order of selection. The order of selection ensures current OCB participants with individualized plans for employment can continue to be served without interruption through the management of the waitlist for new applicants who are determined eligible and assigned to a disability priority category that is closed. All Priority Categories will be closed when the agency predicts entering OOS in February 2026.

As a small agency with stakeholders that are stitched into the community, OCB has taken a streamlined approach to sharing plans about the order of selection. The agency has yet to publicly announce a date for the change but has held public comment and sought input/approval from the CAP. The following actions have already occurred:

- Beginning August 20, 2025 – VR leadership and staff held a weekly series of meetings with the OOS implementation team 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 ensuring Order of Selection impacts Oregonians with vision loss to the least extent possible. These weekly planning meetings continue as of the date of this submission and are expected to continue throughout OOS.
- October 3, 2025 – Agency leadership team met with the OCB commission board that oversees policy/oversight for the agency and received approval to proceed with plans for OOS. Note that OCB does not have an SRC.

- October 22, 2025 – OCB leadership presented to all OCB staff on the need for and process around the Order of Selection. Time was allowed for Q&A.
- November 19-20 – OCB hosted public meetings, both in-person and virtual, on the need for and process around the Order of Selection. Time was allowed for Q&A. The agency also allowed for public comment via an asynchronous and anonymous survey platform.

OCB will implement an OOS after the PY 2024 State Plan is amended and approved by RSA. OCB will evaluate its budget/expenditures monthly as we determine the opening of categories, beginning with priority category I: Individuals with Most Significant Disabilities serving individuals by application date in FFY 2026.

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

Provision of services under order of selection shall be provided with the following considerations:

(1) Priority Categories: On and after the effective date of the Order of Selection, OCB will conduct monthly and quarterly fiscal analyses. After the analysis is complete, we will determine the extent to which it can provide services to individuals on the waitlist. OCB 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:

- a. 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 waitlist and the category is fully open then,
- b. 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 waitlist and the category is fully open then,
- c. 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.
- d. 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.

The following process is how OCB will handle the assignment of Priority Categories:

(1) In order to determine an eligible individual's priority under an Order of Selection, OCB:

- a. Shall use the data gathered in the assessment of the individual's eligibility for program services.
- b. 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.

(2) OCB shall not consider the following factors in the Order of Selection:

- a. Duration of residency provided the individual is present in the state. The state may not require residency as part of the eligibility for services.
- b. Type of disability.
- c. Age, sex, race, color, national origin.
- d. Source of referral, type of expected employment outcome.
- e. The need for specific services except as provided for as follows:

(1) Applicants or eligible individuals, who is not otherwise able to receive services under an Order of Selection, may request to receive specific services or equipment to maintain their current employment.

(2) Only services or equipment that an individual needs to maintain current employment may be provided under this exception. This means that if the individual needs services not directly tied to maintaining current employment, the individual's ability to receive those services from the Program depends on the individual's placement in the State's Order of Selection. (Section 101(a)(5)(D) of the Rehabilitation Act and 34 CFR 361.36(a)(3)(v))

(3) The Program shall only provide the specific services or equipment necessary for the eligible individual to maintain their current employment.

(4) The Program counselor shall document in the eligible individual's file:

- (a) Evidence of the immediate risk of the individual losing their current employment; and,
- (b) The specific services or equipment necessary to maintain the individual's employment.

(5) The Program shall not determine that an eligible individual is at immediate risk of losing their current role, if that risk is based on the individual choosing to voluntarily leave their current employment.

Requirements for Assignment of Priority Categories:

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

- a. Has been determined eligible for services under 34 CFR 361.42 and 585-010-0020.
- b. 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
- c. 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. OCB shall assign an individual to priority category two if the individual:

- a. Has been determined eligible for services under 34 CFR 361.42 and 585-010-0020.
- b. 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
- c. 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. OCB 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 and [585-010-0020](#), to priority category three.

OCB shall:

- a. Provide notice to an applicant regarding their eligibility for Program services under [585-010-0020](#) If determined to be eligible, the individual's assignment to a priority category and notification of placement on a waitlist, if applicable.
- b. Information on comparable benefits as described earlier in this section such as Oregon's public workforce system.

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

OCB'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 agency is in an Order of Selection the program will utilize Information and Referral services to leverage the public workforce system and other relevant comparable benefits in Oregon to assist job seekers. An individual whose service priority is closed at the time of eligibility determination will be placed in Delayed (waitlist) 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.

OCB will use its case management system to manage waiting lists while in the Order of Selection. OCB's plan to evaluate when to open categories and/or move out of 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 (PE). With the utilization of the Order of Selection, OCB will ensure that all current Oregonians with Individualized Plans for Employment can be served without interruption through the management of the waitlist for new applicants. As fiscal resources are available, OCB will begin to release applicants from the waitlist based on the criteria in section B 1 (above).

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

[X] Yes

Waiver of Statewideness.

1. OCB does not have a waiver of Statewideness in place, and does not request one.

Comprehensive System of Personnel Development

1. Analysis of current personnel and projected personnel needs including
 - a. The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category;
 - b. The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;
 - c. Projections of the number of personnel, broken down by personnel category, who will be needed by the VR agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Vocational Rehabilitation Counselor	13	14	16
Rehabilitation Instructors	24 (15 VR, 9 Independent Living for Older Blind)	24	26
Rehabilitation Assistants	9	9	11
Administrative Unit	9 (5 VR, 4 Business Enterprise)	9	10
Executive Management/Management	8 (1 Executive Director, 1 CFO, 1 VR Director, 1 WIOA Manager, 1 Training Center Director, 1 Office Manager, 1 Business Enterprise Director, 1 Independent Living for Older Blind Director)	8	9

i. 1. Analysis of current personnel and projected personnel needs including—

i. 1. D. Ratio of qualified VR counselors to clients:

The agency has a total of 13 Vocational Rehabilitation counselor positions: a) 11 are caseload-carrying positions b) 1 is a career exploration counselor with a small caseload c) 2 are counselors who specialize in working with employers to enhance employment outcomes. The most recent two year PY average ratio of clients served to VRC (full caseload carrying) FTE was 65:1 (including potentially eligible/Pre-ETS clients). OCB reviews and analyzes qualified personnel needs on an ongoing basis to ensure quality service provision.

i. 1. E. Projected number of individuals to be served in 5 years:

The State Oregon Office of Economic Analysis provides a short and long term population forecast for the state. The office forecasts a population of 4,468,800 in 2029. In 2022, the ACS indicated 4.3% of Oregonians reported vision loss which would suggest that 192,158 might be eligible for services in FFY 2028. At this point, the forecast is more of an art than a science. There is no way to know the number of legally blind individuals out of how many Oregonians experience any form of vision loss. For context, the agency three year average of individuals served is 674 unique cases which equates to approximately 0.07% of the population that experiences any form of vision loss. In five years the agency may serve slightly over 700 participants in the VR program (excluding IL and OB programs).

The economic forecast can be found at <https://www.oregon.gov/das/oea/pages/forecastdemographic.aspx>

i. 2. A. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program; the number of students enrolled at each of those institutions, broken down by type of program; and the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
Western Oregon State University (WOU)	MS, Rehabilitation Counseling	39	12
Portland State University	MS, Clinical Mental Health Counseling and Clinical Rehabilitation Counseling	37	10

Western Oregon State University (WOU) and Portland State University (PSU) are the only two graduate programs in the state of Oregon that provide VR professionals with master’s level training/education and hold Council for Accreditation of Counseling and Related Educational Programs (CACREP) accredited graduate programs in Rehabilitation Counseling.

PSU offers a Master of Science in Clinical Rehabilitation Counseling. This is a three-year program, as opposed to the two-year curriculum at WOU and other regional university programs. All students are served through the main PSU campus in downtown Portland, with courses scheduled in the evenings, making it possible for working individuals to have access to attaining a Clinical Rehabilitation Counseling degree.

WOU has two Rehabilitation Counseling degree options: The Master of Science in Rehabilitation and Mental Health Counseling for the Deaf (RCD) is one of only four deafness specialty programs in the United States and has been in place continuously since 1973; and the Master of Science in Rehabilitation and Mental Health Counseling (RMHC), which was authorized by the Oregon University System in 1991.

Oregon has no other Institutions of Higher Education preparing VR professionals.

Regional Institutions of Higher Education not in Oregon:
Western Washington University (WWU), located in Everett, Washington, offers a hybrid on-campus/online two-year Master of Arts in Rehabilitation Counseling.

i. 2. B. The VR agency's plan for recruitment, preparation and retention of qualified personnel, which addresses the current and projected needs for qualified personnel; and the coordination and facilitation of efforts between the VR agency and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

OCB actively works with PSU and WOU graduate programs in Vocational Rehabilitation and related fields. All OCB counseling staff meet the state/agency's CSPD standards as they have all either earned a degree in Vocational Rehabilitation Counseling or a related field or possess a valid Certified Rehabilitation Certificate.

OCB works closely with the graduate education programs at WOU, PSU, and elsewhere to increase the recruitment of qualified applicants in the field. OCB connects with faculty and leadership in these graduate programs, and works to provide practicum and internship sites for students in these programs. In 2024-2025 OCB hosted three graduate interns and one practicum student. The agency consistently engages with WOU and PSU to solicit additional practicum and internship students each year. OCB works intentionally to identify potential new hires from minority backgrounds and those with disabilities, and utilizes the state's human resources recruiting resources to improve its recruitment messaging to communities of color and to people with disabilities seeking employment with the state of Oregon. OCB reaches out to professional organizations such as AER and others to solicit potential candidates for opportunities at OCB. OCB leads the state of Oregon as the agency with the highest percentage of people with disabilities on staff.

i. 2. C. Description of staff development policies, procedures, and activities that ensure all personnel employed by the VR agency receive appropriate and adequate training and continuing education for professionals and paraprofessionals:

The agency promotes a positive atmosphere and makes every effort to provide staff with clear and consistent communications regarding performance expectations, agency decisions, and agency initiatives. Recruitment of a diverse staff is important for the agency - we want our staff to be representative of the customer base and communities we serve. Two OCB staff are fluent in ASL and five are Spanish speaking. The agency's biggest recruitment challenge stems from the fact that Oregon has limited local training programs for both Rehabilitation Teachers and Orientation & Mobility Specialists. OCB is committed to staff development and training whenever possible and appropriate. As such, there are currently two staff enrolled in an O&M degree program sponsored by the agency. The agency regularly sends instructors to conferences and remote trainings.

In 2022 the agency implemented quarterly check ins for staff. These one on one sessions are documented in the HRIS and generally follow the same template: review of prior quarter goals, setting goals for the next quarter, general feedback, and other timely topics. The agency has a maintains a 100% completion rate of quarterly check ins. In October 2024, the agency hosted an all-staff training week based out of the agency headquarters. The training lasted all week and covered role-specific topics. All staff members participated in managing stress in uncertain times, foundations of cultural change, cross team communication, and general VR field updates. Additional topics included TA on MSGs, skills for working with youth, critical data analysis and decision making, DBT training, progressive employment, and assistive technology demos. Although the format may switch to virtual due to lack of funds, OCB intends on hosting a similar training late 2026 and fully supports the professional development of its staff. In 2025, the agency also sent three instructors and one Business Relations Coordinator to the CSUN technology conference and as funds allow we will continue this practice.

OCB conducts a minimum of quarterly training for counselors. These sessions provide training to staff on a variety of topics and subject areas, including but not limited to: assessment, assistive technology, vocational counseling, job placement, measurable skill gains, and data accuracy/validation.

Throughout the year all OCB staff are encouraged to engage in career/professional development activities, which are tracked internally as part of OCB's performance

management system. On average over the past year, at least 50% of staff have logged career development hours in a given quarter. Staff engage in professional development activities regardless of their team designation or role.

i. 3. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

OCB plans to continue to hire qualified Masters in Rehab Counseling or CRC certified VR counselors wherever possible. We recognize that the lower standards through WIOA may impact the agency's ability to meet the internal CSPD standards, and we will continue to monitor availability and continued quality of candidates with that certification.

OCB is well connected to the Oregon Employment Department via several venues. The Workforce Talent and Development Board (WTDB) convenes industry and education leaders several times per year to make sure Oregonians have equitable access to advancement opportunities. OCB is represented by OVRs and sends representation to participate as audience members and bring back information to the staff. Furthermore, OCB has a representative on the Employment Department's Workforce Modernization project. In this workgroup, OCB is able to advocate for accessibility so that customers of all abilities are able to engage with technology while searching for work and educational opportunities.

i. 4. Method(s) the VR agency uses to ensure that personnel are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

Some of our staff members speak diverse languages such as Spanish and American Sign Language. Where it makes sense to do so, staff are able to communicate directly with customers and community members in their native or preferred language. Two staff

speak ASL and five speak Spanish. Where it does not make sense to rely on staff language skills, or where we do not have access to those skills, agency staff access vendors/interpreters and community resources to communicate with diverse populations. Individuals who are Deaf- Blind or Hard- of- Hearing/Blind may communicate with staff via voice relay service as well. American Sign Language (ASL) interpreters are utilized when needed for in- person meetings, trainings or events. Bi-lingual WIOA partner staff are accessed to assist OCB clients as they engage with WorkSource Oregon (WSO) services as needed and appropriate.

OCB continues to employ personnel who are familiar and confident in the use of an array of communication modes to fully benefit the recipients of the program based on the preferred method of communication of the customer. Other translation services are accessed as needed such as in person, live translation for classes in the training center.

i. 5. As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

The Agency has a long history of successful coordination with education officials in order to enhance the service delivery for transition aged students in Oregon. OCB collaborates with a number of partners to coordinate strategic activities to insure positive outcomes for students with vision loss. These services are regularly coordinated with transition services provided under the Individuals with Disabilities Education Act (IDEA).

There is active information sharing and coordinated planning between OCB and regional programs, OVRS, and education and health care organizations throughout the state. Partners join in planning outreach efforts, coordinate referrals of potentially eligible students for VR, and implement process improvements for state-wide assessment & training in the areas of daily living skills, orientation and mobility/cane travel, communication skills, technology, vocational aptitudes, interpersonal/social skills, and academic preparation for transition-age students. OCB's application for pre-employment transition services for students eligible or potentially eligible for vocational rehabilitation services, begins around age 16 (and as early as age 14), and for those students wanting access to the full breadth of VR services, requires the development of an Individualized Plan for Employment (IPE) for all students within 90 days of eligibility, which matches the timeline for adult services. There is no maximum age for which individuals may apply for VR services; however, there is a minimum and maximum age at which Pre-Employment Transition services are available to students with disabilities who are eligible or potentially eligible for VR services (age 14-21).

OCB's primary services while a student is in high school are outreach, assessment, information & referral, counseling & guidance, and pre-employment transition services, in order to prepare for successful transition into post-secondary higher education and career activities. OCB authorizes and pays for any services needed to establish a transition student's eligibility for OCB services, and funds services outside the scope of the school district's FAPE (free appropriate public education) responsibility. OCB collaborates with educational staff and families to ensure students who are blind have early exposure to pre-employment transition services such as career exploration, job shadowing, paid work experiences, and extra-curricular opportunities to more fully develop self-advocacy and independent living skills. OCB's transition counselors conduct outreach and ongoing consultation statewide to teachers of the visually impaired, students, families, and others in the education community. Students who are blind, Deaf/blind, and visually impaired are eligible to apply for individualized vocational rehabilitation services. Case management activities are coordinated by the agency's VR Counselors to provide pre-employment transition services. OCB also coordinates closely with local school districts and regional Teachers of the Visually Impaired (TVIs), to identify students who are blind and visually impaired that are eligible for VR services.

OCB is able to develop relationships with students who are blind/visually impaired and parents, providing a vocational context within IEP and 504 Planning & Implementation Team discussions and ensuring an important link to identifying the individualized skills needing to be addressed in order for the students to be prepared for adult life after graduation.

OCB transition counselors provide students with counseling/services/programs to aid in preparation for transitioning to post-high school/college/employment. Individuals who are blind/low vision who have early exposure to adaptive skills training, vocational exploration and active socialization have a head start to becoming functional, employed and fully integrated adults.

The OCB knows not all learning can take place in the classroom, and thus offers the Summer Work Experience Program (SWEPE) to complement the learning that is available through the education system. These Pre-Employment Transition programs serve to give each participant a safe environment to discover their vocational aptitudes, develop confidence in adaptive skills, and encourage self-advocacy and independence. These Pre-Employment Transition programs (offered in the summer) are a key to the agency's success in quality of employment outcomes for students with vision loss.

Additional Pre-employment Transition activities: OCB has had a long history of providing strong vocational counseling & guidance and progressive core pre-employment transition services and activities for students with visual disabilities. OCB's goal is to expand upon our existing pre-employment and work experience programs by increasing capacity for the existing programs and developing new opportunities for pre-employment workshops, peer mentorship, and career and work experiences throughout the year.

The full scope of services authorized for transition students in supported employment is provided to all transition clients after they enter into their IPE. Each client is evaluated individually to determine his or her eligibility and potential to engage in supported employment. VR services occur prior to and include job placement services. Supported Employment (on-going supports) begin after employment begins. Supported Employment services and extended services are available to youth with most significant disabilities after employment begins.

A supplemental assessment may be provided when a reassessment of the suitability of the placement is warranted, or when there is a change in the individual's medical condition.

If the assessment shows that the student will require ongoing support to sustain acceptable work performance and maintain employment, supported employment is included in the services to be provided in the IPE. The IPE includes collaboration and funding from other agencies or organizations that assist by providing the ongoing support services required. All services provided by the Commission for the Blind are time limited unless the eligible individual and the counselor jointly agree that additional time is required to reach the IPE goal and the individual is progressing toward that goal.

The following services may be provided: 1. Supplemental assessments. 2. Job development and placement. 3. Supported employment services needed to support individuals with the most significant Disabilities such as: a) Intensive on the job skills training and other training to achieve and maintain job stability b) Follow up services to reinforce and stabilize the job placement c) Discrete post-employment services following transition that are unavailable from an extended services provider and that are necessary to maintain the job placement d) Specialized technology devices and training.

Training and post-employment services that will lead to supported employment are provided by this agency. The necessary extended support is provided by other agencies. Services we provide include: the provision of skilled job coaches who accompany the worker for intensive on the job training, systematic training, job development, follow up services, regular observation or supervision of the individual at

the training site, rehabilitation technology, and other services needed to support the client in employment.

Ongoing supports may be provided by the agency from the time of job placement until the transition to ongoing support. These are services that are needed to support and maintain the individuals with the most significant disabilities in supported employment. Ongoing support services may consist of:

1. Specialized assessments
2. Skilled job trainers at the work site
3. Job development and placement
4. Social skills training
5. Regular observation or supervision of the individual
6. Follow up services such as regular contact with the employer, the individual, etc., to reinforce and stabilize the job placement
7. Facilitation of natural supports at the work site.

Once the individual is transitioned from agency vocational rehabilitation support, another agency or resource provides the ongoing support services.

From the 2023 CSNA:

The top three vocational barriers for young adults experiencing vision loss were identified as part of the CSNA survey activities. Survey responses asking about barriers to transitioning from school to work of students (n=4) was reported as the following:

Advocacy, both self and by the agency for employment. Lack of tech skills.

For Business Enterprise, not many people came back to the building/café where they worked. VRC helped explore open avenues to figure out how to proceed. Appreciate having a VRC that was on board to develop a new plan and move forward with anything that would work.

Couldn't conceive of doing anything besides the old work they had done. They did a career assessment to figure out transferable skills

Transportation, asking for a driver. Need transportation for outreach.

OCB's goals and strategies work to address these overarching barriers - and will remain viable strategies for OCB moving forward. The relevant Goals and strategies include: Goal 3: Expand Pre-Employment Transition Services for students with disabilities who are potentially eligible or eligible for VR services. The agency identifies several tactical ways of achieving goal three including: 1) Increase collaboration with local workforce development organizations to promote greater access to apprenticeship, certificate, and similar non-collegiate career tracks to youth experiencing vision loss; 2) Develop creative and collaborative partnerships to increase access to Pre-ETS services for students in rural or otherwise underserved communities; 3) Increase identification of potentially eligible students as early as possible in order to maximize impact of Pre-ETS services, especially as it relates to college and workplace readiness; and 4) Maintain

consistent communication with secondary and post-secondary education providers to ensure OCB services address current and anticipated technology and skill competencies necessary for post-secondary success in a rapidly changing social and technological environment. These goals and strategies address the higher level needs of youth while the tactical and operational aspects will follow. The youth responses tended to focus on the immediate needs and while the agency can address those in IPEs, there are higher level systems the agency can address through broader goals defined above.

Coordination of professional development under IDEA Agency staff who work with transition-age youth coordinate transition activities throughout Oregon to teachers of the visually impaired and other Special Education personnel. These staff work with regional staff to ensure customers receive services and information necessary to facilitate a smooth transition from high school to adult services. Based on assessments and training provided by OCB, OCB staff provide recommendations and information to regional programs, parents and students about vocational rehabilitation services including availability of services as potentially eligible students, referral to the full array of services, and eligibility requirements that support a coordinated transition plan from high school to post-school services.

Consultation is also provided as early as necessary to special education staff regarding IEP planning and development. OCB staff shares data and reports relevant to program development and planning with partners as appropriate and necessary.

Coordination with Education Officials

1. Describe plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities, that are designed to facilitate the transition of the students with disabilities from the receipt of educational services in school to the receipt of vocational rehabilitation services, including pre-employment transition services.

OCB has a current agreement with State Education Agency (Oregon Department of Education, ODE). Per this agreement, ODE and OCB follow the coordinated documentation procedures in accordance and consistent with Section 511 of the Rehabilitation Act and C.F.R. Part 397. This includes but is not limited to, notification requirements, documentation requirements, explanation of services and other details.

Students with disabilities who are eligible or potentially eligible, are able to access OCB's Pre-Employment Transition Services (Pre-ETS). Students can begin receiving Pre-ETS prior to receiving Vocational Rehabilitation Services, as appropriate. All potentially eligible students may receive Pre-ETS regardless if they meet VR eligibility requirements. When students turn 16 they also become eligible to apply for the Summer Work Experience Program (SWEP). To participate in SWEP, students apply for VR and must be eligible for VR services in order to attend. All students who apply for VR Services, starting as early as 14 years, participate in the application, eligibility, and plan development process. Students collaborate with their VRC to develop an Individualized Plan for Employment (IPE) within 90 days of eligibility, which matches the timeline for adult services.

OCB's primary services while a student is in high school are outreach, assessment, information & referral, counseling & guidance, and pre-employment transition services in order to prepare for successful transition into post-secondary higher education and career activities. Consultation and technical assistance is provided to both the SEA and Local Education Agency (LEAs) around the state, using alternate means for participation when needed (i.e. video or conference calls), to assist the ODE in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services, transition services for youth, and other vocational rehabilitation services.

Under the Cooperative Agreement with the Oregon Department of Education, the following responsibilities are outlined:

The Oregon Department of Education will assist local education agencies, including the Oregon School for the Deaf: in accessing the services provided by OCB, which can be requested to aid in the transition to employment services, serve as a liaison between the parties, encourage the screening, identifying and referring of potential clients to OCB to provide a continuum of appropriate procedures and services, identify methods to coordinate the IEP with the IPE, provide information related to the availability of public education programs, and facilitate the availability of diagnostic and evaluative information to the Oregon Commission for the Blind relevant to the determination of eligibility.

The Oregon Commission for the Blind will provide consultation & technical assistance, using alternate means for participation when necessary (i.e. video or conference calls) to the schools to prepare students with disabilities for career opportunities. Oregon does not permit subminimum wage employment. The governor signed Executive Order No. 15-01 on February 2, 2015 outlawing sub-minimum wage pay and sheltered employment. Students and youth with disabilities shall be paid at least minimum wage which aligns with the agency and state's values of equality.

Coordination with Employers

1. 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.

OCB knows that given the unique needs of our clients, a robust employer engagement model is required to be successful. OCB employs the Progressive Employment model which, in alignment with WIOA, is a dual customer model approach that serves both OCB clients and businesses as customers.

OCB uses Community Resource Providers (CRPs) to identify individual employment, assessment and training opportunities, as well as Progressive Employment opportunities. OCB provides extensive training to contracted CRPs (Job Developers and Job Coaches) to help improve their understanding of the context, issues, and supports available for job seekers experiencing vision loss.

Additionally, OCB strives to expand the base of employers who work with our clients who do not require individualized outreach to employers. By leveraging opportunities with other workforce partners, OCB continues to increase employment opportunities for Oregonians with disabilities and change the perception associated with individuals with disabilities/vision loss in the workforce.

OCB has implemented a statewide Workforce Team that provides services to Oregon businesses and is composed of 1 full-time Workforce Manager, 2 full-time Business Relations Coordinators, and 5 full-time Assistive Technology Specialists. This team supports each of the local field offices in the activities detailed below.

The OCB Workforce team partners with:

- Regional Employment Department business teams to coordinate employment services, employer recruitment events and job fairs, regional business events to enhance disability awareness
- Local workforce development boards (LWDB) to coordinate employer engagement activities

- Internal VR staff to keep them informed of the latest news regarding apprenticeship programs and processes, 503 protocols and processes, and Regional Business Relations Communications
- Local mental health providers to coordinate employment services
- Oregon Vocational Rehabilitation (the state's general agency) Workforce and Business Coordinator on collaborative employer outreach
- Local employer engagement events and activities for individuals with disabilities
- Community Rehabilitation Partners to provide Job Development and job coaching services
- OFCCP by leveraging our partnership to best service businesses 503 recruitment needs and establish local MOU's with federal business contractors
- Businesses and partner agencies to provide local trainings and resources on disability awareness and blind etiquette, quarterly Business Outreach Newsletter, accommodations, develop opportunities for company tours, job shadows, informational interviews, internships and work experiences for OCB clients. Additionally, the OCB Workforce team provides consultation around accommodations, diverse recruitment strategies, work site assessments, assistive technology assessments and recommendations
- Local nonprofits that provide employment services
- OVRS SRC Business/ Committee Outreach Committee, as an ad hoc member, to develop a new platform for business facing disability related partnerships

OCB is actively engaged with the National employment Team (NET). The national network of the 80 public Vocational Rehabilitation (VR) programs supports a united or "one company" approach to working with business customers. The 80 VR Directors have each named a business consultant that functions as the designated point of contact for their agency. These 80 points of contact, through CSAVR leadership and support, form the National Employment Team or The NET.

OCB has a strong working relationship with The NET Business Relations Director who provides local introductions to NET Business partners throughout the State. OCB also participates in National Team calls, Regional Team calls, and presented at the 2023 NET Summit. OCB will continue working with NET on evolving strategies for engaging businesses, including the Model State Employer program.

Examples of business relationships established based on OCB's involvement with The NET include, but are not limited to: Amazon, Xerox, Apple Care Call Center, Sprint Call Center, Wells Fargo, CVS, Starbucks, Walgreens, Intel, Microsoft, and Hewlett Packard (HP).

A strategy OCB uses with state and national employers is Progressive Employment (PE). The PE model used by OCB is based on the Vermont Progressive Employment model, and replicated in Oregon with assistance from JD VRTAC and University of Massachusetts, Boston. PE expands a selection of career exploration tools and approaches and a dual customer strategy to create career exploration opportunities that lead to competitive, integrated employment opportunities that are right for each individual client and business partner. PE packages readily available VR pre-employment options and coordinates rehabilitation counseling, job placement, and business account management to ensure that both jobseekers and employers benefit.

PE is a low risk model for employers that allows them to get to know a candidate as a person and a worker prior to making a hiring decision, and allows career exploration opportunities for the client. Some PE activities include: company tours, job shadows, mock Interviews, informational interviews, work assessments, and work experiences.

Interagency Cooperation with Other Agencies

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

OCB engages with the Public Utility Commission Technology Devices Access Program. The Oregon Telecommunication Devices Access Program (TDAP) loans adaptive telephone equipment at no charge and with no income restrictions to eligible Oregon residents who have a loss in hearing, speech, vision, mobility or cognition. The Public Utility Commission of Oregon oversees the program.

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

OCB does not have cooperative agreements with programs carried out by the Under Secretary for Rural Development of the Department of Agriculture.

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

The Oregon Commission for the Blind (OCB) is actively engaged with the National Federation of the Blind of Oregon and the American Council of the Blind of Oregon. Both consumer groups have been very helpful in offering scholarships to clients as well as providing mentoring and educational opportunities to clients. Both organizations also hold positions on the agency's board and are very active in setting agency policies and priorities.

OCB engages with Northwest Association for Blind Athletes (NWABA) in order to provide clients with exposure to social and environmental experiences that prepare them for dealing with challenges and opportunities in both independent living and work.

The agency regularly and actively engages with businesses around the state through involvement with local Chambers of Commerce and other business facing organizations. Although these are not formally connected to the workforce system, these are important connections in order to maximize the placement opportunities for OCB clients.

Through collaboration with these and other non-educational entities and non-workforce entities, creative wraparound supports can be brought into place when needed to support and assist OCB's out of school youth to obtain positive employment outcomes. These supports include: scholarships, mentoring,

educational activities and more that have had a benefit on the positive employment outcomes for OCB's out of school youth.

4. State use contracting programs;

OCB does not currently have cooperative agreements with State use contracting programs.

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

OCB collaborates with the Department of Human Services (DHS), Seniors and People with Disabilities (SPD), Developmental Disability Services (DDS) and Community Rehabilitation Provider (CRP) brokerages throughout the state of Oregon. OCB will continue to explore and build opportunities for additional and enhanced collaboration, coordination of services, and better understanding of the scope and role of Medicaid in promoting success for individuals who require long-term employment supports. OCB will develop an improved understanding of the role of Medicaid for vocational services under an Order Of Selection scenario (though we are not in Order Of Selection currently).

In Oregon, the Oregon Health Authority (OHA) is the agency that administers the State Medicaid Program. Through a series of intergovernmental agreements (IGAs) and memorandums of understanding (MOUs), the Department of Human Services (DHS) is established as the agency that operates the Medicaid programs and waivers. OCB has not entered into separate formal agreements with OHA or DHS at this time. OCB receives and provides technical assistance and information and referral from and with OHA, SPD and DDS in order to maximize OCB client benefit from Medicaid and Medicaid related services and resources. Medicaid acts as an additional support for appropriate OCB clients in establishing stability to improve positive employment outcomes for individuals with the most significant disabilities.

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

OCB is committed to collaboration with DHS, SPD, DDS, ODE and brokerages throughout Oregon in order to prioritize long-term supports for employed individuals, and for detailing means for collaboration, coordination of services,

and mutual understanding of scope and role of each agency in promoting success for individuals who require long-term employment supports.

OCB is included in the Integrated Work Plan for Individuals with Intellectual and Developmental Disabilities. The Oregon Department of Human Services (DHS) along with its many partners and stakeholders, strives to support the choices of individuals with intellectual and other developmental disabilities (I/DD) and their families within local communities by promoting and providing services that are person-centered and directed, flexible, inclusive and supportive of the discovery and development of each individual's unique gifts, talents and abilities. Oregon is committed to work toward service options that ensure people with I/DD have the opportunity to live lives that are fulfilling and meaningful.

OCB clients benefit from strong working relationships with these service providers in Oregon. OCB, ODDS, the 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 the joint case management of shared clients. Moving forward, OCB will continue to work with ODDS and I/DD service delivery systems as well as with ODE to increase our collaboration to maximize funding, streamline processes, and meet the competitive and integrated employment goals of intellectually and developmentally disabled clients. OCB staff collaborate with these state and community service providers to share information, best practices and resources in order to maximize positive employment outcomes for OCB's IDD clients.

7. State agency responsible for providing mental health services; and

OCB is committed to collaborating with mental health services throughout Oregon in order to insure collaboration, coordination of services, and mutual understanding of scope and role of each agency in promoting success for individuals who require long-term employment supports.

Although we have no formal agreement in the provision of mental health services, the agency has been effective in the individualized coordination of services on a case by case basis, in the event we have a client who is blind who is also a client of that system. OCB has supported the expansion of evidence based supported employment services through work with county mental health organizations. 35 out of Oregon's 36 counties provide IPS services to Oregonians, and this has been helpful to OCB staff in connecting clients to specialized resources and services when appropriate. OCB staff have and continue to access

resource and referral services, technical training and structural supports that exist within Oregon's IDD services infrastructure. This ongoing relationship help OCB staff build competency and appropriate skill sets needed to impact employment and retention outcomes for OCB clients.

While continuing to expand and support employment outcomes, the quality of those outcomes, and the skills of the employment service providers, OCB is looking ahead to increasing the capacity of community rehabilitation programs and providers working with IDD clients. OCB will continue to build on, expand and develop it's existing CRP and service provider training for ongoing improvement. Access to the specialized expertise of these and other mental health providers throughout the state have increased positive employment outcomes for OCB clients, and helped build out systems for OCB clients needing mental health resources to achieve and retain competitive, integrated employment goals.

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

The Oregon Commission for the Blind (OCB) is committed to collaborating with stakeholders as an essential aspect of assisting people with disabilities to successfully become employed. This ongoing effort maximizes resources and addresses the quality of life issues that can enhance the ability of a person with a disability to obtain and maintain employment.

The agency recognizes that the major leading causes of blindness are diabetes and age related macular degeneration. For this reason, the agency maintains regular communication with the medical community as well as WIOA and non-WIOA partners who provide services to Oregonians throughout the state. Staff regularly engage with these organizations in order to outreach to potential referral sources and clients and to provide education on blindness related issues.

These relationships are long standing and many have not culminated in formal cooperative agreements. However, the Commission for the Blind is open to such agreements as the state workforce system continues in the implementation of WIOA.

OCB has developed and maintains cooperative agreements and relationships where necessary with federal, state and local agencies not carrying out activities through the statewide public workforce system. OCB maintains a cooperative agreement with the Oregon Department of Education in this way.

OCB's formal and informal cooperative agreements include, but is not limited to, the partnerships that follow: OCB actively partners with Centers for Independent Living (CILs) around the state. OCB refers clients for related services to support their independent living goals and individualized plans for employment. We also often receive referrals from these CILs and work in collaboration with CILs to improve outcomes for our mutual clients. OCB actively engages with and partners with the Washington State School for the Blind (WSSB), school districts/regional programs, teachers of the visually impaired, and families of students with vision loss in order to ensure the youth are supported throughout their transition from high school to college/employment. OCB collaborates with the Oregon University System (OUS). OCB and Oregon's Office of Vocational Rehabilitation Services (OVRS) have entered into a formal agreement with the Oregon University System and public institutions of higher education in Oregon. This agreement facilitates collaboration for our participants with disabilities who are attending Higher Education schools in the state of Oregon.

OCB engages with tribal vocational rehabilitation programs in order to better serve our mutual clients through enhanced communication and understanding of specific needs. OCB has cooperative agreements in place with the following Tribal entities: The Confederated Tribes of the Umatilla Indian Reservation Tribes, and The Confederated Tribes of Warm Springs, The Confederated Tribes of the Grand Ronde.

OCB services and corresponding outcomes for OCB's clients have improved through these partnerships. OCB has benefited from work with the CIL's by accessing services and resources from their system as they become available and as appropriate. This provides OCB with additional flexibility in service delivery. Agreements with Tribal entities have resulted in improved communication and enhanced outcomes, while building staff capacity with this population. Relationships with Oregon's community college system have improved communication and streamlined referral to services and resources for OCB clients and staff. Benefits from these varied relationships, partnerships and agreements help create efficient and effective referral and service delivery - including joint planning when appropriate, provide coordinated and non-duplicated services, leverage funding and enhance wrap around supports for OCB clients that contribute to positive competitive, integrated employment outcomes.

9. Other private nonprofit organizations.

OCB has established a number of formal and informal cooperative agreements with non-profit organizations to enhance services and resources available to OCB clients and business partners.

National Federation of the Blind of Oregon (NFBO) & American Council of the Blind (ACB) – OCB collaborates and shares information with consumer groups with a focus on vision loss in Oregon to promote opportunities for our participants, partner around shared issues related to blindness, and to solicit input for consumer priorities and expectations in service provision. The agency actively encourages and supports agency participants who are new to blindness and staff in attending state consumer conventions in order to broaden exposure to issues of blindness and consumer perspectives.

Helen Keller National Center (HKNC) - OCB regularly collaborates with the Helen Keller National Center (HKNC). The Helen Keller National Center is a resource for OCB on Deaf-Blind resources and can provide contracted services to OCB participants as well as trainings for OCB staff for working effectively with clients who are Deaf Blind. We have a MOU with HKNC that outlines on-going engagement and collaboration strategies.

The National Employment Team (NET) – OCB has an active relationship and partnership in the activities of the NET, connecting agency participant talent to businesses that understand the importance of inclusion of people with disabilities into their workforce. OCB is represented as a single point of contact for NET activities.

Northwest Association for Blind Athletes (NWABA) - OCB engages with Northwest Association for Blind Athletes in order to provide clients with exposure to social and environmental experiences that prepare them for dealing with challenges and opportunities in both independent living and work

Blindskills, Inc.: OCB has an on-going partnership with Blindskills, which distributes information to young people and their families through a nationally distributed magazine. Subscribers learn about how successful persons with vision loss accomplish their work, participate in recreational activities and enjoy engaged and fulfilling lives. OCB also uses Blindskills, Inc. for community resources and blindness related supports for clients.

Easter Seals, Connecting Communities Program: OCB works collaboratively with the Connecting Communities program, which provides training/education to non-native English speaking participants focusing on employment. Their program consists of bilingual staff members who utilize program resources to support translation and interpretation services to persons who do not speak English as

their first language and to assist them in their training and job placement efforts. They serve non-English speaking job seekers with disabilities in multiple locations throughout Oregon.

Centers for Independent Living (CILs): OCB works collaboratively with CILs throughout Oregon both formally and informally to benefit our mutual clients. CILs provide CRP services to our clients under the RFA and also provide benefits planning and the full breadth of CIL services to clients via referrals from, and collaboration with, OCB.

The cooperative relationships vary from information and referral relationships to fee-for-service and pay for performance relationships. OCB follows State of Oregon contractual processes when establishing contracts for services.

OCB works with the Office of Contracts and Procurement to develop contracts. The fee for services is determined by fair market value. Additionally, these contracts follow state Rules and Policies that simplify, clarify and modernize Public Contracting pursuant to ORS 279A.015(1). These Rules provide a foundation for ethical and fair dealing in Public Contracting, designed to instill public confidence pursuant to ORS 279A.015(2). The Oregon Department of Justice also reviews contracts as an additional oversight.

Partnering and collaborating with Private Non-Profit organizations enhances and expands OCB's 'toolkit' of resources and services available to clients. In developing these relationships, OCB staff are able to better 'meet clients where they are at' and respond to individual client needs in a more individualized manner. In this way, OCB is better able to realize positive employment and retention outcomes for individual clients and OCB's business partners. These collaborations, services and contracts will enhance OCB's capacity to respond to specific populations with regards to disability, cultural and linguistic and communication preference.

Certification Signature

Signatory information	Enter Signatory information in this column
Name of Signatory	[Enter the name of authorized representative below]
Title of Signatory	[Enter the title of authorized representative below]
Date Signed	[Enter date here]

Vocational Rehabilitation Program Performance Indicators

Performance indicators table				
Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)				
Employment (Fourth Quarter After Exit)				
Median Earnings (Second Quarter After Exit)				
Credential Attainment Rate				
Measurable Skill Gains				

GEPA

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
 - a. Mission: The Oregon Commission for the Blind exists to provide services to Oregon's citizens who experience vision loss and need specialized training and support to live full and productive lives. OCB's mission is to "Empower Oregonians who are Blind to Fully Engage in Life." With this ethos in mind, we serve all clients regardless of demographics, level of blindness, or ability. Oregon takes steps to identify barriers to equitable access by gathering information for the Comprehensive Statewide Needs Assessment through focus groups, surveys, and by reviewing population data and prevalence information.

Basic Rights Oregon ensures equal opportunity for clients that participate in any project or program administered through OCB. OC ensures equitable access and/or participation for gender, race, color, religion, national origin, age, disability, marital status, changes in marital status, pregnancy, and parenthood.

- b. Policies: OCB has a policy that clients (and employees) may request documents in an alternative format that is accessible to them. Agency leadership strives to ensure documents are accessible from the creation and will ensure that staff make adjustments as requested.

To make our services culturally accessible, the agency provides interpreting services. Speaking in a native language allows for ease of communication and demonstrates that the agency is attempting to reduce barriers. As well, transparent policies for service delivery, eligibility criteria, and complaint procedures are established. This information is readily available on the website and by request of any staff member. The agency also regularly assesses and reports on the organization's progress toward achieving equity goals.

- c. Commitments. OCB seeks to be a good partner with the blindness and workforce community. The agency attends and presents at both state level consumer organizations (NFB and ACB) to make sure we are meeting people where they are at. Staff at the consumer organizations are

encouraged to bring back information they learn that would inform and improve agency best practices.

OCB is further committed to data-driven decision-making. Utilize data to identify and address disparities in access, participation, and outcomes for different groups. Use data to inform program development, resource allocation, and policy changes.

- d. Continuous improvement: Commit to ongoing self-assessment and improvement efforts. Conduct regular internal audits and external evaluations to identify and address areas of inequity and ensure continuous progress towards equitable access and participation.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

Based on the CSNA, the urban/rural divide may be the largest barrier to obtaining employment for Oregonians who experience vision loss. From an equity perspective, there are generally more employment opportunities and services for clients located near urban centers. The concept of geographical diversity considers factors such as the vast geography of our state and travel challenges that accompany this, significant local and regional differences in culture and values, diversity in race/ethnicity, challenges of poverty, access to affordable foods and/or subsistence foods, variability in community infrastructure such as utilities, suitable housing, access to broadband, and governance. Values related to disabilities and participation in service delivery systems vary widely among families, cultural groups, and communities.

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

OCB is currently engaged in the strategic planning process. The agency's board and leadership will further examine what steps can be taken to implement the agency's closely held value of equity.

OCB continues to work with WIOA core, required, and additional partners (such as WorkSource Oregon) to provide pathways to remove or eliminate barriers based on gender, race, color, religion, national origin, age, disability, marital status, changes in marital status, pregnancy, and parenthood.

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

Targeted milestones and timelines are:

- At Risk Youth
 - Additional work experiences are available. (July 2025)
 - Work experiences more closely mirror high demand job industries. (September 2025)
 - Meet or exceed expected number of Pre-ETS students provided services. (December 2025)
 - Additional CRPs are available to provide Pre-ETS services especially for rural youth. (Dec. 2026)
 - Transition Coordinator travel occur (July 2025)
- Oregonians living in rural parts of the state.
 - Travel approved for a minimum of two trips a year to rural areas and travel with partners when possible. (July 2025)
 - Travel Expectations document is used and adhered to. (July 2025)
 - More utilization of WorkSource Oregon locations for reaching rural clients. (July 2026)

GEPA 427 Form Instructions for Application Package - Supported Employment

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

The Oregon Commission for the Blind exists to provide services to Oregon's citizens who experience vision loss and need specialized training and support to live full and productive lives. OCB's mission is to "Empower Oregonians who are Blind to Fully Engage in Life." With this ethos in mind, we serve all clients regardless of demographics, level of blindness, or ability. Oregon takes steps to identify barriers to equitable access by gathering information for the Comprehensive Statewide Needs Assessment through focus groups, surveys, and by reviewing population data and prevalence information.

For supported employment, counselors are able to commit resources such as job coaches who work along clients to improve job success rates. Even before an

employment situation, job developers can work with employers on finding positions that fit their abilities. Some tactical options include paid work experiences, job modifications, and on the job training.

OCB is committed to working with service providers who specialize in disabilities that would lead to supported employment. The agency regularly conducts trainings with these organizations to explain the needs of employees who are blind. Preparing service providers with information ahead of time gives them the tools to prepare for working with OCB clients. As well, the agency embodies a positive support mentality. This approach respects individual autonomy, promotes choice, and fosters self-advocacy skills.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

The 2023 CSNA provided insight into barrier related to supported employment. Two main themes presented themselves in the results of surveys and interviews. These are tailoring services to meet the needs of supported employment participants and developing relationships with other individuals and entities providing additional support. Specific recommendations from staff include adapting training curriculum that considers the specific needs of supported employment participants including those with behavioral challenges, intellectual and developmental disabilities, and severe and persistent mental illness. A vocational rehabilitation counselor also suggested the Agency designate a specific counselor to be a supported employment specialist. Developing relationships with other Agencies, vendors, and employers was also identified as needs of supported employment participants.

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

To adapt the curriculum, the agency has included professional development in it's strategic plan along with it's budget request. Resources can be invested in the instructional staff so they're familiar with strategies to help those with developmental delays learn best. Additional topics would include clients who experience mental health challenges, ADD, and other conditions.

As mentioned in the CSNA, the agency could consider a counselor dedicated to supported employment. This would need to given further thought as there are implications of dedicating one person to a more intense caseload. This decision

may impact the counselor : client ratio or require requesting additional FTE. However, making connections with organizations that support the needs of participants in supported employment is reasonable and can be considered.

4. What is your timeline, including targeted milestones, for addressing these identified barriers?
 - Increasing instructor knowledge of how to best teach participants in the supported employment program (Begin June 2024 and ongoing)
 - Examine the possibility of a dedicated counselor to supported employment (January 2025 and on going)
 - Increasing partnerships with organizations that would support clients participating in supported employment (June 2024 and on going)