

# OFFICE OF VOCATIONAL REHABILITATION STATE PLAN 2024-2027

## Section A: State Rehabilitation Council

- a. 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:

(B) has established a State Rehabilitation Council

- a. 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.

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	2	06/21
Parent Training and Information Center	2	02/24
Client Assistance Program	1	10/21
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	1	01/22
Community Rehabilitation Program Service Provider	2	08/22
Business, Industry, and Labor	2	08/22
Business, Industry, and Labor	2	08/22
Business, Industry, and Labor	2	08/22
Business, Industry, and Labor	1	02/23

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
National Federation for the Blind	1	08/22
Kentucky Council for the Blind	1	08/22
Bluegrass Council for the Blind	1	08/22
Committee of Blind Vendors	Vacant	---
Current or Former Applicants for, or Recipients of, VR services	1	02/24
Representative of a disability group that includes individuals with physical, cognitive, sensory, and mental disabilities.	2	02/24
Representative of a disability group that includes individuals with disabilities who have difficulty representing themselves or are unable due to their disabilities to represent themselves.	2	06/21
Section 121 Project Directors in the State (as applicable)	N/A	
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	1	02/24
State Workforce Development Board	1	02/24
VR Agency Director (Ex Officio)	2	07/19

- a. 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.**

Kentucky's State Rehabilitation Council (SRC) is established under the Kentucky Office of Vocational Rehabilitation (OVR) by Kentucky Revised Statute (KRS) 151B.245, as the Kentucky Statewide Council for Vocational Rehabilitation (hereafter referred to as "SCVR" or "Council").

The SCVR convenes at least four (4) quarterly meetings each year, in accordance with Section 105(f) of the Rehabilitation Act of 1973, as amended by Title IV of WIOA and 34 CFR 361.17(j). Each quarterly meeting has a hybrid option for both in-person and video teleconference options for members to attend and participate and for members of the public to observe in compliance with the Open Meetings Laws. Minutes from each quarterly meeting of a 2-year period are posted on the OVR website for public viewing.

The SRC's required composition in Section 105(b) mandates at least fifteen (15) members for specific represented categories. The SCVR has fulfilled each applicable category required in Section 105(b) and encompasses an additional four (4) member categories in accordance with KRS 151B.245 to ensure representation for the blind and visually impaired. Currently, the Council has one (1) vacancy. Efforts are being made by the Council to fulfill the vacancy identified in the previous section and required in KRS 151B.245. In Kentucky, the Governor has the sole discretion to appoint members to the state's SRC. The Council continues to carry out its functions since "no vacancy affects the power of the remaining members to execute the duties of the Council" as stated in 34 CFR §361.17(f)(2).

- a. 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.**

The Kentucky Statewide Council for Vocational Rehabilitation (SCVR) is established under the Office of Vocational Rehabilitation (OVR) by KRS 151B.245 as Kentucky's State Rehabilitation Council (SRC) in accordance with 34 CFR 361.16(a)(2). As part of the agency's commitment, OVR will continue to provide funding support for the SCVR to be used for the publication of the Annual Report and conducting both the Consumer Satisfaction Survey (CSS) and the Comprehensive Statewide Needs Assessment (CSNA). Reimbursement of expenses will be provided to members for expenses incurred related to activities and functions of the Council.

The Statewide Council for Vocational Rehabilitation (SCVR) provided input into the planning of the state plan forums, the state plan and Annual Report. The Council reviewed and analyzed the Consumer Satisfaction Survey (CSS), Comprehensive

Statewide Needs Assessment (CSNA) and other reports, such as the Supported Employment Provider Satisfaction Survey. The Council played an active role in the CSNA by participating in initial forums that set the tone for question formation and the information gathering process. Recommendations to OVR were made by the Council from analyzing agency reports and other information related to the delivery of services to consumers presented at quarterly meetings.

The SCVR consists of the following six standing committees to assist in carrying out the functions of the Council: Executive, Policy and Planning, Public Awareness and Legislative, Consumer Services and Program Evaluation, Nominating and Bylaws and Blind Services. The committees played an active role in informing the State Plan, Annual Report, CSNA and CSS by providing feedback, advise and reviewing reports.

Below describes the Council's input from 2023 to the beginning of 2024:

### **State Plan**

The Council provided input into the State Plan during the Policy and Planning (PPC) committee meeting, council quarterly meetings and forums. The PPC oversees the strategic plan, the state plan, and other components of the program. The committee assisted in the planning of the State Plan forums by advising OVR to hold multiple forums with morning and evening options to allow all members of the public the opportunity to participate. Members suggested a hybrid location in the eastern and/or western part of the state, to ensure accessibility for rural populations. The committee preferred both in-person and virtual options due to the concern of some individuals not having access to a computer or Wi-Fi. Questions were provided to OVR that may be of public interest, which included awareness of OVR programs, eligibility information, services offered, and any cost factors associated with obtaining services. As potential concerns, they discussed questions related to lack of transportation and awareness of programs in schools.

As a result, OVR held five (5) forums with hybrid options, morning and evening hours, which included a physical location at the Carl D. Perkins Vocational Training Center (CDPVTC) in the eastern part of the state. The forums were announced at the quarterly Council meetings and members were encouraged to participate. Members of the PAL, PPC and Blind Services committees, including the SCVR Chairperson, attended both in-person and virtually. Members provided the following input to inform the state plan:

- The need for more outreach and making the public and employers aware of OVR services;
- The impact of not having transportation options on a consumer's ability to obtain and maintain competitive integrated employment;
- The need to utilize assistive technology for consumers to engage in remote work; and
- The need to provide information to k-12 schools to make parents, special education teachers and counselors aware of VR services.

The goals, objectives, strategies and measures in the new OVR Strategic Plan were reviewed and discussed by the PPC committee and presented to the full Council. The SCVR accepted the Strategic Plan by vote at the October 2023, quarterly meeting. The Council was provided an accessible first draft copy of the State Plan and the Strategic Plan for review and comment. Members received ongoing information regarding the submitting of the State Plan and all interagency activities related to the Plan.

### **Annual Report**

The SCVR Annual Report is overseen by the Public Awareness and Legislative (PAL) Committee. PAL committee provided input and recommendations for the 2023 Annual Report during the committee and full Council quarterly meetings. The committee discussed the annual report, and the theme "Building on a Solid Foundation" was chosen and established. Members discussed how the report could make OVR services more visible. Each member of the Council responded to a survey and provided a brief personal bio to include in the annual report. SCVR Chairperson and Vice-Chairperson reviewed and approved the completed and finalized 2023 Annual Report.

### **Consumer Satisfaction Survey (CSS) and Comprehensive Needs Assessment (CSNA)**

The Consumer Services and Program Evaluation (CSPE) committee oversees the CSS and CSNA. During the January 2023 quarterly meeting, members reviewed the CSS question list with staff support and made changes to two questions related to the meaning of accessible and clarifying that virtual meetings are included in the VR offices. University of Kentucky's Human Development Institute (UK-HDI) provided a report to the Council with the results and overall findings of

the survey at the April 2023 quarterly meeting. The Council approved the 2022 CSS. The report was sent to the full Council and made available to the public on OVR's website.

The UK-HDI Principal Investigator (PI) and team attended and presented an in-depth overview of the project plan and timeline of the CSNA, including the methodology at the July 2023 quarterly meeting. A Council member suggested that UK-HDI consider individuals with color blindness in their reporting as well as those with low-vision. The PI assured the accommodations would be made. Council members participated voluntarily in activities carried out in the CSNA and outside the quarterly meetings. A status update was provided to the Council at the October quarterly meeting reporting that the survey is underway. The Council was updated on all activities of the CSNA and had opportunities to ask questions and/or make comments.

### **Supported Employment Provider Satisfaction Survey**

The Council requested that the Community Rehabilitation Program (CRP) Branch Manager report program information, particularly survey results at quarterly meetings. CRP Branch Manager presented the questions and results of the Supported Employment Provider (SEP) Satisfaction Survey at the April 2023 quarterly meeting. The survey was revised based on the previous responses and comments from the Council. The revised version was more specific to supported employment providers, adds more clarity to the questions and provides more measurable responses. This survey was provided across the state in January 2023 with the expectations of receiving a baseline of consumer experiences in 2022. The Council advised that methods of engagement other than email should be utilized to lower the 'no response' percentage from one of the questions. The feedback was taken for the next scheduled SEP Satisfaction Survey.

### **Council Meetings - Recommendations**

During the SCVR quarterly meetings, members provided input and made recommendations related to agency reports and functions of the Council. To express appreciation to members whose terms are set to expire, it was recommended that certificates be presented at their last full Council meeting. An annual refresher training was recommended for continuous learning among members. It was also requested that this be implemented as soon as possible. As a step further, the Council recommended a retreat which would further the understanding of the Council's functions and its committees to accomplish a more structured, strategic vision and goals. Members requested a representative of the

STABLE/ABLE Account and the Rehabilitation Technology Branch present program information at a quarterly meeting. During a fiscal budget report, the Council was informed that spending patterns would increase with the help of reminding vendors to submit invoices. A member recommended implementing a process of reminding vendors to submit invoices by contacting them. During the Executive Report, the vendor manual and process was discussed as being updated. A member asked if there were continued updates to the process to ensure timely payment from OVR.

- a. 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.**

#### **Recommendation 1**

The SCVR recommended that OVR provide certificates of appreciation to members whose terms are near expiration.

#### **Response to Recommendation 1**

OVR agrees. OVR will provide certificates of appreciation to members whose terms are set to expire at their last full Council quarterly meeting.

#### **Recommendation 2**

The SCVR recommended a regular training be offered to members as soon as possible to learn about the council on a continuous basis.

#### **Response to Recommendation 2**

OVR agrees. An annual Member's Refresher Training will be provided by the SCVR liaison to assist members in being reacquainted with the role of the Council. The training will also be available to staff support assisting the Council, as needed.

#### **Recommendation 3**

The SCVR suggests OVR implement a process of reminding vendors to turn in invoices by contacting them to help increase spending patterns.

#### **Response to Recommendation 3**

OVR agrees. OVR will work to implement a process or policy that reminds vendors to submit invoices to help increase spending patterns.

#### **Recommendation 4**

A suggestion was made to use methods of engagement other than email to lower the 'no response' percentage from one of the questions on the CRP report.

#### **Response to Recommendation 4**

OVR agrees. However, after reviewing the options of phone calls and interviews, it was determined that this method was not feasible due to the number of Employment Specialists employed by CRPs. OVR has decided to utilize regular mail for CRPs to distribute to their Employment Specialists in the event the email is not answered.

#### **Recommendation 5**

The SCVR suggested implementing a process to ensure timely payment to CRP's that could address the slow reimbursement rate.

#### **Response to Recommendation 5**

Staff responded that the agency is bound in some areas but will look to identify where areas of improvements can be made.

#### **Recommendation 6**

The SCVR recommended a representative from the Rehabilitation Technology Branch present information regarding assistive technology to the Council.

#### **Response to Recommendation 6**

OVR agrees. OVR will have a representative from the Rehabilitation Technology Branch provided to the Council at an upcoming quarterly meeting.

#### **Recommendation 7**

The SCVR requested that a presentation of the STABLE/ABLE Account be added to the agenda.

#### **Response to Recommendation 7**

OVR agrees. OVR will have the STABLE/ABLE Account representative present to the Council at a quarterly meeting.

#### **Recommendation 8**



The SCVR recommended a retreat for the planning and implementation of a way to connect with one another and better carry out the functions of the Council.

### **Response to Recommendation 8**

OVR agrees. OVR will assist the Council by providing resources, training and a facilitator to clarify vision, goals and strategies for the Council and its committees in 2024.

## **Section B. Comprehensive Statewide Needs Assessment (CSNA)**

### **b. 1. A. Individuals with the most significant disabilities and their need for Supported Employment;**

#### **Executive Summary**

The 2024 Comprehensive Statewide Needs Assessment (CSNA) identified several key needs of individuals with the most significant disabilities in Kentucky. The assessment highlights that this population often faces significant challenges in accessing vocational rehabilitation services and employment opportunities due to various barriers.

#### **Key Identified Needs**

1. **Access to Specialized Services**
  - Individuals with significant disabilities require tailored and intensive vocational rehabilitation services, including job coaching, customized employment, and assistive technologies.
  - Expanded access to mental health support, counseling, and comprehensive care is crucial for those with co-occurring conditions.
2. **Employment Support**
  - There is a critical need for more inclusive workplaces that offer reasonable accommodations and disability-friendly environments.
  - Individuals often require assistance with job searching, training, and placement, as well as long-term support to maintain employment.
3. **Navigating Benefits and Services**

- Assistance is needed in understanding and navigating government benefits like SSI and SSDI while balancing vocational goals. Fear of losing benefits remains a significant deterrent to employment.
- Coordination between agencies and streamlined application processes are necessary to reduce complexity.

4. *Transportation and Accessibility*

- Reliable and accessible transportation remains a challenge, particularly for those in rural areas and those requiring mobility aids.
- Improved accessibility to buildings and public spaces is needed to ensure equitable participation in employment and community life.

5. *Financial Security*

- Many individuals with significant disabilities live in poverty due to limited employment options, highlighting a need for more comprehensive economic support.

6. *Awareness and Advocacy*

- Raising awareness among employers and service providers about the specific needs of this population is essential for developing effective services.
- There is a need for self-advocacy training and family involvement to empower individuals in navigating vocational rehabilitation programs.

Within the CSNA, Community Rehabilitation Providers (CRPs) expressed a strong demand for expanded resources to augment existing services, with supported employment being among the most utilized OVR services, as indicated by surveys. Additionally, a shortage of CRP service providers in specific regions further exacerbated the challenges faced by individuals with MSD in accessing needed SE services. When surveyed regarding SE services, an overwhelming majority of OVR staff and counselors agreed that emphasizing SE was important, with 57% of those surveyed indicating satisfaction with the number of SE providers and services available to transition-aged consumers. This sentiment was echoed in transition-age youth surveys, where nearly all agreed on the importance of having access to SE services, with 70% expressing satisfaction with their availability. Key informant interviews with supported employment consumers and providers revealed a vital partnership between Supportive Employment Specialists (SES) and OVR, characterized by excellent communication and mutual support in

meeting consumer's needs. However, challenges persisted, notably the need for increased public awareness of services and enhancements in the referral process to bridge the gap for individuals with MSD seeking meaningful employment opportunities. Furthermore, transportation for individuals with MSD was consistently noted as a significant barrier to accessing supported employment services, particularly in the more rural areas of the state where longer commutes were often required.

## **Introduction**

This report provides a summary and the findings of the activities of the Office of Vocational Rehabilitation (OVR) in an effort to comprehensively assess the various vocational rehabilitation (VR) needs in the Commonwealth of Kentucky.

A Comprehensive Statewide Needs Assessment (CSNA) was conducted in 2023, and the results were available early 2024. This assessment was conducted for strategic planning purposes and to meet the comprehensive needs assessment requirement of the Rehabilitation Services Administration (RSA) as defined in 34 CFR 361.29. This federal regulation requires the agency to assess the following areas:

1. Services to individuals with the most significant disabilities, including their need for supported employment services.
2. Services to individuals who are minorities or in unserved or underserved populations.
3. Services provided to individuals with disabilities through various components of the workforce development system.
4. Youth and students with disabilities, including their need for transition services.
5. The need to establish, develop or improve community rehabilitation programs.

The CSNA provides a summary of the surveys and the findings of OVR activities to understand the needs and concerns of the disability community that we serve throughout the state. The report assists KYOVR in recognizing its current state and in making any needed adjustments based on those findings.

In addition to the triennial assessment, OVR uses a variety of methods to further inform the state plan the needs of the disability community within the state. By obtaining information and data from the Statewide Council for Vocational

Rehabilitation (SCVR) meetings, staff trainings and surveys, the Consumer Satisfaction Survey (CSS), public forums, and other reports, OVR is better situated to address service concerns or issues and equitable access to services more strategically, and therefore more effectively. Through this process of gathering information, the agency is able to plan for the evolving needs of the disability community and also for staff to meet those needs.

OVR previously conducted a comprehensive needs assessment in 2021. Federal regulation requires the needs of individuals with disabilities in the state be assessed every three years. The current study (2023) is also intended to identify and provide recommendations for trends in the service needs, disability populations and any environmental factors possibly impacting Kentuckians with disabilities. Information from the current survey is intended to allow a more informed strategic planning process, seeking to address the identified trends and prioritize them based on data identified in the needs assessment.

### **2023 Comprehensive Statewide Needs Assessment**

The current comprehensive needs assessment was conducted in 2023 with guidance provided by the SCVR, as required by 34 CFR 361.17(h)(3). OVR and the SCVR offered input into the methodology and data analysis of the assessment, assuring the research would adequately reach the target population, would return valid and reliable data, and would produce recommendations that would guide the strategic planning and budget development process.

The CSNA was implemented to identify gaps in existing services that can be reduced through programs and policies by the OVR. A mixed method of online surveys and forums was used to collect insights about the rehabilitation needs of Kentuckians with disabilities. The insights gained from the CSNA will provide the information needed for the development of the State Plan for services. The Needs Assessment was carried out by OVR staff working with the staff and faculty at the Human Development Institute (HDI).

Kentucky's 2023 CSNA contains both quantitative and qualitative data addressing the needs of the state vocational rehabilitation system. The data collection included:

- 1) A review of OVR metrics data of individuals receiving services;
- 2) Demographic information for Kentucky;

- 3) A review of the Satisfaction Survey of closed cases successful and unsuccessful;
- 4) Input from stakeholder focus groups;
- 5) Input from online surveys;
- 6) Facilities assessment of maintenance needs;
- 7) Strategic planning;
- 8) Input from public forums; and
- 9) Data reports and feedback from the Rehabilitation Services Administration off site monitoring and the draft monitoring report.

### **Environmental Scan**

The following environmental scan was conducted with the goals of 1) establishing a demographic profile of Kentuckians with disabilities who are potentially eligible for services through the OVR; and 2) understanding some of the unique characteristics of working-age adults with disabilities in Kentucky.

### **Demographic Overview**

Kentucky's total population was estimated to be 4,428,274, with 801,061 individuals identified as having a disability. Kentuckians with disabilities constituted 18.1% of the total population, placing Kentucky among the top three states nationally in terms of disability prevalence. Notably, Kentucky's disability rate surpassed the national average (13.4%) by nearly 5%.

### **Age**

Since OVR services are available to Kentuckians with disabilities who are experiencing barriers to employment, data presented will focus on working-age adults (aged 18 to 64) who identify as having a disability, capturing the lion's share of OVR's target population. Kentucky's population of working-age adults (18-64) was estimated at 2,656,255. Within this group, approximately 433,308 individuals (or 16.31%) identified as having a disability. The disability prevalence rate for working-age Kentuckians was 5.29% higher than the national average (11.02%).

### **Gender/Sex**

Among Kentuckians identified as having a disability, females slightly outnumber males, constituting 51% of this population. The gender breakdown of Kentuckians with disabilities was consistent with national averages.

### **Race/Ethnicity**

The racial/ethnic profile of Kentuckians with disabilities was as follows: White (85.67%), Black or African American (7.33%), Hispanic/Latino (2.36%), Asian (0.55%), American Indian/Alaskan Native (0.15%), Two or more races (5.23%), and Other (0.98%).

### **Disability Type**

The American Community Survey (ACS) assesses disability type using the following (non-exclusive) six categories: Hearing, Vision, Cognitive, Ambulatory, Self-Care, and Independent Living. For working-age Kentuckians with disabilities (433,608), cognitive impairments were the most common disability (46.1%), followed by ambulatory or mobility impairments (44.1%), independent living limitations (35%), vision impairments (20.9%), hearing impairments (19.73%), and finally self-care limitations (15.2%).

### **Educational Attainment**

Data for educational attainment included adult residents aged 25 and older in the Commonwealth of Kentucky. Data are presented for both people with and without disabilities for reference. In total, 21.3% of Kentuckians with disabilities have less than a high school education, compared with 8.9% of Kentucky residents who do not have disability (+12.4% gap). Similarly, 38.4% of those with disabilities have only a high school diploma or equivalent versus 30.7% of those without disabilities (+7.7% gap). Just over a quarter of both Kentuckians with disabilities (26.7%) and those without disabilities (28.5%) have an associate degree or some college (26.7%; -1.8% gap). Next, only 8.4% of Kentuckians with disabilities have earned a four-year college degree, while 18.8% of those without disabilities have earned a four-year college degree (-10.4% gap). Finally, 5.2% of Kentuckians with disabilities had earned a credential beyond a four-year degree compared to 13.1% of those without disabilities (-7.9% gap).

### **Veterans Status**

There are currently 118,466 civilian veterans living in the commonwealth of Kentucky. Of those civilian veterans, just over one-quarter (26.4%) have a service-connected disability.

### **Special Education Services**

Youth with disabilities in Kentucky are provided access to a free and appropriate public education in the least restrictive environment under the IDEA (Individuals with Disabilities Education Act). For academic year 2022-23, 16.5% of Kentucky students (109,672 students) received special education services under the IDEA. This includes an Individualized Education Plan (or IEP) for each student that includes transition planning at age 14. The top five disability categories served included: speech or language impairment (27%), specific learning disability (16.6%), other health impaired (14.9%), developmental delay (12.2%), and autism (9.9%).

Data available on transition outcomes for Kentucky students with IEPs that exited high school is available via the Kentucky Post School Outcomes (KYPSO) annual report. Most recent data from the 2020-21 academic year indicated that 4,687 students with an IEP exited high school. Of those students who exited high school 39.9% were employed in a competitive integrated setting within a year of exiting high school, whereas 23.5% were employed in a non-competitive integrated setting, and 36.6% were not engaged in the workforce. A total of 16% of those students with IEPs who exited high school were engaged in higher education.

### **Employment Rate**

The employment rate for Kentuckians with disabilities aged 18 to 64 was 32.3%. This was 8.4% lower than the US average for Americans with disabilities (40.7% employed) and 44.2% lower than the average for Kentuckians without disabilities (76.5% employed). Kentucky's disability employment gap ranked among the three largest in the US.

A closer examination of employment rate by county type shows that the employment gap in Kentucky (42.3%) was even larger for the state's rural population. In Kentucky's 35 metropolitan counties, the employment rate for those with disabilities was 36.5% compared to 79.6% for those without disabilities (-43.1% gap). For Kentucky's rural counties, the disability employment rate was 25.2% (over 10% lower compared to the metropolitan counties) compared to 70.7% for those without disabilities (a 45.5% gap).

### **Poverty Rate**

While employment is a key contributor to an individual's overall economic well-being and security, it is also helpful to examine poverty rates for additional

economic context. As may be expected with the substantial employment gap observed for Kentuckians 18-64 with disabilities, nearly one-third (31.2%) of this population was living below the poverty line, compared to only 12.8% of their non-disabled counterparts (+18.4% gap). This puts Kentucky 5.8% higher than the national average (25.4%).

Similar to employment rates, the poverty rates observed were significantly higher in the rural areas of the state. For Kentuckians with disabilities in the metropolitan counties of the state, 27.6% were living below the poverty line, compared to 34.7% of those living in the rural counties. Furthermore, the most rural (or non-core) counties observed the highest rate of poverty (35.7%). For the veterans in Kentucky living with service-connected disabilities, the poverty rate is currently 18.7%.

### **Benefits Receipt**

While receipt of SSI/SSDI benefits provides a needed safety net for many Americans with disabilities, it has frequently been cited as one of the most significant barriers to entering/staying in the workforce. In Kentucky, 9.8% of the resident working-age population (aged 18-64) received either SSI or SSDI benefits. Nationally, that puts Kentucky behind only West Virginia (11.1%) in the proportion of working age adults in the state who receive either SSI or SSDI benefits. This means that one in ten working-age Kentuckians are currently receiving one or both federal benefits. Most recent data has indicated that there are just over a quarter million beneficiaries between the ages of 18 and 64 in Kentucky with 179,666 receiving SSDI benefits, 75,188 receiving SSI only, and 26,340 receiving both SSI and SSDI.

### **Income**

Another helpful economic indicator is examining the annual median full-time income for a population of interest. In the Commonwealth of Kentucky, those without disabilities have a median full-time income of \$46,318, whereas Kentuckians with disabilities earn a median full-time income of \$40,689 (an annual gap of \$5,629).

### **Housing Burden**

Access to affordable, secure housing is an integral piece of economic stability. Lack of affordable housing production, increasing housing prices, and stagnant/lower wages have led to many individuals across the Commonwealth



experiencing a housing burden. The impact has been especially felt by historically marginalized populations, including those with disabilities. Housing burden is defined as households that spend more than 30% of their income on housing costs and utilities. Most recent data have indicated that nearly one-third of working-age (18-64) Kentuckians with disabilities (30.25%) experience housing burden. This is over 12% higher than the housing burden rate observed in non-disabled counterparts (18%).

### **Health Insurance**

Access to healthcare and the presence of health insurance coverage are critical for many individuals with disabilities to maintain their overall wellness, manage any ongoing conditions, and be able to afford needed treatments and medications. Currently 94.4% of Kentuckians with disabilities have health insurance coverage with 38.3% having access to private coverage and 66.2% holding some level of public coverage.

<sup>1</sup> <https://data.census.gov/table/ACSST1Y2022.S1810?g=010XX00US>

<sup>2</sup> <https://data.census.gov/table/ACSST1Y2022.S1810?g=040XX00US21>

<sup>3</sup> [https://www.ssa.gov/policy/docs/statcomps/di\\_asr/2022/sect05.html](https://www.ssa.gov/policy/docs/statcomps/di_asr/2022/sect05.html)

### **Case Management System Metrics Overview-FFY 21-23**

This section is dedicated to providing an overview of the aggregate case data available from the Kentucky Office of Vocational Rehabilitation (OVR) for federal fiscal year (FFY) 2021 through FFY 2023. Through this analysis, we aim to offer insights into the demographics of OVR consumers, a comparison of the population of working-age Kentuckians with disabilities to OVR's consumer base, case outcomes and expenditures, and employment data.

#### **Consumer Demographic Overview**

Over the three-year period of review, OVR closed a total of 38,465 cases. Over half (54.1%) of OVR consumers identified as male and 45.9% as female. The mean age of individuals served by the KY OVR during this period was 38.97 years, with a median age of 35 years. The age range of clients varied from 15 to 97 years. The distribution of OVR consumers across age groups showed that transition-age youth (aged 15-25) made up over one-third of OVR consumers (34%), followed by mid-career consumers (aged 40-59; 27.1%), early career

consumers (aged 26-39; 23%), late career consumers (aged 60-70; 11.4%), and finally, consumers over the age of 70 (4.5%).

### *Race/Ethnicity*

In terms of race/ethnicity, a majority of OVR consumers identified as White (79.9%), followed by Black or African American (10%), Hispanic/Latino (of any race; 8.8%), Asian (0.3%), Native American or Alaskan Native (0.2%), Hawaiian or Pacific Islander (0.1%), and two or more races (0.6%).

### *Primary Impairment/Disability*

OVR collects data related to a consumer's reported disability. The main category collected is the primary source of impairment or disability that has resulted in the consumer experiencing a barrier to attaining or retaining employment. The five most common reported primary impairments among OVR consumers included psychosocial and mental disabilities (30.9%), deafness and hearing loss (29.1%), cognitive disabilities (21.2%), physical and mobility impairments (14.2%), and blindness and other visual disabilities (4.2%).

### *Area of Residence*

The data showed that 54.4% of OVR consumers were from the state's metropolitan counties while 45.6% were from rural counties. Further, just over one-third (34%) of OVR consumers resided in the state's Appalachian region.

### *Employment and Income*

At the application stage, a majority of OVR consumers were currently unemployed (58.7%). A substantial portion of consumers (39.8%) reported being engaged in competitive integrated employment, while the remaining 1.5% were employed in non-integrated settings. At application, OVR consumers who were employed (n = 10,065) reported earning a median annual income of \$31,200 (avg annual income of \$32,915.79) working a median of 40 hours per week (avg of 32.9 hours per week) at a median wage of \$15 per hour (avg of \$19.24 per hour). In terms of financial support, 59.7% of consumers at application indicated they relied on others (e.g., family and friends, social security, or public assistance) as their primary income source. Moreover, a total of 22% of OVR consumers

reported receiving either Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI) benefits at the time of application.

### **Comparison to Kentuckians with Disabilities**

This section examines the overall demographic profile of the consumers served by OVR from FFY 21-23 compared to the profile of working-age (18-64) Kentuckians with disabilities established in the environmental scan.

Gender/Sex. While 51% of Kentuckians with disabilities identified as female, less than half of OVR consumers were female (45.9%). This finding underscores a need for OVR to better utilize targeted outreach toward women with disabilities across the state. However, when removing cases that never reached the Individualized Plan of Employment (IPE) stage of OVR services (i.e., began formally receiving services), the gender/sex composition of OVR consumers is much closer (48.4% female) to the known demographic profile of Kentuckians with disabilities. Given that 58.6% of consumers who exit OVR before the IPE stage are male and nearly half (45.2%) are transition-age youth, the gender gap observed is likely largely due to a disproportionate number of young males receiving school-based transition services (such as Pre-ETS).

Race/Ethnicity. A direct comparison of racial and ethnic identities of OVR consumers to the racial/ethnic breakdown of Kentuckians with disabilities revealed that OVR served a higher proportion of consumers who identified as Black or African American (OVR: 10%; KY: 7.33%), Hispanic or Latino/a (OVR: 8.8%; KY: 2.36%), Native American or Alaskan Native (OVR: 0.2%; KY: 0.15%), and Hawaiian or Pacific Islander (OVR: 0.1%; KY: 0%). The only minority population group that OVR was not proportionately, or better serving was consumers who identified as Asians (OVR: 0.3%; KY: 0.6%). The overall data suggests that OVR is excelling in their efforts to provide services to marginalized population groups, particularly Kentuckians who identified as Hispanic or Latino/a. The low proportional service rate for Kentuckians of Asian extraction is of particular note given the documented rise in discrimination against Americans of Asian descent in the wake of the COVID-19 pandemic.

Disability Type. The differences in the way that the American Community Survey (ACS) and OVR collect and categorize disability data make a direct comparison somewhat limited in value. However, given the similarity in how visual and hearing conditions are defined and tracked, a comparison of those categories is warranted. As such, the service data revealed that OVR services appeared to be reaching a proportionally higher number of consumers with hearing impairments

(OVR: 29.1%; KY: 19.7%) and a proportionally lower number of consumers with visual impairments (OVR: 4.2%; KY: 20.9%). The findings on hearing impairments underscore the effectiveness of OVR's specialized service program for consumers who are deaf or hard of hearing and reveal a possible area of improvement, that is provision of VR services to Kentuckians with visual impairments.

*Employment.* Data available from the ACS on working-age Kentuckians with disabilities indicated that their employment rate was currently 32.3%, significantly lower than the US average (40.7%). OVR data on consumers served showed that 39.8% of OVR consumers were employed at the time of application. This data may suggest that OVR is disproportionately providing services to Kentuckians with disabilities who are currently employed and reveals a possible area of focus, doing more targeted outreach with unemployed Kentuckians with disabilities.

*SSI/SSDI Beneficiaries.* Data collected via the Social Security Administration (SSA) revealed that 9.8% of the resident working-age population in the Commonwealth receive SSI or SSDI benefits. That is the second highest SSI/SSDI beneficiary rate in the US. Data collected by OVR from consumers indicated that 22% of their consumers reported receiving SSI or SSDI benefits at the time of application, meaning that OVR is serving a proportionally higher number of consumers with SSI/SSDI benefits. Given that reducing reliance on SSI/SSDI benefits is a meaningful outcome of vocational rehabilitation services, this data would indicate that KY OVR is appropriately reaching SSI/SSDI beneficiaries with their services.

### *Outcomes*

There are numerous reasons why a consumer with an open case at KY OVR may have their case closed. The main categories of case closure examined for the purpose of this analysis included an unsuccessful case closure prior to the IPE stage of services (i.e. exit before IPE), an unsuccessful case closure after the consumer had established an IPE (i.e. exit after IPE), and a successful case closure, which is when a consumer is engaged in competitive integrated employment and no longer requires OVR services. Of the 38,465 cases closed by OVR from FFY 21-23, over a quarter (27.8%) resulted in a successful case closure, nearly half of the cases (49.9%) never made it to the IPE stage, and the final 22.3% resulted in an unsuccessful closure after an IPE had been established.

*Exit Before IPE.* Nearly half (49.9%) of all OVR cases closed in the three-year review period exited unsuccessfully from services before the IPE stage of

services. Examples of consumers exiting at this stage includes individuals who exited from application, from accepted, from referral, from potentially eligible as a result of receiving pre-ETS services, and those who were ineligible from services. The three most common reasons listed for consumers exiting before IPE included “all other reasons” (38.7%), no longer interested in services (32.3%), and unable to locate or contact (25.5%).

Unsuccessful Closure after IPE. These cases, representing 22.3% of all case closures, got through the IPE phase of services and were closed as unsuccessful. Examples of unsuccessful closure after IPE could include a consumer no longer interested in services, a consumer being employed in a non-competitive integrated setting, and someone who is not able to be located or contacted. The three most common reasons for unsuccessful closure after IPE for OVR consumers were unable to contact or locate (40.1%), no longer interested in services (33.8%) and “all other reasons” (13.6%).

Case Expenditures and Service Duration. Cases that were closed unsuccessfully after IPE had a median case expenditure of \$3,462.46 (avg of \$5,836.92; ranging from \$10 to \$794,728) and a median service duration of 729 days (avg of 1033.47 days; ranging from 6 days to 10,629 days). The case expenditure and service duration data were heavily skewed by older cases with higher overall case expenditures.

Successful Closures. A successful case closure at OVR occurs when a consumer achieves competitive integrated employment and no longer requires OVR assistance. The overall successful case closure rate for all closed cases from FFY 21-23 was 27.8%. When eliminating the cases that never reached the IPE stage (i.e. actually received OVR services), the case success rate rises to 55.5% (10,699 successful case closures).

Case Expenditures and Service Duration. Successful case closures had a median case expenditure of \$3,123.74 (avg of \$6,384.05; ranging from \$6.84 to \$407,094) and a median service duration of 355 days (avg of 692.01 days; ranging from 93 days to 7,144 days). The case expenditure and service duration data for successful closures were also positively skewed by older cases with higher overall case expenditures. Compared to the unsuccessful closures after IPE, successful cases were (at the median point) 9.88% less costly and about half as long (51.3% shorter case durations). Cases that were closed unsuccessfully after IPE had a median case expenditure of \$3,462.46 (avg of \$5,836.92; ranging from \$10 to \$794,728) and a median service duration of 729 days (avg of 1033.47 days; ranging from 6 days to 10,629 days). The case expenditure and

service duration data were heavily skewed by older cases with higher overall case expenditures. These findings support the vocational rehabilitation literature which suggests that a higher intensity of services (i.e. more services delivered over a shorter period of time) supports successful VR case outcomes.

**Successful Closure Income and Support.** For the OVR consumers whose cases ended in competitive integrated employment, a median annual income of \$33,280 (avg of \$35,731.28) was reported at a median of \$16 per hour for 40 hours per week (avg. of \$20.21 per hour for 34 hours per week). Compared to this group's income levels at application, that represented a median annual increase of \$15,808 (avg increase of \$19,178.56). Further, 91.1% of these cases reported being primarily reliant on their own income (a 30.2% increase from application levels) and only 14.2% reported receiving SSDI/SSI benefits (a 1% decrease from application levels).

### **Year by Year Trends**

The closure data for FFY 2021 through 2023 indicated a steady increase in the number of cases closed by OVR. In 2021, there were 10,908 closures, representing 28.4% of the total closures. This number increased to 11,410 (29.7%) in 2022 and further rose to 16,147 (42.0%) in 2023. This upward trend in closures suggests an increased demand for vocational rehabilitation services in the state and could be indicative of post COVID-19 labor force engagement rebound for Kentuckians with disabilities.

### **Successful Case Closures**

The closure type analysis revealed significant shifts over the three-year period. Successful closures (among those cases that reached the IPE stage) increased from 50.6% in 2021 (2,756 successful closures), to 55.9% in 2022 (3,282 successful closures), and finally to 58.6% in 2023 (4,661 successful closures). OVR not only increased the proportion of successful closures each year over this three-year span, but also closed more cases each year, resulting in a steady increase in the raw number of successful case closures in addition to the increased case success rate.

### **Service Duration**

For cases that made it past the IPE phase in FFY 2021, the median service duration was 617 days (avg of 946.47 days). The following year (FFY 2022) the median service duration decreased to 470 days (avg of 870.65 days).

In the final year of the review period (FFY 2023) the median service duration further decreased to 389 days (753.73 days). This three-year trend shows a dramatic reduction in the number of days cases spent actively in service, with an overall 37% decrease in the median service duration from FFY 21 to 23.

### Case Expenditures

For cases that made it past the IPE phase in FFY 2021, the median case expenditure was \$3,277.58 (avg of \$6,109.77). The median case expenditures remained relatively steady in FFY 2022 with a median expenditure of \$3,205.80 (avg of \$6,118.12). Again, the year over year amounts were relatively steady into FFY 2023 where consumers had a median case expenditure of \$3,210.95 (avg of \$6,201.34). So, while the service duration of OVR cases reduced dramatically over the three-year period, case expenditures remained relatively stable, suggesting that OVR consumers were receiving a similar level of services over a significantly shorter period of time.

### Income Source

The first year (FFY 2021) of this review saw OVR boost the number of consumers served who were able to primarily rely on their own income sources by 17.9% (from 33.5% at application to 51.4% at closure). The following year the increase was 15.2% (from 40.1% at application to 55.3% at closure). Finally, FFY 2023 saw a 13.4% increase in reliance on self-income (from 45.1% at application to 58.5% at closure). While the overall gains in reliance on self-income reduced each year, the percentage of consumers who were reliant on their own income sources at closure steadily increased each year from 51.4% in 2021 to 58.5% in 2023.

### SSI/SSDI Beneficiaries

For FFY 2021, consumers that received OVR services saw a 1.5% decrease in receipt of SSI/SSDI benefits (from 22.2% at application to 20.7% at closure). The following year (FFY 2022), consumers reported a 1.2% decrease in benefits receipt (from 22.5% at application to 21.3% at closure). Finally, in FFY 2023, OVR achieved a three-year best, with a 2.3% reduction in SSI/SSDI beneficiaries (from 21.8% at application to 19.5% at closure).

### Annual Income Changes

For the successful OVR case closures in FFY 2021, consumers reported a median annual income increase of \$21,673.60 (from \$9,422.40 at application to \$31,096 at closure). FFY 2022 saw a median increase of \$17,628 (from \$14,612 at application to \$32,240 at closure) for successful case closures. Finally, OVR successful closures in FFY 2023 reported a median annual income increase of \$13,104 (from \$23,296 at application to \$36,400 at closure). Similarly, to income source, the amount of increase got smaller each year, but the overall earnings at closure increased each year from \$31,096 in FFY 21 to \$36,400 in FFY 23.

### CSNA Methodology

The Concerns Report Methodology, conceived by researchers at the University of Kansas in the 1980s, is a Participatory Action Research framework extensively utilized for eliciting pertinent consumer concerns and establishing an agenda for essential changes in both policy and service provision. This methodology revolves around identifying perceived strengths and issues within a specific demographic, resulting in a comprehensive catalogue of strengths and weaknesses pertaining to policy and practices in a given domain. It goes further by offering recommendations aimed at preserving identified strengths and remedying weaknesses. What sets this methodology apart is its inclusive approach—individuals with disabilities act as partners in the CRM research process, actively contributing to the selection of data collection elements, determining effective data collection methodologies, participating in analysis, interpreting results, and devising problem-solving strategies, thereby ensuring their voices are integral in decision-making processes.

The HDI Evaluation Team is employing the Concerns Report Methodology to drive the KYOVR CSNA through a multifaceted approach. This involves conducting focused discussions via focus groups involving consumers with disabilities, community rehabilitation providers, and OVR staff members. These interactions aim to gather critical insights that will directly shape the survey items tailored for these groups, facilitating the creation of a comprehensive list delineating OVR's strengths and areas necessitating improvement. Moreover, these survey results will inform recommendations made to OVR as a result of the CSNA. Importantly, this methodology extends beyond survey creation. It encompasses post-survey forums designed to provide constituents with platforms to contribute feedback on the survey outcomes and the subsequent recommendations, ensuring their perspectives continue to steer the decision-making process within the OVR,



promoting inclusivity, and aligning strategies more effectively with the real needs of the community.

The culmination of priority concerns exposed in all methods of assessing the needs for the state from the most recent CSNA were:

1. The recruitment, training and retention of a competent workforce of staff with specialized knowledge in the field of rehabilitation.
2. Community Rehabilitation Provider Capacity inclusive of services operations (staff, recruitment, training, data collection), transition services and referrals and funding from OVR.
3. Increased outreach for the area of employer engagement and public awareness to increase opportunities for services and increased employment outcomes.
4. OVR will ensure all information, communications and technology is accessible so that everyone will have equal access to agency services and resources.
5. Increased efficiency in agency processes in order to serve consumers in a more timely and effective manner.

The concerns identified above align with the goals and priority areas of 1) Sound Fiscal Management, 2) Quality Assurance, 3) Staff Resources and 4) Consumer Services and 5) Public Awareness. For the area of Provider Capacity, the concerns align with the goals set for the distribution of Title VI, Part B Funds.

### **Focus Group and Results**

The HDI Evaluation Team has conducted focus groups with SCVR, OVR staff, Community Rehabilitation Providers, and finally with public constituents. Each focus group and corresponding themes are discussed below.

#### **Focus Group 1: Statewide Council for Vocational Rehabilitation (SCVR)**

The SCVR focus group was conducted on 10/23/23 at 1:00 PM and resulted in the following themes and subthemes.

1. Services:
  - Core offerings or programs provided by the organization.
  - Considerations or challenges related to transportation services.

- Offering or promoting services without cost-sharing obligations
- 2. Knowledge/Expertise:
  - Demonstrating proficiency and specialized knowledge within the team or organization.
- 3. Networks:
  - Strong connections or partnerships within the industry or community.
- 4. Promoting Services:
  - Challenges or strategies related to advertising or making services known to the public.
  - Opportunities to enhance marketing strategies and target specific audiences effectively.
- 5. Hiring and Retaining Staff:
  - Challenges in recruiting and maintaining a competent workforce.
- 6. Getting and Retaining CRPs (Consumer Rehabilitation Providers):
  - Efforts and challenges related to attracting and maintaining service providers.
- 7. Funding:
  - Concerns, limitations, or uncertainties regarding financial resources.

*Focus Group 2: Community Rehabilitation Providers (CRPs)*

The HDI Evaluation Team conducted a virtual focus group with community rehabilitation provider administrators and staff on 10/31/23 at 10:30 AM. This focus group resulted in the following themes and sub-themes.

1. Communication and Relationship Management
  - Emphasis on open communication between OVR, counselors, and CRPs.
  - Challenges with counselor and consumer communication.
  - Lack of community understanding about OVR services.
2. Service Delivery and Support for Consumers
  - Insufficient funding impacting service provision.

- Need for better vetting of consumers and clearer expectations.
  - Challenges with transportation options and service availability
3. Challenges with Pre-Employment Transition Services (Pre-ETS)
    - Issues with the rollout, sustainability, and accessibility of Pre-ETS.
    - Desire to restore original services and funding levels.
  4. Provider Support and Collaboration
    - Calls for transparent and inclusive long-term planning.
    - Desire for increased support, financial transparency, and involvement of CRPs.
    - Advocacy for CRP needs, cultural shifts, and regular budget examination.
  5. Training and Resources
    - Need for more training and resources for counselors and CRPs.
    - Calls for standardized training, quality-focused training for CRPs, and better tools/resources.
  6. Process Efficiency and Timeliness
    - Concerns about lengthy processes, authorization delays, and intake procedures.
    - Desire for better systems and technology to streamline communication and processes.
  7. Workforce Issues and Caseload Management
    - Counselor overload and overwhelmed staff.
    - Need for appropriate caseload numbers and additional staff training.
  8. Flexibility and Adaptability
    - Desire for a more flexible and adaptive approach to service delivery.
    - Need for innovative solutions, advanced technology, and leveraging current workplace shortages.

### Focus Group 3: OVR Staff

A focus group was conducted with OVR staff and counselors on 11/02/23 at 2:00 PM. The following themes and subthemes emerged from this focus group.

1. Staffing Challenges and Recruitment
  - Difficulty in finding qualified candidates.
  - Long-term employees and retention issues.
  - Need for competitive pay and benefits.
  - Short-staffed offices.
2. Internal Operations and Accessibility
  - Internal accessibility updates needed.
  - Office updates required.
  - Case management system improvements.
  - Redundant paperwork and processes.
  - Lack of policy guidance and procedural limitations.
3. External Communication and Promotion
  - Strengthening communication post-pandemic.
  - Better promotion of services to the public.
  - Communication with special education (SPED) and contractors/vendors.
  - Lack of Consumer Rehabilitation Providers (CRPs).
4. Service Enhancement and Accessibility
  - Opportunities for staff/counselor training and continuing education.
  - Accessibility assessments and updates needed.
  - Improving services for independent living (IL).
  - Removal of specialized caseloads and transition youth emphasis.
  - Transportation options and no cost-sharing services.
5. Technology and Office Infrastructure
  - Sub-par Commonwealth of Technology (COT) office services.

- Difficulty with technology updates and system navigation.
  - Lack of technology updates in OVR offices.
6. Consumer Needs and Services
    - Inability to handle all consumer needs.
    - Emphasis on income increase and no cost-sharing services.
    - Lack of specialized caseloads and CRPs.
  7. Evaluation and Work Environment
    - Counselor evaluations appropriateness.
    - Increased access to quality professional development opportunities.
    - Focus on improving work environment and reducing redundancy in processes.

#### Focus Group 4: Public

Two public focus groups were conducted by the HDI Evaluation Team on 11/14/23 at 10:30 AM and at 7:00 PM. The following themes and subthemes emerged from these groups.

1. Service Provision:
  - Various types of services catered to youth, specific needs, and complementary support.
  - Consistency and wide-ranging support within services provided.
2. Accessibility and Communication:
  - Challenges in reaching staff members and the discouragement associated with multiple attempts.
  - Difficulty with website usability and contact information accessibility.
  - Weak internal communication structure within the organization.
  - Long wait times and difficulties in scheduling appointments for consumers.
3. Staffing and Workload:
  - Understaffing leading to overworked and overwhelmed current staff.

- Need for more OVR staff to meet consumer demands.
- 4. Consumer Interaction and Support:
  - Compassionate and caring attitude of counselors while addressing consumer needs.
  - Efforts made by counselors to ensure consumers receive maximum benefits.
  - Education needed for consumers on effective communication methods with OVR.
- 5. Technology and System Challenges:
  - Outdated phone systems and websites posing difficulties for consumers.
  - Privacy concerns regarding consumer information shared with OVR.
- 6. Consumer Awareness and Outreach:
  - Need for outreach and marketing campaigns to raise awareness about OVR services.
  - Stigmas preventing consumers from accessing OVR services need to be addressed.
- 7. Process Improvement:
  - Need for improved internal processes, including expedited processes for clients and conducting exit interviews.
- 8. Partnerships and Resources:
  - Call for creating more partnerships to expand resources and support for consumers.

### **CSNA Survey Summaries**

#### **A. Consumer Survey**

The OVR Consumer survey has received 89% of the target completion rate with a total of 873 responses. Consumers with disabilities themselves made up 81% of survey respondents. Survey respondents were primarily female (61%) and resided in 96 of Kentucky's 120 counties. The most represented disabilities among respondents were deafness/hard of hearing (40.5%), behavioral/mood disorder (21.8%), and other physical impairment (13.3%).

In terms of the Concerns Report issues that were generated from the OVR Consumer/Public focus group, each of the 18 items were rated as important by the respondents (avg importance rating of 93.6%). The final Concerns Report concluded that 100% of the items were viewed as strengths or moderate strengths by OVR consumers, with 17 of the 18 being rated as strengths (having a satisfaction rating of 75% or higher). The items that garnered the highest satisfaction ratings included: OVR provides opportunities for consumers to give feedback and listens to their concerns (90%), OVR counselors and staff are professional and helpful (90%), OVR counselors are dedicated to providing quality services (89%), OVR physical locations are accessible (89%), and OVR provides accessible and easy to use communication options to consumers (89%).

Over half of the respondents were employed full-time (52%) and an additional 17% were employed part-time. Most (83%) reported they were satisfied with their current job and were secure in their employment (86%). Many respondents indicated their technology needs were met (73%) and smartphones (77.6%) and computers (73.6%) were by far the most commonly used types of technology utilized. Consumers were largely satisfied with the OVR experiences (81.9% satisfaction rating) and most (89.2%) would recommend OVR services to someone who needs assistance.

#### *B. Counselor/Staff Survey*

The OVR Counselor/Staff survey exceeded the target completion goal by 143% and received 320 total responses. The counselor/staff survey respondents were primarily female (75%), both counselors and staff had representation (41% and 59%, respectively), and all 19 OVR districts in the Commonwealth were represented. In terms of the Concerns Report issues that were generated from the OVR Counselor/Staff focus group, each of the 19 items was rated as important by the respondents (avg importance rating of 92.6%). The final Concerns Report concluded that 79% of the items were viewed as strengths or moderate strengths by OVR counselors and staff. The strengths with the highest satisfaction ratings were related to a positive workplace environment and services provided to OVR consumers. The identified areas for improvement included the need for more staff and resources to serve consumers, and a need to reevaluate the current CMS system.

Counselors and staff were generally very positive about their work at OVR. Overall, the OVR counselors and staff indicated that they were satisfied

with their work (83% satisfaction rate). This included positive satisfaction ratings for the communication and collaboration within OVR (71% satisfaction rate), the resources and tools available to them (70% satisfaction rate), and their current compensation and benefits packages (68% satisfaction rate). The most common issues noted by counselors and staff who were dissatisfied with their jobs were base salary (77%) and workload (52%). A majority of counselors and staff indicated that their technology needs were met (72%) and that they believed they could complete their work effectively while telecommuting (80%).

The survey respondents seemed in agreement that there is a strong need for more Community Rehabilitation Providers (CRPs) and that more resources are needed to further develop and expand the existing CRPs. This is in line with the sentiment from the Concerns Report which indicated that counselors and staff believe they need more resources to be able to effectively serve their consumers. Some of the most commonly utilized CRP services included traditional supported employment (77%), employment and retention (74%), job development (68%), person-centered job selection (64%), and individual placement support (IPS; 53%).

### C. Youth/Transition Survey

The OVR Youth/Transition survey surpassed the number of target completions by 114% and received a total of 273 responses. Parents or guardians of consumers with disabilities comprised more than half of survey respondents (51.3%) and transition-aged consumers made up another 42.5% of the responses. Over half of Kentucky's 120 counties (65 in total) were represented by survey respondents. The most commonly represented disabilities included autism (36.8%), behavioral/mood disorder (26.4%), and intellectual disability (21.5%).

In terms of the Concerns Report issues that were generated from the OVR Consumer/Public focus group, all 20 items were rated as important by the respondents (avg importance rating of 90.1%). The final Concerns Report concluded that 100% of the items were viewed as strengths or moderate strengths by OVR transition-aged consumers, with three-quarters of the items rated as strengths (having a satisfaction rating of 75% or higher). The items that garnered the highest satisfaction ratings included: OVR provides opportunities for consumers to give feedback and responds to their concerns (84%), Student preferences for job goals and assistive



technology are prioritized by OVR staff (83%), and OVR provides accessible and easy to use communication options to consumers (83%).

Over half of the respondents were employed (51.9%) at the time of the survey and most felt that their technology needs were currently being met (78%). The most commonly identified current or future service needs of respondents included job placement (62.3%), independent living skills (55.8%), resume and interviewing skills (53.9%), vocational evaluation (50%), and paid work experience (45.5%).

#### D. Community Rehabilitation Provider (CRP) Survey

The OVR CRP survey recorded 99% of the target completion goal and had a total of 94 respondents from Community Rehabilitation Providers (CRPs) across the Commonwealth. CRP respondents were primarily female (66%) and all 19 KY OVR regions were served by the respondent CRPs. Louisville was the most represented region with 32.5% of respondents indicating they provided services in the greater Louisville area. A majority of CRP respondents (61.4%) receive 25 or fewer referrals and send 25 or fewer referrals to OVR annually. In terms of the Concerns Report issues that were generated from the CRP focus group, each of the 19 items were rated as important by the respondents (avg importance rating of 94.7%). The final Concerns Report concluded that 100% of the items were viewed as strengths or moderate strengths by CRP respondents. The top three highest rate strengths were as follows: OVR values and emphasizes partnerships with CRPs (90% satisfaction rating), OVR counselors demonstrate compassion and flexibility when working with Kentuckians with disabilities (88% satisfaction rating), and OVR provides necessary services to all categories of consumers including those with the most significant disabilities (83% satisfaction rating).

A majority of CRP respondents indicated that their technology needs had been met (88%) and that they had what they needed to meet virtually with consumers (96%). Seventy-two percent of CRPs reported they were able to respond to referrals within a week and 69.3% said they currently have no waiting list for services. The top five barriers to providing services to OVR consumers identified by respondents included: lack of long-term support funding (38.7%), lack of available qualified and/or trained staff (34.6%), low KY-OVR fee for service rates (33.3%), lack of available financial resources (29.3%), and increases in consumers with multiple disabilities (26.6%).

### E. Kentucky Career Center (KCC) Survey

The Kentucky Career Center (KCC) Survey achieved 100% of the target completions and had 12 total respondents representing their respective Kentucky Career Centers. Survey respondents were primarily female (78%) and represented seven unique regions across the Commonwealth (Cumberlands, Green River, KentuckianaWorks, Lincoln Trail, Northern KY, South Central, and Tenco). All but one respondent (89%) indicated that individuals with disabilities were able to fully access and participate in their available services. The most identified training needs for KCC staff were Social Security Work Incentives, Deaf and Hard of Hearing Support, Intellectual/Learning Disability Support, and Blindness and Low Vision Support. A majority of respondents (80%) reported having a good or excellent working relationship with OVR, and relatedly indicated that it was easy to refer someone to OVR services (80%) and that the process was seamless and high quality (80%). Generally speaking, KCC representatives indicated a high level of knowledge related to disability and accessibility-related topics, however, 40% of representatives reported a “poor” level of knowledge related to providing materials in alternate or accessible formats.

### 2022 Consumer Satisfaction Survey (CSS)

As part of federal requirements, OVR has collaborated with the Statewide Council for Vocational Rehabilitation (SCVR), the state’s SRC, and the University of Kentucky Human Development Institute (HDI) since 1996 to coordinate the annual OVR Consumer Satisfaction Survey (CSS). The most recent survey was for cases closed between October 2021– September 2022. The CSS was presented to the SCVR at the quarterly meeting on April 24, 2023.

The sample of people randomly selected to participate was stratified to reflect the population of all consumers with cases closed in fiscal year 2022. IQS Research contacted consumers by email and/or telephone in January through March of 2023 to participate in the survey. A total of 1,042 individuals participated in the survey which was available as both a telephone and online survey, with responses included from each of the districts. Phone surveys accounted for 38.1% of responses and 61.8% of responses were collected via online surveys. The overall response rate for the survey was 23.8%. There was a 46% response rate via phone contacts and 18% via email contacts. HDI compiled the results, and the final report was reviewed by the SCVR Consumer Services and Program Evaluation Committee prior to HDI presenting to the entire council during the April 2023 quarterly meeting.

A total of 1,042 individuals participated in the survey with responses received from each of the 19 field districts. The overall statewide consumer satisfaction was 88.8% with an average score of 3.49 on a four-point scale (1 = very poor, 2 = poor, 3 = good, and 4 = very good)

Highlights from the report include the following:

1. Regardless of case closure status, respondents indicated that overall services provided by the Office were good or very good (88.8%).
2. The overall rating is highest for those individuals who closed Successful in Competitive integrated employment (96.6%).
3. More than three fourths (76.6%) of respondents whose cases were closed successfully felt that OVR helped prepare them for their current job.
4. 92.4% of consumers said they would return to OVR in the future.
  1. 93% of consumers who were employed indicated they are satisfied with the kind of work they do.
  2. 86.6% reported being satisfied with the salary they receive.
  3. 85.5% reported overall satisfaction with the quality of services as good to very good.

### **OVR Strategic Planning**

In conjunction with the Statewide Council for Vocational Rehabilitation (SCVR), OVR utilized the strategic planning process to implement a four-year plan of action for the agency. The OVR Strategic Plan developed includes the goals, objectives and strategies for the agency and provides measures for determining the effectiveness in accomplishing its goals. The process was used as a part of the triennial Comprehensive Statewide Needs Assessment (CSNA). Information gained from this process was used to inform the State Plan.

The planning process was implemented in two planning sessions across a three-day period with the Executive Leadership Team (ELT), Regional Branch Managers and Cabinet staff, including the SCVR Liaison and Fiscal Team members. The strategic planning sessions began at 1PM on Tuesday, September 26, 2023, and ended at 12PM on Thursday, September 28, 2023.

During the first planning session on Tuesday, the ELT and staff met to analyze the agencies current goals and objectives to determine the progress of those goals and others that should carry forward in the new plan. In addition, the ELT

reviewed the results of an agency-wide survey that was distributed to staff in late August of 2023. The survey results expressed the needs and concerns of staff and identified areas of improvement needed for staff to be more efficient in service delivery. The ELT focused on identifying those areas that presented an opportunity to implement within the next plan year and those areas that would become part of the final four-year strategic plan.

On Wednesday, UA Currents staff led by Robin Freeman joined the staff and conducted team building interactive activities that focused on building work relationships for the overall mission and vision of the agency. UA Currents Staff surveyed and engaged staff in team-building exercises to address the changing dynamics since the COVID-19 pandemic, which included communications, personality assessments, diversity and inclusion awareness and generational understanding within the workplace. The exercises were interactive, and staff were placed in rotating categories and on multiple teams to learn more about one another, their perspectives and their personalities related to work. One of the main purposes of the activities was to assist in efforts such as the strategic planning process to build trust, confidence and good working relationships amongst both seasoned and developing staff to accomplish agency goals as the OVR expands.

During the final planning session on Thursday, the team continued to work on the Strategic Plan for the agency. The six areas of focus identified on the October 1, 2021, through September 30, 2024, strategic plan was: (1) Sound Fiscal Management, (2) Quality Assurance, (3) Staff Resources, (4) Center Operations, (5) Consumer Services and (6) Public Awareness. The ELT determined that multiple areas of focus from the last plan were still relevant and are currently being implemented or planned. Therefore, the six areas of focus will remain in the new OVR strategic plan and in the same priority listed to complete. However, some revisions, additions and removals were made to the objectives within the areas of focus to reflect the identified needs of the agency, which are also laid out in Sections C and D of this state plan. The following new goals are:

1. Implement sound fiscal management that aligns with federal and state regulations for accurate and consistent reporting and operations.
2. Compliance with federal and state regulations in all areas to ensure continuous improvement and quality outcomes for consumers.
3. Maximize technology and business processes to effectively support accessibility and the evolving needs of all stakeholders.

4. Improve facilities and expand programs to increase competitive, integrated employment outcomes.
5. Implement innovative practices to improve quality outcomes.
6. Implement an ongoing, flexible outreach plan and process to improve public awareness of VR programs, services, and agency employment.
7. Changes were made to the goals for title VI, Part B Funds in keeping with the identified need for provider capacity for the community rehabilitation programs. There is one goal with multiple objectives and strategies.
  - Goal 1: Build capacity within supported employment services for individuals with the most significant disabilities.

### **OVR State Plan Forums**

In accordance with Section 101 of the Rehabilitation Act of 1973, as amended, the OVR held public meetings from September 19, 2023, through October 24, 2023, to obtain public input and comment regarding the delivery of services to persons with disabilities prior to the implementation of the state plan.

Information regarding the forums were announced to the public through multiple venues, such as the websites for the Education and Labor Cabinet (ELC), OVR and SCVR. Announcements were made during the SCVR meetings prior to the event, and an informational document was distributed agency wide, through social media and to the Council for sharing. All forum materials and accompanying documents, including the previous OVR portion of the state plan, were created in an accessible format. An announcement video-log was created to ensure individuals who are deaf and hard of hearing were aware of the forum activities, and Interpreters were present at each forum for participation.

SCVR advised OVR in the planning of the forums and participated in several, providing input and comments. OVR held five public forums with hybrid options to provide all Kentuckians access and an opportunity to comment at the dates, times and/or locations below:

- Virtual Public Forum: Sept. 19, 2023, 10 – 11 a.m. EST.
- Virtual Public Forum: Sept. 19, 2023, 6:30 – 7:30 p.m. EST.
- Thelma (in-person and virtual options): Oct. 17, 2023, 6:30 – 7:30 p.m. EST, Carl D. Perkins Vocational Training Center, 5659 Main St., Thelma.

- Louisville (in-person and virtual options): Oct. 24, 2023, 10 – 11 a.m. EST, Charles W. McDowell Center for the Blind, 8412 Westport Road, Louisville.
- Louisville (in-person and virtual options): Oct. 24, 2023, 6:30 – 7:30 p.m. EST, Charles W. McDowell Center for the Blind.

Common themes identified during the forum discussions were the need for more outreach efforts, transportation options, utilization of assistive technologies and building relationships with local schools and employers. Below is a summary of the discussions.

### **Outreach**

The public suggested the agency utilize more available resources to help spread the word about OVR services, including the use of newspapers. Providing a more in-person outreach strategy to accommodate rural communities that do not have broadband or technology was advised. The public discussed the distribution of educational material and providing them to medical clinics in rural and/or underserved communities. OVR was encouraged to stay in contact with colleges and higher education to assist with transition and present VR services to students in college, not only in special education, but other disciplines as well.

### **Transportation**

When assessing the level of difficulty, or ease, in finding a job for persons living with a disability, the public identified transportation as a barrier. Transportation in rural areas make the VR process difficult, such as offering job coaching. Bioptic driving and transportation concerns were expressed in rural areas for people who are blind or have low vision and not being able to make appointments. Transportation was also considered a gap in services within the VR program.

### **Building Relationships with Employers and Local Schools**

Several ideas were given to OVR to increase relationships with employers to provide good opportunities for individuals with disabilities. The public believed that taking opportunities to educate and provide information about VR services could be instrumental at such places like the Chamber of Commerce events. At these organizations, OVR could promote the benefits of hiring individuals with disabilities. In addition, more staff from the agency could meet with employers and assess their hiring needs. However, it was mentioned that issues with a consumer's odd schedules are not working for employers' schedules; and, if any

issue arises, employers may not want to allow another chance for the consumer or other consumers.

A training video of a person performing the work could assist by allowing an individual with a disability a better opportunity to understand how the work is done. For better consistency throughout the state, more VR specialist/pre-ETS could reach out to the schools regarding VR services for those with IEP's and 504's. It was explained that in certain areas, parents have no knowledge of the services OVR offers. Equip the schools with education about VR services so that employment will not be an afterthought for individuals with disabilities. Building relationships locally are very important for school outreach.

### **Assistive Technologies**

While OVR was commended for offering Assistive Technologies (AI), the agency should look at the benefits of having assistive technologies within the home. This adaptive equipment would serve to help consumers get prepared for work, such as technology in the kitchen as well as on the job. Remote work for people with disabilities should be viewed as important, with assistive technology and adaptive equipment as needed. Assistive technology has promising abilities for people who are blind or low vision, for example the ability to read hand-written letters. However, Orientation and Mobility services are just as important in order to navigate the home and job, especially for those who are blind. Van modifications were viewed as vital for maintaining employment for people who use wheelchairs. OVR was encouraged to stay abreast of these products and findings to be available to consumers.

### **Assistive Technology Branch**

A high-tech driving system is one in which electronic gas, brake, and/or steering is required to allow an individual to operate a motor vehicle safely and independently. From January of 2022 through September 2023, high tech driver evaluations were completed for 21 consumers. Of these, 12 were repeat vehicle modifications. Repeat modifications are relatively streamlined because evaluations can be completed in the consumer's current vehicle and training is not typically required. The average time to evaluation for these repeat services was just over 3 months. The 9 remaining evaluations were for new high-tech drivers. On average, for the new drivers, it took approximately 120 days from referral before a completed evaluation report was returned to the Office of Vocational Rehabilitation.

Once an individual is evaluated and a driving system recommended, they must have an Individualized Plan for Employment (IPE) approved for the modification before services can continue. This process typically takes less than a month and occurs for both new and experienced high-tech drivers. With the IPE approved, training authorizations are obtained immediately for new high-tech drivers. However, due to the lack of availability of the van, services are delayed several months while waiting for a van for training. Once the van is available, the minimum training time for a high-tech vehicle is 20 hours and can be up to about 60 hours. Where possible, training is completed in 2 to 4 weeks. It is important to complete the training at one time because driving is a skill that is lost if not practiced regularly. It is not effective to train for a day and then wait a few weeks and train another day. The van must be available for an extended period that matches the expected training time of the consumer before training is started. Vehicle setup is also an issue in providing efficient services. It can take a day to properly set up a vehicle, and this time takes away from training time when a van is borrowed.

For completed high-tech vehicle modifications in 2022 and 2023 for new drivers, the average time from referral to completion is 16 months vs. a time of 8 months for van modifications where lower technology modifications are required. The lack of an evaluation and training vehicle creates a significant delay for consumers. It takes approximately 8 months longer for a consumer to obtain a high-tech vehicle modification when compared to a lower tech van modification.

Currently, a van is borrowed from Superior Van and Mobility when a high-tech evaluation (or training) needs to be completed. However, the van available through Superior is shared among states where Superior has dealerships and therefore, its availability is limited. If the agency owned a vehicle, the evaluations and training could be scheduled much more quickly, and consumers would have the independence they need to go to work. With our own van, OVR could set up the vehicle and leave it set for the consumer until training is complete. Then the setup could be switched for the next consumer. This is more effective use of both staff time and allowing consumers who require new high-tech modifications to be served more quickly. If the agency owned a vehicle, the evaluations and trainings could be scheduled much more quickly, and consumers would have the independence they need to go to work.

Therefore, the need assessed for the Assistive Technology Branch that is pressing within the next four years is to secure an evaluation and training vehicle for



consumers to be effectively evaluated and trained in order to obtain, and be ready for, competitive integrated employment.

### **Kentucky Business Enterprises**

Kentucky Business Enterprises is one of the nation's vending and foodservice programs operated by individuals who are visually impaired or blind. The program trains and places individuals as self-employed operators of snack bars, dining facilities and automated vending facilities in public and private buildings across the state. The program provides full-time employment and career opportunities for Kentuckians who are legally blind while providing high-quality vending and food services for government and businesses.

The mission of KBE is to provide opportunity and independence to blind entrepreneurs across the Commonwealth. This mission will continue as we find our new normal after COVID, all while working to replace opportunities, improving efficiencies, and maintaining and updating current locations. KBE's goal is to increase independence, fiscal prosperity, and the abilities of its blind vendors through technology and industry proven best practices.

As telework becomes the norm and more staff work from home, it reduces the opportunities for blind vendors in federal and state buildings that were once filled with staff daily. The continued telecommuting trend means modifications to KBE sites will continue to be necessary. This includes updating equipment, changing the service line from a snack shop to a micro market, utilizing self-ordering technology, and other possibilities which may not even be on the market yet. KBE must maintain a first mover advantage, to introduce up to date concepts to our locations around the state. The food service industry has been quick to embrace rapidly changing technology, with the intention of reducing costs and/or decreasing labor. This creates a unique challenge for KBE as we look at fiscal planning for the future of the program. Much of the technology we will be purchasing in a year or two may be only in the development stage right now. This is why industry training and education is essential for blind vendors and KBE staff.

The future of vending, as we have known it, is uncertain and ever changing. KBE will need funding to embrace new technology as it comes on the market. This new tech is still expensive, with time needed to train and implement, thus the need for strong funding is needed to support this revolutionary change. KBE must be revolutionary rather than evolutionary to provide a world class product to our vendors and our customers. We will look to industry groups (Kentucky Restaurant Association, National Restaurant Association, National Automated

Merchandisers Association) consumer groups (National Association of Blind Merchants, Randolph Shepard Vendors of America, Kentucky Committee of Blind Vendors), and other stakeholders (General Services Administration, Department of Defense, Kentucky Finance Cabinet) to identify the future technology which will provide new or greater independence to blind vendors, and superior service to the locations we serve.

Ongoing education and training will be essential for Kentucky's vendor population and agency staff, in the future, this includes new vendor training. As always, traditional industry trainings are important, and training on emerging technology will be vital. In addition to technology, vendors need education and training in all areas from customer service and food safety to business practices. These trainings may be provided by agency staff, or be industry and specialty led. These training opportunities may be, but are not limited to, national industry events that require travel and the associated costs, including the cost of accessible, independent travel for the blind vendors. Vendor participation in industry events increases active participation from the vendors in the assessment of needs and the purchasing process for new equipment.

With dwindling sales due to building staff permanently telecommuting, many vendors will no longer be able to make a sustainable wage at their current locations. There will be an increased need for KBE to provide additional opportunities by obtaining new sites for blind vendors, while maintaining the current locations. As history has shown, KBE will not willingly be awarded locations that are lucrative for others. In many cases, this involves legal battles with federal and state entities to defend the Randolph- Sheppard priority against those who do not recognize it, or the comparable state law. Legal options should always be a last resort, but in most cases, have proven to be both necessary, and quite costly. These legal expenses are often prolonged over time and can necessitate a long-term financial outlay by the agency. KBE will always provide the location and vendor with the most current and advanced assets that meet all stakeholders needs.

As the Agency evolves, it is critical to update operational equipment to service our vendors needs in a safe and efficient manner. A pressing request currently and as we move forward is a modified box truck. The truck we need must meet certain criteria, including a high weight liftgate, the ability to secure items while in route, and the capacity for moving large amounts of equipment at one time. The liftgate is necessary as KBE moves equipment statewide and many locations do not have loading docks or receiving areas. Having a box truck will allow KBE to

meet the needs of our locations and vendors in a timely manner. Many times, we need to move things with only a day's notice. Currently, if we need a box truck, rental agencies can't always accommodate us, as it is hit or miss whether they have a truck available with the modifications we need. We may have to wait for an extended time before one becomes available. This is not good business practice. Our vendors and locations depend on us and are left without machines that should be serving their customers and earning income for the vendor. The cost of this purchase would also need to include maintenance, repair, and fuel needs for the life of the vehicle.

The agency has experienced significant growth over the last two years. It is our goal that this growth in staffing to support the vendors statewide will continue. There is a need for a full-time administrative assistant with our recent additions. The vendor body has made a request to see a new coordinator position that specializes in micro markets, a fast-growing trend in vending. There is also a need for a technology/business specialist to work one on one with vendors. This would be a combination assistive technology specialist, business advisor role. This role in many cases will assist vendors at a very remedial level of experience with technology and business acumen. This hybrid training specialist will be essential as the program strives to develop the next generation of entrepreneurs to lead this program. The addition of any staff comes with cost past just salary alone. Each staff comes with benefits cost, plus office space and technology needs. Each new staff will need to increase the KBE fleet on a 1:1 need as basis.

KBE's needs are ever changing as is the business world in which we operate. A new change we have experienced recently is the need to provide our own drink machines. In years past, bottling companies such as Coke and Pepsi provided and maintained these machines, in exchange for vendors purchasing the product from them. This is changing as bottlers no longer want to maintain this equipment, and vendors want the flexibility in where and how to purchase this product. This will lead to an increase in monthly lease payments as we add this new equipment into our inventory. Kentucky is in year five of its rental program National Vending. This will restart the terms for the original equipment as it is replaced, and we should expect an increase in the rental rates. The percentage of increase is unknown at this time.

### **Kentucky RETAIN**

Kentucky Retain is a U.S. Department of Labor grant focused on assisting individuals who have a non-work-related injury or illness continue to work. The Education and Labor Cabinet, Vocational Rehabilitation and other workforce

partners administer the grant. Through immediate customized intervention and supports, KY RETAIN helps employers keep valuable staff and helps employees keep their worker identity. All enrolled participants in RETAIN have support of a Return-to-Work Coordinator. This is a strategy OVR utilizes for individuals in work re-entry. OVR staff refer individuals to RETAIN and RETAIN staff refer individuals to OVR. There have been 1,478 individuals referred by OVR Counselors through RETAIN and RETAIN has referred 131 individuals to RETAIN. For those completing the program there is a 92% success rate of return to work. Most individuals return to their pre-injury/illness job with the same employer. OVR is currently engaged in sustainability planning to keep Kentuckians as valued, productive members of the labor force past the end date of the grant in the spring of 2025. The program design is built around a rapid-response, interdisciplinary, and person-centered return-to-work/stay at work strategies that will result in higher rates of continued employment and lower rates of application for long-term Federal disability benefits. Return to Work Coordinators provide early intervention services aimed at getting employees back to work or to stay at work while navigating needed services. There will continue to be a strong emphasis on assistive technology, universal design and peer support. Currently the target population is workers with non-work-related injuries and illnesses that have not applied for or are receiving federal disability benefits in keeping with the research design of the grant. Once the grant ends OVR will expand the eligibility criteria to serve all eligible applicants that need early return to work/stay at work services. OVR is committed to continuing the work of RETAIN sustaining key initiatives and promising practices to meet the needs of employers and workers in the prevention of job loss.

### **Case Management System**

Kentucky continues to use a VR case management system that is approximately 23 years old. The system processes are cumbersome, time consuming and plagued with technical problems. System modifications take time, which mean we can focus only on the critical additions and changes with little time for effective process improvements.

OVR released an RFP in FY 2021 and through a competitive bid process chose a vendor. OVR is now in the process of design and development. The project is delayed and behind schedule due to change orders in place to assure the required functions for customization are met as stated in the contract. At this time, we do not have a set Go-Live date.

### **RSA Monitoring, Data Reports and the Corrective Action Plan.**

OVR was last monitored through an offsite monitoring with the Rehabilitation Services Administration (RSA) during the period of July 16, 2021, through August 20, 2021. OVR received their final monitoring report on January 22, 2022. After a thorough review of the recommendations, findings and corrective actions, OVR utilized the information in formulating a plan of corrective action to address the issues identified by RSA regarding the Vocational Rehabilitation and Supported Employment Programs.

OVR had ten findings in the following areas for Performance: 1) Insufficient Internal Controls for Management of the Federal Award; and 2) Non-Compliant and Outdated State Education Agreement. OVR had findings in the following areas for Financial Management: 1) Missing/Insufficient Internal Controls and Financial Management Deficiencies. Five of the ten findings have been resolved. The main focus area from the monitoring that OVR continues to focus on is the implementation of sufficient internal controls for both financial and performance management. OVR is in the process of the development of a new case management system to meet the growing needs of the agency and address reporting concerns and issues.

Throughout the year, RSA has conducted quarterly performance data reviews that has assisted OVR in identifying areas of concern from the RSA data dashboards. This allowed for comprehensive discussions and RSA provided technical assistance during the sessions. One area of focus is specific to pre-employment transition services and the number of students completing those services but not making application to OVR. Our rates of application have maintained at around 8 percent. The other area of concern identified is the attrition rates for individuals exiting services prior to development of the plan.

#### **b. 1. B. Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program;**

### **Summary of Findings**

The 2024 Comprehensive Statewide Needs Assessment (CSNA) identified several key needs of individuals who have been unserved and underserved by vocational rehabilitation (VR) services in Kentucky. The assessment emphasized the importance of understanding the unique barriers and challenges faced by marginalized groups to develop tailored, strategic solutions.

### **Key Identified Needs**

1. Awareness and Outreach:

- Unserved and underserved populations often lack awareness of available VR services due to insufficient targeted outreach and communication.
- Improved outreach strategies, particularly for rural communities and minority groups, are necessary to increase program visibility.

2. Access and Geographic Barriers:

- Geographic location is a significant barrier to accessing VR services, particularly in rural areas where transportation is limited.
- Increased accessibility to VR offices and services is essential, requiring mobile or virtual services and partnerships with local organizations.

3. Employment Opportunities and Training:

- Marginalized groups, including racial and ethnic minorities, women, and those in rural areas, have higher unemployment rates and require more accessible job training and placement services.
- The assessment highlighted a need for more inclusive training programs, apprenticeships, and partnerships with local employers to create meaningful job opportunities.

4. Tailored Support Services:

- Culturally competent and language-specific support services are crucial for underserved groups to navigate VR programs effectively.
- Support services should address specific challenges faced by marginalized populations, such as discrimination or complex family situations.

5. Coordination and Partnerships:

- Improved coordination between VR and community organizations, advocacy groups, and employers is needed to address barriers effectively.
- Building stronger networks and partnerships can help reach unserved individuals and improve service delivery.

6. Inclusive Program Design:

- Program development should include the input of unserved and underserved populations to create tailored strategies that address their needs directly.

## 7. Awareness of Barriers:

- Awareness among service providers and policymakers of the systemic barriers affecting unserved and underserved individuals is essential for effective policy and program design.

Individuals with disabilities, particularly those with mental illness, criminal backgrounds, out-of-school youth, and sensory impairments like blindness or deafness, had lower rates of VR utilization and demonstrated poorer outcomes. The CSNA specifically identified disparities in employment rates, income levels, and service outcomes across various demographic groups. Black and African American consumers, for instance, entered VR services with lower employment rates and higher rates of SSI/SSDI benefits receipt compared to their White counterparts, resulting in substantial earnings gaps. Hispanic and Latino/a consumers also faced challenges in accessing VR services, exhibiting lower employment rates and income self-reliance upon entry to the program. Despite improvements observed in income and employment outcomes for successful cases, disparities persisted, indicating a continued need for targeted support. Transition-age youth comprised a significant portion of VR cases, yet many exited services before an Individualized Plan for Employment (IPE) could be established. Successful case outcomes demonstrated notable increases in income and employment, underscoring the importance of early intervention and support for this demographic. Rural and Appalachian communities encountered unique challenges due to geographic isolation, leading to barriers in accessing VR services. Findings from interviews and surveys conducted during the CSNA underscored the need for targeted outreach and improved public awareness strategies to effectively reach and serve these marginalized populations.

### **OVR Selected Consumer Populations for FFY 2021-23: Minorities and Unserved/Underserved**

#### **Female Consumers**

Over the three-year review period, OVR closed 13,426 cases for consumers who identified as female, comprising 45.8% of the total population of consumers served. The average age of the OVR female consumers was 39.5 years (SD=17) and an examination of the age distribution of female consumers revealed that nearly one-third of the female consumers were in the transition-age group (32.1%), followed closely by mid-career (28.1%), early career (23.4%), late career (12.2%), and female consumers over age 70 (4.2%).

In terms of racial and ethnic identities, female consumers were primarily White (80%), followed by Black or African American women (10.3%), Hispanic or Latina (8.2%), Asian (0.5%), Hawaiian or Pacific Islander (0.2%), Native American or Alaskan Native (0.2%), and those who identified with two or more races (0.6%). Female OVR consumers had proportionally more representation than their male counterparts in the Black or African American category (+0.6%), among those who identified as Asian (+0.3%), and finally in the Hawaiian and Pacific Islander population (+0.1%). Meanwhile, women were more underrepresented than men in the Hispanic or Latino/a category (-1%).

Just over half of OVR's female consumers resided in Kentucky's metropolitan areas (52.4%) and well over one-third (37.2%) were living in the Appalachian region of the state. Compared to males, females were about as likely to live in metropolitan counties (+0.2%) but were more likely to reside in Appalachia (+2.3%).

In terms of employment and income, at the time of application 41.5% of OVR female consumers reported being engaged in competitive integrated employment, 38.1% were primarily reliant on their own income sources, and 20.9% reported receipt of SSI/SSDI benefits. This means that female consumers entered OVR services with higher employment rates (+3.3%), higher levels of income self-reliance (+2.2%), and lower rates of SSI/SSDI benefits receipt (-2.2%) than OVR male consumers in the same time frame.

### Early Exit Rate

Just under one in three OVR female consumers exited services before an IPE could be established (30.8%). This is a lower rate than the 37.3% of male consumers who exited before the IPE. The top three given reasons for cases closed before IPE among female consumers were "all other reasons" (48.6%), no longer interested in services (26.3%), and unable to contact or locate (19.2%).

### Outcomes

Among OVR female cases that made it past the IPE stage into services, a case success rate of 55.1% was observed. This was slightly lower (-0.9%) relative to their male counterparts. On average, females had slightly lower overall case expenditures (Female: \$6,014; Male: \$6,285) and spent more time in services (Female: 890 days; Male: 803 days). This demonstrates an overall disparity in the breadth and timeliness of services delivered to



female consumers, which may explain help explain the slightly lower case success rates.

For successful cases, female OVR consumers saw an increase of 30.5% in income self-reliance rate and a 0.9% decrease in SSI/SSDI benefits receipt rate from the time of application to case closure. For reference, male consumers reported a 29.8% increase in income self-reliance, and a 1.2% decrease in SSI/SSDI benefit receipt rate. In terms of income, female consumers, on average, reported increases in wages (from \$13.49 at application to \$19.92 at closure) and hours worked (from 22 hours per week to 33.6 hours per week), resulting in an average annual income gain of \$19,371 (from \$15,433 per year to \$34,804 per year). A slightly greater annual increase than male consumers who added an average of \$18,965 in income.

### **Black and African American Consumers**

Over the three-year period, OVR closed 2,427 cases for consumers who identified as only Black or African American, comprising 10% of the total population of consumers served. The average age of the OVR Black/African American consumers was 40.5 years (SD = 15.6) and an examination of age distribution revealed that the most frequently served age group among Black/African American consumers was those in the mid-career age bracket (34.2%), followed by early career (26.3%), transition-age (24.5%), late-career (12.8%), and over age 70 (2.2%). Just over half (50.3%) of Black/African American consumers identified as male. More than three-quarters of OVR's Black/African American consumers resided in Kentucky's metropolitan areas (79.6%). Conversely, only 7.1% of Black/African American consumers were living in the Appalachian region of the state.

In terms of employment and income, at the time of application 24.6% of Black/African American consumers reported being engaged in competitive integrated employment, 21.1% were primarily reliant on their own income sources, and 39.2% reported receipt of SSI/SSDI benefits. This means that Black/African American consumers entered OVR services with substantially lower employment rates (-17.2%), lower levels of income self-reliance (-18%), and higher rates of SSI/SSDI benefits receipt (+19.1%) compared to their White counterparts over the same time period.

### Early Exit Rate

Just under one in three Black/African American consumers exited services before an IPE could be established (30.2%). This is a much higher rate of exit (+11.6%) compared to the 18.6% of White consumers who exited before the IPE. The top three given reasons for cases closed before IPE among Black/African American consumers were no longer interested in services (34.7%), unable to contact or locate (27.7%), and "all other reasons" (26.8%).

### Outcomes

An analysis of cases that reached the IPE stage revealed that Black/African American cases were closed successfully at a rate of 36%. This was substantially lower (-21.7%) relative to their White counterparts. On average, Black/African American had slightly higher overall case expenditures (Black: \$6,485; White: \$6,236) and spent slightly less time in services (Black: 839 days; White: 874 days).

For successful cases, Black/African American consumers saw an increase of 44.3% in income self-reliance rate and a 3.5% decrease in SSI/SSDI benefits receipt rate from the time of application to case closure. For reference, White consumers reported a 29.4% increase in income self-reliance, and a 0.9% decrease in SSI/SSDI benefit receipt rate. While Black/African American consumers had lower rates of successful cases, the cases that did close successfully demonstrated far greater shifts in positive outcomes. In terms of income, Black/African American consumers, on average, reported increases in wages (from \$6.61 at application to \$15.33 at closure) and hours worked (from 12.5 hours per week to 29.7 hours per week), resulting in an average annual income gain of \$19,379 (from \$4,297 per year to \$23,676 per year). A lower annual increase than White consumers who added an average of \$21,684 in income.

The discrepancy becomes much more concerning when comparing the final reported annual incomes of successful Black/African American consumers (\$23,676 per year) to White consumers (\$41,063), revealing a \$17,387 earnings gap between successful Black/African American consumers and their White counterparts.

### Hispanic and Latino/a Consumers

Over the three-year review period, OVR closed 2,144 cases for consumers who identified as Hispanic or Latino/a (of any race), comprising 8.8% of the total population of consumers served. The average age of the OVR Hispanic/Latino consumers was 39.5 years (SD = 17.1) and an examination of age distribution revealed that the most frequently served age group among Hispanic/Latino consumers was those in the transition age range (31%), followed by mid-career (29.6%), early career (23.5%), late-career (11.7%), and over age 70 (4.3%). More than half (54.7%) of Hispanic/Latino OVR consumers identified as male. A majority (55%) of Hispanic/Latino consumers resided in Kentucky's rural counties, however, just under half (46.6%) of Hispanic/Latino consumers dwelled in the state's Appalachian region.

In terms of employment and income, at the time of application 40.4% of Hispanic/Latino consumers reported being engaged in competitive integrated employment, 37.8% were primarily reliant on their own income sources, and 18.5% reported receipt of SSI/SSDI benefits. Overall, Hispanic/Latino consumers entered OVR services with slightly lower employment rates (-1.4%), lower levels of income self-reliance (-1.3%), and lower rates of SSI/SSDI benefits receipt (-1.6%) compared to their White counterparts over the same time period.

#### Early Exit Rate

Just over one in three Hispanic/Latino consumers exited services before an IPE could be established (34.1%). This is a much higher rate of exit (+15.5%) compared to the 18.6% of White consumers who exited before the IPE. The top three given reasons for cases closed before IPE among Hispanic/Latino consumers were "all other reasons" (30.5%), no longer interested in services (29.9%), and unable to contact or locate (29.5%).

#### Outcomes

An analysis of cases that reached the IPE stage revealed that Hispanic/Latino cases were closed successfully at a rate of 56.7%. This was slightly behind that of their White counterparts (-1.0%). On average, Hispanic/Latino consumers had substantially lower overall case expenditures (Hispanic/Latino: \$4,690; White: \$6,236) and spent far less time in services (Hispanic/Latino: 507 days; White: 874 days).

For successful cases, Hispanic/Latino consumers saw an increase of 25% in income self-reliance rate and a 0.8% decrease in SSI/SSDI benefits receipt rate from the time of application to case closure. For reference, White consumers reported a very similar 29.4% increase in income self-reliance, and a 0.9% decrease in SSI/SSDI benefit receipt rate. In terms of income, Hispanic/Latino consumers, on average, reported increases in wages (from \$16.01 at application to \$20.88 at closure) and hours worked (from 25.5 hours per week to 35.3 hours per week), resulting in an average annual income gain of \$17,098 (from \$21,229 per year to \$38,327 per year). A lower annual increase than White consumers who added an average of \$21,684 in income (making \$41,063 per year).

### **Transition Age Youth**

Over the three-year review period, OVR closed 13,087 cases for consumers who were transition age (aged 15-25), comprising over one-third (34%) of the total population of consumers served. The average age of the OVR transition age consumers was 21.9 years (SD = 1.9) and a majority (60.7%) identified as male.

In terms of racial and ethnic identities, transition age consumers were primarily White (77.6%), followed by Hispanic or Latino/a (10.9%), Black or African American (9.7%), Asian (0.6%), Native American or Alaskan Native (0.1%), Hawaiian or Pacific Islander (0.1%), and those who identified with two or more races (1.0%). Just over half of OVR's transition age consumers resided in Kentucky's metropolitan areas (52.8%) and just over one in three (34.8%) were living in the Appalachian region of the state.

In terms of employment and income, at the time of application 14.7% of transition age consumers reported being engaged in competitive integrated employment, 7.8% were primarily reliant on their own income sources, and 18.4% reported receipt of SSI/SSDI benefits.

### **Early Exit Rate**

About two-thirds of transition age consumers exited services before an IPE could be established (66.3%). Over half (54.4%) of OVR transition age consumers exited as potentially eligible after receiving pre-ETS services, serving as the primary cause for the exceptionally high pre-IPE closure rate in the group. The three most prevalent reasons given for case closure were "all other reasons" (57%), no longer interested in services (24.1%), and unable to contact or locate (17.3%).

### Outcomes

Among transition age cases that made it past the IPE stage into services, about over one-third (33.4%) of cases resulted in a successful closure. On average, \$7,627 was spent on each transition age case and the typical duration of services was approximately 923 days. For successful cases, a staggering 72.6% increase in income self-reliance was observed among transition age consumers as well as a 0.5% decrease in SSI/SSDI benefits receipt rate from the time of application to case closure. In terms of income, transition age consumers reported increases in wages (from \$2.04 at application to \$13.98 at closure) and hours worked (from 4.4 hours per week to 29.9 hours per week), resulting in an average annual income gain of \$21,269 (from \$467 per year to \$21,736 per year).

### Rural Consumers

Over the three-year review period, OVR closed 17,500 cases for consumers residing across Kentucky's 85 rural counties, comprising 45.6% of all OVR consumers.

### Appalachian Consumers

Over the three-year review period, OVR closed 13,049 cases for consumers residing across the Commonwealth's 54 Appalachian counties, comprising just over one-third (33.9%) of all OVR cases.

### Demographic Profile of Working-Age Consumers

The overall demographic profile of the consumers working age (18-64) served by OVR from FFY 21-23 was examined.

A direct comparison of racial and ethnic identities of OVR consumers to the racial/ethnic breakdown of Kentuckians with disabilities revealed that OVR served a higher proportion of consumers who identified as Black or African American (OVR: 10%; KY: 7.33%), Hispanic or Latino/a (OVR: 8.8%; KY: 2.36%), Native American or Alaskan Native (OVR: 0.2%; KY: 0.15%), and Hawaiian or Pacific Islander (OVR: 0.1%; KY: 0%). The only minority population group that OVR was not proportionately, or better serving was consumers who identified as Asians (OVR: 0.3%; KY: 0.6%). The overall data suggests that OVR is excelling in their efforts to provide services to marginalized population groups, particularly Kentuckians who identified as Hispanic or Latino/a. The low proportional service rate for Kentuckians of Asian extraction is of particular note given the

documented rise in discrimination against Americans of Asian descent in the wake of the COVID-19 pandemic.

Underserved communities, especially communities of color, experience higher rates of violent crime, especially hate crimes and gun violence, which have devastating effects on victims, their families, and their communities. In addition, some communities still experience disparities that strain progress in areas such as health, education, housing and employment. OVR will provide vocational rehabilitation services to all individuals who have disabilities who are eligible for services regardless of gender, race, national origin, religion, color, disability, or age. The agency assures the provision of services to American Indians who are individuals with disabilities to the same extent as it provides services to other significant populations or individuals.

<https://data.census.gov/table/ACSST1Y2022.S1810?q=010XX00US>

<https://data.census.gov/table/ACSST1Y2022.S1810?q=040XX00US21>

### **Kentucky's Older Population and Vision Loss**

OVR contracted with VisionServe Alliance (2022). Kentucky's Older Population and Vision Loss: A Briefing, St. Louis. of Kentucky's Older Population with Vision Loss to identify the growing need for this underserved/unserved community.

#### **Executive Summary**

This briefing is designed to assist policy makers and service providers to better understand the characteristics and circumstances of older people with vision impairment in Kentucky. Data from the Behavioral Risk Factor Surveillance System and the Census provide considerable insight into the population of people experiencing vision loss. Almost 10% of older Kentuckians report severe vision impairment, with men (9.5%) and women (9.8%) reporting about the same prevalence of vision impairment, but women with vision impairment comprise 56% of the older population. African Americans report a higher prevalence of vision impairment than whites. Vision impairment is not evenly distributed across the state. The prevalence of vision impairment among people aged 65 years and older by county ranges from about 3.3% to 23.5%.

Older people with vision impairment have lower levels of education and are poorer than older people without vision loss. Thirty-one percent of older people with vision impairment have not graduated from high school, and 32% have annual incomes below \$20,000. In addition, older people with vision impairment

report higher prevalence of chronic conditions, particularly stroke, arthritis, diabetes, kidney disease, and depression. Not surprisingly, then, 48% of older people with vision impairment in Kentucky compared to 27% among older people without vision impairment report fair or poor health. Moreover, 41% of older people with vision impairment report 14 or more days of poor physical health in the past 30 days compared to 17% of those without vision impairment. Similarly, 14% of people with vision impairment report 14 or more days of poor mental health compared to 7% of those without vision loss. This disparity in quality of life is repeated in activity limitation days, where 30% of people with vision impairment report 14 or more days of activity limitation compared to 20% among those without vision impairment. Upstream factors including poverty and lower education have the potential to contribute to higher prevalence of chronic conditions and poorer health-related quality of life. These factors may lead to increased disability, including increased difficulty walking, dressing/bathing, and doing errands.

Data from state and national surveys provide quantitative information regarding health, chronic conditions, and quality of life factors associated with vision impairment in Kentucky. These data, when informed by the personal experiences of people who have lost vision, serve to define policy decisions and interventions to preserve the independence, dignity, and autonomy of older people with vision impairment. By aligning aging services, public health initiatives, transportation resources, and vision rehabilitation programs to meet the needs of older people with vision impairment, there is potential to improve health, quality of life, and function.

### **Purpose**

This briefing provides estimates of the prevalence of vision impairment among older people in the state of Kentucky at the state and county level. Using state and national data systems, this report describes self-reported health, prevalence of chronic conditions, and quality of life among older people with and without vision impairment. The findings show that an estimated 9.7% of older people in the state report vision impairment, and they report substantial health and social disparities compared to older people without vision impairment, differences that potentially compromise function and quality of life. By better understanding the circumstances of older people with vision impairment in Kentucky, policy makers and providers can tailor services in aging, public health, transportation, and vision rehabilitation to preserve the dignity, independence, and quality of life of older people.

## **Introduction**

Vision impairment and blindness often have profound effects upon older people and those who care for and about them. Vision impairment can make common activities difficult or impossible; for example, climbing stairs, crossing a street, driving, using public transportation, preparing meals, and performing household activities may be compromised. Older people experiencing vision impairment may have difficulty managing accounts, paying bills, and identifying prescribed medications. Falls or fear of falling may further compromise their independence. Vision impairment is often isolating, keeping people at home when they prefer to be with family and friends. Many older people with vision loss do not interact with others who are going through the same experience, creating further isolation and depression.

An estimated 9.7% of older Kentuckians report vision impairment or blindness. Those most at risk for vision impairment are African Americans and older age groups. Older people with vision impairment are more likely to report less education and to experience poverty. They are also more likely to have age-related chronic conditions compared to older people without vision impairment. As Kentucky's population continues to age, the number of people experiencing vision impairment will likely increase.

While the circumstances and risk factors associated with aging and vision loss are serious, much can be done to ameliorate the effects of vision impairment. For example, improved access and utilization of vision and eye health, as well as the availability of comprehensive vision rehabilitation service providers, promoting independence and autonomy, are effective strategies often enabling older people in Kentucky to live independently and remain in their community.

## **Social Determinates of Health and Health Equity**

Health inequities are shown to be related to social determinants of health based on sex, socio-economic status, race, ethnicity, and specific health conditions. Overall, people with vision impairment, as this report demonstrates, are disadvantaged in multiple domains of poorer health, decreased quality of life, and increased disability.

One social determinant of health is defined by educational level which often predicts career and economic well-being. Among older people with vision impairment, 31% did not complete high school compared to 17% of people without vision impairment.



In addition, older people with vision impairment are much more likely to experience poverty and lower incomes than people without vision impairment. For example, 14% of older people with vision impairment report annual incomes of less than \$10,000 compared to 6% of older people without vision impairment. Nine percent of older people with vision impairment report annual incomes between \$10,000 and less than \$15,000, compared to 7% of people without vision impairment. Ten percent of older people with vision impairment, compared to 8% of people without vision impairment, report an annual income of \$15,000 to less than \$20,000. Lower socio-economic status has also been shown to represent a substantial barrier to access to care for those with vision loss—those with the most need for care.

While people with or without vision impairment are likely to have health insurance and a regular doctor, more people with vision impairment report having to delay health care because of cost, 8% compared to 4% of people without vision impairment.

### **Geographic Distribution**

Vision impairment is not evenly distributed across the United States or within states. The prevalence of vision impairment is shown among people aged 65 years and older among the 120 counties of Kentucky. Five categories of prevalence are presented, ranging from about 3.3% to 23.5%. Higher prevalence of vision impairments tends to occur in more rural counties where resources and care providers may be scarce. Lyon County (23.5%), Owsley County (23.3%), Martin County (22.7%), Lee County (21.8%), and Breathitt County (20.8%) report the highest prevalence of vision impairment among older people while Logan County (3.3%), Simpson County (3.4%), Spencer County (4.3%), Shelby County (4.4%), and Ohio County (4.5%) report the lowest prevalence.

### **Demographic Characteristics**

An analysis of 2019 Behavioral Risk Factor Surveillance System data reveals that 9.7% of people 65 years of age and older report vision impairment in response to the question, "Are you blind or do you have serious difficulty seeing, even when wearing glasses?" While 9.8% of older women over age 65 years report vision impairment, 9.5% of men do so. Women, however, comprise 56% of the older population of people with vision impairment. In Kentucky, vision impairment varies by race: 9.3% of whites report vision impairment compared to 12.1% among African Americans.

### **Vision Rehabilitation Program**

A central component of supports for older people with vision impairment is a network of public and private agencies providing vision rehabilitation services addressing communication, activities of daily living, personal care, self-advocacy, travel and mobility skills, diabetes, and medication management, as well as access to assistive technology (e.g., smart phones, tablets, and computers). Services often include counseling, information, and referrals to community resources and supports. Vision rehabilitation services generally include low vision evaluations and the provision of adapted vision devices. Moreover, older people with vision impairment benefit from peer support groups where older people share common experiences and exchange information about successful management strategies. These services are often provided in the client's home or in an agency setting. The sum of vision rehabilitation services improves independence, self-esteem, health, and quality of life.

Despite the best effort of these agencies, only about 3% of older people with vision impairment nationally receive vision rehabilitation services (see [healthypeople.gov](https://www.healthypeople.gov) here). This gap between need and response represents a major public health and public policy concern recently addressed by a National Academies of Science, Engineering, and Medicine (NASEM, formerly the Institute of Medicine) seminal report Making Eye Health A Population Health Imperative: Vision for Tomorrow. The NASEM report asserted, "Vision rehabilitation is essential to maximizing the independence, function, participation, safety, and overall QOL of people with chronic vision impairment. Yet there are numerous barriers to high quality and universally accessible vision rehabilitation services." A goal of Healthy People 2030 is to increase access to vision rehabilitation services by only 10%, to 3.3% over a ten-year period (see Healthy People 2030 here).

### **Discussion**

The experience of vision impairment for older people is complex and multidimensional. This report estimates the population and distribution of older people with vision impairment in Kentucky, and it characterizes the population in terms of health, chronic conditions, health-related quality of life, and disability status—variables available from the Behavioral Risk Factor Surveillance System and the American Community Survey. These findings reveal that upstream circumstances related to poverty and poorer education create the potential of downstream outcomes in poorer overall health and quality of life as well as increased disability.

While this briefing provides considerable insight into health, chronic conditions, and quality of life factors at the population level, the report does not tell the personal stories of older people who have lost vision. It does not chronicle the isolation or struggle to find eye care or vision rehabilitation service providers. It does not describe the positive effects of vision rehabilitation or the power that older people feel when participating with peers to share their stories or solve common problems. That gap will be filled by others.

### **Conclusion**

About 9.7% of people aged 65 years and older respond yes to the question “Are you blind or do you have severe difficulty seeing even when wearing glasses.” African Americans and people who are older, poorer, and less educated report higher prevalence of vision impairment. People who are older and visually impaired report higher prevalence of chronic conditions, poorer overall health, and poorer health-related quality of life.

These factors appear associated with higher prevalence of disability indicators. These findings reveal that people with vision impairment are disadvantaged in multiple ways that place them at greater risk for compromised independence and autonomy.

The findings in this report are designed to inform policy makers and providers about the circumstances of older people with vision impairment so that decisions and programs can be designed to better support older people with vision loss.

### **Foundational Purposes for KYOVR**

The Big Data Project serves as a foundation for the following:

- Informing strategic planning;
- Driving policy development;
- Engaging state holders—aging, public health;
- Redefining outcomes: improved health and quality of life, O & M as example; and
- Other materials will fill gap between state data and human experience.

### **OVR Diversity Committee**

In 2021, OVR created a diversity committee to address diversity and inclusion inequities within OVR. The OVR Diversity Committee team is made up of OVR staff, and representation from the state Office of Diversity, Equality and Training (ODET). An agency-wide survey was distributed in September of 2021 to better understand staff views on diversity within the agency and within the community we serve. Representatives of ODET from the Personnel Board provided feedback and shared their expertise to keep the committee focused and aware of state level initiatives as it implements a strategic vision for the agency. As a result, the committee created its first 3-year strategic plan. The following goals remain a priority for the agency:

### **Staff Diversity**

**Goal:** Recruit, hire and retain a diverse and inclusive staff to provide high quality services to Kentuckians with Disabilities.

**Objective 1:** Increase recruitment and hiring to fill vacant positions with staff who are representative of the population we serve.

**Objective 2:** Increase staff retention to ensure continuity of high quality of services to Kentuckians with disabilities and to increase diversity at all agency levels.

### **Consumer Diversity**

**Goal:** Ensure equitable service provision to all Kentuckians with disabilities through outreach, training, and data analysis.

**Objective 1:** Develop a system to periodically review data regarding consumer diversity as well as policies, and practices that impact service provision.

**Objective 2:** Raise awareness of OVR services in underserved communities through targeted outreach.

**Objective 3:** Create a more welcoming and inclusive environment for all VR stakeholders.

The OVR Executive Director is a member of the CSAVR Diversity, Equity, and Inclusion professional Network. This allows for OVR to participate in a national workgroup addressing racial disparities specific to the field of vocational rehabilitation.

Management and staff shall focus on the agency mission, which is competitive integrated employment, in assignment of tasks, planning and utilization of work time, initiation of self-directed work teams, and innovative projects. This includes expanding the diversity of the Agency in terms of employment outcomes to individuals with the most significant disabilities who are minorities. Staff shall ensure that persons with the most significant disabilities who are minorities will receive the same employment related services that non-minority and individuals with disabilities receive. OVR works to develop outreach activities to minorities to facilitate increased consumer referrals to the Agency. OVR encourages staff to get to know key community leaders and minority organizations to facilitate outreach. The Office follows Equal Employment Opportunity guidelines and Affirmative Action Procedures. The Office encourages existing minority staff to play an active role in policy and program development, service delivery and program monitoring activities.

The Office provides cultural diversity training to staff in order to develop a better understanding of different cultures and value systems. Staff participates in the Governor's Equal Employment Opportunity Conference. Service demographic and population data is utilized to determine the number of minorities in regions and develop strategies to increase percentages. OVR will utilize different methods and channels of communication in targeting minority populations. This will include usage of the "Language Line" that will enable our staff to communicate with non-English speaking applicants in their native language.

Individuals who are minorities have equal access to vocational rehabilitation services. OVR is committed in its effort to build the capacity to effectively service individuals with most significant disabilities who are minorities.

The following outlines the actions in OVR's outreach plan:

Management and staff shall focus on the agency mission, which is employment, in assignment of tasks, planning and utilization of work time, initiation of self-directed work teams, and innovative projects. This includes expanding the diversity of the Agency in terms of employment outcomes to individuals with the most significant disabilities who are minorities.

Staff shall provide leadership in implementation of the Career Center Systems throughout the Commonwealth. Staff shall ensure that persons with the most significant disabilities who are minorities will receive the same employment related services that non-minorities and individuals with disabilities receive.

Recruit and hire Rehabilitation Counselors from minority and culturally diverse groups. Improve system linkages with the Department of Workforce in order to reach more minorities across the state. Collaboration with other entities will allow for effective coordination of services and referrals.

Integrate internal controls through quality assurance to identify areas where there is successful outreach and best practices and identify areas needing additional outreach.

Develop outreach activities to minorities to facilitate increased consumer referrals to OVR. OVR supports staff in making linkages with community leaders and minority organizations to facilitate outreach.

Encourage existing minority staff to play an active role in policy and program development, service delivery and program monitoring activities.

Provide cultural diversity training to staff in order to develop a better understanding of different cultures and value systems.

Utilize service demographic and population data to determine the number of minorities in regions and develop strategies to increase percentages.

Encourage minorities to play an active role in the State Rehabilitation Council, participating forums and the provision of input into policies and procedures.

**b. 1. C. Individuals with disabilities served through other components of the workforce development system; and**

In Kentucky the Kentucky Workforce Innovation Board (KWIB) serves as an advisory board to the Governor on workforce training and development issues. The KWIB is charged with creating a statewide vision for workforce development and adopting a plan to move Kentucky forward through workforce training and development. Kentucky offers a wide range of workforce education and training activities tailored to meet the needs of employers and job seekers in varied and unique communities across the state. The certified Kentucky Career Centers (KCC) are the storefront, but the Workforce Innovation and Opportunity Act's (WIOA) core and optional one-stop partner services reach into communities as well.

OVR has five regional managers that are assigned as liaisons with the local workforce areas in their regions. As the liaison they work closely with the local managers and operators for their areas. They serve on the local workforce boards

and their respective committees. The Regional Managers submit reports quarterly to the Field Services Director and the Executive Director summarizing activities and projects on the local area.

OVR collaborated with agencies across the Department of Workforce Development for state plan activities and to analyze Kentucky's workforce needs throughout the ten local workforce regions. The Kentucky Workforce Innovation Board (KWIB) created an Interagency Team to meet regularly to facilitate activities that promote collaborations between all Core Programs and the Cabinet. The OVR Executive Director, Deputy Executive Director, Vocational Rehabilitation Administrator and SCVR liaison, and Regional Program Managers within the Division of Field Services, participated in the Interagency Team activities. From June through October 2023, the OVR staff attended meetings, traveled across the local workforce development areas (LWA) and engaged in various listening sessions to learn the concerns, ideas and challenges of these local communities.

Insight was gathered from learning the public's perspective of the current Kentucky workforce system and how it might be seen as a valuable resource for the local communities. Some communities discussed the need for more emphasis on on-the-job training programs for youth while in high school, community housing and the accommodations needed for the economic growth of the area, the difficulty in finding and keeping employees and the lack of broadband in rural areas. These concerns are often compounded for individuals with disabilities, which is discussed throughout the OVR state plan.

The collaborative efforts continued until the completion and final submission of the state plan.

### **Kentucky Career Center (KCC) Survey Summary**

The Kentucky Career Center (KCC) Survey achieved 100% of the target completions and had 12 total respondents representing their respective Kentucky Career Centers. Survey respondents were primarily female (78%) and represented seven unique regions across the Commonwealth (Cumberlands, Green River, KentuckianaWorks, Lincoln Trail, Northern KY, South Central, and Tenco). All but one respondent (89%) indicated that individuals with disabilities were able to fully access and participate in their available services. The most identified training needs for KCC staff were Social Security Work Incentives, Deaf and Hard of Hearing Support, Intellectual/Learning Disability Support, and Blindness and Low Vision Support. A majority of respondents (80%) reported having a good or excellent working relationship with OVR, and relatedly indicated

that it was easy to refer someone to OVR services (80%) and that the process was seamless and high quality (80%). Generally speaking, KCC representatives indicated a high level of knowledge related to disability and accessibility-related topics, however, 40% of representatives reported a “poor” level of knowledge related to providing materials in alternate or accessible formats.

**b. 1. 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 Kentucky Office of Vocational Rehabilitation (OVR) continues to partner with the Kentucky Department of Education (KDE) through the National Technical Assistance Center on Transition (NTACT). OVR and KDE have representatives that co-lead a team dedicated to improving transition services to Kentucky students with disabilities. This team met bi-weekly throughout 2023 and received intensive technical assistance from NTACT. The team also sent a group to the NTACT Capacity Building Institute in Charlotte, NC to receive additional technical assistance and training.

To determine specific areas of need for students with disabilities, the team conducted focus groups with seven different school districts throughout the Commonwealth of Kentucky. Each of the five OVR regions was represented by these seven schools and care was taken to choose a diverse group of school districts, including both urban and rural districts. The intent of the focus groups was to determine the level of collaboration between each school district and the local OVR office assigned to serve those schools. Additionally, three focus groups were conducted with OVR staff assigned to local school districts. Although all focus groups have been completed, a data analysis is currently being conducted and a report of the findings is not yet available. However, a review of the transcripts from the focus groups reveal some common themes.

Many of the school districts that participated in the focus groups did not have a good understanding of the OVR process, including how and when to refer students to OVR. Some school staff stated that they did not know how to contact or had never met the OVR Counselor assigned to their school. This was more common among rural districts, where the OVR Counselor is responsible for multiple school districts. These Counselors are also responsible for providing services to adults with disabilities. Staff turnover, both OVR and school staff, was



mentioned in multiple focus groups as a significant barrier to services. Many teachers and OVR Counselors in the focus groups were new to their roles.

Another common theme was an apparent lack of understanding of the continuum of VR services, including Pre-Employment Transition Services (Pre-ETS), Transition Services, and Employment-Related Services. Some school staff mentioned that they would try to refer students with IEPs to OVR late in their senior year, just before graduation. Others stated that they did not understand the difference between Pre-ETS and other OVR services.

It is our hope that students with disabilities in Kentucky will begin receiving Pre-Employment Transition Services as early as age 14. These Potentially Eligible students may receive Pre-ETS over a two-year period before they apply for OVR services. Early in the third year of secondary school, these students should apply for OVR services so they may begin working with a VR Counselor to determine an appropriate job goal. At this point, they will begin receiving transition services to help them achieve their job goal.

Through the strategic planning process with the Employment First Council, a focus group of students was held at the Carl D. Perkins Vocational Training Center in June of 2023. The main topic of the focus group was Transitioning from High School to Post-Secondary Education. There were six students that participated in the focus group facilitated by the Facilitation Center at Eastern Kentucky University. The following emerging themes shared from this group were for planning purposes: 1) addressing transportation; 2) Employers taking disabilities more seriously; 3) life skills and being able to live on your own; 4) Steady cash flow/income; and 5) understanding benefits. Another focus group of six OVR Vocational Rehabilitation Counselors and Pre-Employment Services Coordinators was held. This group focused on key issues and potential actions for the area of Transition Services. Emerging themes for consideration were: 1) Lack of coordination and cooperation in state agencies, provider to client, within providers; 2) Lack of education for a broad group; 3) Pre-employment transition services need to grow; 4) Transportation; and 5) Turnover and lack of staff and the impacts.

### **Youth/Transition Survey Summary**

The OVR Youth/Transition Survey surpassed the number of target completions by 114% and received a total of 273 responses. Parents or guardians of consumers with disabilities comprised more than half of survey respondents (51.3%) and transition-aged consumers made up another 42.5% of the responses. Over half of

Kentucky's 120 counties (65 in total) were represented by survey respondents. The most commonly represented disabilities included autism (36.8%), behavioral/mood disorder (26.4%), and intellectual disability (21.5%).

In terms of the Concerns Report issues that were generated from the OVR Consumer/Public focus group, all 20 items were rated as important by the respondents (avg importance rating of 90.1%). The final Concerns Report concluded that 100% of the items were viewed as strengths or moderate strengths by OVR transition-aged consumers, with three-quarters of the items rated as strengths (having a satisfaction rating of 75% or higher). The items that garnered the highest satisfaction ratings included: OVR provides opportunities for consumers to give feedback and responds to their concerns (84%), Student preferences for job goals and assistive technology are prioritized by OVR staff (83%), and OVR provides accessible and easy to use communication options to consumers (83%).

Over half of the respondents were employed (51.9%) at the time of the survey and most felt that their technology needs were currently being met (78%). The most commonly identified current or future service needs of respondents included job placement (62.3%), independent living skills (55.8%), resume and interviewing skills (53.9%), vocational evaluation (50%), and paid work experience (45.5%).

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

Through the most recent Comprehensive Statewide Needs Assessment (CSNA), the University of Kentucky Human Development Evaluation (HDI) Team conducted a virtual focus group with Community Rehabilitation Provider (CRP) administrators and staff on 10/31/23 at 10:30 AM. This focus group resulted in the following themes and sub-themes.

1. Communication and Relationship Management
  - Emphasis on open communication between OVR, counselors, and CRPs.
  - Challenges with counselor and consumer communication.
  - Lack of community understanding about OVR services.
2. Service Delivery and Support for Consumers
  - Insufficient funding impacting service provision.
  - Need for better vetting of consumers and clearer expectations.

- Challenges with transportation options and service availability
- 3. Challenges with Pre-Employment Transition Services (Pre-ETS)
  - Issues with the rollout, sustainability, and accessibility of Pre-ETS.
  - Desire to restore original services and funding levels.
- 4. Provider Support and Collaboration
  - Calls for transparent and inclusive long-term planning.
  - Desire for increased support, financial transparency, and involvement of CRPs.
  - Advocacy for CRP needs, cultural shifts, and regular budget examination.
- 5. Training and Resources
  - Need for more training and resources for counselors and CRPs.
  - Calls for standardized training, quality-focused training for CRPs, and better tools/resources.
- 6. Process Efficiency and Timeliness
  - Concerns about lengthy processes, authorization delays, and intake procedures.
  - Desire for better systems and technology to streamline communication and processes.
- 7. Workforce Issues and Caseload Management
  - Counselor overload and overwhelmed staff.
  - Need for appropriate caseload numbers and additional staff training.
- 8. Flexibility and Adaptability
  - Desire for a more flexible and adaptive approach to service delivery.
  - Need for innovative solutions, advanced technology, and leveraging current workplace shortages.

The final assessment, gathered through the HDI survey for CRPs, was summarized to assess perspectives of services and needs for OVR. The OVR CRP survey recorded 99% of the target completion goal and had a total of 94 respondents from Community Rehabilitation Providers (CRPs) across the Commonwealth. CRP respondents were primarily female (66%) and all 19 KY OVR regions were served by the respondent CRPs. Louisville was the most represented

region with 32.5% of respondents indicating they provided services in the greater Louisville area. A majority of CRP respondents (61.4%) receive 25 or fewer referrals and send 25 or fewer referrals to OVR annually.

In terms of the Concerns Report issues that were generated from the CRP focus group, each of the 19 items were rated as important by the respondents (avg importance rating of 94.7%). The final Concerns Report concluded that 100% of the items were viewed as strengths or moderate strengths by CRP respondents. The top three highest rate strengths were as follows: OVR values and emphasizes partnerships with CRPs (90% satisfaction rating), OVR counselors demonstrate compassion and flexibility when working with Kentuckians with disabilities (88% satisfaction rating), and OVR provides necessary services to all categories of consumers including those with the most significant disabilities (83% satisfaction rating).

A majority of CRP respondents indicated that their technology needs had been met (88%) and that they had what they needed to meet virtually with consumers (96%). Seventy-two percent of CRPs reported they were able to respond to referrals within a week and 69.3% said they currently have no waiting list for services. The top five barriers to providing services to OVR consumers identified by respondents included: lack of long-term support funding (38.7%), lack of available qualified and/or trained staff (34.6%), low KY-OVR fee for service rates (33.3%), lack of available financial resources (29.3%), and increases in consumers with multiple disabilities (26.6%).

### **Kentucky Employment First Council Initiatives**

Kentucky Employment First Council recently adopted a strategic plan to promote and advance Competitive Integrated Employment (CIE) throughout the state. Through the strategic planning process with Employment First Council, a focus group made up of employment service providers was held in June of 2023. The main topic of the focus group was identifying key issues and potential actions for the area of competitive integrated employment (CIE). There were five providers that participated in the group. The following eleven (11) emerging themes were identified to consider in planning: 1) Collaboration and the need for all to work together; 2) Creating a statewide coalition on best practices; 3) Informing consumers and their families early and using a K–12 approach with school systems; 4) Starting at infancy; 5) More involvement with the Chamber; 6) More schools willing to collaborate; 7) Focus on solutions; 8) Streamline communication of visions; 9) No best practice curriculum within special education; 10) Measuring of the wrong metrics; and 11) Employer education.

In addition, Kentucky Employment First Council partnered with the Department of Labor's Office of Disability Employment Policy on the National Expansion of Employment Opportunities Network Initiative. This collaborative effort aimed to develop strategic plans for increasing competitive integrated employment opportunities, including those with significant disabilities. Kentucky's involvement in Project NEON created momentum for agencies to align policies with the state's definition of competitive integrated employment. As part of Project NEON, Kentucky hosted a "Best Practice Day" attended by nearly 50 stakeholders, including national subject matter experts. This milestone event in Frankfort, KY fostered strategic development across multiple stakeholders to enhance competitive integrated employment through policy improvements, expanded partnerships, and sharing of best practices. Out of this project a need for the Council and OVR to focus on provider capacity came to the forefront. On November 16th, 2023, the KYOVR was awarded 300 additional technical assistance hours to continue their efforts in collaboration with Project NEON, specifically focusing on provider capacity/support throughout the state. This reinforces the results of the last needs assessment findings that there are not sufficient numbers of Community Rehabilitation Providers with the needed experience and expertise in serving job seekers.

### **OVR Statewide Field Counselor Survey**

OVR conducted a statewide survey of field counselors to explore the need and availability of Customized Supported Employment services for individuals with the most significant disabilities. It was expected, due to Section 511 of WIOA, that there would be an increase in the need and demand for Customized Supported Employment Services. Fifty-two percent (52%) stated that there are Community Rehabilitation Program (CRP) providers in their area that provide CSE. However, 62% also stated that it's not readily available due to limited staff or oversized caseloads. Around 93% of the counselor's state that only 3 or fewer of their individuals have been able to utilize this service due to lack of availability. When asked if there was a need for CSE in their area, overwhelmingly, 85% stated that there was a need. Over 46% stated that they have at least 4 or more consumers on their caseloads that could benefit from CSE. Over 17% state that they have at least 8 or more consumers that need this service. As a result, the OVR implemented 3 Establishment Project MOAs to assist in making this service readily available to individuals with the most significant disabilities in the areas of the state that need it most. The primary purpose of this project is to expand the evidence-based model of customized employment throughout a four- year period. At this time the projects are finishing up the first year of planning. As existing

MOAs approach expiration, consideration will be given to new MOA recipients for continued expansion of customized employment. OVR is also exploring the implementation of a customized employment fidelity scale. The OVR CRP Branch staff participates in supported and customized employment Community of Practice meetings, which includes ongoing discussions pertaining to the development and implementation of fidelity scales.

### **OVR's Establishment Projects for Individual Placement and Support (IPS)**

A thorough review of existing and prospective agencies was conducted by OVR. OVR conducted several meetings with Department of Behavioral Health (DBH) staff throughout the state to obtain information of existing agencies that have longitudinally strong relationships with DBH, and that also exemplifies high quality service delivery. The purpose of such a selection process is to increase the likelihood of success among programs. This process aided in the identification of potentially new and existing providers that could be used in expanding Individual Placement and Support (IPS) to those in unserved or underserved areas, as well as provide an evidenced based model of IPS SE to individuals with intellectual disabilities. As a result, OVR implemented four (4) establishment projects for the expansion of IPS to single mothers with serious mental illness and/or substance use concerns. The primary purpose of this project is to expand the evidence-based model of IPS SE throughout this 4-year period to the greatest extent possible to individuals who do not have access to this type of service. At this time the projects are finishing up year one of the planning year.

### **OVR State Owned and Operated Rehabilitation Centers**

The Charles W. McDowell Center and the Carl D. Perkins Vocational Training Center are the State-owned and operated comprehensive rehabilitation centers in Kentucky. Both are community rehabilitation programs providing necessary vocational rehabilitation services to individuals with disabilities. The Centers provide supports, training, and resources to the most unserved and underserved populations in Kentucky to maximize their opportunities to obtain competitive integrated employment. The centers serve individuals, largely from rural areas of the state, with significant, complex or multiple disabilities such as sensory impairments, criminal justice backgrounds and mental illness.

In order to keep the Centers operational and ensure continuity of service provision, at times it is necessary for the State to repair or replace systems and equipment within the center, including, but not limited to electrical, plumbing and

hot water, fire prevention, ventilation, sewage, etc., that go beyond ordinary repairs and maintenance. The State will submit requests for prior approval to RSA for related costs that exceed the capital expenditure threshold used by the State. Master Agreements are in place for scheduled routine maintenance and inspection of the facility.

### **The Charles W. McDowell Center**

The Charles W. McDowell Center is a rehabilitation facility serving individuals from across the Commonwealth and is owned and operated by the Kentucky Office of Vocational Rehabilitation (OVR). The facility provides office and meeting space for OVR Field Services Division Staff as well as dormitory and classroom space for the residential and training program for blind and visually impaired consumers.

The McDowell Center, located in Louisville, is the only facility in the state of Kentucky which provides blindness skills training to adults, making it a singular and particularly important resource for individuals who are blind and visually impaired wishing to adjust to their vision loss and pursue competitive integrated employment. The McDowell Center offers training in vocational preparation, personal adjustment services, independent living skills, orientation and mobility, Braille, assistive technology, academic remediation, career assessment, vocational planning, work adjustment and work experience.

OVR's East Jefferson District staff and the Central Blind District field staff (i.e., VR counseling staff, assistants, assistive technology staff, community rehabilitation branch staff) are housed in the building. This greatly increases the foot traffic of VR participants and other stake holders in the building. In the last year, the Center had between 220 and 250 program applicants/consumers and other stakeholders travel through the lobby's front desk per month for scheduled appointments and meetings. The McDowell Center blindness skills training program receives referrals from across the state. The number of staff housed at the Center is around 65 when fully staffed. In the 2023 state fiscal year, 83 blind and visually impaired individuals, representing both day and residential students, received training services through the McDowell Center and 1,170 received services through the VR unit housed at the Center.

Master Agreements are in place for scheduled routine maintenance and inspection of the facility. On a monthly basis, elevator, water treatment and pest control inspections occur. The HVAC system is provided quarterly maintenance. Backflow testing is conducted annually.

Semi-annually, the kitchen equipment, grease traps and electrical systems for fire alarms are inspected and maintained. On an annual basis, maintenance and inspections of the sprinkler system and kitchen hood occur.

State facility staff performed an assessment of the facility needs in 2019 and 2020. In 2021, state facility staff engaged architecture and engineering consultants to provide further review of the building and mechanical systems. It was determined that the work should proceed in phases and prioritized to address most critical issues related to dormitory renovations in 2021 and 2022. This Phase I work is complete. In 2023, state facility staff engaged these consultants again to determine Phase II work.

The results are as follows:

1. Building Renovation - The interior Architectural and all Mechanical, Electrical and Plumbing Engineering Systems (MEP) must be evaluated for replacement based on current operating condition, equipment life expectancy, and energy usage. All systems should be evaluated to determine the most effective means of controlling building spaces to desired set points for humidity and temperature.
  1. All Building automation systems (BAS) should be upgraded to current standards and must provide for remote access via internet, centralized served storage, and application software. User interface must allow access to logic programming, graphics, data logging, trend data, alarms, and self – diagnostics.
  2. All building sanitary drain piping must be replaced due to systemic failure of current piping system materials. All proper engineering standards and Housing Building Construction (HBC) plumbing codes must be followed. Architectural renovation to allow improved and expanded ability to serve consumers should also be included in this process, including but not limited to lighting, tactile surfaces, training areas, safety, interior design improvements for visually impaired and ADA for mobility affected students.
  3. Paint, flooring and signage throughout entire building
  4. Sun shading awning over windows of south facing cafeteria to prevent extreme heat and glare into south facing cafeteria.
  5. Cafeteria kitchen – due to the age of existing equipment combined with lack of use during the pandemic, anticipate updates and replacement to



- appliances such as the ice machine, water dispenser, salad bar, freezer and dishwasher.
6. Consumer Training Kitchens – Updates Needed: Renovate three consumer training kitchens to facilitate increasing the numbers of students who can receive training and improve workspace and layout to accommodate students using a wheelchair.
  7. This project may require completion in two phases based on work scope, building occupancy and timing of work.
  2. Dormitory Restroom Accessibility and Safety – The dormitory restrooms require renovations to address ventilation, flooring, safety grab bars, storage and fixtures. All restrooms require accessible “ADA” shower areas. Wheelchair users cannot navigate into the shower for safe transfer, and controls for the shower are located outside the shower. Water from the shower is not contained and is a safety concern. Updates Needed: Recess the concrete slab in order to lower the shower panel, which would prevent water from draining out into the main bathroom area. Renovation to showers would allow for transfer and access to controls.
  3. Security Cameras – additional security cameras to be added to existing security system, for front entrance lobby, instructional hallways and building hallways. Intercom system at dormitory entrance in order for residential staff to converse with individuals at door.
  4. Campus Grounds Accessibility Updates Needed: Complete last phase of paved access encircling facility allowing safe exit from all exit doors.
  5. Orientation and Mobility paved quarter- mile to half-mile walking path behind building on existing acre for independent travel and exercise around the training campus.
  6. Exterior Repairs – Updates Needed: Retention walls require repairs to add proper drainage system, replace dislodged and crumbling bricks, and add a protective cap to the top of the wall. The service dog outdoor enclosure needs to be replaced.

### **The Carl D. Perkins Vocational Training Center**

The Carl D Perkins Vocational Training Center at Thelma, KY is a multidisciplinary comprehensive residential rehabilitation and vocational training facility opened in 1973. The Perkins Center's mission is to assist Kentuckians with disabilities achieve suitable employment, maximize independence, and gain self-respect through individualized comprehensive services.

The Perkins Center is the only comprehensive, post-acute residential rehabilitation facility within Kentucky and regularly provides services to rehabilitation consumers throughout the Commonwealth. OVR Counselors located throughout Kentucky make referrals to the Perkins Center for a variety of rehabilitation programs and services based on the needs of eligible persons. The five programs of operation that comprise most of the Center's operation and meet high standards for program quality are Vocational Evaluation, Job Readiness Training, Vocational Skills Training, Assisted Living/Physical Restoration/Outpatient Rehabilitation, and the Lifeskills Enhancement Program.

The Commission on Accreditation of Rehabilitation Facilities (CARF) accredits the Evaluation and Training Units of the Perkins Center. To maintain quality program services and retain CARF accreditation while adequately serving individuals with the most significant disabilities, the Perkins Center must have adequate technology, a sufficient number of staff, and be able to continue to make improvements to the facility, which allows consumers, including those with the most significant disabilities, to access the facility. The following needs were identified by facilities and maintenance personnel:

*1. Renovate Assisted Living Unit Restrooms and Replace all PTAC's*

The need was identified in the Assisted Living Unit of the building interior on July 8, 2020, when facilities maintenance staff conducted a thorough assessment of the building. Renovation is needed to increase capacity in the assisted living unit by making the restrooms accessible. Many of the existing restrooms, built in 1973, are not accessible and require the use of a common shower area within the Unit. The work needed includes selective demolition, removal and replacement of plumbing systems, replacement of existing light fixtures, concrete slab replacement, doors/frames/hardware replacement, interior finishes including tile work (walls, floors, and base), drywall, painting and restroom accessories. The Assisted Living Unit is joined structurally to the existing building and does not constitute a separate building and costs do not exceed the appraised value of the building. We currently have full capacity assigned to those 13 rooms and 12 consumers on the waiting list for vacancies as they are available. Completion of this project would increase room space to 14, allow consumers to use their own accessible restroom area, allowing the Perkins Center to meet consumer needs timely while increasing the numbers served due to our continuous waiting list for the Assistant Living Unit. The Perkins Center has 113 PTAC (Package Terminal Air Conditioner) units located in

dorm rooms and offices. These units are 17 years old or older and have become costly to repair, if repairing is possible. The HVAC industry recommends such units be replaced if such units are more than 10 years old and functioning properly becomes an issue.

## 2. Industrial Truck/Forklift Training Area

This program is designed to meet entry level workforce needs of any business that employs industrial truck/forklift operators. Perkins Center consumers enrolled in this program will have the opportunity to obtain a 3-year renewable OSHA approved Industrial Truck/Forklift Operator's license. Upon completion of this training, consumers typically go to work in a multitude of businesses including, but not limited to retail stores, manufacturing plants, warehouses, wholesalers, or distribution centers. The outdoor training area is a tennis court that was built more than 30 years ago and has an asphalt surface. The surface has deteriorated over time, allowing the program to only use about one half of the entire surface for training purposes, currently. The program's Industrial Trucks are stored in a building on campus and require them to be driven to the training area. This program has grown tremendously in recent years and the following numbers will further explain our need for this project:

**2017:** 20 consumers completed the program; 11 consumers received a license; and 2,834 units/hours of total services were provided.

**2018:** 27 consumers completed the program; 19 consumers received a license; and 4,635 units/hours of total services were provided.

**2019:** 28 consumers completed the program; 26 consumers received a license; and 6,024 unit/hours of total services were provided.

**2020 and 2021:** During the COVID-19 Pandemic, the Perkins Center experienced difficult years due to the restrictions on programs. However, the program continued to serve consumers with over 1500 hours of training were provided during 2021.

**2022:** 22 consumers completed the program; 22 consumers received a license; and 5,662 units/hours of total services were provided.

**2023 (through September):** 27 consumers completed the program; 27 consumers received a license; and 6,170 unit/hours of total services were provided.

By utilizing the old tennis court location to construct a 5000 sq. ft. steel engineered building, Perkins Center would provide storage and training area for the Forklift Operations Program. More specific, concrete building pad should be at least 10,000 sq. ft. to accommodate outdoor training area as well. Building would require minimum temperature control, supply air/ventilation system for exhaust from propane powered fork trucks. Building should be equipped with a minimum of one 10' roll up door and one 36" utility door for access. Lighting should be high bay LED style and be no lower than 12' above floor. One multi-use bathroom should be included in the design. Suitable electrical, plumbing and internet systems should be included in the design. Completion of this project will allow the Perkins Center to train consumers timely, during all seasons and within an environment similar to the jobs available in this field.

### 3. Fire Panel System and HVAC BAS Software/Controls Renovation

A large part of our facility fire monitoring system continues to run on a decades old system that needs to be merged into one active panel. This upgrade would allow us to get all our monitoring points up to code and eliminate the myriad of problems along with inconveniences of the old panel. The Center HVAC system controls in the main building are obsolete and operating on a system that cannot be upgraded or repaired if there is any major repair required. A new system with remote access, server operable, provides user interface for both graphics and logic operation while being capable of trending and data storage is needed. The system will need to interface with all building systems in use and sized for future needs. The system should also be capable of interfacing with multiple energy meters for the purpose of monitoring and data storage. The obsolete BAS controls in the main building should be replaced with current version equipment. The new system must provide remote access, be server operable, provide for user interface for both graphics and logic operation, be capable of trending and point data storage. Any remote modules must be able to be downloaded from remote connection. In addition, it must be able to interface with all building systems presently in use and sized for future needs. The system must also be able to interface with multiple energy meters for the purpose of monitoring and data storage.

### 4. Site Access and Security

The Perkins Center presently has two driveways onto the property and 22 doors allowing access into the building. The current layout is difficult for

security to monitor and poses a safety threat for staff and students. The property is contained on three sides by fencing but is open to the road in the front. To further complicate the situation, the security office and camera monitoring station is in the rear of the building with no easy access to the front of the property. A building will need to be constructed roadside for security staff to be housed. An automatic gate with key card and remote operation will also be necessary for both entrances. There are four doors that are identified for replacement due to being mechanically irreparable and structurally deteriorating due to age (outside Cosmetology training area, both doors entering into the playground area, and two exiting the gymnasium to the rear concrete basketball area). A walk-through metal detector will need to be placed at the main entry to the building. This will allow staff to identify any persons who may have concealed weapons or other devices that are not allowed on center property. The overall objective is to provide a secure and safe environment.

#### 5. Site Drainage and Riverbank Erosion

The frontage property of the Perkins Center is lower than the main road and the buildings on the property. Drainage piping is there and has been for many years. The original drain leading to the rear of the property is compromised and causes water to pond in low lying areas of the site during wet weather. The original drain needs to be assessed to determine if all or part of it can be replaced/repared to allow water to drain from the property. Mowing and caring for this part of the Perkins Center property is often difficult and requires extra labor due to the condition of the ground. It also presents as a hazard to consumers on-site when there is standing water.

Erosion/Slippage Area: There is significant erosion of property near the Big Sandy River, which joins the property. The goal of this project is to stabilize the erosion/slippage area at rear of property boundary. This section of the property is bordered by the Levisa Fork of the Big Sandy River. As the rivers water level rises and falls, it has eroded approximately 100 feet of shoreline at the rear of the property. This has left drain lines exposed and is undermining the security fence. It is a safety concern for those using the adjacent soccer field. This will require an engineering study to determine project scope.

## 6. Plumbing -Building Drain Lines

Plumbing systems have been repaired and replaced as needed over the years. The manhole in our Courtyard area is central to the drain system of our kitchen and dormitory areas. An assessment of that drain to the sewer plant is needed along with those systems leading from the dormitory into it. Frequent repairs have been made to maintain the interior drain lines from inside the building, however these failures have steadily increased in recent years. A complete assessment of these plumbing/drain systems is needed to determine the extent of what needs repair/replacement.

## 7. Exterior Security Lighting

Areas around the main and perimeter buildings are adequate but should be updated to LED type to provide longer life and reduce energy costs. However, there are issues with site perimeter lighting that need to be addressed. This includes repair parking lot lighting and additional lighting installed around the perimeter of the property. This will require removal of asphalt to repair the underground line, or another method of lighting such as solar be established. The front perimeter of the property, adjacent to Main Street does not have any lighting, making it very dark the entire 950' of frontage and 100' onto the property. The other area of concern is along the adjacent street (Riverview Drive), and it spans an area of 450' of property frontage by approximately 50' onto Perkins Center property. Correcting these concerns would provide a much safer and secure environment for consumers and alleviate issues security staff encounter when monitoring those areas by video and in person.

## 8. Renovation/Replacement of Store Front Windows

The glass "store front style" windows surrounding the interior of the main building and half of the physical therapy area, leaks whenever it rains. Towels must be kept throughout the building to catch the water from those windows when there is precipitation. There is rust and corrosion present. It is unclear if new structure is needed or replacement glass and seals to resolve the issue. Most of the glass and structure is original to the building built in 1973. The interior glass measures 2,608 sq ft. and the physical therapy glass is 225 sq. ft. A complete assessment as to the extent of repairs, or replacement, of the glass is needed.

#### 9. Resurface Gymnasium Flooring

The current gym surface (73'5" long x 39'5" wide) is badly worn and in need of repair. It is original to the construction of the gym. It will need installation of a layer of Tarkolay over existing floor, then a 5+2 pad and pour system, game lines painted, vinyl base along walls, and a vinyl reducer along doorways and openings.

#### 10. The Perkins Center Front Entrance including Childcare Area

The main entrance to the Center needs a canopy constructed to allow those loading/unloading to safely do so without concern for snow, rain and other weather conditions that may occur. Also, a covered walkway should be constructed to the outside entry of the Childcare room. Often, consumers, family members and staff must load/unload vehicles packed with clothing, food items, electronics, and other items at our front entrance where there is no cover from the elements. Parents/caregivers of children that utilize our daycare are also subject to weather events and a covered walkway to their entry would be attached to the structure and main building. Using a wheelchair lift is also a task that often becomes difficult due to rain, snow, or adverse conditions where the pavement may become slick or hazardous. A canopy and covered walkway have also been identified as a need on our Accessibility Plan performed by an Occupational Therapist.

#### 11. Perkin's Center Hot Water Systems

Replacement of aging Hot Water Heaters throughout the facility are needed. The site currently operates its hot water supply by utilizing twenty separate hot water heating units, eleven of which are near specified end of life service for these types of units and are not performing at full capacity. A planned replacement schedule should be determined and implemented before a failure constitutes an emergency.

#### 12. The Carl Perkins Center Rooftop HVAC Units

The facility operates heating and cooling for all areas except the student dormitory by means of RTU's (rooftop HVAC units) located on the rooftops of various sections of the buildings. There are 23 individual units, 21 of which are 2001 or older manufacture. These units are beyond the specified 15–20-year service life cycle and are expensive to operate and maintain. Many of the units are not performing at 100%. All units provide cooling utilizing R-22 freon which is now obsolete to manufacture. Several units are

either non-operational or operating in a limited capacity, currently. Based on evaluations of all RTU units, a scope for replacement is being developed to provide a timeline and an accurate cost determination.

#### 13. The Carl Perkins Center Facility Wastewater Treatment Plant

The facility is served by an onsite Wastewater Treatment Plant that was installed in 2004/2005. This plant has a capacity to process up to 25k gallons of wastewater per day. The primary tank structure typically has a lifespan of 25-30 years. The support structure and decking, piping, electrical controls, blowers, pumps, and other hardware have a service life of 10-15 years. Based on an assessment completed by the original manufacturer, it is recommended that these system components and hardware be renovated, and suspect parts be replaced. The goal of this renovation would be to make the Plant viable for another 8-10 years before full replacement would be required.

#### 14. The Carl Perkins Center Parking, Driveway, and Entry Areas

The facility has approximately 110,000 square feet of areas that need replacement of asphalt, parking stops, concrete curbs, and grading. The entry/exit area to Cosmetology training will require a 900 square feet concrete pad.

#### 15. The Carl Perkins Center Therapy Pool

The facility has a therapy pool utilized by consumers participating in therapy services. The liner for the pool is approximately 15 years old and is beginning to show signs of aging. The pool is used a minimum of 30 hours per week for both physical therapy and wellness participants. The typical pool liner has a lifespan of 15–20 years.

#### 16. The Carl Perkins Center Building Exterior

The facility is 50 years old with an exterior made of aluminum/metal. The exterior has only been painted one time in the past 28 years. Many areas of the structure are stained and show signs of weathering. Because the structure includes a five-story dormitory, there are areas unreachable by facility maintenance staff and requires special equipment to reach.



17. The Carl Perkins Center Custodial/Building Maintenance/Maintenance Equipment

There is more than 75,000 square feet of flooring that requires daily cleaning and maintenance. The Center currently has a ride-on floor scrubber that is approximately 15 years old. It has been repaired multiple times and will soon need to be replaced. This equipment is used by both the Center janitorial staff and as part of the Building/Maintenance Training program.

18. The Carl Perkins Center Carpeting

There is approximately 15,000 square feet of flooring that is currently covered in commercial grade carpeting. These areas include the Cafeteria, common areas, training areas, and conference rooms. Several of these areas have carpeting that is more than 20 years old that needs to be replaced.

19. The Carl Perkins Center Paging/Intercom/Clock System

Currently the Center has an intercom system that is more than 30 years old. The dormitory has more than 100 rooms in which the intercom system should operate for emergency notifications and announcements; however, approximately 20% of the intercoms are inoperable. Furthermore, the intercom system should work throughout the building. As with the dormitory, several of these devices no longer work or are inaudible for announcements and notifications.

20. Carl Perkins Center Portable Stage

The Carl Perkins Center has a portable stage that is more than 15 years old. It is used for graduations, celebrations, and events such as job placement activities or movie nights. This stage is nearing the end of its' lifespan. Multiple sections are repaired each time it is utilized, and some sections are to the point of not being repairable. The replacement of this portable stage will be a priority in the near future.

## Section C: Goals, Priorities, and Strategies.

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

The 2023 Comprehensive Statewide Needs Assessment (CSNA) was conducted in 2023 and completed in 2024 by the Office of Vocational Rehabilitation (OVR) with input and participation from the Statewide Council for Vocational Rehabilitation (SCVR). The OVR State Plan contains goals and strategies based on the needs identified through the CSNA and other assessments performed. The SCVR, for the Combined Agency, reviewed, gave input and approved the goals for this state plan. During the quarterly meetings, the Council was informed of progress on the corrective action plan and OVR's progress in meeting the goals of the plan. The Executive Director and Division Directors report out at every quarterly meeting on the metrics data for services, capital plans and progress on the strategic plan goals. The council was given the opportunity for input on the goals and priorities and was involved in the decision-making process of keeping in place the existing goals moving forward. The existing goals address the issues in the corrective action plan as well as issues presented throughout the current statewide needs assessment.

The 2023 CSNA informs the OVR strategic and state plan; meets the Federal regulatory requirements of 34 CFR §361.29; and provides vital information on the State VR program which is used by both public and private disability advocacy agencies. The State Rehabilitation Councils along with the OVR worked collaboratively to assess the needs of individuals with disabilities.

### c. 2. Goals, Priorities, and Strategies - 2

#### **A. Support innovation and expansion activities:**

Office of Vocational Rehabilitation (OVR) will use innovation and expansion funds to support the following activities: To support the Statewide Council for Vocational Rehabilitation (SCVR), Kentucky's SRC, including all meeting expenses and expenses related to conducting an annual survey of consumer satisfaction (CSS); the Annual Report of the council; and the Comprehensive Statewide Needs Assessment (CSNA). Although the Statewide Independent Living Council (SILC) is now independent of the state and has established its own 501C (3) nonprofit, OVR will continue to provide annual funding in the amount of \$65,000. Effective July 14, 2022, legislation was passed that appoints the Department of Workforce

Development, Office of Vocational Rehabilitation as the administrator of the Employment First initiative as well as the Employment First Council through KRS 151B.212. OVR will be providing funding for the activities of the Employment First Council.

OVR is committed to continuing the work of KYRETAIN sustaining key initiatives and promising practices to meet the needs of employers and workers in the prevention of job loss. The current grant under the Department of Labor, Office of Disability Employment ends in May of 2025. OVR is currently engaged in sustainability planning to keep Kentuckians as valued, productive members of the labor force past the end date of the grant project. The program design is built around a rapid-response, interdisciplinary, and person-centered return-to-work/stay at work strategies that will result in higher rates of continued employment and lower rates of application for long-term Federal disability benefits. Return to Work Coordinators provide early intervention services aimed at getting employees back to work or to stay at work while navigating needed services. There will continue to be a strong emphasis on assistive technology, universal design and peer support. Currently the target population is workers with non-work-related injuries and illnesses that have not applied for or are receiving federal disability benefits in keeping with the research design of the grant. Once the grant ends, OVR will expand the eligibility criteria to serve all eligible applicants that need early return to work/stay at work services. The final year of the grant will be used to enable a smooth transition to innovative systems change model in Kentucky VR. OVR proposes using a portion of VR funds to support innovative efforts, through Stay at Work Kentucky, aimed at systemwide improvement of Kentucky's workforce. We posit that these system-focused efforts, working in concert with other statewide workforce efforts (including Kentucky's WIOA State Plan), will lead to more Kentuckians, including those with disabilities, entering, re-entering, and staying connected to the workforce. We propose that the innovative and systemwide improvements imagined through Stay at Work Kentucky hold more promise for sustained engagement in the workforce of all Kentuckians, including those with disabilities.

OVR will continue its funding of the OVR state owned and operated facilities and public community rehabilitation programs. OVR will continue its funding of the three customized employment projects and four Individualized Placement Supports (IPS) Establishment Projects. The IPS projects are an evidence-based supported employment program, based on eight principles, including Rapid Job Development, Competitive Employment, Systematic Job Development, Integrated Services, Benefits Planning, Zero Exclusion, Time-Unlimited Supports and Worker

Preferences. The IPS Model of Supported Employment has proven to be a successful approach for individuals with Serious Mental Illness and Substance Use. Funding through these contracts will be used to provide IPS Supported Employment (SE) for individuals with Serious Mental Illness (SMI), substance use disorders, and to individuals with intellectual and/or developmental disabilities. OVR will continue to be a partner in the IPS International Learning Collaborative and will provide data that may be used throughout partnering efforts. The Customized Employment projects are under the Marc Gold & Associates model of customized employment. MG & A provides technical assistance and training in support of community inclusion of people with the most significant disabilities to national and state agencies, nonprofit and educational agencies that impact the lives of individuals with disabilities and their families.

#### **B. Overcome barriers to accessing VR and supported employment services:**

OVR has taken steps to ensure equitable access to and participation in federally funded programs for all consumers and for agency staff regardless of race, color, national origin, sex, sexual orientation, gender identity or age. The agency takes into consideration the needs of staff in correlation to the service needs of individuals with disabilities in Kentucky, specifically for: a) Individuals with the most significant disabilities, including the need for supported employment services; and b) individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program. We will comply with the provisions of the Americans with Disabilities Act (ADA) Public Law 101—336, and applicable federal regulations relating to prohibiting discrimination against otherwise qualified disabled individuals under any program or activity and adhere to the US Department of Labor Final Rule on Federal Executive Order 11246.

OVR is committed to a policy of equal opportunity to all qualified applicants without regard to race, color, national origin, gender, age or disability. OVR encourages applications for employment from persons who are members of groups that have been traditionally underrepresented in the workplace such as members of racial or ethnic minority groups, women, and those with disabilities. There is an explicit commitment to assuring equal access for all communications through outreach, media contact of any form inclusive of social media, websites, online learning or flyers, and other announcements or correspondence under the project.

OVR has an accessibility workgroup that focuses on ensuring all materials and electronic communications are accessible to VR participants. Information is provided to individuals participating in services in their preferred language. OVR is committed to assuring that all individuals with disabilities have equal access to participate in services using the provision of reasonable accommodations and assistive technology and other available auxiliary aids and services. In 2023, this workgroup developed an Accessible Information & Communication Technology policy and procedure for the agency that is currently under review by the Executive Leadership Team. It is the agency's goal that this policy and procedure for accessibility will be fully implemented by 2024.

The OVR Executive Director and designee are members of the CSAVR Diversity, Equity and Inclusion professional Network. This allows for OVR to participate in a national workgroup addressing racial disparities specific to the field of vocational rehabilitation.

In 2021, OVR created a diversity committee to address diversity and inclusion inequities within OVR. The OVR Diversity Committee team is made up of OVR staff and representation from the state Office of Diversity, Equality and Training (ODET). An agency-wide survey was distributed in September of 2021 to better understand staff views on diversity within the agency and within the community we serve. Representatives of ODET from the Personnel Board provided feedback and shared their expertise to keep the committee focused and aware of state level initiatives as it implements a strategic vision for the agency. As a result, the committee created its first 3-year strategic plan. The following goals remain a priority for the agency:

### **Staff Diversity**

Goal: Recruit, hire and retain a diverse and inclusive staff to provide high quality services to Kentuckians with Disabilities.

Objective 1: By October 1, 2025, increase recruitment and hiring to reflect 12% minority and 50% women showing staff are representative of the population we serve.

Objective 2: By October 1, 2025, increase staff retention by no less than 10% to ensure continuity of high quality of services to Kentuckians with disabilities and to increase diversity at all agency levels.

### **Consumer Diversity**

Goal: Ensure equitable service provision to all Kentuckians with disabilities through outreach, training, and data analysis.

Objective 1: By October 1, 2025, develop a reporting system to periodically review data regarding consumer diversity as well as policies, and practices that impact service provision. Reports will provide data that can be analyzed at the state, regional, district, and caseload levels. Once created, these reports will help OVR establish baselines and identify areas for improvement.

Objective 2: By October 1, 2025, raise awareness of OVR services in underserved communities through targeted outreach. OVR staff will participate in at least 10 community events annually.

Objective 3: By October 1, 2025, create a more welcoming and inclusive environment for all VR stakeholders through consumer needs assessments, staff training and evaluation.

The OVR Executive Director is a member of the Council of State Administrators of Vocational Rehabilitation's (CSAVR) Diversity, Equity, and Inclusion Professional Network. This allows for OVR to participate in a national workgroup addressing racial disparities specific to the field of vocational rehabilitation.

With a commitment to the agency's mission, management and staff at OVR focus on competitive integrated employment in assigned tasks, planning and utilization of work time, initiative of self-directed work teams, and innovative projects. Expanding employment outcomes to minorities with the most significant disabilities is inclusive in the agency's commitment and principles. Cultural diversity training is provided to staff in order to develop a better understanding of different cultures and value systems. Staff shall ensure that persons with the most significant disabilities who are minorities will receive the same employment related services that non-minority and individuals with disabilities receive. OVR works to develop outreach activities to minorities to facilitate increased consumer referrals to the Agency. Staff are encouraged to get to know key community leaders and minority organizations to facilitate effective outreach. The Office follows Equal Employment Opportunity guidelines and Affirmative Action Procedures, and staff are encouraged to continue to participate in the Governor's Equal Employment Opportunity Conference. The Office encourages existing minority staff to play an active role in policy and program development, service delivery and program monitoring activities.

Service demographic and population data is utilized to determine the number of minorities in regions and develop strategies to increase percentages. OVR will utilize different methods and channels of communication in targeting minority populations. This will include usage of the "Language Line" that will enable our staff to communicate with non-English speaking applicants in their native language.

OVR is committed in its effort to: a) ensuring individuals with disabilities who are minorities have equal access to vocational rehabilitation services; and b) building the capacity to effectively service individuals with most significant disabilities who are minorities.

The following outlines the actions in OVR's Outreach Plan:

- Management and staff shall focus on the agency mission, which is employment, in assignment of tasks, planning and utilization of work time, initiation of self-directed work teams, and innovative projects. This includes expanding the diversity of the Agency in terms of employment outcomes to individuals with the most significant disabilities who are minorities.
- Staff shall provide leadership in implementation of the Career Center Systems throughout the Commonwealth. Staff shall ensure that persons with the most significant disabilities who are minorities will receive the same employment related services that non-minorities and individuals with disabilities receive.
- Recruit and hire Rehabilitation Counselors from minority and culturally diverse groups. Improve system linkages with the Department of Workforce in order to reach more minorities across the state. Collaboration with other entities will allow for effective coordination of services and referrals.
- Integrate internal controls through quality assurance to identify areas where there is successful outreach and best practices and identify areas needing additional outreach.
- Develop outreach activities to minorities to facilitate increased consumer referrals to OVR. OVR supports staff in making linkages with community leaders and minority organizations to facilitate outreach.
- Encourage existing minority staff to play an active role in policy and program development, service delivery and program monitoring activities.
- Provide cultural diversity training to staff in order to develop a better understanding of different cultures and value systems.

- Utilize service demographic and population data to determine the number of minorities in regions and develop strategies to increase percentages.
- Encourage minorities to play an active role in the State Rehabilitation Council, participating forums and the provision of input into policies and procedures.

**C. 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):**

In Kentucky there are 171 school districts consisting of 1,477 schools. There are more than 106,000 students with IEPs that are potentially eligible in the state according to the Kentucky Department of Education. Currently, the Department of Education has no way to count the number of students with 504 plans or those who would qualify as a student with a disability that do not have an IEP or 504 plan. The number of students in private or home schools that would qualify as students with disabilities is also not readily available.

OVR will use a variety of methods to improve and expand VR services for students. As stated in this section internal and external methods utilized are WEBI, Crystal Reports, Case Reviews, Satisfaction Surveys, Comprehensive Statewide Needs Assessment, 107 Monitoring, the State's performance under the performance accountability measures of section 116 of WIOA and the Strategic Planning Process.

OVR conducts a statewide comprehensive needs assessment in order to satisfy requirements in the Rehabilitation Act of 1973, as amended. The assessment has a component that identifies additional VR service needs of both students and youth. A part of the assessment is tailored to this population to identify emerging needs. Information gained through this process is then analyzed to develop conclusions and potential action strategies in serving this population.

OVR uses the strategic planning process as one of its methods to ensure the effective implementation of rehabilitation programs and services to this target population. Through quality assurance processes, OVR provides internal and external methods and examinations to identify areas where improvement and training are needed. OVR will utilize the case review process to Improve Professional Skills to review transition cases.



OVR continues to receive technical support from the National Technical Assistance Center on Transition: The Collaborative (NTACT:C). A KY NTACT team has been formed to develop an Intensive Technical Assistance Plan to achieve goals related to data-sharing and quality transition services. This is a collaborative effort between KY OVR and KY Department of Education and with other community partners providing services to transition age youth.

OVR created the Transition Services Branch in October 2020 to engage with and provide Pre-Employment Transition Services and Transition services to students with disabilities. The branch consists of one (1) Branch Manager, three (3) Program Administrators, one (1) Administrative Specialist, and six (6) Pre-ETS Coordinators. The Branch Manager oversees all branch activities and represents the agency on inter-agency teams. The Program Administrators coordinate and monitor Pre-ETS and Transition services throughout the state, including specific contracts with service providers. The Administrative Specialist provides clerical support to the branch. The Pre-ETS Coordinators work with Potentially Eligible students in their specific regions. They collaborate directly with schools and providers to receive referrals, coordinate Pre-Employment Transition Services, and monitor the progress of Potentially Eligible students to help determine if/when it is appropriate for a student to apply for OVR services. The Pre-ETS Coordinators transfer the Potentially Eligible students' cases to VR Counselors who determine eligibility for services and develop Individualized Plans for Employment (IPE). Pre-ETS Coordinators do not determine eligibility or develop IPEs; they only work with Potentially Eligible Students.

The Transition Services Branch:

- Formulates, develops and interprets policies, standards and procedures.
- Maintains a comprehensive knowledge of and assures that OVR adheres to all Federal and State Regulations, administrative rules and policies for transition and pre-employment transition services.
- Assists in the evaluation of the effectiveness of agency transition policies and procedures.
- Coordinates the activities of transition/Section 511.
- Coordinates the activities of Pre – Employment Transition Services.
- Facilitates the development and maintenance of agency fee schedules and cooperative agreements.

- Collaborates regularly with partners by participating in workforce partner meetings, community rehabilitation, OVR team meetings, vendors/contractors and Department of Education staff.
- Facilitates effective communication with the Executive Leadership, Field Services Management and field staff to assure the attainment of agency goals.
- Represents the agency by participation and representation on Transition Related events and Councils.

The Transition Services Branch has the following goals for the next three years:

1. Develop and implement strategies to increase the number of students applying for VR service by 10% through engagement.
2. Implement a system for approving new Pre-ETS providers to ensure high quality services are provided statewide and to increase the number of providers by at least 10%.
3. Develop and implement a data sharing agreement with partner agencies by October 1, 2025.
4. Identify underserved populations by partnering with community agencies and KDE. Increase services to underserved student populations by at least 10%.
5. Evaluate service efficacy through SWOT analyses.
6. Seek feedback from providers and OVR staff to facilitate continuous improvement.

OVR receives technical assistance from the NTACT: C to ensure that OVR is meeting RSA requirements. Transition Services Branch staff participate in webinars and communities of practice to learn about different ways to deliver services and complying with the latest guidance from NTACT: C.

The Transition Services Branch continues to refine ways to do outreach to identify more students, to ensure that providers are following established guidelines, and to ensure students receive high quality transition services. Technical assistance will be sought from NTACT:C, as needed.

To assure the coordination of services to facilitate the transition students from school to postsecondary life (including the receipt of VR services, post-secondary education, competitive integrated employment, and Pre-Employment Transition Services), OVR utilizes the following process:

The Pre-ETS Coordinator and VR Counselor are responsible for the schools located in their assigned region. Pre-ETS Coordinators and VR Counselor work with school staff and service providers to identify potentially eligible students assuring that they are given the opportunity to apply for services starting at age 14. While the student is enrolled in school, the Pre-ETS Coordinator and VR Counselor work with school staff to ensure that student receives the needed services to aid in the transition to post-secondary life. The Pre-ETS Coordinators will work with Potentially Eligible students who only require Pre-ETS. These Coordinators will monitor students' progress and will transfer the students to a VR Counselor for application when they require other VR services. The VR Counselor will then take applications, determine eligibility, and determine appropriate services to help students achieve Competitive, Integrated Employment.

Services include but are not limited to:

- Pre-Employment Transition Services,
- Other VR services and programming offered by OVR, and
- Other services specific to transition aged students by school districts and other entities.

VR Counselors provide individualized services and where gaps in services are identified, staff work to develop new and innovative services in the students' home area to better serve this population.

OVR has representation and involvement in several organizations and councils as follows:

OVR was appointed to serve as a voting member of the State Interagency Council (SIAC) for Services and Supports to Children and Transition-Age Youth.

Regional OVR representation has been established for the Regional Interagency Councils (RIAC) for the system of care to have consistent OVR representation.

OVR and Kentucky Department of Education continues to meet quarterly with interested interagency partners and serve as the catalyst for development and implementation of an infrastructure which supports youth with disabilities to transition from high school to post-secondary school and employment.

OVR has Memorandum of Understanding with the KDE for transition planning and service delivery for secondary students with disabilities.

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

**Sound Fiscal Management**

*Goal 1: Implement sound fiscal management that aligns with federal and state regulations for accurate and consistent reporting and operations.*

Objective 1-A: Develop internal controls that are embedded throughout service delivery.

*Strategies 1-A:*

- Conduct a risk analysis and identify needed procedures for internal controls.
- OVR staff works closely with Cabinet-level fiscal staff (budget, procurement, and accounting) in the development and implementation of written procedures that adhere to state and federal requirements.
- Develop needed policies and procedures.
- Train staff on established policies and procedures.

*Measures 1-A:*

- Completion of a risk analysis and a report is developed (June of 2025).
- Policy and procedural manual completion (September of 2024).
- Monthly meetings with Cabinet-level fiscal staff occur 75% of the time (9 meetings annually).
- 100% of staff are trained on established policies and procedures (December of 2025).

Objective 1-B: Best practices and effective policies are embedded in day-to-day operations.

*Strategies 1-B:*

- Dedicated staff are assigned to quality assurance monitoring over the internal control processes.
- Develop a quality assurance monitoring plan.

- Implement the quality assurance plan.
- Metrics are established for internal control processes.

Measures 1-B:

- 3 Program Grants Management Staff are assigned to quality assurance monitoring (September of 2024).
- Completion of the quality assurance plan (December of 2024).
- Metrics are established and included in the quality assurance plan (December of 2024).
- Quality Assurance Plan is implemented, and monitoring reports are submitted quarterly by the Grants Branch Manager (December of 2025).

Objective 1-C: Proper allocation and expenditure of funds.

Strategies 1-C:

- Conduct fiscal forecasting.
- Develop a plan for expenditure for the grant award.

Measures 1-C:

- Fiscal forecasting completed (September each year).
- Completion of expenditure plan (September of each year).
- Zero VR funds are reallocated annually (August of each year).
- OVR does not return any Pre-Employment Transition services annually (October annually).

**Quality Assurance**

Goal 2: Compliance with federal and state regulations in all areas to ensure continuous improvement and quality outcomes for consumers.

Objective 2-A: Enhance program compliance through the development and maintenance of policies and procedures.

Strategies 2-A:

- Identify an agency standard of accessibility.

- Develop a structure to maintain, update, and review policy and procedures.
- Train staff on the new process for policy and procedures.

*Measure 2-A:*

- Development and approval of an accessibility standard and manual (June of 2025).
- Complete a policy and procedure process for policy development and review (August of 2024).
- 100% of staff are trained (May of 2025).

Objective 2-B: Consistently analyze and use data to inform planning.

*Strategies 2-B:*

- Implement a consistent development and review process.
- Obtain input of leadership and management to identify outcome data needs.
- Hire staff to develop a strong data review process.
- Partner with internal and external stakeholders in education and workforce to obtain necessary data.

*Measures 2-B:*

- Identification of both internal and external data for programmatic and fiscal analysis completion (July 2024).
- Develop a contract with an outside source for data analysis and identification of trends (September 2024).
- Develop data sharing agreements with education and workforce partners (December 2025).
- Development of a plan for consistent development and review of data to inform day to day planning of service delivery is completed (July 2024).

*Staff Resource*

*Goal 3: Maximize technology and business processes to effectively support accessibility and the evolving needs of all stakeholders.*

Objective 3-A: All forms and documents meet accessibility standards.

*Strategies 3-A:*

- Ensure staff use accessible forms and documents.
- Staff responsible for creating forms will create forms that meet accessibility standards.
- Policies and procedures are in place for compliance.
- Train staff on accessibility and compliance.

*Measure 3-A:*

- All forms and documents meet established accessibility standards (December of 2024).
- Accessibility policies and procedures and the manual are completed (June of 2025).
- 100% of staff are trained on accessibility and compliance procedures (May of 2025).

**Facility Operations**

*Goal 4: Improve facilities and expand programs to increase competitive, integrated employment outcomes.*

Objective 4-A: Upgrade building facilities to provide a safe and accessible environment for all staff across the state.

*Strategies 4-A:*

- Develop a formal plan for ongoing and regular maintenance of state-owned buildings.
- Identify building locations private and state owned that present potential service, health, and safety risks for staff.
- Identify relocation needs.
- Follow and adhere to all state and federal processes.
- Implement approved projects in a timely manner.

Measure 4-A:

- A formal plan for ongoing and regular maintenance is completed for both the Carl D. Perkins and Charles W. McDowell facilities by December of 2024.
- A formal plan is developed with facilities for relocation of staff in field office locations with set timeframes by December of 2024.
- All facility projects are completed and operational as identified in the agency Capital Plan (annually).
- All facilities meet facility and safety requirements and pass annual inspections by the Cabinet Safety Officer (annually).
- 100% of projects have prior approval from RSA.
- 75% of approved projects are completed in a timely manner (annually).

Objective 4-B: Increase capacity to offer statewide services at state operated Centers.

Strategies 4-B:

- Expand curriculum and training opportunities in industry-standard computer software programs (e.g., computer literacy).
- Address hardware, software, and connectivity access barriers.
- Expand learning formats to include a variety of online and hybrid programs.
- Develop and implement a plan to ensure adequate resources for the learning format expansion.
- Centers will increase outreach efforts to reach consumers in all 120 counties.

Measures 4-B:

- Increase training enrollments by 25% for both Centers by 2024.
- Increase competitive, integrative employment by 25% for both Centers by 2024.

Objective 4-C: Maximize job readiness training and work experience opportunities.



Strategies 4-C:

- Expand job readiness training and work experience opportunities at the Centers.

Measures 4-C:

- 75% of McDowell Center VR participants complete a work experience (annually program year).
- Re-establish all the Perkins Center's current relationships and expand those by 25%.
- Completion of job readiness training at the Perkins Center will increase by 25% by 2024.

**Consumer Services**

Goal 5: Implement innovative practices to improve quality outcomes.

Objective 5-A: Increase the number of credentialed vendors.

Strategies 5-A:

- Incorporate vendor recruitment as a part of the outreach plan.
- Train staff on new vendor credentialing and processes for vetting.
- Recruit new vendors for increased consumer choice.
- Maintain a strong application/recruitment/retention vendor process.

Measure 5-A:

- All newly approved vendors are credentialed (July of 2024).
- Outreach Plan developed by (December of 2025).
- Increase supported employment providers by 5%. (July of 2025).
- 100% of staff are trained annually in May.

Objective 5-B: Consumers have access to industry-driven training, career, and other resources.

Strategies 5-B:

- Develop a list and expand the number of agency-approved vendors.

- Develop a plan for consumers to have access to technology and virtual services.
- Counselors place greater emphasis on providing informed choices.

Measure 5-B:

- Increase the number of consumers who are engaged in and complete training by 10% (June of 2025).
- 100% of Counselors are trained on informed choice (May of 2025).
- Completion of a plan for consumer access to technology and virtual services (December of 2024).

Objective 5-C: Strengthen existing workforce partnerships, develop new partnerships, and expand learning opportunities.

Strategies 5-C:

- Employer Services Branch will develop and implement a plan to partner with employers who offer jobs in targeted sectors.
- Increase work-based learning opportunities in targeted sectors.
- Train staff using career pathways strategy guides.

Measure 5-C:

- 10% increase in competitive, integrated employment outcomes in targeted sectors (July annually).
- 100% of staff are trained on career pathway strategy guides (May of 2025).

Objective 5-D: Counselors implement a career pathways approach to increase quality employment outcomes.

Strategies 5-D:

- Increase use of Labor Market Information in employment goal development.
- Increase consumer engagement.
- Implement policies that guide the implementation of the career pathway approach team-based, early intervention strategies.

Measure 5-D:

- Annual increases in the required federal common measures (annually July).
- Decrease cases closed "unable to contact/refused services" by 10% (June of 2025).
- 100% of staff receive training in "Engagement" and "Labor Market Information" (May of 2025).
- Policies are developed on Career Exploration (September 2024).

*Objective 5-E: Ongoing Systematic Training for all Staff.*

*Strategies 5-E:*

- Formation of a Training Development Team.
- Develop a systematic training Schedule.
- Implement a systematic training schedule for all staff.

*Measure 5-E:*

- Training Plan Developed by December 2024.
- Ongoing systematic training is implemented by June 2025.

*Objective 5-F: Increase service capacity and customer engagement through additional staff resources.*

*Strategies 5-F:*

- Conduct an assessment of statewide staff needs based on a internal job duties analysis and service delivery trends.
- Develop a talent management plan.
- Recruit and hire staff to fill identified positions.

*Measures 5-F:*

- Assessment of statewide staff needs completed by June 2024.
- Talent Management plan completed by December 2024.
- # of Positions Filled reducing the turnover rate from 16.67 % to 15% by June of 2025.

**Public Awareness**

Goal 6: Implement an ongoing, flexible outreach plan and process to improve public awareness of VR programs, services, and agency employment.

Objective 6-A: Implement a comprehensive outreach plan for the agency.

Strategies 6-A:

- Hire a dedicated outreach person.
- Create an outreach plan.
- Develop outreach materials to recruit vendors.
- Outreach materials that reflect current information and are engaging and in accessible formats.
- Outreach materials are made available to staff and consumers.

Measures 6-A:

- Staff hired to oversee outreach (July of 2025).
- Outreach plan completed by December 2025.
- All outreach materials are updated and maintained in appropriate, accessible formats (annually).
- Social Media presence maintained on most popular accessible sites (annually).
- All outreach materials will be located for easy access to staff and consumers (agency website/paper material to Perkins for distribution/Docushare Drive) (December 2024).

Objective 6-B: Recruit talent.

Strategies 6-B:

- Identify a staff representative to work with the Education and Labor Cabinet and Personnel Cabinet on issues related to talent recruitment.
- Identify staff representatives to make presentations to colleges, universities and technical colleges regarding OVR services and employment opportunities.
- Expand the quantity and types of internship programs with university programs.

- Leverage social media as a tool for recruitment.

Measures 6-B:

- Open positions are filled with qualified candidates at 90% or above (annually).

**The Kentucky Office of Vocational Rehabilitation set the following goals for the distribution of Title VI, Part B Funds. Kentucky has set the following goals to assist with increase employment outcomes for adults and youth with a significant disability.**

Goal 1: Build capacity within supported employment services for individuals with the most significant disabilities.

Objective 1.1: Increase the number of CRP's providing supported employment services.

Strategies: Recruit more IPS providers for supported employment by holding outreach opportunities for potential providers.

Strategies: Implement additional IPS Establishment Project contracts to continue expansion of the IPS model throughout KY.

Strategies: Recruit more Employment Specialists for participation in the University of Kentucky's Human Development Institute Leadership Series on Customized Employment.

Strategies: Implement additional Customized Employment Establishment Project contracts to continue expansion of Customized Employment throughout KY.

Strategies: Continue existing contract with the University of Kentucky to allow scholarship opportunities among Employment Specialists to participate in the Leadership Series training.

Strategies: Hire internal staff to serve as IPS Trainers and Fidelity Monitors

Strategies: Hire additional CRP Branch Consultant staff to increase recruitment of new CRPs.

Measure: Increase in the number of providers (10% annually).

Measure: Increase the number of certified employment specialist in customized employment (10% annually)

Objective 2:1: Reduce attrition among CRPs providing supported employment.

Strategies: Revamp supported employment payment structure.

Strategies: Develop and implement CRP Sustainability Survey.

Strategies: Research supported employment payment structures from other state VR agencies.

Strategies: Hire additional CRP Branch Consultant staff to strengthen CRP technical support.

Measure: Development, approval and implementation of new supported employment payment structure (September of 2024).

Objective 3.1: Improve monitoring and exploration of additional strategies to improve CRP service quality and compliance.

Strategies: CRP Branch staff will facilitate monthly meetings with CRP and VR staff to address quality and compliance issues.

Strategies: CRP Branch will regularly assess and amend the CRP Manual to ensure up to date and accurate information is readily available to CRP and VR staff.

Strategies: Train staff on new policies related to customized employment and person—centered planning.

Strategies: Provide quarterly CRP Branch Bulletin newsletter to CRP and VR staff.

Measure: Quarterly report (December of 2024)

Measure: Scorecard (December of 2024)

Objective 4.1: Seek alternative strategies for providing and funding Extended Services.

Strategies: Provide Extended Services support to youth with disabilities as outlined in CFR 361.5 (19).

Strategies: Gather input from staff, education partners, service providers, individuals with disabilities, their families, and other stakeholders.

Strategies: Explore state funding earmarked for Extended Services

Measure: Increased Partnerships with partnering state agencies of Behavioral Health (December of 2025).

Measure: MOU development (December of 2025)

## **Section D: Evaluation and Reports of Progress: VR and Supported Employment Goals**

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

#### **Sound Fiscal Management**

**Goal 1: Implement sound fiscal management that aligns with federal and state regulations for accurate and consistent reporting and operations. (Continuing into the next PY)**

**Objective 1-A: Develop internal controls that are embedded throughout service delivery.**

#### **Strategies 1-A:**

- Conduct a risk analysis and identify needed procedures for internal controls.
- OVR staff works closely with Cabinet-level fiscal staff (budget, procurement, and accounting) in the development and implementation of written procedures that adhere to state and federal requirements.
- Develop needed policies and procedures.
- Train staff on established policies and procedures.

Measures 1-A:

- Internal controls are implemented in day-to-day service delivery.

**Progress:** OVR has not conducted a formal risk analysis at this time. Currently, the agency has worked closely with Cabinet level fiscal staff to identify and develop written procedures that adhered to state and federal requirements that align with the findings in the Corrective Action Plan (CAP). OVR has developed and finalized policies and procedures for the following: SF-425, Program Management, Case Record Review, Program Income, RSA 911, RSA-17, 9169, Authorizations, Service Fee Memorandums, Case Service Report, Rate Setting, Vendors, Prior Written Approval and Third-Party Cooperative Agreements (14 policies and procedures). An important piece of this process is that a detailed position description procedure is developed for each designated staff responsible for the day-to-day implementation into service delivery for the listed policy and procedure. Responsible staff are trained and are knowledgeable on those established policies and procedures and their individual position description procedures. An intensive training from the VRTAC-QM provided executive leadership staff, agency fiscal staff and cabinet fiscal staff with training on D-RAN or Delegable, Reasonable, Allocable and Necessary expenditures with a focus on Period of Performance as well.

Objective 1-B: Best practices and effective policies are embedded in day-to-day operations.

Strategies 1-B:

- Dedicated staff are assigned to quality assurance monitoring over the internal control processes.
- Develop a quality assurance monitoring plan.
- Implement the quality assurance plan.
- Metrics are established for internal control processes.

Measures 1-B:

- Clean audit with no findings.
- Reduction of case review errors.
- Timely submission of reports with no errors.



**Progress:** Weekly administrative policy and procedure meetings occur weekly with Executive leadership and program policy and support staff. Monthly meetings occur between OVR program and grant staff and Cabinet fiscal staff to discuss fiscal operations across divisions and programs. Additional staff resources have been dedicated to associated job duties to ensure compliance in all areas under the Program and Policy Support Branch (PPS). PPS Staff are provided with training on their individual position description procedures to assure they are implementing internal controls in the day-to-day service delivery. OVR has drafted internal control policies to ensure that the provisions of 34 C.F.R. § 361.47 are met and verified through accurate service record documentation. The case review has been part of the intensive technical assistance provided to the agency by VRTAC-QM and they have been involved in the development and review at all phases of this effort. OVR has successfully completed a pilot program of the new Case Review Process and one quarterly review. OVR continues its work on the development of internal controls for the case management system and performance measures. The process is not advanced enough to develop and establish metrics for internal control processes. During the first year of the implementation of the new Case Review Process, the Case Review Unit of PPS is working on establishing a baseline for case review measures. The development and implementation of a quality assurance monitoring plan will be a focus over the next year.

OVR was a part of the Statewide Single Audit of The Commonwealth of Kentucky Volume II For The Year Ended June 30, 2021 with no findings. OVR submitted all reports in a timely manner but there have been reporting errors that required correction. An obstacle for accuracy of reporting data that the agency is currently working toward resolution on is the implementation of an updated or new case management system to ensure that accurate data is captured for reporting purposes. As we work toward resolution with a new system, staff have outlined additional manual processes in their procedures for additional checks and balances to assist with the accuracy of the information of reports, including measures for corrective action for identified errors.

*Objective 1-C: Proper allocation and expenditure of funds.*

*Strategies 1-C:*

- Conduct fiscal forecasting.

- Develop a plan for expenditure for the grant award.

Measures 1-C:

- Fiscal forecasting completed.
- Adequate expenditure of funds

**Progress:** The agency has worked closely with Cabinet-level fiscal staff to identify and develop written policies and procedures that adhered to state and federal requirements that align with the findings in the Corrective Action Plan (CAP). As already stated, OVR has developed and finalized around fourteen (14) policies and procedures). Responsible staff are trained and are knowledgeable on those established individual position description procedures that provide for necessary checks and balances for the expenditure of funds. OVR is currently working on developing a plan for expenditures of the grant award that includes fiscal forecasting and assures the adequate expenditure of funds. OVR is receiving technical assistance from the NTAC for the area of pre-employment transition services and the VRTAC-QM for this area.

OVR utilizes Service Fee Rates policies and procedures to inform how rates are regularly established, reviewed and updated to ensure that rates are allowable reasonable, and allocable. OVR's best practice is to review fee schedule rates every two years to align with the federal fiscal year, except for post-secondary tuition rates which are reviewed annually. Service fee rates will also be reviewed as needed if a rate is determined to impact consumer needs or other factors that necessitate a rate adjustment (i.e., lack of providers, continuous denial from active vendors).

## Quality Assurance

**Goal 2: Compliance with federal and state regulations in all areas to ensure continuous improvement and quality outcomes for consumers. (Continuing into the next PY)**

Objective 2-A: Enhance program compliance through the development and maintenance of policies and procedures.

Strategies 2-A:

- Identify an agency standard of accessibility.

- Develop a structure to maintain, update, and review policy and procedures.
- Train staff on the new process for policy and procedures.
- Train staff on common performance measures

Measure 2-A:

- Completion of a formal policy and procedure manual. (Not Met)
- Meets or exceed the RSA negotiated performance rates. (Not Met)

**Progress:** The accessibility workgroup developed an agency standard of accessibility, and a draft policy and procedural manual is under review of the agency Executive Leadership Team. The draft standard of accessibility manual is grounded in the Kentucky Accessible Information Technology Law (KRS 61.980 to 61.988), Section 508 of the Rehabilitation Act of 1973, and the Web content Accessibility Guidelines (WCAG) 2.1. The policy establishes guidelines for accessible information and communication technology (ICT), such as webpages documents, presentations, and forms. The agency continues to work on this goal area.

One area of significant progress is the revamping of the Case Review Process. Agency staff and VRTAC-QM have worked closely together to develop policy and procedures for this process that include associated forms and standardized practices for feedback to staff that will lead to quality improvements. Additional staff have been hired to provide additional supports for the case review processes. The team shall identify focus topics, complete reviews, provide data on potential federal reporting impact, provide feedback, follow-up with corrections, and provide training, within designated time frames. Case reviews will be completed every two months January through October. A total of 137 cases were reviewed in March 2024. The criteria for the cases reviewed in March were: Accepted for services, closed from accepted, trial work, or closed from trial work. There are seven (7) categories with a total of 54 competencies scored for each review. The statewide average score for March case reviews was an 90.8%, indicating a majority of the counselors were overall compliant.

OVR continues to work on the development and implementation of a formal policy and procedures manual that has administrative, financial, and programmatic sections. OVR is working on the development of internal control processes to monitor the effectiveness and efficiency of operations;

the reliability of reporting for internal and external use and OVR's compliance with applicable laws and regulations. Errors and violations that occur are identified through these internal control processes are examined and acted upon through corrective action. Corrective action may be in the form of the development of new or revision of existing policies and internal controls and the training of staff. This includes the performance of the Vocational Rehabilitation and Supported Employment programs including pre-employment transition services, leading to quality competitive integrated employment and supported employment outcomes for individuals with disabilities. Currently, leadership holds weekly administrative review meetings inclusive of subject matter experts that work on policy development and procedures. OVR has a goal of September 2024 for completion.

Staff performance evaluations now include expectations related to timely completions of Eligibility and IPE determination with reviews conducted on interim and annual basis. All staff have been trained on common performance measures and timely and accurate data entry in FFY 2023 - 2024. OVR met actual performance levels for PY22 for the negotiated rates. OVR for the area of Median Earnings placed in the 1st Quartile, for Quarter 2 Employment Rate the 2nd Quartile, the 3rd Quartile for Quarter 4 Employment rate and fell into the 4th Quartile for measurable skills gains and credentials. This shows there are still much needed areas of improvement.

OVR utilizes the Monitoring and Technical Assistance Guide (MTAG) for periodic on-site monitoring scheduled by RSA and as a tool annually when updated to assist with performance accountability assuring compliance with the provisions of its State Plan under Section 101 and the State Plan Supplement under Section 606 of the Rehabilitation Act and with the evaluation standards and performance indicators established under Section 106 of the Rehabilitation Act (which are subject to the performance accountability measures in Section 116(b) of WIOA and 34 C.F.R. part 361, subpart E).

*Objective 2-B: Consistently analyze and use data to inform planning.*

*Strategies 2-B:*

- Implement a consistent development and review process.

- Obtain input of leadership and management to identify outcome data needs.
- Hire staff to develop a strong data review process.
- Partner with internal and external stakeholders in education and workforce to obtain necessary data.

*Measures 2-B:*

- Data is always used in the decision-making process.

**Progress:** The OVR Case Management System is the authorized mechanism for staff to collect data required for reporting and needed for the provision of services to consumers. OVR maintains adequate internal controls in order to ensure the accuracy and security of the data collected. The system contains edit checks and balances for data entry, authorized services and access to data, files and programs is appropriately controlled. Monthly Metrics Reports are generated from the Case Management system and disseminated statewide to all staff. This consists of three reports: 1) the current monthly metrics; 2) the current quarter metrics and 3) the calendar year to date program metrics. The metric reports contain statewide data as well as by district and by individual caseload for timeliness of services, time from referral to application, time from application to eligibility, time from eligibility to the development of the plan, Credential attainment, measurable skills gains, Employment Rate 2nd quarter after Exit, Employment Rate 4th quarter after Exit, and median earnings OVR began the development of a plan to identify outcome data needs.

OVR utilized the RSA Data Dashboards that contain performance results for four previous quarters of the RSA-911 data. RSA also uses the data to assess the performance of the VR program through the calculation of evaluation standards and performance indicators as required by Section 106 of the Rehabilitation Act, which must be consistent with the common performance accountability measures established in Section 116 of Title I of WIOA for the core programs of the workforce development system. OVR uses the dashboards in supporting quality assurance efforts for the RSA-911 reporting and fostering data-driven decision-making in the VR program.

OVR is working on a contractual agreement with the University of Kentucky Center for Excellence for their evaluation unit to do an analysis of program data, programmatic and fiscal trends to us in decision-making for the

strategic planning and state plan process. Currently, they are doing a three-year trends analysis of some of the 911 data fields. OVR continues to receive technical support from the National Technical Assistance Center on Transition: The Collaborative (NTACT:C). A KY NTACT team has been formed to develop an Intensive Technical Assistance Plan to achieve goals related to data-sharing and quality transition services. This is a collaborative effort between KY OVR and KY Department of Education and with other community partners providing services to transition age youth.

### **Staff Resource**

**Goal 3: Maximize technology and business processes to effectively support accessibility and the evolving needs of all stakeholders. (Considered Complete)**

**Objective 3-A: All forms and documents meet accessibility standards.**

**Strategies 3-A:**

- Ensure staff use accessible forms and documents.
- Staff responsible for creating forms will create forms that meet accessibility standards.
- Policies and procedures are in place for compliance.
- Train staff on accessibility and compliance.

**Measure 3-A:**

- All forms and documents meet established accessibility standards.

**Progress:** The agency has in place an Accessibility Team, an Accessibility Coordinator and a Diversity, Equity, and Inclusion (DEI) Team to assistance with compliance and forward progress in policy and procedure as it relates to this goal. The Accessibility Team has developed a standard of accessibility and a detailed manual with recommendations for training development staff support in this area. The DEI Team has included accessibility as part of their Strategic Plan. All documents, forms and electronic communications are sent to the Accessibility Coordinator prior to dissemination and training in adherence to OVR policy and procedure. The agency Accessibility Coordinator works closely with staff to ensure that documents, forms and other correspondence meet accessibility requirements. In addition, the coordinator also assists with ensuring that

documents sent out through larger Cabinet initiatives are also accessible for our staff. This has been accomplished through a solid working relationship with staff of the Education and Labor Cabinet (ELC) Office of Communications on accessibility. The ELC is also working to secure their own accessibility specialist to assist them with internal assurances of compliance for all documents, forms and correspondence. They are using the OVR position description for our Accessibility Coordinator to establish the roles and responsibilities for the position they intend to hire. This continues to be a work in progress and considered completed at this time.

## **Facility Operations**

### **Goal 4: Improve facilities and expand programs to increase competitive, integrated employment outcomes. (Continuing into the next PY)**

**Objective 4-A: Upgrade building facilities to provide a safe and accessible environment for all staff across the state.**

#### **Strategies 4-A:**

- Develop a formal plan for ongoing and regular maintenance of state-owned buildings.
- Identify building locations private and state owned that present potential service, health and safety risks for staff.
- Identify relocation needs.
- Follow and adhere to all state and federal processes.
- Implement approved projects in a timely manner.

#### **Measure 4-A:**

- All facility projects are completed and operational as identified in the Capital Plan.
- All facilities meet facility and safety requirements.

**Progress:** The Carl D. Perkins Vocational Training Center (CDPVTC) and the Charles McDowell Center are both older residential facilities with complex maintenance issues that must be addressed. Both facilities have in place a formal plan for ongoing and regular maintenance. The agency staff, along with executive leadership, meet bi-monthly and more if needed with the Education and Labor Cabinet (ELC) facilities staff to discuss the ongoing and regular maintenance issues as well as the capital projects that

have been approved by RSA and state leadership for implementation. For CDPVTC this includes a new forklift area as this is a consistently sought after certification with crucial update needs for continued program implementation. CDPVTC also has plans for medical wing updates and other maintenance initiatives to maintain or enhance current program. Charles McDowell Center staff have undergone maintenance to update dorms, safety features of the building and climate control mitigation to address moisture issues in the facility. CDPVTC continues to have Wi-Fi issues due to the large number of individuals in the building sharing the network and the number of technology devices that pull from that system such as staff computers and phones as well as student computers, phones, televisions, game systems, etc. The Wi-Fi system was updated by the Commonwealth Office of Technology in 2023 but continues to be a challenge for the area in which they are located.

The largest issue that the agency faces regarding maintenance issues, is the associated processes fiscal process from state government. Delays in approvals and project implementation/completion can significantly impact the budget projections for expenditures for period of performance as well as program progress. This in addition to labor and product shortages has impacted the work on capital projects for OVR.

*Objective 4-B: Increase capacity to offer statewide services at state operated Centers.*

*Strategies 4-B:*

- Expand curriculum and training opportunities in industry-standard computer software programs (e.g., computer literacy).
- Address hardware, software, and connectivity access barriers.
- Expand learning formats to include a variety of online and hybrid programs.
- Develop and implement a plan to ensure adequate resources for the learning format expansion.
- Centers will increase outreach efforts to reach consumers in all 120 counties.

*Measures 4-B:*

- Increase training enrollments by 25% for both Centers by 2024.



- Increase competitive, integrative employment by 25% for both Centers by 2024.

**Progress:** Both divisions consistently work to improve facility services and the courses offered to consumers. Perkins is implementing a Barista program due to the increased growth in coffee houses throughout the state. Perkins is partnering with Division of Blind Services to grow the knowledge of visual disabilities with their staff to provide services to consumers with visual impairments in a supportive role to the Charles McDowell Services. The Bioptic Driving Program is adding additional staff to support this program. COVID provided an opportunity for both centers to hone staff skills related to virtual service delivery and this continues to be a utilized training support for consumers for both of these programs. CDPVTC continues to maintain their Commission on Accreditation for Residential Facilities (CARF) status.

Perkins Materials Management Program is in the final stages of implementing new training that will allow the students to have instruction and certification as a Certified Production Technician and a Certified Logistics Technician (both of which are MSGs). Perkins updated internet extenders throughout the building, increasing from 12 access points to 48 in the building. 72% of Perkins staff have a laptop for work purposes. The Perkins on-line permit class had 121 referrals in 2023 and year to date for the first 4 months of 2024 we are at 50. The Perkins Center completed an expansion of the Distance Learning Room adding video/sound quality for learning opportunities through our Technology Plan. Training enrollments increased from 124 to 139 in 2023 or 9%. The first four months of 2024 produced an increase of 50% for competitive integrated employment Outcomes from the same time period in 2023 for individuals participating in Perkins Center programs.

OVR is establishing a baseline for the McDowell Center for these measures for the program year 2024. The McDowell Center operations were interrupted during COVID and during renovations of the residential area of the building. The Center reopened at full capacity in October of 2023.

Objective 4-C: Maximize job readiness training and work experience opportunities.

Strategies 4-C:

- Expand job readiness training and work experience opportunities at the Centers.

Measures 4-C:

- 75% of McDowell Center VR participants complete a work experience.
- Re-establish all the Perkins Center's current relationships and expand those by 25%.
- Completion of job readiness training at the Perkins Center will increase by 25% by 2024.

**Progress:** OVR's Blind Services division of the McDowell Center was accepted into the Progressive Employment (PE) Development Project through Explore VR/Institute for Community Inclusion. Since that time, the division director and key McDowell staff have participated in targeted monthly technical assistance with the PE team, quarterly nationwide PE meetings of participating states, and have even attended one in-person learning collaborative meeting. In January 2024, an ICI staff provided on-site training with McDowell staff and OVR field staff. The McDowell Center for the Blind (a residential and day training center for visually impaired adults) has implemented the Progressive Employment model with the goal of providing the highest quality training opportunities and increasing competitive employment outcomes for consumers. McDowell Center outreach materials list Progressive Employment as a "core" program offering alongside Braille, Assistive Technology and Orientation and Mobility. Center participants are provided work-based learning services, such as job shadowing, informational interviews, paid work experiences, and employer site tours. Implementing the model has resulted in an updated job readiness curriculum that is more dynamic and focuses on building relationships with employers and the larger community outside the walls of the Center. Participating in Progressive Employment allows consumers to gain a deeper understanding of their career interests and skills, and to overcome the fear and anxiety related to entering or re-entering the workforce as a blind adult. The McDowell Center is establishing baseline numbers for the program during the program year 2024 for the area of work experience.

The Perkins Center established a new position for a Job Readiness Instructor. Perkins added the number of MOAs with new businesses by 8.

Perkins increased the number of completions of job readiness training by 23% during the first four months of 2024. (2023 – 48; 2024 – 68)

## **Consumer Services**

### **Goal 5: Implement innovative practices to improve quality outcomes. (Continuing into the next PY)**

#### **Objective 5-A: Increase the number of credentialed vendors.**

##### **Strategies 5-A:**

- Incorporate vendor recruitment as a part of the outreach plan.
- Train staff on new vendor credentialing and processes for vetting.
- Recruit new vendors for increased consumer choice.
- Maintain a strong application/recruitment/retention vendor process.

##### **Measure 5-A:**

- All newly approved vendors are credentialed.
- Increase supported employment providers by 5%.

**Progress:** The agency has developed and implemented policy and procedures related to Vendor Approvals, credential confirmations, timely agreement distribution and returned vendor agreements. The agency has designated staff assigned specific job duties regarding the vendor process. An important piece of this process is that a detailed position description procedure is developed for each designated staff responsible for the day-to-day implementation into service delivery for the listed policy and procedure. In addition, the agency developed a vendor manual that provides vendors with the resources needed to conduct business with OVR and it outlines the standards for vendor qualifications established by Federal and state law, national certification boards, applicable licensure boards, and OVR standards. There is still a great deal of work needed for the area of vendor recruitment and provider capacity. There are no vendor recruitment materials currently available. The agency did develop a specific Outreach packet for Kentucky Psychiatric Association professional conference held in Louisville in 2023. This was an identified area of significant need for vendor recruitment. Plans for the agency include the development of additional Outreach materials for the vendor groups. Currently, we are looking at restructuring the Employer Services Branch to

maximize statewide services and address jobs in targeted sectors using of career pathway strategies.

Although various models of supported employment are utilized statewide, there continues to be a significant need for providers. During Program Year (PY) 2019-2020, there were 100 CRPs that were providing supported employment. Currently, there are 82 with some of those agencies reducing the territory with which they serve. OVR will continue to work on this area to increase supported employment providers by 5%.

Objective 5-B: Consumers have access to industry-driven training, career, and other resources.

Strategies 5-B:

- Develop a list and expand the number of agency-approved vendors.
- Develop a plan for consumers to have access to technology and virtual services.
- Counselors place greater emphasis on providing informed choices.

Measure 5-B:

- Increase the number of consumers who are engaged in and complete training by 10%.

**Progress:** All consumers have the option for virtual and in person appointments as a part of the VR process. OVR has expanded and implemented virtual instruction at both residential centers for the areas (i.e. driver permit instruction, blindness skills). All staff are trained on informed choice at hire. Intensive training the provides an increased emphasis on informed choice will occur in 2025 as a part of the training plan that will be completed in December 2024. All consumers have access to technology through the rehabilitation process. Counselors identify any technology needs consumers may have making appropriate referrals to OVR assistive technology staff. The Kentucky Office of Vocational Rehabilitation (OVR) is the lead agency for the KATS Network. The KATS Network in turn collaborates with five nonprofit organizations to operate assistive technology resource centers (ATRCs) across the state in Louisville, Lexington, Ft. Mitchell, Hazard, and Owensboro. These ATRCs provide assistive technology demonstrations, device loans, as well as accept device donations which they refurbish and redistribute to individuals in need. In

addition to the ATRC collaborations, the KATS Network teams up with many other organizations to meet individual's unique needs as well as works to connect Kentuckians to community resources. The KATS Network is a statewide network of organizations and individuals connecting to enhance the availability of assistive technology devices and services to improve the productivity and quality of life for individuals with disabilities.

OVR houses the Assistive Technology Alternative Financing Program (ATAFP) for Kentucky is the Kentucky Assistive Technology Loan Corporation (KATLC). KATLC provides financial loans for the purchase of assistive technology with its lending partner for individuals with disabilities or the parent or legal guardian of an individual with a disability. KATLC Efforts by OVR staff to provide these available resources to consumers continue to be made. The agency believes that a well-trained professional staff is essential in providing quality services to individuals with disabilities and achieving competitive integrated employment outcomes for agency consumers. The Assistive Technology Branch holds an Assistive Technology Conference annually for Kentucky State University's Research Farm. The 3-day conference ensures awareness of the various programs, services and resources available. Professional continuing education credits for assistive technology professionals occurs annually when the agency partners with the Kentucky Assistive Technology System (KATS) Network and Protection and Advocacy to coordinate a statewide training. The content includes current best practices, emerging trends and issues related to the various aspects of assistive technology. The Summer Assistive Technology Workshops are attended by KYOVR staff, AT professionals, educators, Occupational Therapists, Physical Therapists, and other professionals that have in interest in or contact with AT. KYOVR administers the KATS Network, the Commonwealth's Assistive Technology program. Rehabilitation Engineering and Assistive Technology Society of North America (RESNA) continuing education credits were offered as part of the training to ensure that all agency rehabilitation technology staff maintain the required credits for continuance of their professional certification.

OVR established a baseline for training for the 2022 school year. OVR had 1,014 cases in secondary school, 2,553 in post-secondary and 545 in Career/Technical/Trade for a total of 4,112. OVR will analyze the numbers for 2023 upon completion of the program year.

Objective 5-C: Strengthen existing workforce partnerships, develop new partnerships, and expand learning opportunities.

Strategies 5-C:

- Employer Services Branch will develop and implement a plan to partner with employers who offer jobs in targeted sectors.
- Increase work-based learning opportunities in targeted sectors.
- Train staff using career pathways strategy guides.

Measure 5-C:

- 10% increase in competitive, integrated employment outcomes in targeted sectors.

**Progress:** The Employer Service Branch oversees the plan for the Coalition for Workforce Diversity expansion in Kentucky. The Coalition for Workforce Diversity project coordinates activities between employers, service providers, and people with disabilities to assist them in obtaining jobs. This is an established operation in Jefferson County, the Louisville metropolitan area. The Coalition focuses on activities with employers to develop their awareness of the value of hiring people with disabilities as a part of their workforce. The expansion plan starting July of 2024 expands the coalition to each of OVR's (5) workforce regions creation the formation of advisory boards in each area.

PEO's program year

2020: 2569 (Baseline)

2021: 3091 (17% increase over the previous year)

2022: 4380 (31% increase over the previous year)

Objective 5-D: Counselors implement a career pathways approach to increase quality employment outcomes.

Strategies 5-D:

- Expand types of employment placements into higher-paying, lower turnover jobs.

- Increase use of Labor Market Information in employment goal development.
- Increase consumer engagement.
- Implement policies that guide the implementation of the career pathway approach through team-based, early intervention strategies.

*Measure 5-D:*

- Annual increases in the required federal common measures.
- Decrease cases closed "unable to contact/refused services" by 10%.

**Progress:** For 2022 OVR median earnings were at \$7,768 giving Kentucky a 1st Quartile ranking. The career pathways strategy strengthens the work of programs and initiatives of the Office of Vocational Rehabilitation (OVR). This is of particular importance in assuring delivery of services to individuals facing significant barriers to employment. Individuals with disabilities seeking to enter the workforce can face additional or compounding barriers to their disability such as outdated skill sets, being a single parent, lacking financial resources, having minimal or no previous work experience, and not completing secondary education. Using a career pathways model is a "best practice" for providing vocational rehabilitation services and is further strengthened by Title IV of WIOA which goes beyond solely placing an individual in an entry-level job but promotes assisting an individual to "advance in" a career. OVR provides opportunities to program participants to obtain industry recognized credentials in multiple career pathways at the Carl D. Perkins Center. Work experiences, internships, and other employer facing experiences are provided at the Perkins Center, the McDowell Center for the Blind, and throughout the state through OVR's community rehabilitation providers and Supported Employment programs. OVR provides individualized vocational counseling to prepare individuals with disabilities for employment through using labor market information and understanding the variety of post-secondary training options suited to their interests and abilities.

As a result of Rehabilitation Services Administration federal grant funding, OVR was able to create and host a Career Pathways Toolkit on its website. This toolkit is a resource for OVR staff development in providing services through a Career Pathways lens. <https://kcc.ky.gov/Vocational-Rehabilitation/seeking-services/projectcase/Pages/default.aspx>

Consumer engagement is an element of focus to reduce to the numbers of cases closed “unable to contact/refused services” and will be a training element in the statewide training initiative in May of 2024 with ongoing training supports upon completion of a systematic training schedule for all staff. At this time 17.1% (2023 Quarter 2) of cases are closed in this status. In Quarter 3 of 22 the number of closed cases in this status were 22%. Although, the percentage has decreased it is staying steady around the 17-percentage area for the first two quarters of program year 2023.

Objective 5-E: Ongoing Systematic Training for all Staff

Strategies 5-E:

- Formation of a Training Development Team
- Develop a systematic training Schedule.
- Implement a systematic training schedule for all staff.

Measure 5-E:

- Training Plan Developed by December 2024.
- Ongoing systematic training is implemented by June 2025.

**Progress:** The agency is working toward establishing a robust training team. During the past year OVR added additional staff to this area with continued plans for growth of personnel to address the diverse and specialized needs of staff. There is currently in place a training team lead and one additional training specialist with a personnel action in place to hire a second training specialist. The current training staff works closely with subject matter experts within the division to assist with the development and implementation of appropriate training programs. OVR is currently working on the statewide training needs assessment of staff to be completed by June of 2024. In addition, with the newly implemented Case File Review process the results will be utilized to systematically determine the needed training elements to ensure timely, accurate, data driven elements are taking place during case service delivery and follow-up. Ongoing systematic training for all staff is ongoing. The new employee orientation for staff has been revamped to ensure timely training for all onboarding. A statewide training for all staff will be held in May of 2024. In 2023, the agency held a statewide training for all assistants to address areas staff identified as critical for their work to increase their individual knowledge and skills. A training plan for all four divisions in the agency



will be developed by December 2024 and implemented beginning January of 2025.

*Objective 5-F: Increase service capacity and customer engagement through additional staff resources.*

*Strategies 5-F:*

- Conduct an assessment of statewide staff needs based on an internal job duties analysis and service delivery trends.
- Develop a talent management plan.
- Recruit and hire staff to fill identified positions.

*Measures 5-F:*

- Assessment of statewide staff needs completed by June 2024
- Talent Management plan completed by December 2024
- # of Positions Filled

**Progress:** OVR is currently working on the statewide needs assessment of staff to be completed by June of 2024. Plans are to hold a Succession planning retreat in October to conduct talent management planning with the plan completion by December 2024. Internships, fieldwork opportunities and job shadowing all continue to be recruitment and outreach tools for the agency. The agency works with educational entities to provide these opportunities for students. With the implementation of state raises at the agency level as well as statewide initiatives initiated by the governor, the agency has increased success in recruitment, filling positions, and retaining qualified candidates in positions. Currently OVR has 90% of its positions filled. The turnover rate for calendar year 2023 was 16.67% for all divisions.

## **Public Awareness**

*Goal 6: Implement an ongoing, flexible outreach plan and process to improve public awareness of VR programs, services, and agency employment. (Continuing into the next PY)*

*Objective 6-A: Implement a comprehensive outreach plan for the agency.*

*Strategies 6-A:*

- Hire a dedicated outreach person.
- Create an outreach plan.
- Develop outreach materials to recruit vendors.
- Outreach materials that reflect current information and are engaging and in accessible formats.
- Outreach materials are made available to staff and consumers.

*Measures 6-A:*

- Staff hired to oversee outreach.
- All outreach materials are updated and maintained in appropriate, accessible formats.
- Social Media presence on most popular accessible sites.
- All outreach materials will be located for easy access to staff and consumers (agency website/paper material to Perkins for distribution/DocuShare Drive).

**Progress:** The agency conducted a statewide outreach needs assessment in 2023 to determine the resources needed by staff to adequately represent the agency at outreach events. The agency coordinated with the Education and Labor Cabinet Office of Communication the development and design of needed resources and a process for securing the needed materials. OVR made the decision based on workflow and existing staff resource not to hire an additional dedicated person for the area of outreach. Currently, existing central office staff work with agency leadership on these initiatives. The agency does have an Outreach Team that coordinates the distribution of all printed and electronic documents for outreach. These items are vetted by the ELC Office of Communications prior to printing and distribution to staff. There are plans for the development of additional Outreach materials for the vendor groups. OVR maintains a social media presence on Facebook with pages dedicated for the agency as a whole and specific page for the Carl D. Perkins Vocational Training Center and the Division of Blind Services. This allows for the sharing of important information and updates with the public as well as opportunities to share success stories associated with the work and services the agency provides. The agency ensures that all protocol is followed regarding the release of identifying consumers for these Outreach initiatives.

Objective 6-B: Recruit talent.

Strategies 6-B:

- Identify a staff representative to work with the Education and Labor Cabinet and Personnel Cabinet on issues related to talent recruitment.
- Identify staff representatives to make presentations to colleges, universities and technical colleges regarding OVR services and employment opportunities.
- Expand the quantity and types of internship programs with university programs.
- Leverage social media as a tool for recruitment.

Measures 6-B:

- Open positions are filled with qualified candidates.

**Progress:** Internships, fieldwork opportunities and job shadowing all continue to be recruitment and outreach tools for the agency. The agency works with educational entities to provide these opportunities for students. With the implementation of state raises at the agency level as well as statewide initiatives initiated by the governor, the agency has increased success in recruitment, filling positions, and retaining qualified candidates in positions. Currently 90% of positions are filled.

**The Kentucky Office of Vocational Rehabilitation set the following goals for the distribution of Title VI, Part B Funds. Kentucky has set the following goals to assist with increase employment outcomes for adults and youth with a significant disability.**

**Goal 1: Increase the number of CRP's providing Supported Employment Services**

Objective 1.1: Recruit more providers for supported employment for unserved and underserved areas.

Strategies:

Create a strategic planning team to analyze and develop a viable and comprehensive payment system to community rehabilitation providers.

**Progress:** The CRP Branch Manager participated in multiple meetings with various states to discuss rates and rate setting. The CRP Branch Manager participated in the bi-monthly Community of Practice (CoP) meetings that addressed and explored rates from other state VR agencies from around the country. Various states provided information to CoP members pertaining to their rates for CRP related services. The CRP Branch Manager and staff developed and disseminated a CRP Sustainability Survey to obtain the perspectives and input of the CRPs. The CRP Branch Manager developed a rate revision proposal for supported employment based on the information obtained from the different sources of information. When exploring possible rate and payment system changes, consideration was given to changes that would increase engagement between the consumer, CRP, and VR staff. The proposal was submitted to OVR leadership and the Program Policy and Support Branch responsible for rate setting for consideration. At this time the proposal is under review.

Create Establishment Projects to replicate the UPS Transitional Learning Center model and expansion of the IPS and Customized employment models to increase a network of services providers.

**Progress:** OVR did not pursue establishment projects used to model the UPS Transitional Learning Center. OVR was a part of a pilot model was pursued and temporarily implemented between the employer, Kyosan Denso Manufacturing Kentucky, LLC (KDMK) and a local CRP that was funded through the current service fee memorandum payment structure. The pilot was discontinued due to staffing issues with the CRP.

There was a total of 8 contracts that were developed and implemented related to the expansion of IPS and Customized Employment. KY VR was successful in obtaining Rehabilitation Services Administration (RSA) approval for three (3) Customized and four (4) Individual Placement and Support (IPS) Establishment Project contracts. Additionally, a contract with the University of Kentucky's Human Development Institute (HDI) was created to provide technical assistance to the new IPS providers, which was vital and necessary to sustain the respective programs.

Increase Capacity in customized employment through participation in the Leadership Series through the University of Kentucky's Human Development Institute.

**Progress:** Through an existing contract with the University of Kentucky's HDI, KY VR was able to offer opportunities for CRPs to participate in the Leadership Series to acquire certification in customized employment under Marc Gold & Associates training Gateways. Establishment Project contracts for customized employment greatly increased participation within the Leadership Series.

Hold outreach opportunities for potential providers.

**Progress:** The CRP Branch has initiated conversations with VR Branch Managers and asked that they implement regular dialogue within their staff meetings that focuses on identifying potential providers in their respective areas. Information obtained from these meetings are to be shared with the CRP Branch so that contact can be made to prospective CRPs throughout the state. Each CRP Branch Consultant would network with each prospective CRP to pursue and gauge interest in becoming a CRP.

5. Provide training on new policies related to customized employment, IPS, and person- centered planning.

**Progress:** The CRP Branch provides training to all new KY VR counselors during Skills Enhancement Training (SET). The CRP Branch has four (4) Consultants that provide training to staff throughout their respective areas address customized employment, IPS, and person-centered planning. The CRP Branch also provides various trainings and meetings to all CRPs throughout the state on these and other CRP related topics.

*Measures:*

Increase the number of providers by 5%.

**Progress:** The number of providers were not increased by 5%. In PY 2021-2022 there were a total of 110 CRPs and in PY 2022-2023 there were a total of 103.

Implementation of new service fees

**Progress:** A service fee was established for Extended Services, which is only for a youth with a disability between the ages of 14-21. Exploration of revisions to current supported employment rates did occur but no final revisions were implemented. Refer to #1 under Goal 1 for additional information.

### Implementation of Establishment projects

**Progress:** There was a total of seven (7) establishment project grants initiated. An additional contract was initiated to support the three (3) contracts pertaining to IPS with technical support, which is consistent with the evidenced-based model. The other four (4) contracts were designed to implement customized employment. Refer to #2 under Goal 1 for additional information.

#### # Of Trainings Provided

**Progress:** CRP Consultants provide quarterly trainings in their respective regions. That equates to 12 trainings per year that are provided regionally. Various consultants provided training at various conferences throughout the year. CRP Quarterly Meetings include subject matter experts to provide trainings to CRPs throughout the state. The CRP Branch provides multiple external training opportunities to CRPs through email correspondence. Each Employment Specialist is required to obtain 15 hours of CEUs annually when providing Supported Employment or Employment and Retention services. CRPs providing pre-Vocational services are required to have 5 hours of CEUs.

Increase in the number of competitive integrated outcomes for individuals in supported employment.

**Progress:** There was a total of 289 successful outcomes in supported employment in PY 2021-PY 2022. Although there were few providers in PY 2023, there were 391 successful outcomes in supported employment in PY 2022-2023. This is an increase of 26%.

### Goal 2: Monitor Service Quality of Providers

Objective 2.1: Develop strategies for continuous quality improvement in collaboration with the Program Policy and Support Branch.

**Progress:** The Program, Policy and Support Branch created policies and procedures pertaining to audits, billing, and invoicing of contract providers. A systematic approach for fiscal and programmatic reviews are in place. Training for program administrators was provided.

Strategies:

Ensure agency compliance to WIOA requirements of Section 511 (annually)

**Progress:** OVR added additional staff under the Program, Policy and Support Branch to oversee compliance of Section 511 among 14C holders. Policies and procedures were developed to provide to aid staff in understanding and consistency of compliance related issues.

Ensure CRP compliance with the terms of their signed service agreements through annual audits and monitoring (annually).

**Progress:** CRP Branch Consultants conduct monthly audits of CRPs within their respective regions. They record detailed information on the Audit Review Form and provide feedback to the CRP. If significant issues surface through the audit process, then the CRP may have to participate in a Program Improvement Plan (PIP). Compliance issues are addressed throughout the year and discussed in monthly meetings held by the Consultants and reiterated in the CRP Quarterly Meeting.

Measures:

Annual Audits of Services

**Progress:** Each CRP Consultant conducts at least 1 audit per month, with 4 consultants, that totals 12 audits per year.

Corrective Action Plans Program Improvement Plans

**Progress:** There were two (2) Program Improvement Plans implemented in PY 2022-2023.

Scorecard

**Progress:** There have been challenges with generating scorecards in a manner that reflects accurate data. The CRP Branch Manager has communicated frequently with the Program, Policy, and Support Branch to address issues. Resolution is ongoing.

**Goal 3: Seek alternative strategies for providing and funding Extended Services**

Objective 3.1: Provide another source of extended services, is if available, so there will be no interruption of services for individuals with significant disabilities.

Strategies:

Seek input from staff and other stakeholders such as education, service providers and individuals with disabilities on extended services.

Identify potential strategies for the provision of services.

Identify potential funding sources. (2023)

Update the Supported Employment Service Fee Memorandum to include extended services to youth.

Measure:

Additional funding secured.

**Progress:** KY VR developed service fee codes for extended services for IPS, Traditional, and Customized Supported Employment services. Extended services are only to be used by youth with a disability between the ages of 14-21. VR is unable to use funding for extended services to adults participating in supported employment. KY VR participated in conversations regarding the 1915 (i) waiver to expand their service delivery coverage to include supported employment. If approved, those with the (i) waiver could access extended services after funding from VR.

**d. 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**

WIOA Section 116 (b) (2) (A) and its implementing regulations 34 CFR 361.155 (a) (1) establish the six primary indicators of performance. They are as follows:

- Employment Rate in the 2nd Quarter After Exit
- Employment Rate in the 4th Quarter After Exit
- Median Earnings in the 2nd Quarter After Exit
- Credential Attainment rate



- Measurable Skill gains (MSG) Rate
- Effectiveness in Serving Employers (Statewide)

Kentucky is committed to gathering the collective data required under section 116 of WIOA for all the core partners. KYSTATS and state agencies will work with the state board to ensure required reports for the performance accountability are completed to the best of the state's ability.

OVR is seeking Technical Assistance from the VRTAC-QE for employment and the VRTAC-QM for quality management. OVR has established the following goals that includes strategies that address OVR's performance on the WIOA accountability measures.

The RSA team has reviewed with Kentucky the quarterly data dashboards. RSA data rankings for PY 2022 for Kentucky are as follows: for the Median Earnings PY 20 OVR is in the 1st Quartile at \$7,768 (met); OVR is in the 2nd Quartile for the 2nd Quarter Employment rate at 59% (met); 4th quarter Employment Rate at 46.9% (met) in the 3rd Quartile and Credential Attainment Rate at 27.0% in the 4th Quartile (met); and for Measurable Skill Gains for PY22, OVR is in the 4th Quartile at 30.7% (not met).

OVR met all of the negotiated rates except for Measurable Skill Gains. The negotiated rate was 38%. OVR fell below the negotiated rates at 7.3%. OVR has provided staff training on timely data entry. This continues to be an area of needed improvement in order to accurately capture the attainment of measurable skill gains in the system. Another factor is the difficulty staff have in obtaining this information in a timely manner from VR consumers.

The current Kentucky OVR VR Case Management System (CMS): a web-based system used to collect required data, enforce workflow rules, verify data accuracy, authorize and pay for consumer services, and produce a variety of monthly and real time reports; was implemented in October 2008. The system was designed to be fully accessible with particular attention to usability with screen reading technology - a goal that none of the "off the shelf" options for case management systems for vocational rehabilitation agencies could meet at the time.

The current CMS system has reached its useful life expectancy. OVR is in process of development of a new system with a vendor. In the interim, the current system is being modified to meet the data collection requirements for common measures as well as the additional data elements required for RSA 911 quarterly reporting.

The current system has allowed for us to collect the necessary data and produce accurate reports prior to the due dates for Rehabilitation Services Administration and common measures reporting.

**d. 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).**

Office of Vocational Rehabilitation (OVR) will use innovation and expansion funds to support the Statewide Council for Vocational Rehabilitation (SCVR), Kentucky's SRC, including all meeting expenses and expenses related to conducting the Annual Report, Consumer Satisfaction Survey (CSS) and Comprehensive Statewide Needs Assessment (CSNA), Establishment Projects and for the support of the Statewide Independent Living Council (SILC).

**Innovation and Expansion Activities for PY 2022:**

**1. SCVR Annual Report:**

The 2022 SCVR Annual Report was completed during PY 2022 with the recommended theme "Focused on Transitions." This theme was chosen to reflect the many transitions consumers experience as they move from one phase of services to the next throughout their OVR journey. The title was also befitting for the agency since a myriad of transitions occurred after the pandemic. The report described the agency with statistical data, consumer stories and a brief update regarding programs and services. The Arthur Campbell, Jr. Advocacy Award that was presented by the Council to a person who is passionate advocate and champions full inclusion for person with disabilities was featured. The SCVR Annual Report is submitted to the Commissioner and funded each year and provides reports according to the FFY.

**2. OVR Consumer Satisfaction Survey (CSS):**

As part of federal requirements, OVR has collaborated with the SCVR and the HDI since 1996 to coordinate the annual OVR Consumer Satisfaction Survey (CSS). The most recent survey was for cases closed between October 2021–September 2022. The CSS was presented to the SCVR at the quarterly meeting on April 24, 2023. The sample of people randomly selected to participate was stratified to reflect the population of all consumers with cases closed in fiscal year 2022. IQS Research contacted consumers by email and/or telephone in January through March of 2023 to participate in the survey. A total of 1,042 individuals

participated in the survey which was available as both a telephone and online survey, with responses included from each of the districts. Phone surveys accounted for 38.1% of responses and 61.8% of responses were collected via online surveys. The overall response rate for the survey was 23.8%. There was a 46% response rate via phone contacts and 18% via email contacts. HDI compiled the results, and the final report was reviewed by the SCVR Consumer Services and Program Evaluation Committee prior to HDI presenting to the entire council during the April 2023 quarterly meeting. A total of 1,042 individuals participated in the survey with responses received from each of the 19 field districts. The overall statewide consumer satisfaction was 88.8% with an average score of 3.49 on a four-point scale (1 = very poor, 2 = poor, 3 = good, and 4 = very good). The CSS is funded each year to gauge the satisfaction of consumers and identify areas of improvement.

### **3. Comprehensive Statewide Needs Assessment (CSNA):**

OVR contracted with the University of Kentucky, Human Development Institute (HDI) to complete the triennial Comprehensive Statewide Needs Assessment (CSNA) to identify gaps in existing services that can be reduced through programs and policies by the OVR. A mixed method of online surveys and forums was used to collect insights about the rehabilitation needs of Kentuckians with disabilities. The insights gained from the CSNA will provide the information needed for the development of the State Plan for services. The Needs Assessment was carried out by OVR staff working with the staff and faculty at the Human Development Institute (HDI). The CSNA is performed at least once every three years to assess the needs of individuals throughout the state and advise the agency regarding steps to take to ensure accessible and equitable service.

### **4. SILC**

OVR provided the Statewide Independent Living Councils (SILC) the amount of \$65,000 for innovation and expansion activities from Basic Support Grant Funds. OVR is committed to provide funding for the SILC on an annual basis. The SILC provided OVR a resource plan that outlines the funding allowable under 34 CFR 361.35 Innovation and Expansion Activities Resource Plans for Statewide Independent Living Councils. The funds will be utilized for the support of the salary of the SILC Coordinator and expenses of the Council. The Division Director of Blind Services represents the agency on the Council, and a SCVR member, and past chairperson, is represented on the SILC. As of October 1, 2023, the SILC is now their own 501C 3.

### **5.Establishment Projects**

OVR established contracts with four community rehabilitation providers for Individual Placement and Supports (IPS) projects for a four-year period. IPS is an evidence-based supported employment program, based on eight principles, including Rapid Job Development, Competitive Employment, Systematic Job Development, Integrated Services, Benefits Planning, Zero Exclusion, Time-Unlimited Supports and Worker Preferences. The IPS Model of Supported Employment has proven to be a successful approach for individuals with Serious Mental Illness and Substance Use. Funding through these contracts will be used to provide IPS Supported Employment (SE) for individuals with Serious Mental Illness (SMI), substance use disorders, and to individuals with intellectual and/or developmental disabilities. OVR will continue to be a partner in the IPS International Learning Collaborative and will provide data that may be used throughout partnering efforts.

OVR established contracts with three community rehabilitation providers for Customized Employment for a four-year period under the Marc Gold & Associates model of customized employment. MG & A provides technical assistance and training in support of community inclusion of people with the most significant disabilities to national and state agencies, nonprofit and educational agencies that impact the lives of individuals with disabilities and their families.

### **Section E: Supported Employment Services, Distribution of Title VI Funds, and Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.**

**e. 1. Acceptance of title VI funds:**

(A) VR agency requests to receive title VI funds

**e. 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.**

Funding will be used for the implementation of supported employment services throughout KY. Funds will be utilized through the current Service Fee Memorandum payment structure to Community Rehabilitation Program providers who provide supported employment services, which is currently based on an outcome payment system. More specifically, CRPs will receive payment for supported employment services when the consumer has worked in competitive integrated employment for thirty-days (30), sixty-days (60), and at ninety-days (90). If the consumer requires additional supported employment services beyond 90-days, then this may be provided by utilizing Additional Supported Employment Services. These payments are available for consumers who may require customized employment, Individual Placement and Support (IPS), which is an evidenced-based model of SE for individuals with Serious Mental Illness (SMI), or for those who may benefit from the more traditional model of SE. The rates used by KY VR are similar or higher than other states, which are designed to assist in obtaining new CRPs and creating higher sustainability among existing CRPs. For example, IPS now has 21 providers throughout the state and has now expanded to 76 counties.

- e. 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 Office of Vocational Rehabilitation (OVR) provides supported employment on a statewide basis. The OVR works with current Community Rehabilitation Programs (CRPs) to expand supported employment services throughout Kentucky to ensure multiple CRP options for eligible consumers.

Supported employment offers more than just the assistance needed to find and learn a job. It provides the necessary ongoing support to help an individual maintain employment. Kentucky has 89 supported employment providers throughout the state. Individualized strategies are also utilized to arrange for supported employment services outside of "organized programs" when necessary (i.e., coworkers at the job site may provide support paid for with various resources; independent supported employment specialists may be hired, etc.).

Extended services are provided by each local supported employment program utilizing funds from a myriad of sources, including the Department for Behavioral Health, Developmental and Intellectual Disabilities (DBHDID), the Kentucky Council on Developmental Disabilities, city and county governments, United Way, fund-raising campaigns, PASS funding, Medicaid, Supports for Community Living Waiver funds, Michelle P waiver funds and other resources. Most programs utilize a combination of funding sources for the provision of extended services. Natural supports are encouraged (such as co-workers, peers, etc.) and are carefully monitored by the supported employment provider.

Kentucky OVR's partner, the Department of Behavioral Health, Developmental and Intellectual Disabilities (DBHDID), has developed a new Medicaid Waiver that would more adequately fund supported employment services for people with developmental disabilities. The Supports for Community Living Waiver 2 (SCL2) effective in 2014 calendar year increased the fee structure and modified the service definitions for supported employment. The Michelle P., ABI, and 1915 C waivers also pay for supported employment services.

Kentucky's supported employment programs have primarily served individuals with intellectual disability and individuals with chronic mental illness. This is largely due to greater availability of funding for extended services for these two groups. Individuals with other disabilities are served if funding for extended services are available and if the supported employment provider has the expertise to meet that individual's needs for employment training and support.

Kentucky has become the 12th state to participate in the Individual Placement and Support (IPS) model of supported employment, which is an evidenced-based practice. The goal is to demonstrate the effectiveness of the IPS model for supported employment for people with serious mental illness throughout Kentucky. In July 2011, four sites in Kentucky began pilot site implementation. In 2012, two sites were added. In 2013, three sites were added. In 2014 BHDDID required that all Community Mental Health Centers implement the IPS program as one of the four evidence-based practices required in their state plan. A Statewide Coordinator, employed through the University of Kentucky, Human Development Institute, oversees the pilot sites. In 2021, the OVR began the process to implement 4 Establishment Project contracts to expand IPS in KY. This initiative was successful and began implementation in March of 2023. Two of these contracts are designed to serve individuals with intellectual and developmental disabilities. This is an innovative strategy by KY VR, and information obtained

through this process will be shared with other state VR agencies and countries within the national IPS Learning Community.

Currently there are 21 providers in KY that provide IPS supported employment services, which serves 76 of the 120 counties in Kentucky. OVR has implemented an agreement with the University of Kentucky for the purpose of increasing technical and fidelity monitoring to support new IPS providers. OVR will continue to explore establishment projects for prospective expansion initiatives with community rehabilitation providers as the existing contracts begin to phase out, which may not exceed four years.

The OVR and the Kentucky Division of Behavioral Health collaborate as Team Leading agencies for the project. The Kentucky Association for Persons in Supported Employment (KY APSE) has been successful in creating greater supported employment awareness among the legislators in Kentucky's General Assembly. These awareness/advocacy efforts will continue with the goal of increased statewide funding allocations and possible supported employment legislation to create a more solid funding base for extended services.

QUALITY Pursuant to federal regulations, supported employment services provided by approved vendors must contain these elements: 1) competitive work; 2) integrated work settings; and 3) provision of extended services. To ensure that supported employment services are provided according to regulation, the following guidelines must be met:

1. Services will be provided to individuals with the most significant disabilities who have a documented need for supported employment services, including extended services.
2. Work will be performed on a full-time or part-time basis. Everyone in supported employment and his/her OVR counselor shall jointly establish in the IPE an appropriate goal for the number of hours per week that will maximize the individual's vocational potential.
3. Work must take place in integrated settings where most workers do not have disabilities.
4. Wages must follow the Fair Labor Standards Act. Each supported employee will have a goal of earning at least minimum wage. Kentucky's supported employment providers adhere to the following principles:
  - The supported employment concept assumes that all persons, regardless of degree of disability, have the capacity and should be

afforded the opportunity to participate in real employment with appropriate support.

- Emphasis is placed on recognizing and maximizing opportunities in the workplace rather than just providing skills training.
- The purpose of the program is employment with all the general expectations of a job such as wages, job security, and performing meaningful work. Job Development rather than Job Placement is the focus.
- Ongoing, extended services are tailored to meet the needs of the consumer.
- Individuals are offered choices in the selection and maintenance of jobs. Decisions about appropriate services are made jointly with the individual and/or the family, the supported employment provider, and the VR counselor.
- Integration on the job site is recognized as necessary and important.
- Opportunities are available for non-work interactions with non-disabled workers. Interactions with non-disabled co-workers are a part of regular job responsibilities. "Natural supports" are developed and emphasized.

Extended services are proactive, not merely reactive. For example, plans are developed with individuals in anticipation of career advancement rather than merely waiting for a job loss, lay off, company closing, etc., before seeking other opportunities. The primary staff responsible for providing supported employment services are "job coaches," "job trainers," and/or "supported employment specialists." Positions are both full and part-time, depending on the size and service territory of the local provider. Training and Consultation for staff is provided by the Supported Employment Branch according to the needs of the provider. Completion of the Supported Employment Training Project is a requirement for all CRP Employment Specialists. This is funded through a Memorandum of Agreement between the Department of Behavioral Health Developmental and Intellectual Disabilities and the OVR. The Supported Employment Training Project is conducted by the University of Kentucky's Human Development Institute.

Technical assistance is also provided by the OVR CRP Branch staff. A CRP manual and other policies and guidelines were developed for vocational rehabilitation counselors and CRP staff. These are periodically revised and updated so that staff



may better understand the rehabilitation process regarding supported employment. Seminars, workshops, and training awareness sessions are arranged and/or participated in throughout the state with various agencies and organizations that can assist with funding, conversion, employment, and other related supported employment issues. Meetings of this nature are regularly held with such groups as The Arc of Kentucky, the Kentucky Commonwealth Council on Developmental Disabilities, Community Mental Health Centers, Kentucky Consortium for Values Based Training, KY APSE, Kentucky Rehabilitation Association, and others. The quality of supported employment outcomes is assessed individually. Such issues as Consumer satisfaction, earnings, benefits, employee and employer satisfaction, the degree of integration, availability of dependable transportation, co-worker support, socialization, work environment, and provision of support services are important. On a regular basis, the CRP Branch staff conducts technical assistance visits with each provider for quality assurance purposes. As well, each supported employment provider has established ongoing strategies to measure customer satisfaction.

EXTENT as a part of the eligibility determination process for the OVR services, supported employment will be considered as a possible vocational outcome for individuals with the most significant disabilities. The agency is now in an order of selection, serving all priority categories of services. The OVR will be able to provide supported employment services through approved vendors and/or individual providers.

These services include:

1. Development of a Person-Centered Employment Plan (PCEP). Vocational Profile, or Career Profile with recommendations for job- development;
2. Individually designed job development services, including assistance with customization, job carving, reasonable accommodation, technology and/or other support strategies;
3. Intensive on-the-job skills training and other support services provided by supported employment specialists and/or co-workers and employers;
4. Time-unlimited follow-up services (including regular contact with employer, trainee, parent, guardian, or others deemed appropriate) throughout the consumer's term of employment;
5. Other services needed to support the individual, such as travel, training, employment advocacy, non-employment advocacy, and counseling; and

6. Development of a Long-Term Support Plan, which includes an outline of the extended services to be provided, and a plan for review and update. The amount, frequency and type of services will be based on the needs of each individual once eligibility is established for supported employment. If off-job-site monitoring is determined to be appropriate, the monitoring, at a minimum, will consist of two meetings per month with the individual and one meeting each month with the employer. Extended services for individuals not considered as youth will be the responsibility of other state agencies, private organizations, and other sources of funding. These services will be considered and planned for prior to an individual receiving the services listed above. Vendor status is not approved unless assurance is made of the availability of funding for extended services. If extended services are not fully assured at the onset of the IPE, the Vocational Rehabilitation counselor and the OVR CRP Branch staff will participate with the provider in planning for these services before the Vocational Rehabilitation case is closed.

The OVR conducted a statewide survey of field counselors to explore the need and availability of Customized Supported Employment services for individuals with the most significant disabilities. It was expected, due to Section 511 of WIOA, that there would be an increase in the need and demand for Customized Supported Employment Services. Fifty-two percent (52%) stated that there are Community Rehabilitation Program (CRP) providers in their area that provide CSE. However, 62% also stated that it's not readily available due to limited staff or oversized caseloads. Around 93% of the counselor's state that only 3 or fewer of their individuals have been able to utilize this service due to lack of availability. When asked if there was a need for CSE in their area, overwhelmingly, 85% stated that there was a need. Over 46% stated that they have at least 4 or more consumers on their caseloads that could benefit from CSE. Over 17% state that they have at least 8 or more consumers that need this service.

As a result, the OVR implemented 3 Establishment Project MOAs to assist in making this service readily available to individuals with the most significant disabilities in the areas of the state that need it most. As existing MOAs approach expiration, consideration will be given to new MOA recipients for continued expansion of customized employment. OVR is also exploring the implementation of a customized employment fidelity scale. The OVR CRP Branch staff participates in supported and customized employment Community of Practice meetings, which includes ongoing discussions pertaining to the development and implementation of fidelity scales.

The CRP Branch within the OVR is making this a main priority to ensure the needs of the individuals being served are met, which will assist them in accomplishing their vocational goals and dreams.

### **Timing of Transition to Extended Services**

Currently, transition from Title VI, Part B funds to various other individually determined funding sources begins 90-days post-placement in the job. The transition to extended services funding is completed (generally) after 90 days on the job. Monitoring of services continues for a minimum of 90 additional days to assure that the job is stable. The current model is under review. Consideration of a new payment structure is being explored for the purpose of building capacity and increasing sustainability among CRPs in all models of supported employment.

Extended services then continue by the provider indefinitely using funds other than Title VI, Part B. The VR case is closed when the supported employment provider, the VR counselor, and the consumer determine that stabilization has been achieved. Stabilization is measured for each individual by considering all circumstances including support needs, consumer choice and satisfaction regarding services, and employer feedback. Extended services are funded and made available without delay for youth with the most significant disabilities.

Extended Services are those services provided to individuals with the most significant disabilities, which include youth with the most significant disabilities. Services may be provided by a state agency, a private nonprofit organization, employer, or any other appropriate resource when the individual no longer receives support services from the agency. OVR will determine the need for and fund services on a case-by case basis dependent upon each individual's need for services. OVR will reserve and expend half (50%) of the State's allotment for the provision of supported employment services and extended services to youth with the most significant disabilities.

Extended services will be available for youth without delay for a period not to exceed four years or until the youth no longer meets the definition of a youth with a disability. OVR will work with providers to ensure another source of extended services to youth are available so there will be no interruption of services for individuals with significant disabilities.

- e. 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 Office will seek to expand services to unserved and underserved counties as well as unserved and underserved disability groups, including youth with the most significant disabilities. We will encourage continuous improvement in supported employment by monitoring the state fiscal climate for opportunities to partner with KY APSE (Association for Persons in Supporting Employment First) to advocate for increased state funding for extended services.

OVR will continue to do the following:

1. Maximize existing dollars for extended services through collaborative agreements and contracts, increasing knowledge of Kentucky's plan for self-determination strategies, especially within the Medicaid Waiver (Supports for Community Living, Michelle P) programs;
2. Partner with local Community Mental Health Centers;
3. Recruit new Providers;
4. Provide training and technical assistance to new supported employment agencies;
5. Provide consultation and technical assistance to OVR staff and providers as needed; and
6. Research better ways to fund and/or deliver services.

Meetings with the Department of Behavioral Health and Developmental and Intellectual Disabilities (ID/DD) are ongoing to strengthen the partnership by leveraging funding to expand IPS SE services in unserved and underserved areas.

For example, the OVR worked diligently over a two-year period on development and implementation of Rehabilitation Services Administration (RSA) approved Establishment Project MOAs for the sole purpose of expanding IPS to individuals with serious mental illness and individuals with ID/DD. Four IPS MOAs were implemented in the spring of 2023. Two of which are designated for ID/DD. KY is one of just a couple of states in the country that is utilizing this evidenced-based model for individuals with ID/DD. KY OVR will assess and evaluate this initiative

and report findings to the National IPS Learning Collaborative, so information can be used by other states who may be considering similar initiatives. Additionally, a contract was developed and implemented with the University of Kentucky's Human Development Institute for the purpose of strengthening the infrastructure for IPS sustainability by expanding technical assistance support and fidelity monitoring. Through this contract, a State IPS Trainer and IPS Fidelity Monitor were hired to provide needed support for staff hired through the Establishment Project MOAs.

Additionally, the OVR developed Customized Employment initiatives and sought RSA approval for the implementation of three (3) Customized Supported Employment (CSE) Establishment Project MOAs for the purpose of expanding customized employment throughout Kentucky. Through an existing contract with the University of Kentucky's Human Development Institute (UK-HDI), training opportunities for employment specialists throughout the state were increased by implementing a training scholarship program. This allows Employment Specialists to apply for scholarships to participate in the Leadership Series, which provides training in Social Role Valorization, Discovery, Job Development, and Systematic Instruction with the last three offering certification opportunities.

The OVR established billing codes for extended services for youth who are participating in supported employment. The purpose of this billing method is to aid in the expansion of services to youth in supported employment with collateral benefits that address sustainability concerns among CRPs. Implementation of billing for Extended Services to youth in supported employment began in October of 2022.

Extended Services are those services provided to individuals with the most significant disabilities, which may include youth with the most significant disabilities. Services may be provided by the State agency, a private nonprofit organization, employer, or any other appropriate resource when the individual no longer receives support services from the agency. OVR will determine the need for and fund services on a case-by-case basis dependent upon each individual's need for services.

OVR will reserve and expend half (50%) of the State's allotment for the provision of supported employment services and extended services to youth with the most significant disabilities.

Extended services will be available for youth without delay for a period not to exceed four years or until the youth no longer meets the definition of a "youth

with a disability". OVR will work with providers to ensure another source of extended services is available so there will be no interruption of services for individuals with significant disabilities.

The Office will collaborate with the Department of Behavioral Health, Developmental and Intellectual Disabilities (DBHDID) to expand supported employment options to unserved and underserved groups, as well as youth with the most significant disabilities without delay.

1. Participation in Commissions established as a result of state legislation, including Commission on Services and Supports for Individuals with an Intellectual Disability and other Developmental Disabilities (HB 144); Commission on Services and Supports to People with Mental Illness and Dual Diagnoses (HB 843); and the Advisory Council on Autism Spectrum Disorders.
2. Development of partnerships with Kentucky Medicaid Waiver Programs (Supports for Community Living, Michelle P, Home and Community Based Waivers, and Acquired Brain Injury Waivers) so that these sources of extended support funding can be fully utilized; and
3. Utilization of interagency workgroups to develop better understanding and expand awareness of work incentives (such as in SCL Waiver, Social Security, etc.).
4. Developing and implementing the IPS Supported Employment programs for consumers with severe mental illness within the community mental health centers.

## Section F: Annual Estimates

**f. 1. A. VR Program; and**

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)
<b>1</b>	22,459	22,459	25,086,703	0
<b>2</b>	6,677	6,677	7,458,209	0
<b>3</b>	1,062	1,062	118,625	0
<b>4</b>	152	152	169,784	0

**f. 1. B. Supported Employment Program.**

Priority Category (if applicable)	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 (if applicable)
<b>1 &amp; 2</b>	1,770	FFY 2025 1,038	FFY 25 \$3,562,185	0

## Section G: Order of Selection

- g. 1. Pursuant to Section 101(a)(5) of the Rehabilitation Act, this description must be amended when the VR agency determines, based on the annual estimates described in description (f), that VR services cannot be**

**provided to all eligible individuals with disabilities in the State who apply for and are determined eligible for services.**

The VR agency is not implementing an order of selection and all eligible individuals will be served.

**g. 2. A. The justification for the order**

OVR utilizes a multimodal approach to assessing the resources available to allow the agency to provide vocational rehabilitation services to all eligible individuals who apply, such as the following:

- Population data related to disability incidence;
- Short and long-term budgetary outlook;
- Short and long-term staffing projections;
- Comprehensive Needs Assessment;
- Waiting list for services;
- VR Counselor caseload size and expenditures; and
- SRC input Public Forum Input.

The agency carefully analyzes information from these sources to predict its ability to provide quality services to eligible individuals with disabilities as required by the Rehabilitation Act of 1973, as amended.

According to data from the 2021 American Community Survey (ACS), published in the Annual Compendium of Disability Statistics, 39% of Kentucky civilians living in the community report having a disability. According to this resource, Kentucky's overall population is 3,414,123 people. Using the percentage in 2021 and applying it to the population numbers, there is an estimated 1,330,951 people in the state of Kentucky who have a disability. The overall rate of individuals with a disability in the United States is 28.3% for 2021. The rate in Kentucky is higher than the rate nationally by 10.7%. The percentage of residents of working age (18-64) in Kentucky who are employed is 76% for 2021. The national average was 76.6% in 2021. In this instance of employment, the rate in Kentucky is slightly lower than the rate nationally.

In FFY 2021, 2022 and year to date FY 2023, agency staff along with fiscal and the State Council of Vocational Rehabilitation reviewed on a quarterly and often monthly basis data on numbers served and agency fiscal resources to determine



the need to open or close categories. During FFY 2022 and year to date in 2023, budgets and fiscal resources were reviewed monthly by the agency Executive Leadership Team (ELT). Information was presented to the State Rehabilitation Council at each meeting.

**g. 2. 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**

The priority categories to be followed in selecting eligible individuals to be provided VR services to ensure those individuals with the most significant disabilities are selected for services before other individuals with disabilities are as follows:

Category 1: Eligible individuals with a most significant disability and that limits three (3) or more functional capacities.

Category 2: Eligible individuals with a most significant disability that limits two (2) functional capacities.

Category 3: Eligible individuals with a significant disability that limits one (1) functional capacity.

Category 4: Eligible individuals with a non-significant disability.

**g. 2. 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.**

Once eligibility is determined, the significance or non-significance of the disability must be established. As part of the eligibility decision, the counselor determines whether the individual has a physical or mental impairment or combination of impairments that seriously limit one or more functional capacities in terms of employment outcome. In order to be considered significantly disabled, an individual is expected to require multiple vocational rehabilitation services, one of which is assumed to be vocational rehabilitation counseling and guidance.

Presumption of Eligibility for Social Security Recipients and Beneficiaries means that an individual who has been determined eligible under Title I or Title XVI of the Social Security Act is:

Considered to be an individual with a significant disability; and Presumed to be eligible for vocational rehabilitation services under Title I (provided the individual intends to achieve an employment outcome consistent with the unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of the individual) unless the office can demonstrate by clear and convincing evidence that such individual is incapable of benefiting from vocational rehabilitation services in terms of employment outcome due to the severity of the disability of the individual.

If the Executive Director and State Rehabilitation Council determine that the agency lacks available funds and/or staff resources to serve all consumers, the office shall follow an order of selection to give priority for services according to a ranking of categories of consumers based on the severity of the disability. The Executive Director of the Office of Vocational Rehabilitation shall direct the order of selection by designating in written memorandum, the priority categories to be served.

Order of Selection will not use any of the following factors in determining eligible individual's residency duration, type of disability; age, gender, race, color, or national origin, source of referral, type of expected employment outcome, need for specific services or anticipated cost of services, or the income level of the individual or its family.

The order of selection shall be implemented on a statewide basis.

The order of selection shall be implemented to assure that eligible individuals with the most significant disabilities are provided services before other eligible individuals.

The order of selection shall not affect: a) the acceptance of referrals and applicants; b) the provision of assessment services to determine whether an individual is eligible for vocational rehabilitation services; c) the individual's priority under the order of selection; d) services needed by any eligible individual who has begun to receive services under an individualized plan for employment prior to the effective date of the order of selection, irrespective of the severity of the eligible individual's disability; and e) individuals requiring post-employment services. The office will ensure that all funding arrangements for providing

services under the State plan, including third-party arrangements and awards under the establishment authority, are consistent with the order of selection.

An eligible individual shall be immediately reclassified into a higher priority category whenever appropriate justification exists in the case record of the individual.

The office shall conduct an assessment to determine whether an individual is eligible for vocational rehabilitation services and the individual's priority under the order of selection. The VR Counselor determines the eligibility of the individual and their priority category based on a review of the data from the assessment.

In the order of selection each eligible individual within a closed priority category shall be placed on a waiting list until such time as the priority category is opened. The process for the waiting list is as follows:

Once an individual has been determined eligible within a closed priority category by the Vocational Rehabilitation Counselor, the individual will receive notification through the counselor in writing of:

- The individual's assignment to a particular category;
- The priority categories currently being served;
- The individual's right to appeal the category assignment and the availability of the Client Assistance Program (CAP);
- Information and referral services; and
- The individual is given the option to be placed on a waiting list by date of application until such a time the priority category can be opened, and the individual employment plan can be developed and initiated.

The waiting list will be maintained by the Director of Field Services and reviewed quarterly by both the Director of Field Services and the Regional Managers.

Consumers will be contacted annually to inform them the status of Order of Selection and their specific priority category. Additional information, (I & R) will be given. The consumer will be asked regarding their preference for remaining on the waiting list.

At the time when funds become adequate and a priority category will be opened, the following sequence of action will occur for those individuals in a closed category:

1. Priority Category Two (2) will be opened and individuals on the waiting list will be served by date of application.
2. The office will assure that eligible individuals, who do not meet the order of selection criteria for the priority categories, shall have access to services provided through the information and referral system in accordance with the 1973 Rehabilitation Act.
3. These services will include referral to other Federal and State programs including the statewide workforce investment programs. The process for this is as follows:
  - The agency will provide the individual with a notice of referral;
  - The notice will contain a point of contact for the program or service an individual is being referred to and any relevant information regarding services for the individual relating to the preparation, securing, obtaining or retaining of employment; and
  - Documentation of the nature and scope of information and referral services provided will be included in the individual service record and entered in the Case Management System (CMS).

Individuals who are presumed to be significantly disabled because they receive SSA benefits will be further assessed to determine if they meet the agency's criteria for "individual with a most significant disability."

Consumers making the decision not to be placed on a waiting list after they receive notification of their priority category will be closed. They will receive notification from their VR Counselor that their case will close and of their right to appeal the agency's decision, including information on how to contact CAP. The notification will include information on how they may reapply for services in the future if their circumstances change or if the agency makes changes to order of selection.

When a request for services by an eligible individual is affected by the order of selection, the individual shall be immediately notified of such in writing and provided with information on procedures for individual rights for appeal, and how the Client Assistance Program may provide help in the process.

Quarterly, the Executive Director, State Rehabilitation Council and Executive Leadership Team along with fiscal staff will reevaluate the agency circumstances to determine whether or not the agency's resources are sufficient in serving all individuals or if there is a need to implement, establish or make changes in Order

of Selection. At such time that the agency finds it is able to serve those individuals in any closed priority category, that category will be re-opened. If the Agency finds that they have the resources to serve some individuals but not all individuals in a priority category, the date of application will be utilized as a criterion for ranking individuals within a priority category. The timeline for this would be a year, unless the agency's financial situation should change, drastically. Circumstances that would allow this to occur include a decrease in the number of referrals or other sources that would result in additional funds, which could be utilized to serve these individuals.

When a priority category is to be opened for services, the Executive Director shall issue an implementing memorandum to staff, with instructions that appropriate services delayed under the order of selection may be provided.

- g. 3 . Has the VR agency elected to serve eligible individuals outside of the order of selection who require specific services or equipment to maintain employment?**

No.

## **Section H: Waiver of Statewideness**

- h. Waiver of Statewideness.**

Not Applicable

## Section I: Comprehensive System of Personnel Development

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

Personnel Category	No. of Personnel Employed 1. A	No. of Personnel Currently Needed 1. B	Projected No. of Personnel Needed in 5 Years 1. C
<b>Accountant</b>	1	1	1
<b>Adaptive Equipment Specialist</b>	1	1	1
<b>Administrative Branch Manager</b>	1	1	1
<b>Administrative Section Supervisor</b>	4	4	4
<b>Admissions Counselor</b>	2	2	2
<b>Assistant</b>	95	98	108
<b>Assistant Director</b>	4	4	0
<b>Bioptic Driving Instructor</b>	2	2	3
<b>Budget Support Specialist</b>	1	1	1
<b>Carpenter Finish</b>	1	1	1
<b>Consumer Services Coordinator</b>	1	1	1
<b>Deputy Executive Director</b>	1	1	1
<b>Disabilities Assistance Specialized Driver</b>	3	3	3
<b>District Food Operations Evaluator</b>	2	2	2

<b>Personnel Category</b>	<b>No. of Personnel Employed 1. A</b>	<b>No. of Personnel Currently Needed 1. B</b>	<b>Projected No. of Personnel Needed in 5 Years 1. C</b>
<b>Division Director</b>	4	4	4
<b>Dorm Counselor</b>	4	4	4
<b>Electronic Technician III</b>	1	1	1
<b>Employment Specialist</b>	10	12	22
<b>Executive Director</b>	1	1	1
<b>Executive Staff Advisor</b>	1	1	1
<b>Facilities Security Officer</b>	6	6	6
<b>Facility Administrator</b>	1	1	1
<b>Facility Maintenance Worker</b>	3	3	3
<b>Fiscal Manager</b>	1	1	1
<b>Grants Administrator</b>	2	5	5
<b>IL/OIB Specialist</b>	9	9	9
<b>Instructor</b>	19	20	20
<b>Interpreter I</b>	1	1	1
<b>Job Placement</b>	4	4	4
<b>Licensed Practical Nurse</b>	4	5	5
<b>Maintenance Manager</b>	1	1	1
<b>Mechanical Maintenance &amp; Operations Technician</b>	3	3	3

<b>Personnel Category</b>	<b>No. of Personnel Employed 1. A</b>	<b>No. of Personnel Currently Needed 1. B</b>	<b>Projected No. of Personnel Needed in 5 Years 1. C</b>
<b>Nurse Supervisor</b>	1	1	1
<b>Occupational Therapist</b>	3	4	4
<b>Occupational Therapy Assistant</b>	1	1	1
<b>Office Support Assistant</b>	2	2	2
<b>Orientation &amp; Mobility</b>	2	3	4
<b>Patient Aide I</b>	3	3	3
<b>Physical Therapist Assistant</b>	1	1	1
<b>Pre-ETS</b>	6	6	10
<b>Pre-ETS Specialist</b>	1	1	2
<b>Procedures Development Specialist II</b>	1	1	2
<b>Program Coordinator</b>	2	2	3
<b>Regional Program Manager</b>	5	5	6
<b>Registered Nurse</b>	4	4	4
<b>Rehabilitation Care Aide</b>	1	2	2
<b>Rehabilitation Technologist</b>	6	6	10
<b>Resource Management Analyst</b>	6	6	8
<b>Speech Pathologist</b>	2	2	2
<b>Staff Assistant</b>	1	1	1



Personnel Category	No. of Personnel Employed 1. A	No. of Personnel Currently Needed 1. B	Projected No. of Personnel Needed in 5 Years 1. C
<b>Therapy Program Assistant</b>	1	1	1
<b>Training Development Specialist</b>	2	2	3
<b>Voc Rehab Counselor</b>	134	141	175
<b>Voc Rehab Manager</b>	27	27	30
<b>Vocational Evaluator</b>	1	1	1
<b>VR Administrator</b>	20	23	29
<b>VR Specialist</b>	1	7	10
<b>Work Experience Coordinator</b>	1	1	1

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

Kentucky OVR employed 134 qualified vocational rehabilitation counselors for this reporting period and had 44,929/134 active consumer cases for a 335 ratio of clients to counselors. This number includes potentially eligible cases in the amount of 15,568 so in removing that number it becomes 29,361/134 with a ratio of 219 client to counselor.

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

Based on the latest estimated population for Kentucky from the U.S. Census Bureau, the National Center on Birth Defects and Developmental disabilities estimate of Kentucky adults in relation to the population, the 2021 Annual Disability Statistics Compendium population of Kentucky growth from 2017 – 2021 and agency consumer growth from 2022 – 2023, the projected number of consumers to be served in PY 2028 is 47,015.

**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
<b>University of Kentucky</b>	Master of Counseling with a Clinical Mental Health Counseling (CMHC) or Rehabilitation Counseling (RC) Track	65 (43 in CMHC and 22 in RC)	18 (13 in CHMC and 5 in RC)
<b>University of Kentucky</b>	Undergraduate Interdisciplinary Disability Studies	17	7

- 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.

Recruitment for state government positions is coordinated through the Commonwealth of Kentucky Personnel Cabinet. The Cabinet advertises available positions on their website and shares the information with LinkedIn. In addition, all advertisements are shared statewide on the agency Kentucky KYOVR (KYOVR) listserv for those that may be interested in advancement opportunities or would like to share the information with others outside of the agency that may be interested in the applying, including agency consumers.

The agency developed a Diversity, Equity and Inclusion (DEI) Team which presented and had approved a Strategic Plan. Within the strategic plan the first goal is “Staff Diversity: Recruit, hire and retain a diverse and inclusive staff to provide quality services to Kentuckians with Disabilities.” The agency is committed to this effort and the cabinet is supportive of this initiative. As result of the successful team format and progress they have made on this initiative, the Education and Labor Cabinet is establishing a DEI Council, and our agency team lead will serve on this council on our behalf.

Additional recruitment occurs because of KYOVR collaboration with the University of Kentucky for fieldwork experiences as well as internships for students when there are available staff to assume the supervision responsibilities. Multiple KYOVR staff serve on the University of Kentucky Advisory Board and attend annual meetings and ad hoc meetings that may occur. Participation on this board allows the agency an opportunity to keep the university apprised of agency goals, challenges and staffing needs while also allowing the university an opportunity to share their stats for the programs and provide updates to the KYOVR team.

In addition to the University of Kentucky Master of Counseling program, the agency also offers internship opportunities to other collegiate programs within the state that support degree programs in social work. With the ever-growing number of new hires from this related degree program, the agency is making efforts to provide exposure to our programs through additional university connections and fieldwork opportunities.

Retention of employees is being addressed in multiple ways. Pay equity has been addressed through agency supported increases, governor initiatives have created pay raises for all state employees and the agency promotes continuous development opportunities for career growth. In addition to agency efforts, the Education and Labor Cabinet now provides access to an Emerging Leaders Program that staff can apply to participate in for career development. Currently there are four agency staff participating in this initiative. Details regarding pay increase and other efforts are explained in subsequent paragraphs.

Retention issues surrounding pay have been addressed in multiple phases. In the spring of 2022, the agency was provided with approval from the Personnel Cabinet to bring all the current staff that were not already at the midpoint of their grade, to the midpoint. A new starting salary for all job classifications within the agency was created to enhance onboarding of new personnel. In addition to this change, the governor approved and provided an 8% increase for all state employees in July 2022 and another 6% was included in the budget for July 2023. The Governor announced in October 2023 that he has proposed the biennial budget to include a 6% increase in July 2024 and a 4% increase in July 2025 for all state employees. The midpoint raises increased starting salaries and additional pay increases through the Governor has made the agency more competitive in salaries and has helped stabilize agency retention. Some vocational rehabilitation professionals that left the agency due to pay have returned to their former positions. Exit interviews with departing staff prior to the raises indicated that the

employees were leaving because of pay and not because of the work or the work environment and the return of these employees appears to verify that finding.

In addition to the raises that have taken place across the agency and state government, the Commonwealth of Kentucky Personnel Cabinet was charged by the legislators with reviewing all job classifications in the Commonwealth to ensure the relevance of the classification and the proper grading of the position based on the requirements of the job. Some reviews have resulted in increased pay for staff based on the education and experience required to fulfill the knowledge and skills for the position. The Personnel Cabinet has completed their review of all vocational rehabilitation specific positions. The reviews resulted in pay increases for the Vocational Rehabilitation Managers and Vocational Rehabilitation Specialists. The Vocational Rehabilitation Counselor classification series was changed from the former three classifications of "Vocational Rehabilitation Counselor, Vocational Rehabilitation Counselor Certified I and Vocational Rehabilitation Certified II" to two classifications. The two positions are now titled "Voc Rehab Counselor" and "Voc Rehab Counselor Certified". There was no downgrading or demotions because of the collapsing of the classifications. Those that qualified for higher level positions based on their qualification and certifications were automatically moved to their new title and grade. Those that did not have a change in their grade did not receive a pay increase nor did their job change, only their job title. The certified counselor classification requires the individual to be a Certified Rehabilitation Counselor.

The agency currently utilizes contract employees to provide additional supports for service delivery. This resource is used to supplement temporary needs but has historically been utilized due to the non-competitive salaries offered in the state positions for professional positions. The agency is reviewing this practice along with the current payrates of contracted professional services to determine if returning these professionals to the state system is achievable. These include such positions as interpreters and rehabilitation technologists. Professional services for mental health counselors, psychiatrists, and psychologists are and will be contracted through universities for services as needed. Temporary staff will continue to be utilized in high turnover positions such as cooks and second and third shift employees at our centers.

The Governor's Minority Management Trainee Program (GMMTP) is a state leadership program that assists in recruitment, preparation and retention within state agencies. GMMTP is a twelve-month transformational leadership development program designed to provide guidance and leadership development

opportunities for minority employees in the merit system. A flagship program, the GMMTP has garnered respect and attention as a model for retaining and promoting minorities within state government. Staff interested and eligible for this program are encouraged to apply.

- 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:**
  - i. **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**
  - ii. **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.**

The agency believes that a well-trained professional staff is essential in providing quality services to individuals with disabilities and achieving competitive integrated employment outcomes for agency consumers. Training plans are based on federal laws, RSA monitoring findings, agency strategic plan, case reviews, continuous improvement initiatives, training needs assessment, staff and consumer input.

The agency utilizes both in-person and online resources for training from internal and external sources. Onboarding for the State of Kentucky, the Cabinet and KYOVR now includes web-based trainings offering more timely engagement. All the required trainings must be completed within 30 days of employment. These include Anti-Harassment, Workplace Violence Prevention, State Government Ethics, Security Awareness for Technology, Performance Evaluation Orientation and Accurate Time Reporting.

Skills Enhancement Training (SET) is the agency new employee orientation program. A new format has been developed to ensure that staff receive the two-week required training within the first 6 months of employment. This training occurs at least 4 times during the calendar year or as often as needed to

accommodate new hires. Agenda items include Laws and Regulations, Organizational Structure, Specific Disabilities, Pre-Employment Training Services/Transition, Case Management, Referral and Application, Social Security, Eligibility, Follow Up and Case Closure, IPE's, Kentucky Business Enterprise Program, Diversity, Cost Sharing, Employer Services, Assistive Technology, Mental Health Issues, Visual Impairments, Deaf and Hard of Hearing Services, Kentucky Retaining Employment and Talent after Injury/Illness Network Retain (KY RETAIN), Engagement and information on both of the centers. To further enhance the new employee knowledge of the agency, two (2) of the sessions are held at the centers to showcase their programs for consumers and provide new staff with a tour of the facility. With the reformatting of SET, participants that completed the orientation training five (5) or more years ago are encouraged to attend the trainings again. Future plans are to require this "Re-Setting" at a minimum of every (5) years. Upon completion of the training the agency sends out an assessment survey to evaluate the training provided. Plans are moving forward to include a repeat assessment survey after 6 months to evaluate the usefulness of the training provided in their daily job duties.

New employees are also required to take a recently updated online training on the Client Assistance Program (CAP) developed in 2023 by the coordinator of that service. The training provides an overview of the services provided to consumers and processes for consumers to enlist the services of CAP if needed.

In April 2023 the agency conducted an assistant training focusing on the duties and responsibilities of the staff that provide support to the counselors and other agency other staff. In May 2024 the agency will conduct a statewide training for all employees providing 3 days of in-person presentations and workshops. A statewide training team with representation from all agency divisions is in place to work with the central office training team to develop an agenda that ensures the provided content applies to all classifications within the agency for pertinent professional development.

The agency counselor mentor program has grown into a program that is an essential component of successful new employee orientation for agency VR Counselors. New counselors receive training and guidance from a trained KYOVR Counselor Mentor. The rehabilitation counselor mentoring program was implemented in June 2002 with pilot programs and has been active since the completion of the pilot in 2003. Currently there are 21 counselors involved in the program. A Counselor Mentor Leadership oversees all aspects of this program including policies, procedures, recruitment, training materials and implementation

of the annual training program for this group. The team consists of an administrator from central office, two field managers (one representing services to the blind and the other representing all other disability services) and appointed counselor mentors with required mentoring experience. There are 11 out of 19 districts represented within the mentoring program. Certified mentors are voluntary and receive no additional pay for their services. They are required to undergo additional training to maintain their mentor credentials. The development of the skills and knowledge required to perform this specific role provides an opportunity to build their resume' and prepares them to assume other leadership roles within the agency.

Eligibility requirements for an individual to apply for the KYOVR Counselor mentor program area as follows: an applicant must have the minimum of a bachelor's degree in a field of study reasonably related to vocational rehabilitation, such as vocational rehabilitation counseling, social work, psychology, disability studies, business administration, human resources, special education, supported employment, customized employment, and economics. An applicant must also have a minimum of three (3) years of experience as a Vocational Rehabilitation Counselor, a Rehabilitation Counselor for the Blind (RCB), or a Rehabilitation Counselor for the Deaf (RCD) for the state of Kentucky if they are a CRC and submit a recommendation from their supervisor. If the applicant is not a CRC, they must have 5 years of experience. The applicant must have successfully completed probation. Applicants must complete a questionnaire with essays regarding their reasons for applying for the mentor program and submit a sanitized case that reflects their best casework. When the case is reviewed, the team reviews the application to determine if the deadline for submission was met, the appropriate documents for the application were provided, the case was sanitized and that the case contains the required documents as per federal law and agency policy. The Mentor Leadership Team reviews the application and case provided to determine admission into the program. If approved, the applicant attends an orientation that contains an overview of the mentor guide. All mentors are required to attend annual training designed by the mentor leadership team to hone their skills and knowledge for the mentoring process. The pandemic and salary discrepancies are variables that have impacted our ability to provide consequential data regarding the formal mentoring process on retention and improved competitive integrated employment outcomes. KYOVR leadership has charged the mentoring team to refocus their review to include updated data tracking the impact of this program on the areas identified.

In 2020 the agency was selected to participate in the Center for Innovative Training in Vocational Rehabilitation, an RSA grant through George Washington University. The introduction for the VR Development Groups YesLMS program is one benefit of participation in this grant as it provided staff access to an already developed VR specific training in an online format. In addition, to the training already developed, the agency training staff and staff in the counselor mentor program worked with Interworks from San Diego State University as a part of the CIT-VR grant to develop a Kentucky specific training for new counselors. In an ongoing effort to stay aware of trends and training developments, agency training staff regularly participate in the Community of Practice (CoP) meetings for Training Coordinators and Directors. Participation in the CoP allows agencies to share and receive information on innovative research, trainings, and materials available.

Due to the benefit and success of the YesLMS use, the agency contracted for access to this resource for all agency staff. This system provides staff access to already developed VR specific training in an online format. All trainings developed by the VR Development Group have certified rehabilitation counselor credits approved and available upon successful completion of the courses and quizzes associated. The system houses a large course library and developers continue to upload new relevant courses as they become available. Additionally, the system allows KYOVR to add agency specific courses to the library. Leadership and management staff can assign additional courses from the library to staff as needed. This is particularly beneficial when staff are dealing with development issues where training is available to assist them with being more successful in their work life. We find that this system is not only helpful to new employees, but also allows the agency to offer advanced training opportunities from national resources to all staff to broaden their 21st century knowledge of workforce innovations, systems and professional advancements.

The Carl D Perkins Vocational Training Center (CDPVTC) Commission on Accreditation of Rehabilitation Facilities (CARP) certified which requires their employees to take training for certification compliance. These trainings include: Ethics and code of conduct, Education to stay current in the field, Education to reduce identified physical risks, Health and safety, Infectious diseases, Transportation safety, Onboarding (only new employees), Workforce development activities, Cybersecurity / HIPPA, Performance measurement (only new, managers staff), Use of positive interventions (student behavior), and Disability Awareness. The trainings offered online are a tremendous supplemental support for training offered onsite at the center.



Professional continuing education credits for assistive technology professionals occurs annually when the agency partners with the Kentucky Assistive Technology System (KATS) Network and Protection and Advocacy to coordinate a statewide training. The content includes current best practices, emerging trends and issues related to the various aspects of assistive technology. The Summer Assistive Technology Workshops are attended by KYOVR staff, AT professionals, educators, Occupational Therapists, Physical Therapists, and other professionals that have in interest in or contact with AT. KYOVR administers the KATS Network, the Commonwealth's Assistive Technology program. Rehabilitation Engineering and Assistive Technology Society of North America (RESNA) continuing education credits were offered as part of the training to ensure that all agency rehabilitation technology staff maintain the required credits for continuance of their professional certification.

The agency also encourages staff to utilize the training offered through other entities within and outside of state government. This type of information is disseminated via email to all staff. One partner in this endeavor is the University of Kentucky Human Development Institute (UKHDI) from the University of Kentucky. Employees also utilize the webinar series topics offered by UKHDI during a spring, summer and fall training program. Topics of 2023 included: Disability Pride: What's In a Name?, Traumatic Brain Injury; What is it and how does it manifest?, Oh, the Places You'll Go! – Transportation access in Kentucky, "The Art of the Grant Proposal" and Leadership in our Backyard: The History and Power of Advocacy in our State.

College and university level classes are highly encouraged for staff though the agency does not provide educational assistance currently. Obtaining an education degree may result in a reclassification if the reclassification also includes an increase in material duties assumed by the employee. The agency shares information with staff regarding formal educational training such as the Master of Rehabilitation Counselor degree. Included in the information are details about scholarships and grants that may be available to assist with educational expenses.

Agency staff are encouraged to participate in the Leadership and Diversity Conference hosted by the Kentucky Personnel Cabinet Office of Diversity Equality and Training. The most recent training took place in September 2023. As with many other conferences, this one took place in a virtual format which created a positive outcome of more employee participating in the event.

Information regarding research and training pertinent to all vocational rehabilitation professionals and paraprofessionals is disseminated via email to all staff. In addition, the Executive Staff Advisor responsible for training, maintains a calendar of all training that has been disseminated along with a folder in a shared drive for all staff that contains a copy of all announcements that have been distributed along with any supporting documentation. Resources that have been shared throughout 2023 are from the following sources: National Institute on Disability, Independent Living, and Rehabilitation Research (NIDILRR), Rehabilitation Services Administration (RSA), Vocational Rehabilitation Technical Assistance Center (VRTAC), National Technical Assistance Center on Transition: The Collaborative (NTACT:C), Workforce GPS, Office of Special Education Programs (OSEP), Office of Disability Employment Policy (ODEP), and the University of Kentucky Human Development Institute (HDI).

KYOVR makes every effort to have representation at and participate in national, regional, and state training events. In 2023 KYOVR staff represented the agency at the following conferences: National Rehabilitation Association Annual Conference, , Kentucky Rehabilitation Association Annual Conference, Kentucky Association of Persons for Supported Employment Conference, Kentucky Individual Placement and Support Conference, Assistive Technology Workshop, Kentucky Governor's Conference on Leadership, Equality, Accessibility and Diversity, Sagebrush Conference for Randolph-Sheppard, Council of State Administrator of Vocational Rehabilitation, National Council of State Agencies for the Blind, National Federal for the Blind, American Federation for the Blind, VR Technical Assistance Webinars, Kentucky Chamber of Commerce Inclusive Workforce Summit and Southeast Rehabilitation Institute on Deafness. Additionally, we have staff participate in the National Rehabilitation Leadership Institute that provides them with additional knowledge to share with staff based on shared ideas that learn within the program.

The agency provides training opportunities to address identified needs from the respective supervisors or as determined based on case review processes and advancements in the field of rehabilitation. Staff are supported in attending associational meetings for the rehabilitation professions such as Kentucky Rehabilitation Association and Association for Persons for Supporting Employment 1st. Staff participated in the Kentucky Chamber of Commerce's Inclusive Workforce Summit in 2023. Presentation titles included, Disability Inclusion Strategies in the Workplace, Getting Comfortable with Disability, Employment First Kentucky, The Impact of Work on Health, Using Universal Design from the Starting Gate as a Key to an Inclusive Workforce, Kentucky Retaining Employment

and Talent after Injury/Illness Network Retain (KY RETAIN): The Study, the Network, the Capacity Building, Preparing Youth and Young Adults with Disabilities for the Workforce, Resources Employers Can Use Today, The Disability Equality Index, and Innovative Supports for Autistic Workers.

- i. 1. **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**
  - A. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and**
  - B. The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.**

The KYOVR defines a “Qualified Vocational Rehabilitation Counselor” as one who meets the following criteria, based on the Kentucky Personnel Classification for vocational rehabilitation counselor positions.

1. A Certified Rehabilitation Counselor (CRC) is preferred.
2. Master’s degree from an accredited university in master’s degree in rehabilitation, rehabilitation teaching or therapy, guidance and/or counseling, psychology, sociology, orientation and mobility, social work, special education with emphasis in vocational counseling or a related; OR
3. Meets the Kentucky Personnel Cabinet standard for a Vocational Rehabilitation Counselor. This position requires the individual to be a graduate of a college or university with a master's degree in rehabilitation, rehabilitation teaching or therapy, guidance and/or counseling, psychology, sociology, orientation and mobility, social work, special education, education with emphasis in vocational counseling, disability studies, behavioral science, human services, vocational assessment, addiction counseling, or a related field. There is a substitution clause that allows for a bachelor's degree plus two years of professional experience in rehabilitation, rehabilitation counseling, rehabilitation teaching or therapy, vocational assessment, employer relations, rehabilitation technology,

vocational evaluation, supported employment, job placement, guidance and/or counseling, psychology, sociology, orientation and mobility, social work, special education, education with an emphasis in vocational counseling, customized employment, health studies, human relations/resources, addiction studies, occupational therapy, physical therapy, school counseling or a related field will substitute for the required master's degree.

Based on the above criteria of Vocational Rehab Counselor, all employed vocational rehabilitation counselors meet or exceed the criteria.

The qualifying certification for the certified position is the Certified Rehabilitation Counselor (CRC).

Managers for vocational rehabilitation counselor positions are required to meet the minimum qualification for their position and are encouraged to obtain their CRC. Currently 84% of our VR counselor managers are also Certified Rehabilitation Counselors.

Certifications required for professional and para-professional positions are supported by the agency through continuing education opportunities provided inhouse as well as other pertinent local, state, and national level training. A broader access to national training is now achieved with the implementation of online training initiatives through a variety of resources. Staff with a desire to achieve a certification in their profession are supported in the preparation phase of their efforts and with examination fee support on a onetime pass or fail basis.

Primary certifications currently utilized within KYOVR are as follows:

- Certified Rehabilitation Counseling (CRCC/CRC)
- Assistive Technology Professional (ATP/RESNA),
- Certified Interpreters (R
- Certified Driver Rehabilitation Specialist (CDRS)

The agency also has need of professionals to fulfill medical and specialized services provided at Carl D. Perkins Vocational Training Center and the Charles McDowell Center. To fulfill those needs there are additional licensed or certified personnel such:

- Driver and Traffic Safety Training Certification - for those that provide on-the-road driver instructions to students.

- Certified Daycare Director - for the childcare program
- Orientation and Mobility (COMS)
- Kentucky Professional Teaching - for the vocational instructors
- Certified Speech Pathologists
- Certified Public Account
- Certified Maintenance Employees and Drivers– plumbing, electric and CDL
- Nursing Staff

Some critical services in the residential facilities must be contracted to provide specialized counseling services and those include.

- Licensed Clinical Social Worker
- Licensed Alcohol and Drug Abuse Counselor
- Licensed Psychologist

The agency training developers consistently share virtual and in-person training opportunities with staff and maintain a calendar of all of the events for easy information access for staff. Professional and paraprofessional positions are provided with supports necessary to maintain their required continuing education for their respective fields and the agency provides financial assistance for the maintenance of required professional certifications. The training team ensures that all courses developed internally provide associated professional certification for continuing education hours. Individuals seeking their credentials in their profession are supported through examination fees and are considered for reclassifications as appropriate based on their academic and professional certification changes.

Online training options are provided through the YesLMS system library and has titles available on various topics that can provide staff with a better understanding of the evolving labor force and the needs of individuals with disabilities. The inclusion of these national trainings in the system broadens 21st century knowledge and awareness on a national level for our agency staff.

- i. 2. **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.**

The agency is committed to established practices that ensure that staff is trained and knowledgeable of resources to assure consumers receive the appropriate communication resources to fully participate in agency processes and programs. Consumers in need of interpreting or communication assistance services have resources provided as part of their vocational rehabilitation process.

The agency has designated counselors with specialized skills assigned to handle caseloads serving individuals who are deaf, deaf/blind, blind and visually impaired. Recruitment of individuals with specialized skills occurs utilizing the Commonwealth of Kentucky Personnel Cabinet through their online job's portal. Classifications for these positions specifically outline the necessary skills required to fill the position.

Supporting the development of additional resources for communication is also part of the agency processes. Specifically, the Deaf and Hard of Hearing Services Branch actively provides internship and volunteer opportunities for students graduating from the American Sign Language (ASL) program at Eastern Kentucky University and those graduates that need training hours for their certification. This gives the graduates a chance to learn and gain exposure to working within the state agency as an employee or serving as in an ASL contracted employee for the state.

**i. 3. 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 KYOVR agency coordinates its CSPD plan to ensure the standards and qualifications of our personnel coordinate with personnel development under the Individuals with Disabilities Education Act (IDEA), and the standards under the Rehabilitation Act, as amended.

The Kentucky Interagency Transition Council meets on a quarterly basis to address continued fulfillment of the Kentucky Interagency Agreement on Transition Services for Youth with Disabilities. The KYOVR and the Department of Education are two of the eleven state agencies that are parties to the agreement. One of the provisions of this agreement is cooperative training and staff development concerning transition issues. KYOVR staff attend Community Work Transition training offered by the University of Kentucky's Human Development Institute (HDI). Rehabilitation counselors work collaboratively with high school education teachers, local directors of special education, and Employment

Specialists for students transitioning from high school into employment. KYOVR Counselors attend Individual Education Plan (IEP) and Admissions and Release Committee (ARC) meetings working with the team in establishing a vocational goal. This assures the development of the students IEP in conjunction with the vocational rehabilitation Individualized Plan for Employment (IPE). KYOVR provides support to teaching instructors, school staff and Employment Specialists regarding rehabilitation issues and other areas of agency staff expertise such as Assistive Technology to ensure successful placements. Often rural schools do not have the needed resources; therefore, KYOVR staff offer their expertise based on the individual needs of the student working closely with all staff involved with IDEA.

## **Section J: Coordination with Education Officials**

- j. 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.**

The OVR Transition Services Branch will coordinate with education officials on a state and local level in the planning and implementation of the provision of Pre-Employment Transition Services (Pre-ETS) and Transition services to students with disabilities. The branch consists of one (1) Branch Manager, three (3) Program Administrators, one (1) Administrative Specialist, and six (6) Pre-ETS Coordinators. The Branch Manager oversees all branch activities and represents the agency on inter-agency teams. The Program Administrators coordinate and monitor Pre-ETS and Transition services throughout the state inclusive of the Community Work Transition Program, including specific contracts with service providers. The Administrative Specialist provides clerical support to the branch. The Pre-ETS Coordinators work with Potentially Eligible students in their specific regions. They collaborate directly with schools and providers to receive referrals, coordinate Pre-Employment Transition Services, and monitor the progress of Potentially Eligible students to help determine if/when it is appropriate for a student to apply for OVR services. The Pre-ETS Coordinators transfer the Potentially Eligible students' cases to VR Counselors who determine eligibility for services and develop Individualized Plans for Employment.

Branch Staff are currently working on the revision of policies and procedures for the branch. OVR staff will receive training on all policies to assure to timely implementation of service delivery and the effective coordination of services. OVR has a focus on internal controls for the areas of documentation and accurate data entry to ensure the efficacy of reporting.

OVR works with many agencies to provide transition services and pre-employment transition services to students with disabilities. This is inclusive of the blind and visually impaired and the deaf and hard of hearing populations. All of the collaborations described below allow for transition and pre-employment transition services to be provided by either OVR or our partners.

OVR provides the following five required pre-employment transition activities:

1. Job Exploration Counseling
2. Work Based Learning
3. Counseling on Post-Secondary Opportunities
4. Workplace Readiness Training
5. Instruction in Self -Advocacy

OVR has assigned a VR Counselors and Pre-ETS Coordinator to each of Kentucky's 171 Local Education Agencies including the School for the Deaf and the School for the Blind for the purpose of ensuring that all students with disabilities are served. The counselors work with referrals from special education and general education staff as well as the individual with a disability, their family, and other agencies who assist students with disabilities who are in need of transition services. These counselors coordinate and authorize transition services for students with disabilities, age who are eligible for VR services. The counselors also provide general coordination, information, and outreach activities about vocational rehabilitation services to the local education agency and student for use in transition planning. OVR Pre-employment Transition Services Coordinators work in conjunction with the VR counselor in the provision of services. Pre-ETS Coordinators receive referrals from services providers, schools, students, and families for students who are Potentially Eligible for VR services. Pre-ETS Coordinators approve and monitor students Pre-ETS activities to help determine when it is appropriate for the student to apply for VR services. Service coordination activities may also include resource information about vocational rehabilitation, presentations, handouts, and staff development. The VR Counselor and Pre-ETS Coordinators collaborate with the local education agency to develop



the transition services section of the Individualized Education Program (IEP) and the Individualized Plan for Employment (IPE) for transitioning students. Both the IEP and IPE will include, if appropriate, a statement of interagency responsibilities or any needed linkages by which the responsibilities of other entities are satisfied.

The student should be prepared to enter the competitive integrated workforce following the provision of needed services, as reflected on the IPE. The student should have ample opportunity to participate in Pre-employment Transition Services before they graduate. The OVR Counselor along with the Pre-Employment Transition Services Coordinators will engage in providing services that would be most beneficial to an individual in the early stages of employment exploration, such as counseling and self—advocacy training. These services are provided to students who are eligible or who are potentially eligible for VR services.

OVR partners with the public-school districts, Department of Education and the University of Kentucky Human Development Institute to provide transition services and pre-employment transition services through the Community Work Transition Program (CWTP). The CWTP is designed to provide Pre-employment Transition Services and transition services to students with the most significant disabilities to assist them in transitioning from high school to competitive integrated employment. Employment Specialists, funded by the local education agency, refer students to OVR in order to provide pre—employment transition services during their final three years of school. The CWTP contracts with the individual school districts to hire employment specialists to provide students with employment exploration and experiences, community-based evaluation, work experience and job placement while in high school.

OVR has a contract with the Jobs for America’s Graduates (JAG) to provide Pre-employment Transition Services to students with disabilities in the school system. JAG is a state-based national non- profit organization dedicated to preventing dropouts among young people who have serious barriers to graduation and/or employment.

Additionally, OVR has contractual agreements with three of the nine special education cooperatives for the provision of Pre-employment Transition Services. Community Rehabilitation Providers may provide Pre-ETS through a Service Fee Memorandum.

Transition Services Branch staff work directly with the Kentucky Interagency Transition Council. These involvements help facilitate all of the partner’s

understanding of the unique transition needs of students with disabilities and assists in understanding the educational process of Public Schools in the State.

The Kentucky School for the Blind (KSB) serves students with visual disabilities from across the state. Students can live and attend classes at the school's Louisville location, or receive outreach services while attending their local elementary, middle and high schools. Staff in specialized positions actively participates in the vocational planning and academic progress of all of these students through collaboration and assistance with KSB's Community Based Instruction Program, and services such as vocational assessments, and annual Individual Education Plans. Staff collaborates on a variety of work-readiness and work-experience programs with KSB such as the Summer Work Program and The World of Work Program that provides work-based learning experiences in a competitive, integrated settings.

The Kentucky School for the Deaf (KSD) provides education to deaf and hard of hearing students from elementary through high school levels. It is a residential program in Danville, KY that also provides outreach services to students in their local schools. Vocational services include opportunities to prepare for work or continued education in the high school curriculum. An OVR Rehabilitation Counselor for the Deaf is assigned to students on campus.

Rehabilitation Counselors for the Deaf are proficient in American Sign Language and serve individuals who are deaf and hard of hearing and use this type of communication. Rehabilitation Counselors for the Deaf are also skilled in serving people who have vision limitations in addition to a hearing loss or deafness. Individuals who are deaf and use American Sign Language are served by a Rehabilitation Counselors for the Deaf. There are Rehabilitation Counselors for the Deaf statewide to provide OVR services.

The Office of Vocational Rehabilitation also has staff trained regarding the limitations that people with hearing loss may experience. These Communication Specialists receive specialized training regarding ways to serve individuals who are hard of hearing or late deafened with auditory/oral communication. This includes training regarding Hearing Aid technology and Assistive Listening Devices.

The State Coordinator of Deaf-Blind Services (SCDB) works with, consults, and provides technical assistance to KY Office of Vocational Rehabilitation (OVR) staff including the Rehabilitation Counselors for the Blind (RCB), Rehabilitation Counselors for the Deaf (RCD), and Communication Specialists. Other staff

include Managers, Blind Services Division Staff, and various other administrators within OVR. The SCDB also maintains relationships for service delivery with staff from the Helen Keller National Center (HKNC), Kentucky Commission for the Deaf and Hard of Hearing (KCDHH), The Kentucky Deaf-Blind Project, KY Mental Health Services for the Deaf and Deaf-Blind, Kentucky Association of Deaf-Blind (KADB), and several other Community Rehabilitation Providers (CRP). Kentucky has one of the largest Deaf-Blind census numbers with approximately 49,000 known individuals listed as being Deaf-Blind in the State. The SCDB also coordinates, plans, and oversees training and support for staff that work with this population.

INSIGHT - Post-secondary Preparation Program for Students Who Are Blind or Significantly Visually Impaired is a collaborative project between the Kentucky Educational Development Corporation Special Education Cooperative, Kentucky School for the Blind, Kentucky School for the Blind Charitable Foundation, the Office of Vocational Rehabilitation, MCP Orientation and Mobility Services, and Morehead State University. INSIGHT is a unique program designed to provide college bound students an opportunity to experience some of the challenges encountered when entering a university or community college. Participants gain an increased awareness of the educational, recreational, and social opportunities and challenges of the post- secondary environment.

Staff also participates with the Kentucky Deaf-Blind Project, which helps promote cooperative transition services for youth who are deaf-blind. OVR has a Deafblind Coordinator who is responsible for helping to facilitate pre-employment transition services, including all the previously described work readiness and summer work experience programs, for this population of students. OVR collaborates with the Kentucky Deaf-Blind Project to provide a weeklong summer camp for eight to nine students who are Deaf-Blind that addresses the five required Pre-Employment Transition Services. This program is unique to Kentucky, and other Deaf-Blind Projects across the nation are interested in replicating it in their states.

The PATH Program is a Pre-employment Transition Services program held either through a virtual platform or at the McDowell Center in Louisville, KY. This program is conducted in collaboration with the University of Kentucky's Teacher Preparation Program in Visual Impairments. Through the University of Kentucky, practicum students from the teacher preparation program are able to assist with the providing the Pre-employment Transition Services to up to fifteen blind or visually impaired students from across the state. The University of Kentucky also provides staff such as Orientation and Mobility Specialists that assist the

McDowell Center staff provide the five required Pre-employment Transition Services.

Workforce Development Boards: OVR counselors actively participate on their local Workforce Development Board's Youth and One Stop committees to enhance and make accessible the programs and services for transition age consumers.

KY AHEAD is a professional organization whose purpose is to promote communication among professionals in post-secondary education in order to improve the development and implementation of services for persons with disabilities. Campus Disability Services Centers are an essential resource for students with disabilities attending post-secondary educational institutions. VR counselors maintain relationships with disability service center staff and strongly encourage college students to utilize the services available at the centers so that they can receive individualized accommodations for their coursework. Every effort is made to arrange for a student to meet with staff at the disability center prior to entry into a post- secondary program in assuring a smooth transition for the individuals.

The Kentucky Special Education Cooperative Network consists of nine special education cooperatives located across the state. These cooperatives were formed to better meet the needs of the multiple school systems across Kentucky's 120 counties. All 171 local school districts, and the Kentucky Schools for the Blind and Deaf are members of a special education cooperative. Each cooperative has VI teachers and an AT specialist to assist students with visual needs. The school districts employ other specialty service providers such as Orientation and Mobility Specialists, Physical Therapists, and Speech Therapists. OVR works collaboratively with each cooperative network across the state in the provision of information and referral for students of all ages.

## **j. 2. Coordination with Education Officials. - 2**

**A. 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;**

The Kentucky Office of Vocational Rehabilitation has a current Memorandum of Understanding with the Kentucky Department of Education that was signed in

September of 2022 and will remain in effect for three years. Within this agreement are strategies for the two agencies to work collaboratively in evaluating, serving, and planning for a seamless transition from school for students with disabilities who are eligible or potentially eligible for Vocational Rehabilitation (VR) services. The intended result of these collaborative strategies and activities is that students will achieve their post-secondary goals as they make the transition from school to adult education, competitive integrated employment (including customized employment and supported employment), continuing and adult education, independent living, and community participation. Signed agreements are in place with the local educational agencies. These agreements are updated annually, and they outline and identify the responsibilities of each party for the provision of services. These agreements are designed to facilitate the transition of students with disabilities from the receipt of educational services in school, to the receipt of vocational rehabilitation services.

Currently OVR, HDI (the Center for Excellence at the University of Kentucky) and KDE are meeting monthly to address policy and procedural changes to address the Community Work Transition Program and transition services, pre-employment transitions services, data sharing agreements and a clear identification of each of the roles of the partners involved in the agreement.

OVR receives ongoing technical assistance from the National Technical Assistance Center on Transition for the area of pre – employment transitions services. NTACT staff provide guidance to assure we have a clear understanding and interpretation of the regulations and any other federal guidance received from the Rehabilitation Services administration. Based on feedback from NTACT and the results of monitoring reviews from other states, OVR is working on implementing a stronger internal controls system. OVR staff will be responsible for monitoring the delivery of pre-employment transition services provided by other entities to ensure the quality of services provided and the accurate reporting of services. Contractual agreements are in place so that OVR has more involvement in the approval of services for students with disabilities. OVR's current case management system and the ability to pull accurate information through the Web Intelligence program has not been as strong as it could be. OVR is currently in the process implementing a new case management system.

The Office participates with the Kentucky Department of Education (KDE) and 21 other state agencies on the Kentucky Interagency Transition Council (KITC) in the coordination among agencies in the delivery of transition services. OVR Transition

Services Branch staff are members of KITC and participate in quarterly council meetings. OVR provides ongoing technical assistance to providers of transition services and pre-employment transitions services. OVR and KDE each have staff serving as team leads on a subcommittee of KITC that meets monthly to work towards improving transition services throughout Kentucky.

The Executive Director of the Office of Vocational Rehabilitation (OVR) was appointed to serve as a voting member of the State Interagency Council (SIAC) for Services and Supports to Children and Transition-Age Youth. The Executive Director or a designee attends monthly SIAC meetings to collaborate on the matters of the council as it relates to youth who are Kentucky students with disabilities. The monthly SIAC meetings give OVR the opportunity to collaborate, plan and develop on going partnerships with other state agency representatives who serve mutual individuals with disabilities. KDE also has representation on the SIAC.

Regional OVR representation has been established for the Regional Interagency Councils (RIAC) for the system of care to have consistent OVR representation. There is a total of 18 RIAC's across the commonwealth. An OVR regional representative attends monthly RIAC meetings to establish partnership with state, public and community agencies to address concerns that families have within the regions of Kentucky. OVR regional representation supports the momentum of the system level work that is occurring statewide. Strategies are set in place to promote a spectrum of effective, community-based services and supports for children and transition-age youth, with at-risk behavioral health needs or other challenges, and their families that: are organized into a coordinated network; builds meaningful partnerships with families and youth and addresses their cultural and linguistic needs in order to help them function better at home, in school, in the community, and throughout life.

OVR and the Kentucky Department of Education continues to meet quarterly with interested interagency partners and serve as the catalyst for development and implementation of an infrastructure which supports youth with disabilities to transition from high school to post- secondary school and employment. Pre-Employment Transition Services will continue to represent the earliest set of services available under OVR for students with disabilities, which are short-term in nature and are designed to help students identify career interests.

OVR continues its work in expanding its relationship with the Kentucky School for the Deaf. A group of stakeholders is part of an Engage for Change group in Kentucky. This is a national effort through the National Deaf Center on

Postsecondary Outcomes. OVR maintains strong relationships with the KY Deaf-Blind Project and the Kentucky School for the Blind, and the programs with these partners are frequently reviewed to improve the quality of these services.

**B. 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;**

Under IDEA, schools are responsible for initiating transition planning at the age of 16 for each student identified with a disability. In Kentucky, as stated in Kentucky Special Education Regulation 707, KAR 1:320, Section 7:1, transition planning can start in the child's 8th grade year or when the child turns age 14, or earlier if the ARC deems it appropriate, in alignment with the child's Individual Learning Plan (ILP). The Memorandum of Understanding between OVR and KDE outlines general responsibilities of both parties related to transition planning for students with disabilities through the provision of information and technical assistance to local education agencies.

Since school faculty and staff are academic specialists, it is very important for the VR counselor to have early influence on the student's vocational future helping to avoid weak or unrealistic vocational training. The VR counselor acts as a vocational specialist forging the educational and future vocational needs of the child realistically together. The VR counselor is educated on the federal and state laws associated with transition and acts as an advocate for the student and parents. VR counselors attend transition related meetings as early as age 14 and act as a consultant in the student's IEP. Early contact and intervention not only save the VR counselor considerable time and effort, but it also allows the student and parents the opportunity to plan a realistic vocational path that will lead them to the vocational goal of their choice.

VR counselors attend student IEP meetings starting at age 14. The school system will continue to have the primary responsibility for accommodations and student's educational needs. Once the student graduates OVR will become the primary agent. It is mandatory that the IPE be developed with the student 90 days after eligibility or prior to graduation, whichever comes first.

An IPE is developed for each student determined eligible and that meets the current order of selection for vocational rehabilitation services. The IPE should address the student's pre- employment transition services needs in the areas of

job exploration counseling, work-based learning experiences, counseling regarding post-secondary training opportunities, workplace readiness training to assist in the development of social and independent living skills, and instruction in self-advocacy.

OVR recognizes that it is the responsibility of Kentucky schools and OVR to coordinate and provide transition planning and services for students with disabilities. The VR counselor will provide consultation and technical assistance to assist the school as well as pre-employment transition services based on the student's needs. OVR recognizes that transition planning is an ongoing process and that a student may choose to go in a different direction requiring a change in their vocational goal. Ongoing exploration, work exposure, and vocational counseling will be provided to assist students in the decision-making process.

**C. 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;**

The Memorandum of Understanding between OVR and KDE clearly states that each entity is, "financially responsible for the services they provide under their own laws and rules."

Additionally, Memoranda of Agreements at the local level are used in order to further the collaborative efforts detailed in the interagency cooperative agreement between the Kentucky Department of Education and the agency. These memoranda of agreements will define the basic tenets of the Community Work Transition Program (CWTP).

The rights and responsibilities of OVR and the local education agency for implementing and carrying out the CWTP are also detailed in these memoranda of agreements. OVR authorizes payment of services needed to determine eligibility and for any services provided that do not fall under the responsibility of the school district. OVR provides payment for pre-employment services such as job exploration counseling, work-based learning experiences, counseling on post-secondary education, workplace readiness training and instruction in self-advocacy.

**D. 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;**

Outreach and involvement of the VR agency begins at age 14. OVR assigns VR Counselors to each school district to provide information regarding transition services, including Pre-employment Transition Services, and to accept referrals of students with disabilities. Local Education Agencies provide lists of students with Individualized Education Plans (IEP) and 504 Plans to VR staff and/or service providers. VR Staff or providers contact these students to encourage participation in transition services, including Pre-employment Transition Services.

OVR obtains a list of the number of students between the ages of 14 and 21 per county that are accessing modified instructional materials due to their visual disability. Rehabilitation Counselors for the Blind receive information regarding the number of students that receive these materials to help identify where unserved students are located in the school districts. Staff conduct outreach to school staff, inclusive of Teachers of the Visually impaired to strengthen partnerships and increase awareness of available services. This includes pre-employment transition services.

The CWTP is designed to provide pre-employment transition and transition services to all students with significant disabilities to assist in transitioning from high school to competitive integrated employment. Employment Specialists, funded by the local education agency, refer students to OVR for services.

Should the student need individualized transition services during this time, OVR counselors work with the Employment Specialists to ensure that community vocational services provided lead to the completion of an individualized vocational evaluation and the development of individualized programs (IEP and IPE) to ensure successful transitioning from high school to post school activities, including employment. Upon completion of the IPE, further community— based vocational services are provided to the student in the form of training for the planned vocational goal. The desired outcome for participants in the CWTP Transition Services is a post—school outcome or competitive, integrated employment.

Outreach to students also occurs through OVR's contractual agreements with Jobs for America's Graduates (JAG) and three of the Special Education Cooperatives for pre-employment transition services. Additionally, local Community Rehabilitation

Providers who provide Pre-employment Transition Services through a Service Fee Memorandum, also provide outreach to students in local schools.

Jobs for Kentucky's Graduates (JAG KY) operates its curriculum program in conjunction with the Kentucky Office of Vocational Rehabilitation to service students in their program who have disabilities and who are potentially eligible and/or eligible for the Office of Vocational Rehabilitation. JAG provides a curriculum for in-school youths with disabilities who have significant barriers to success that includes academic, physical, psychological, work related, and/or environmental barriers to success. The curriculum will include career development, job attainment, job survival, basic skills, leadership and self-development, personal skill, life survival skills, and workplace and economic empowerment. The JAG KY curriculum will also include presentations by local VR staff to encourage students to apply for OVR services. JAG KY employs and certify Specialist who are assigned to the schools that have a JAG KY Program through Kentucky.

The Kentucky Special Education Cooperative Network consists of nine (9) Special Education Cooperatives located across the state.

- Central Kentucky Educational Cooperative (CKEC)
- Green River Regional Educational Cooperative (GRREC)
- Greater Louisville Education Cooperative (GLEC)
- Kentucky Educational Development Corporation (KEDC)
- Kentucky Valley Educational Cooperative (KVEC)
- Northern Kentucky Cooperative for Educational Services (NKCES)
- Ohio Valley Educational Cooperative (OVEC)
- Southeast/Southcentral Education Cooperative (SESC)
- West Kentucky Educational Cooperative (WKEC)

OVR has the opportunity to enter into contracts with each of the Educational Cooperatives. Upon contract implementation, Pre-employment Specialists are hired by the cooperatives to provide the five required services to qualified students through individual and group activities. The activities will be determined by individual student need(s). The Cooperatives collaborate and utilize the student's individual education program (IEP), the student need(s), or the ARC committee decisions to determine what Pre-employment activities the students

need. Outcomes are determined by multiple data points, such as evidence of participation and evaluation of readiness and engagement in the activities.

The Community Rehabilitation Programs (CRP) provide Pre-employment Transition Services on a Fee Schedule in groups or to individual students. Proposals for the provision of pre-employment services are submitted to the OVR Transition Services Branch. CRP programs may provide the five required pre-employment services: Job exploration counseling, work-based learning experiences, post-secondary counseling, workplace readiness training, and self-advocacy. CRPs provide in-school and after-school Pre-employment Transition Services.

**E. 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**

The Memorandum of Understanding between OVR and KDE references Section 511 of the Workforce Innovation and Opportunities Act (WIOA) which requires OVR to perform certain actions prior to an employer paying an individual a wage that is below the standard minimum wage (subminimum wage).

OVR ensures that all OVR staff are trained to understand the process that a youth (24 or under) with a disability must complete prior to entering a subminimum wage employment:

1. Youth must be determined eligible.
2. Youth must have an approved Individualized Plan for Employment.
3. Youth must have worked toward their vocational goal for a reasonable amount of time with appropriate supports, without success and have their OVR case closed.
4. Pre-employment transition services and/or Transition services, supported employment and/or customized employment are provided as appropriate.
5. Career Counseling is provided and information regarding resources and other available programs in support of competitive integrated employment.

OVR provides subminimum wage facilities within the Commonwealth access to:

- A Career Counseling video that is to be shown to individuals according to the requirements set forth in WIOA.

- The Career Counseling Participation Form is completed on each individual and provided to the Community Rehabilitation Program (CRP) Branch of OVR, per Federal requirement.
- Offer multiple Pre-Employment Transition Services (Pre-ETS) opportunities for youth with a disability to ensure that this WIOA mandate is met.
- Provides individuals with available resources in their community to help with services for obtaining employment and support.

OVR continues to:

- Monitor and provide technical assistance to subminimum wage facilities to ensure WIOA requirements are met.
- Retain records on all individuals that receive Career Counseling.
- Provide individuals during first year, Career Counseling twice.
- Provide individuals during subsequent years, Career Counseling annually.

**F. 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.**

The OVR will not 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.

## **Section K: Coordination with Employers.**

### **k. Coordination with Employers**

#### **Vocational Rehabilitation Services**

The Department of Workforce Investment (DWI) in partnership with local and state workforce organizations are dedicated to providing proactive business services and industry skills development. Through local Kentucky Career Center Business Service networks, this partnership has laid a foundation for coordinated business services that leverage the assets of the Office of Employer and Apprenticeship Services (OEAS).

Kentucky Career Center Business Services offer a streamlined approach to assisting businesses with recruiting talent, training new and existing employees, and developing tomorrow's workforce. At its core, the Business Service strategy consists of five primary organizations who provide direct resources and services to businesses:

- Local Workforce Development Boards (LWDB)
- Kentucky Education and Workforce Development Cabinet (EWDC)
- Kentucky Cabinet for Economic Development (CED)
- The Kentucky Chamber's Workforce Center (Workforce Center)
- Kentucky Community and Technical College System (KCTCS)

These partnering agencies strive to provide unified, efficient, quality, and seamless workforce services and resources to new, existing, and expanding companies within the Commonwealth. The Kentucky Career Center Business Service strategy has the following four primary components:

- Identify a single point of contact for business development within each WIOA region;
- Streamline workforce resource delivery;
- Unify and coordinate outreach and information; and
- Leverage multiagency data sharing systems.

Core programs and partners gained access to a business customer relationship management system based on a Salesforce platform. Phase 1 allowed shared access to employer contacts and business needs, and Phase 2 gave the partnership the ability to add and assess employer programs and resources. This platform allows the tracking of business engagement and reporting for the aligned goal of furthering business services and is the tool that encompasses the Kentucky Integrated Business Engagement System (KIBES). The OVR Employer Services Branch is dedicated to employer outreach and consumer job placement services allowing for a consistent approach to services across the state. This enables the agency to focus on more intensive employer outreach, including increased emphasis on corporate employers and partnership, and expanding direct employer interaction statewide.

OVR employs ten job placement specialists across the state. These specialists are responsible for developing relationships with local employers to facilitate the placement of OVR consumers into competitive integrated employment. Employer

engagement activities may include: 1) technical assistance to employers on hiring individuals with disabilities; 2) disability awareness training; 3) ongoing and regular contact with employers; 4) attending meetings of local Chambers of Commerce, Society of Human Resource Managers (SHRM), and other business-related groups; and 5) no cost accessibility surveys to employers. Job placement specialists utilize the targeted industry sectors, as determined by their local workforce region, in order to provide specific labor market information to consumers, employers and agency partners.

OVR employs a statewide Employer Services Branch Manager who is responsible for the supervision and oversight of staff and statewide employment activities. This is inclusive of providing training and technical assistance to the Job Placement Specialists, developing agency-wide relationships with large employers and acts as the agency contact for the National NET and TAP programs managed by Council of State Administrators of Vocational Rehabilitation (CSAVR).

OVR recognizes that it has two customers, the job seeker and the employer, and works collaboratively with partner organizations in providing quality services on all levels. OVR is positioned to provide valuable services to 503 Federal Contractors with utilization goals of 7% of their workforce, employees with disabilities. DWI shares with OVR the list of federal contractors it maintains, and staff are assigned to contact those employers individually making them aware of vocational rehabilitation services available to them.

The Statewide Council for Vocational Rehabilitation (SCVR), Kentucky's State Rehabilitation Council (SRC), and the Employment First Council include several employers and a representative of the Kentucky Workforce Innovation Board (KWIB) who provide important input on agency policy and activities related to employment. The SCVR presents the Employer Recognition Award annually to employers who work closely with the OVR and who make the hiring of persons with disabilities a priority. OVR conducts a Job Placement Month annually in October which includes many events around the state that promote collaboration with employers. Regional Employer Recognition Awards are given out during the month to employers who have hired OVR consumers.

OVR participates in Project SEARCH, the immersive job experience program for transition-aged students with disabilities. OVR's Statewide Coordinator for Project Search identifies and collaborates with employers throughout the state to introduce and promote the program designed to provide transition-age students an on-site working and learning experience. Currently, there are four major employers involved in Project Search Programs: University of Kentucky Healthcare

in Lexington, Northern Kentucky University in Highland Heights, ABB Optical in Florence and Baptist Health Hospital in Elizabethtown. OVR develops relationships with employers to provide transition-age students the opportunity to explore career paths and identify opportunities that lead to competitive integrated employment after completion of the program. Transition-age students have received instruction for entry level jobs and training in high-demand career fields specific to area, such as central sterile, research and manufacturing. OVR's Statewide Coordinator continues to develop local partnerships with employers and schools to create a coalition of support for assisting transition-age students in developing, building and identifying career opportunities.

OVR will continue to partner with local initiatives like Project SEARCH in Northern Kentucky and the Coalition for Workforce Diversity in Louisville, Lexington, Ashland, and Mayfield to identify and educate employers willing to develop new programs specifically designed to focus on hiring and training individuals with disabilities.

**Transition Services for youth with disabilities and students with disabilities, including pre-employment transition services.**

OVR currently has innovative programs that provide high school students a variety of work-based learning, financial literacy, self-advocacy training, job exploration, career counseling, and workplace readiness training opportunities that exist in the community with employers, in our rehabilitation center, and in post-secondary institutions. A diverse array of partnerships is needed in order to market the benefits of earn and learn opportunities including registered apprenticeships to Kentucky businesses for individuals with disabilities, including youth and students with disabilities. OVR will work with its existing partners among workforce, economic development, education and business entities to foster work-based learning opportunities. OVR has contractual agreements with three of the nine special education cooperatives and Jobs for American Graduates for the provision of Pre-employment Transition Services.

Kentucky's registered apprenticeship program continues to be a national model in preparing individuals for successful entry into the workforce. This administrative move builds momentum by harnessing Kentucky Education and Workforce Development Cabinet's (KEWDC) existing statewide network to connect employers with potential employees and provide increased apprenticeship opportunities for Kentuckians. There are over 4,000 apprentices in Kentucky in 600+ different programs currently representing 200+ unique occupations.

The Registered Apprenticeship model is a flexible, employer-driven approach that provides high-quality job training and produces skilled, competent employees for Kentucky employers. The division is responsible for registering apprenticeship programs that meet federal standards, issuing nationally recognized and portable Credentials of Completion to apprentices, and promoting the development of new programs through education, outreach and technical assistance.

The Community Work Transition Program (CWTP) is designed to provide pre-employment transition services and transition services to assist students with the most significant disabilities in transitioning from high school to Competitive Integrated Employment upon exiting secondary education. There is a Supported Employment Consulting fee available with the CWTP to facilitate a seamless transition into Competitive Integrated Employment.

There are specific programs in place with specialized services for the blind and visually impaired.

The PATH Program focuses on job exploration, workplace readiness training, and self-advocacy and is an intensive three-week program that introduces employability skills to students with disabilities. The curriculum is specific to individuals who are blind or visually impaired. The Summer Work Experience Program is in collaboration with Community Rehabilitation Providers (CRP). CRPs are paid to find work experiences in competitive integrated settings for transition aged individuals. The goals of the work experience are to provide community-based career exploration and the opportunity to practice work readiness skills. It is also hoped that by participating in the work experience program, employers will be open to providing more opportunities for individuals who are blind or visually impaired in their communities.

The Summer Work Program is in collaboration with the Kentucky School for the Blind (KSB), Kentucky Kingdom, the American Printing House for the Blind, and the Louisville Zoo. The World of Work Program is another program in which the OVR and KSB provide work-based learning experiences to students. The program provides competitive integrated work experiences to students that attend the Kentucky School for the Blind. The INSIGHT Post-Secondary Preparation Program is held each summer at Morehead State University. Students are able to participate in college classes, live in the dorm, and participate in social activities both on and off campus during this eight-day program. They receive counseling on post-secondary opportunities and are taught the self-advocacy skills necessary to succeed in a post-secondary environment along with workplace readiness skills.



## Section L: Interagency Cooperation with Other Agencies

### **I. 1. State programs (designate lead agency(ies) and implementing entity(ies)) carried out under Section 4 of the Assistive Technology Act of 1998;**

The Kentucky Assistive Technology Services (KATS) Network is the state program carried out under Section 4 of the Assistive Technology Act of 1998 for making assistive technology (AT) information, devices and services easily obtainable for people of any age and/or disability, their families, employers and employment service providers, educators, healthcare and social service providers. The KATS Network serves Kentucky residents of all ages with disabilities of all types, their families, employers and employment service providers, educators, health care and social service providers, and others seeking information about assistive technology (AT) and accessible information technology.

The Kentucky Office of Vocational Rehabilitation (OVR) is the lead agency for the KATS Network. The KATS Network in turn collaborates with five nonprofit organizations to operate assistive technology resource centers (ATRCs) across the state in Louisville, Lexington, Ft. Mitchell, Hazard, and Owensboro. These ATRCs provide assistive technology demonstrations, device loans, as well as accept device donations which they refurbish and redistribute to individuals in need. In addition to the ATRC collaborations, the KATS Network teams up with many other organizations to meet individual's unique needs as well as works to connect Kentuckians to community resources. One example of this, is the Statewide Hearing Aid Reuse Program (SHARP), a program the KATS Network operates in partnership with Starkey. Starkey repairs and refurbishes donated hearing aids to SHARP and provides those hearing aids to individuals in need at a reduced cost. Additionally, the KATS Network receives financial credit for hearing aid donations which is used to cover the cost of hearing aid repairs for Kentuckians. The KATS Network is a statewide network of organizations and individuals connecting to enhance the availability of assistive technology devices and services to improve the productivity and quality of life for individuals with disabilities.

The Assistive Technology Alternative Financing Program (ATAFP) for Kentucky is the Kentucky Assistive Technology Loan Corporation (KATLC). KATLC provides financial loans for the purchase of assistive technology with its lending partner for individuals with disabilities or the parent or legal guardian of an individual with a disability. KATLC has joined with the Appalachian Assistive Technology Loan Fund (AATLF) to provide no interest, no fee loans from \$100-7,000 for assistive

technology to promote independence and enhanced quality of life for individuals with disabilities.

KATLC is funded by both private and public monies to assist Kentuckians with disabilities to obtain low interest loans for the purchase of assistive technology that will promote their independence and enhance their quality of life. KATLC is actively working to obtain a new lending partner to provide loans over \$7,000.

## **I. 2. Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;**

The USDA Rural Development makes available funding to rural communities across the Commonwealth. One of the main goals of Rural Development is to strengthen the local economies by working to improve not only small businesses but also to engage the communities surrounding the businesses.

Programs and initiatives are geared towards providing resources and building bridges of communication for rural communities. The fundamental concerns for rural areas and their communities are wrapped around access and equity. This includes individuals who are living with a disability and their support systems.

Kentuckians with disabilities living in rural areas have further challenges. Kentucky is a primarily rural state, incorporating 54 Appalachian counties, and characterized by a high poverty rate relative to other U.S. States. (Project E3). According to 2021 Census data, Kentucky is among five states with the highest disability populations in the country making up more than 17% of the state's population. This data also explains that individuals experiencing disabilities represent over half the population in rural areas throughout the country. The geographic isolation of Kentucky's rural communities poses significant challenges for persons with disabilities in achieving competitive, integrated, and lasting employment and community participation and integration. The rural nature of Kentucky and the centralization of employment opportunities in urban areas create significant transportation and access barriers to employment opportunities. (Project E3).

An important program that will assist the broader community in rural Kentucky is the USDA Rural Development's broadband initiative. The Rural Development Innovation Center's Broadband Resources for Rural America program addresses the digital gap in households and assists in providing internet access across these rural areas. Broadband services are important to families in rural communities for

them to have access to education, training and health resources as well as connecting them to workforce opportunities.

Rural families and businesses are seeing more opportunities by the support of USDA programs, offering loans, aggressively pursuing broadband access for communities, advancing infrastructure and equity initiatives for both families and businesses that will benefit people's livelihood and workforce opportunities in all areas of the state. This initiative may also help with isolation experienced by people living in rural areas.

Efforts by OVR staff to provide information for these available resources to consumers continue to be made. The Assistive Technology Branch holds an Assistive Technology Conference annually for Kentucky State University's Research Farm. The 3-day conference ensures awareness of the various programs, services and resources available. At the most recent 2023 Assistive Technology Conference held in June, the following topics discussed were:

- Assistive technology and the college experience;
- Comprehensive automotive mobility solutions;
- Built-in accessibility features in windows and other software;
- Increasing independence at home with smart home technology;
- Maximizing mobility and independence;
- Mental health in the workplace; and
- Advocacy, education and empowerment for people with disabilities.

OVR Counselors are aware of programs to assist single families living in rural areas in securing a variety of loans and grants to improve their living situations, such as the single-family housing program to assist with affordable housing for individuals with low or very-low income. Agency staff provide information and referral to consumers for these programs to meet their individual needs.

### **I. 3. Non-educational agencies serving out-of-school youth;**

OVR serves out-of-school youth such as high school non-completers, students expelled from school or habitually truant, high school graduates and GED holders who are basic skills deficient, unemployed or underemployed, as well as those enrolled in postsecondary education. This is an area identified to increase outreach and strengthen those existing relationships in order to reach and engage out-of-school youth on a higher level.

In Kentucky the vocational rehabilitation agency is one of two workforce programs that are fully integrated into the Kentucky Career Centers. This has strengthened our relationships with the other core programs of the workforce development system. OVR works collaboratively with the following additional agencies and groups of individuals.

- Juvenile and Criminal Justice Systems. Juvenile Justice is responsible for prevention programs for at-risk-youth, court intake, pre-trial detention, residential placement/treatment services, probation, community aftercare/reintegration programs and youth awaiting adult placement or court.
- Faith-based Organization (i.e., churches, Jewish Family Services, health clinics).
- Community organizations like Big Brothers, Big Sisters, and other community-based organizations.
- Service Organizations (i.e., Lions, Rotary, Kiwanis, Elks)
- Kentucky Cabinet for Health and Family Services that administers foster care and the division of family support (Medicaid, Foster Care and Supplemental Nutrition Assistance Program)
- Employers
- Kentucky Youth Career Center offices are located in Jefferson, Bullitt, and Shelby Counties, and are administered by KentuckianaWorks, the region's Workforce Development Board.

Overseeing and coordinating programs in the community for youth ages 16 - 21, the Youth Career Centers offer innovative education, employment, and youth empowerment services. The Kentucky Youth Career Center offers resume and interview preparation assistance, GED tutoring and help with testing fees, help applying to colleges and job-training programs, and financial assistance for college and job training. Depending on the need, referrals are made to other community services such as housing, transportation, food, and physical or mental health services. The Kentucky Youth Career Center also creates engagement opportunities with employers through internship and summer job programs, and fosters connections to mentors as well as other youth, and provides an ongoing series of workshops on life-enhancing topics.

#### **I. 4. State use contracting programs;**

Under the state procurement code, administered by the Finance and Administration Cabinet, there are preferences to be given by governmental entities and political subdivisions in purchasing commodities or services from specified entities. Specifically, when purchasing commodities or services, first preference is given to the products made by the Department of Corrections, Division of Prison Industries, as required by KRS 197.210. Second preference shall be given to any products produced by Kentucky Industries for the Blind, Incorporated, or any other nonprofit corporation that furthers the purposes of KRS Chapter 163, and agencies of individuals with severe disabilities as described in KRS 45A.465 i.e., Community Rehabilitation Providers (CRP). This means that state and local governmental agencies are to purchase directly from Correctional Industries, or an Industries contracted with by OVR and/or a CRP without having to utilize the competitive procurement processes.

**I. 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.);**

In Kentucky, The Cabinet for Health and Family Services (CHFS) is home to most of the state's human services and health care programs, including Medicaid, the Department for Community Based Services and the Department for Public Health. Medicaid Services purchases quality healthcare and related services that produce positive outcomes for persons eligible for programs administered by the department.

OVR has worked with the Department for Medicaid Services to attempt to expand the Medicaid Works, Kentucky's Medicaid Buy-In program, to maximize the opportunities for OVR consumers to get employed in competitive, integrated employment. Eligibility requirements remain restrictive and very few individuals have qualified for Medicaid Works. OVR still feels a revised buy-in would help more individuals with disabilities become successfully employed. As discussed in (6) of this section, Medicaid Waiver funding is utilized to provide long term supports for supported employment consumers, increasing the numbers of individuals who can benefit from supported employment services.

In addition, OVR's newly established Employment First Council has representation from the Department of Medicaid Services. Most recently, through the implementation of the Department of Labor's Office of Disability Employment Policy (ODEP), the Employment First Council was chosen to participate in the National Expansion on Employment Opportunities Network (NEON). Project NEON allows agencies, including that of OVR and the Department of Medicaid Services,

to review policy in order for them to align with Kentucky's definition of competitive integrated employment to propel the movement of Employment First throughout the commonwealth.

While OVR serves on numerous councils that have representation from the Department for Medicaid Services, the agency will continue to work to ensure the provision of vocational rehabilitation services and if appropriate, accommodations or auxiliary aides and services.

**I. 6. State agency responsible for providing services for individuals with developmental disabilities;**

The Department for Behavioral Health, Developmental and Intellectual Disabilities is the agency that provides quality information, services and support for individuals with needs related to mental illness, intellectual disability or other developmental disability and their families.

The Office of Vocational Rehabilitation (OVR) is an active member of the Commonwealth Council for Developmental Disabilities, participating in their strategic plan development and collaborating on projects to promote independence and employment for the specific population.

The OVR works with the Division of Developmental and Intellectual Disabilities (DIDD) to improve quality Supported Employment Services and provide a smooth transition from VR supported employment services to long-term support services through the Supports for Community Living (SCL) and the Michelle P. Waiver. OVR and DIDD jointly fund the Supported Employment Training Program at the University of Kentucky's Human Development Institute to train all Supported Employment Specialists in the state.

OVR serves on numerous councils, boards, and planning committees, such as, the Commonwealth Council for Developmental Disabilities, as well as the Kentucky Advisory Council on Autism, the HB144 Commission and, the Kentucky Judicial Commission on Mental Health, relating to persons with developmental disabilities.

Additionally, effective on July 14, 2022, legislation was passed, stating, "the General Assembly finds and declares that it is the policy of the Commonwealth of Kentucky that competitive integrated employment shall be considered the first and primary option for persons with disabilities of working age who desire to become employed." KRS 151B. 211. With the passage of the recent legislation, a new Employment First Council was established and delegated to be supported by

OVR. With the formation of the Council, comes a representative from DIDD, several other key agencies, community partners, and advocates, to collaborate and address the five charges of the Council, which are:

1. Identify state policies that create disincentives for the employment of people with disabilities and develop recommendations to address and eliminate those disincentives;
2. Develop training and resources for families, self-advocates, public and private providers, and employers on the benefits of competitive integrated employment of workers with a disability;
3. Recommend the development and implementation of policies and effective practices for providers of supported employment services that increase employment opportunities for workers with a disability;
4. Utilize appropriate metrics to assess progress of efforts to increase the competitive integrated employment of workers with a disability; and
5. Submit an annual report by December 1 to the Legislative Research Commission, the secretary of the Education and Labor Cabinet, and the Governor summarizing its findings and recommendations.

OVR continues to review ways to increase interagency collaboration and support.

#### **I. 7. State agency responsible for providing mental health services; and**

The Department of Behavioral Health (DBH) is responsible for the administration of state and federally funded mental health and substance abuse treatment services throughout the commonwealth. Publicly funded community services are provided for Kentuckians who have challenges with mental health, developmental and intellectual disabilities, or substance abuse, through Kentucky's 14 regional Boards for Mental Health or Individuals with an Intellectual Disability (Regional MHID Boards). Regional MHID Boards are private, nonprofit organizations established by KRS Chapter 210 which serve residents of a designated multi-county region.

OVR has partnered with the DBH to implement the Individual Placement Service (IPS) Model, an evidenced based practice in Supported Employment, for consumers with serious mental illness. Currently, there are 21 IPS programs throughout Kentucky. In 2019, OVR participated in meetings with the Cabinet for Health and Family Services to initiate efforts to expand IPS Supported Employment services to individuals with opiate use conditions. OVR will continue

to collaborate with other state partners to expand and provide IPS services to underserved populations.

The OVR serves on numerous councils that also have representation from the DBH. In 2021, the OVR began the approval process to implement 4 Establishment Project contract opportunities with CRPs to expand IPS to unserved or underserved areas. Four providers were selected and approved, two of which were selected to provide IPS to individuals with intellectual and/or development disabilities. These contracts were approved by RSA and began in spring of 2023. It's the intent of the OVR to continue with new Establishment Projects as others phase out to continue the efforts to build capacity for IPS services throughout Kentucky.

**I. 8. Other Federal, State, and local agencies and programs outside the workforce development system.**

OVR maximizes all available resources in collaboration with all partners and agencies in assisting individuals with disabilities to achieve competitive integrated employment. This will ensure the provision of vocational rehabilitation services described in subparagraph (A) other than those specified in paragraph (5) (D), and in paragraph (1) through (4) and (14) of Section 103 (a) of the Rehabilitation Act Amendments of 1998, that are included in the individualized plan for employment of an eligible individual, including the provision of such vocational rehabilitation services during the duration of any dispute.

OVR will continue to have a collaborative relationship with agencies and entities within and outside the statewide workforce investment system both private and public agencies and programs. OVR works cooperatively with the following agencies to avoid the duplication of services and enhance the service delivery process for consumers. OVR has representation on the State Interagency Council (SIAC) for services and supports to Children and Transition-age Youth. Regional Interagency Councils (RIACs) operate as the locus of accountability for the system of care, providing a structure for coordination, planning, and collaboration of services and supports at the local level to children, adolescents, and transition-age youth and their families, to help them function better at home, in school, in the community and throughout life. OVR has representation through the Kentucky Cabinet on the Commission on the Deaf and Hard of Hearing (KCDJHH). KCDJHH advisory board provides education, advocacy, and programs to eliminate barriers for deaf and hard-of-hearing Kentuckians. Also, Collaboration and coordination of services occur between OVR and the Veterans Administration Rehabilitation and



Employment Programs. Veterans Administration provides rehabilitation services including vocational guidance and counseling, job development, and placement to veterans with disabilities.

OVR collaborates and coordinates services for individuals with disability within school districts, including the School for the Deaf and the School for the Blind. There are also nine special education cooperative networks across the state created to enhance educational opportunities.

As an agency, we receive and make referrals to the following agencies when needed: Department of Behavioral Health; Intellectual and Developmental Disabilities through their 14 Regional MH/IDD Boards for Supported Employment; Kentucky Drug Courts; Kentucky Cabinet for Health and Family Services; Social Security Administration; Community Rehabilitation Providers; Kentucky Association of Persons in Supporting Employment First (APSE); Department of Medicaid Services; Department of Community Based Services; Supplemental Nutrition Assistance Program (SNAP); Employment and Training (E & T) program; American Printing House for the Blind; Kentucky School for the Blind; Kentucky Federation of the Blind; and Kentucky American Council of the Blind.

We also work closely with the University of Kentucky Human Development Institute, a University Center of Excellence established by federal legislation to promote team-based approaches to provide services for individuals with disabilities and their families. OVR also works closely with The Kentucky Assistive Technology Service (KATS), which is a statewide network of organizations and individuals connecting to enhance the availability of assistive technology devices and services to improve the productivity and quality of life for individuals with disabilities. In addition, the Office works in coordination with the Statewide Independent Living Council (SILC).

OVR works with other federal, state, and local agencies related to the rehabilitation of individuals with disabilities such as the Department of Protection and Advocacy, Department of Probation and Parole, Department of Workers Compensation, and Department of Disability Determination. The Client Assistance Program is available for additional assistance and advocacy during the entire rehabilitation process as well.

## **I. 9. Other private nonprofit organizations.**

The Office of Vocational Rehabilitation (OVR) maintains Memorandum of Agreements with providers of private, non-profit vocational rehabilitation service

providers to support achievement of successful competitive integrated employment outcomes for individuals with disabilities. The OVR works with Community Rehabilitation Program providers (CRPs) through a vendor application process to ensure quality services to agency consumers.

OVR currently works with 114 CRP's. Currently, 75 CRPs provide Employment and Retention services, another 89 provide Supported Employment services resulting in competitive integrated employment. Other agreements with private, non-profit OVR service providers will be made as necessary.

To provide services with the agency, the process is as follows:

1. The potential vendor obtains the vendor application, vendor manual, and CRP manual from the OVR website or from an OVR staff member.
2. The potential vendor reviews the Vendor and CRP Manuals to ensure the vendor is applying for appropriate services.
3. The potential vendor completes the application and provides required supplemental documentation (dependent on types of services applying for) to [OVRVendors@ky.gov](mailto:OVRVendors@ky.gov).
4. Central Office staff monitors the web box, and reviews submitted application and any documentation provided.
5. Central Office staff provides the application, with all documentation provided, and all internal review completed to CRP branch.
6. CRP branch reviews to ensure no additional documentation or clarification is needed.
7. Application is approved, and the Vendor is notified.
8. Vendor completes the Vendor Registration Process by a) Obtaining a vendor number by registering on our vendor self-service platform, or by completing an EZ Registration form and provide it to finance cabinet, along with a W9, for finance to establish a vendor number; b) Reviewing and signing a Vendor Agreement; and c) Reviewing and signing a CRP Agreement.
9. CRP Branch assists the Vendor with training and other information.
10. All CRP vendors are required to participate in the Supported Employment Training Project provided through the University of Kentucky Human Development Institute.
11. All CRP vendors are monitored by the CRP Branch Staff for programmatic review.

12.All CRP vendors are monitored by Central Office staff for financial review.

13.All CRPs are subject to audits at least once every three years, or more frequently, if necessary.

14.CRP Branch ensures all Employment Specialist have the mandated 15 hours of continuing education units (CEUs) annually, with at least 4 of the hours consisting specifically to servicing individuals who are blind, deaf, or DeafBlind.

15.CRPs are required to review and sign a CRP agreement every two (2) years.

Note: Current ones are good through 06/30/2024.

## 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
<b>Employment (Second Quarter After Exit)</b>	61.0%	61.0%	63.0%	63.0%
<b>Employment (Fourth Quarter After Exit)</b>	49.0%	49.0%	51.0%	51.0%
<b>Median Earnings (Second Quarter After Exit)</b>	\$7,923.00	\$7,923.00	\$8,081.00	\$8,081.00
<b>Credential Attainment Rate</b>	29.0%	29.0%	31.0%	31.0%
<b>Measurable Skill Gains</b>	32.0%	32.0%	34.0%	34.0%
<b>Effectiveness in Serving Employers</b>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> 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 2024 and 2025.

## GEPA 427 Form Instructions for Application Package - VR Services

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

Office of Vocational Rehabilitation (OVR) is committed to ensuring equitable access to and equitable participation in all vocational rehabilitation services, programs and activities provided by the agency and discussed in this proposed 4-year plan. The belief in the agency's core values, mission and vision statements are reflected in practices, policies, and strategic plans, for guidance and consistency within the agency and in service delivery. To further our commitment, the Diversity, Equity and Inclusion (DEI) Committee was established to more specifically, and strategically, address equitable participation in and access to programs and services as well as within the agency. The current DEI Committee's three-year strategic plan addresses important steps the agency is making towards assuring that access and participation for all Kentuckians is a priority.

### **The Agency's Principles**

#### OVR Core Values:

OVR recognizes and respects the talents and contributions of all individuals as a vital part of a productive society; therefore, OVR values:

- That persons with disabilities deserve an opportunity;
- The rights, merit, and dignity of all persons with disabilities;
- Independence for Kentuckians with disabilities;
- Diversity, inclusion, and belonging;
- Competitive, integrated employment;
- Career advancement and economic security; and
- Collaborative efforts and partnerships.

#### OVR Vision Statement:

All Kentuckians with disabilities have an opportunity to be an essential part of Kentucky's workforce and their communities.

#### OVR Mission Statement:

To empower Kentuckians with disabilities to maximize independence and economic security through competitive, integrated employment.

#### **The Agency's Diversity, Equity and Inclusion (DEI) Committee's Priorities**

#### Core Values:

The Office of Vocational Rehabilitation's Diversity, Equity and Inclusion Committee recognizes and respects the talents and contributions of all individuals as a vital part of a productive society. Therefore, the committee values:

- Diversity in all forms
- Inclusive partnerships
- Equitable treatment of all stakeholders
- Education and training
- Accessibility in all forms
- Cultural competency

#### Vision Statement:

The KY OVR will be the nation's exemplary VR agency and a model employer by leveraging diversity and fostering inclusion and belongingness to deliver optimal vocational rehabilitation services.

#### Mission Statement:

To create a culturally diverse and inclusive environment at all levels, including, but not limited to, OVR Staff, individuals we serve and community partners.

For more information, please see: Section B: CSNA; Section C: Goals, Priorities and Strategies; Section D: Evaluations and Reports of Progress; Section I: Comprehensive System of Personnel Development.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

OVR has identified barriers that may impede equitable access to consumers through multiple sources such as forums, internal and external surveys, and needs assessments. The following barriers that continue to affect consumers to equitable access and participation are: 1) the lack of program awareness; 2) transportation issues; and 3) physical barriers.

### **Program Awareness**

Through input and comments from the Statewide Council for Vocational Rehabilitation (SCVR), public forums and internal surveying, OVR recognizes that many Kentuckians are unaware of the agency, its programs and services. This may impede progress towards equitable access to and equitable participation in the services provided to the public. The resources available for any person living with a disability who wants to work and who qualifies for services can be a crucial step for self-sufficiency, independence and inclusion into the working world and can be life changing. This is identified as a barrier to equitable access and participation since not knowing about the programs and services does not allow all Kentuckians with disabilities the opportunity to be served. Ensuring that OVR services are known to the public are related to outreach efforts and visibility across minority, underserved or unserved and rural populations as discussed in various sections of this state plan, but more specifically in Section B: Comprehensive Statewide Needs Assessment.

### **Transportation**

During the state plan forums, there were multiple comments regarding continued transportation barriers. There are existing concerns of consumers in using for hire driving services such as Uber and Lyft due to safety concerns and lack of ability for many of the individually contracted drivers to provide the necessary accessibility features to meet the needs of the consumer as related to their specific disability. Consumers lack transportation options which present barriers to services and employment options, including those in rural areas.

### **Physical Structures**

Physical barriers exist within some state buildings.

For more information, please see discussion in Section B: Comprehensive Statewide Needs Assessment, particularly subsection 1(b) and Section C.

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?

Based on the identified barriers to equitable access and participation, the steps OVR will or has taken are listed below:

### **Outreach:**

Outreach has become a greater focus to ensuring available services and resources are known. OVR continues to be a resource that many Kentuckians are unaware, and we are taking initiatives to address educating communities about these services.

OVR's Strategic Plan incorporates an outreach plan and process to improve public awareness that includes hiring a dedicated staff member for the outreach of the agency. The work for the dedicated staff would include presenting and representing culturally diverse settings that inform the public. As the first step towards this priority, the agency conducted a statewide outreach needs assessment in 2023 to determine staff needs to adequately represent the agency. The agency was able to understand the requirements needed to implement the outreach plan, which include the collaborative efforts within the cabinet and the number of dedicated staff needed for outreach. Dedicated staff could serve as a direct representative, and point of initial contact, of minority and unserved or underserved communities. Currently, the agency prepares documents and information in both English and Spanish with the ability to address other languages through the Language Line Access Point contracted by the state for such services to assist in breaking language barriers.

The Diversity, Equity and Inclusion (DEI) Committee's Strategic Plan is making priority efforts in hiring and retaining diverse personnel who are representative of the populations served. The agency has taken action to assist this initiative by implementing its strategy outlined in Section C 2(b). The plan also addresses the need for outreach to minority and underserved populations across the state to help eliminate equitable access issues regarding services. The committee has developed objectives to ensure equitable service provision to all Kentuckians that



include raising awareness and reviewing consumer diversity as well as policy and procedures that impact equitable service provision.

Underserved communities include the Deaf and Hard of Hearing, and the agency ensures access and participation by providing needed services. Currently, American Sign Language Interpreters are available for trainings, meetings, forums, etc. as needed and when other signing needs are required beyond the scope of what internally available ASL interpreters can provide. The agency works with the Commission on Deaf and Hard of Hearing Services as well as other resource providers to secure the appropriate interpreter for the situation.

In addition, the Department of Workforce Development has initiated a departmental wide Diversity, Equity, Inclusion and Accessibility (DEIA) training series through Next Level Now (NLN) Collaborative. The trainings will explore identifying strategies for a more inclusive and accessible workforce development system among other considerations, and agency wide participation is expected.

For more discussion, see Sections B, C 2(b), D, I 2(b) and 2(c), Section J, Section K, and Section L.

### **Transportation:**

While OVR does not provide direct transportation to consumers, a process for reimbursement of expenses for certain services are in place. In urban areas public transportation is more available than in rural areas. In these cases, virtual options are provided to prevent transportation barriers from interfering with services needed. In addition to those services the agency can provide to assist with resources for transportation, OVR has a seated member on the Coordinated Transportation Advisory Committee (CTAC) that allows a voice for input into the currently available resources, deficits that exist in the current structure and future needs of those in need of public transit services.

During the State Plan Forums, suggestions from the public were made to involve the consumers family support system. It is not uncommon for consumers to rely on support structures for participation in services and for work which may include transportation. It was believed that if an authorized family or support contact was included and aware of appointments and other related meetings, this would help with transportation issues for some individuals. The agency considers the comments and input from the public.

The use of virtual services has greatly increased the ability to provide services. The agency utilizes Teams and Zoom as resources to interact with consumers and offer consumer choice as to whether services are preferred online or in-person. This has expanded the ability of individuals to receive services from our agency when transportation is a barrier for them.

### **Physical barriers:**

Career Centers are required to obtain ADA certifications regarding their physical structures and address any barriers with correction as part of their certification process. Agency assistive technology staff provide expertise as needed regarding recommendations for accommodations necessary to allow consumers access into the physical structures where services are housed.

When business activities, meetings and trainings are planned the accessibility of any facility identified for use is reviewed by qualified staff to ensure equal access is available to all attendees.

The use of virtual services has greatly increased the ability to provide services without the structural barriers that exist in physical buildings. The agency utilizes Teams and Zoom as resources to interact with consumers and offer consumer choice as to whether services are preferred online or in-person. This has expanded the ability of individuals to receive services from our agency when transportation is a barrier for them.

For more information, please see: Section C: Goals, Priorities and Strategies; Section D: Evaluations and Reports of Progress, particularly priorities "Staff Resource," "Facility Operations" and "Public Awareness" discussions; Section E: Supported Employment Services, Distribution of Title IV Funds..., particularly E (4); Section I: Comprehensive System of Personnel Development, particularly 2(b); Section L: Interagency Cooperation with other Agencies.

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

The steps taken to address the identified barriers in question 3 are incorporated into OVR's and the Diversity, Equity and Inclusion (DEI) committee's strategic plans to address as a priority. Throughout this state plan, equitable access and participation is discussed as an agency concern for both internal and external consumers. The agency makes efforts to identify community and population

needs of the state by providing reports in addition to the required CSNA, such as the Kentucky's Older Population and Vision Loss to learn even more about the states underserved and unserved populations.

Due to the broad affects some barriers have on consumers and the limitations OVR has on eliminating some barriers, such as public transportation availability and physical barriers that exist in other state buildings, most will be ongoing discussions to find ways services can still be provided. However, OVR has worked to bring consumers options, accommodations and adjustments for removing barriers that are often out of the agency's control as discussed in the previous question.

Targeted milestones are based on the timelines of the strategic plans, which are reviewed, measured and/or adjusted, yearly. For example, the following timelines are:

OVR Strategic Plan: Started on October 1, 2023, and will expire on September 30, 2027. The agency's new strategic plan carries over priorities from the last with revisions, adjustments, additions and the removal of objectives as having been met. The current plan will be rewritten in 2027, but revisions may occur prior to 2027 as goals are either met or in progress. For more information regarding goals, priorities and strategies, particularly for Public Awareness, and the progress made by the agency, see Sections B, C and D.

DEI Strategic Plan: Started in 2022 and will expire in 2025. Currently, three objectives have been partially met, and two have been fully met. The newly formed committee and its strategic plan is still in progress and working towards its mission and vision. An updated plan will be in place for 2025. For more information, please see Section B and C 2(b).

OVR learns and discusses barriers of consumers regularly, from obtaining input and gaining insight through survey information. The partnership with the Statewide Council for Vocational Rehabilitation (SCVR) allows issues of concern to be shared more often with the agency whether formally or informally. OVR is committed to working to remove barriers to equitable access and participation in the agency and in its programs and services.

## 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.

Office of Vocational Rehabilitation (OVR) is committed to ensuring equitable access to and equitable participation in all vocational rehabilitation services, programs and activities provided by the agency and discussed in this proposed 4-year plan. The belief in the agency's core values, mission and vision statements are reflected in practices, policies, and strategic plans, for guidance and consistency within the agency and in service delivery. To further our commitment, the Diversity, Equity and Inclusion (DEI) Committee was established to more specifically, and strategically, address equitable participation in and access to programs and services as well as within the agency. The current DEI Committee's three-year strategic plan addresses important steps the agency is making towards assuring that access and participation for all Kentuckians is a priority.

### **The Agency's Principles:**

#### OVR Core Values

OVR recognizes and respects the talents and contributions of all individuals as a vital part of a productive society; therefore, OVR values:

- That persons with disabilities deserve an opportunity;
- The rights, merit, and dignity of all persons with disabilities;
- Independence for Kentuckians with disabilities;
- Diversity, inclusion, and belonging;
- Competitive, integrated employment;
- Career advancement and economic security; and
- Collaborative efforts and partnerships.

#### OVR Vision Statement

All Kentuckians with disabilities have an opportunity to be an essential part of Kentucky's workforce and their communities.

### OVR Mission Statement

To empower Kentuckians with disabilities to maximize independence and economic security through competitive, integrated employment.

### **The Agency's Diversity, Equity and Inclusion (DEI) Committee's Priorities:**

### Core Values

The Office of Vocational Rehabilitation's Diversity, Equity and Inclusion Committee recognizes and respects the talents and contributions of all individuals as a vital part of a productive society. Therefore, the committee values:

- Diversity in all forms
- Inclusive partnerships
- Equitable treatment of all stakeholders
- Education and training
- Accessibility in all forms
- Cultural competency

### Vision Statement

The KY OVR will be the nation's exemplary VR agency and a model employer by leveraging diversity and fostering inclusion and belongingness to deliver optimal vocational rehabilitation services.

### Mission Statement:

To create a culturally diverse and inclusive environment at all levels, including, but not limited to, OVR Staff, individuals we serve and community partners.

For more information, please see: Section B: CSNA; Section C: Goals, Priorities and Strategies; Section D: Evaluations and Reports of Progress; Section I: Comprehensive System of Personnel Development.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

OVR has identified barriers that may impede equitable access to consumers through multiple sources such as forums, internal and external surveys, and needs assessments.

The following barriers that continue to affect consumers to equitable access and participation are: 1) the lack of program awareness; 2) transportation issues; 3) physical barriers; and 4) limited provider capacity.

### **Program Awareness**

Through input and comments from the Statewide Council for Vocational Rehabilitation (SCVR), public forums and internal surveying, OVR recognizes that many Kentuckians are unaware of the agency, its programs and services. This may impede progress towards equitable access to and equitable participation in the services provided to the public. The resources available for any person living with a disability who wants to work and who qualifies for services can be a crucial step for self-sufficiency, independence and inclusion into the working world and can be life changing. This is identified as a barrier to equitable access and participation since not knowing about the programs and services does not allow all Kentuckians with disabilities the opportunity to be served. Ensuring that OVR services are known to the public are related to outreach efforts and visibility across minority, underserved or unserved and rural populations as discussed in various sections of this state plan, but more specifically in Section B: Comprehensive Statewide Needs Assessment.

### **Transportation**

During the state plan forums, there were multiple comments regarding continued transportation barriers. There are existing concerns of consumers in using for hire driving services such as Uber and Lyft due to safety concerns and lack of ability for many of the individually contracted drivers to provide the necessary accessibility features to meet the needs of the consumer as related to their specific disability. Consumers lack transportation options which present barriers to services and employment options, including those in rural areas.

### **Physical Structures**

Physical barriers exist within some state buildings.

### **Limited Provider Capacity**

Through input from public forums and internal and external surveying, OVR recognizes that many Kentuckians may not have access to viable supported employment services. There are many providers that have implemented waiting lists, which may delay access to services. In some cases, this is due to having only one provider in a given area. In others, it may be due to limited staff among respective providers.

For more information, please see discussion in Section B: Comprehensive Statewide Needs Assessment.; Section E: Supported Employment Services and the Distribution of Title VI Funds.

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?

Outreach has become a greater focus to ensuring available services and resources are known. OVR continues to be a resource that many Kentuckians are unaware, and we are taking initiatives to address educating communities about these services.

OVR's Strategic Plan incorporates an outreach plan and process to improve public awareness that includes hiring a dedicated staff member for the outreach of the agency. The work for the dedicated staff would include presenting and representing culturally diverse settings that inform the public. As the first step towards this priority, the agency conducted a statewide outreach needs assessment in 2023 to determine staff needs to adequately represent the agency. The agency was able to understand the requirements needed to implement the outreach plan, which include the collaborative efforts within the cabinet and the number of dedicated staff needed for outreach. Dedicated staff could serve as a direct representative, and point of initial contact, of minority and unserved or underserved communities. Currently, the agency prepares documents and information in both English and Spanish with the ability to address other languages through the Language Line Access Point contracted by the state for such services to assist in breaking language barriers.

OVR has increased its focus on building provider capacity for the provision of supported employment services. The development and implementation of establishment project grants for the purpose of expanding Individual Placement and Support and Customized Employment will continue. This will result in request for proposal opportunities for existing CRPs to expand their scope of service and/or geographic area for existing services, or for prospective CRPs to develop programs in underserved areas. The agency has been able to explore perspectives of CRPs to better understand sustainability issues impacting them. OVR has begun the process to explore supported employment rates and systems, to better determine the unintended impact on CRPs.

### **Transportation:**

While OVR does not provide direct transportation to consumers, a process for reimbursement of expenses for certain services are in place. In urban areas public transportation is more available than in rural areas. In these cases, virtual options are provided to prevent transportation barriers from interfering with services needed. In addition to those services the agency can provide to assist with resources for transportation, OVR has a seated member on the Coordinated Transportation Advisory Committee (CTAC) that allows a voice for input into the currently available resources, deficits that exist in the current structure and future needs of those in need of public transit services.

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For more information, please see: Section C: Goals, Priorities and Strategies; Section D: Evaluations and Reports of Progress, particularly priorities "Staff Resource," "Facility Operations" and "Public Awareness" discussions; Section E: Supported Employment Services, Distribution of Title IV Funds...



4. What is your timeline, including targeted milestones, for addressing these identified barriers?

The steps taken to address the identified barriers in question 3 are incorporated into OVR's strategic plan to address as a priority. Throughout this state plan, provider capacity is discussed as an agency concern for both internal and external consumers. The agency makes efforts to identify community and population needs of the state by conducting surveys to learn even more about the states under-served and unserved populations.

Due to the broad affects some barriers have on consumers and the limitations OVR has on eliminating some barriers, such as public transportation availability, physical barriers, and limited provider capacity that exist, most will be ongoing discussions to find ways services can still be provided. However, OVR has worked to bring consumers options, make accommodations and adjustments for removing barriers that are often out of the agency's control as discussed in the previous question.

Targeted milestones are based on the timelines of the strategic plans, which are reviewed, measured and/or adjusted, yearly. For example, the following timelines are:

OVR Strategic Plan: Started on October 1, 2023, and will expire on September 30, 2027. The agency's new strategic plan carries over priorities from the last with revisions, adjustments, additions and the removal of objectives as having been met. The current plan will be rewritten in 2027, but revisions may occur prior to 2027 as goals are either met or in progress. For more information regarding goals, priorities and strategies, particularly provider capacity, and the progress made by the agency, see Sections D and E.

OVR learns and discusses barriers of consumers regularly, from obtaining input and gaining insight through survey information. The partnership with the Statewide Council for Vocational Rehabilitation (SCVR) allows issues of concern to be shared more often with the agency whether formally or informally. OVR is committed to working to remove barriers to equitable access and participation in the agency and in its programs and services.