### Program-Specific Requirements for State Vocational Rehabilitation (Combined or General)

#### a. State Rehabilitation Council.

##### 1. All VR agencies, except for those that have an independent consumer-controlled commission, must have a State Rehabilitation Council (Council or SRC) that meets the criteria in Section 105 of the Rehabilitation Act. The designated State agency or designated State unit, as applicable, has:

(B) has established a State Rehabilitation Council

##### 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) | Vacant |  |
| Parent Training and Information Center | 2 | 2/22 |
| Client Assistance Program | Vacant |  |
| Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency) | 2 | 2/22 |
| Community Rehabilitation Program Service Provider | Vacant |  |
| Business, Industry, and Labor | 1 | 2/22 |
| Business, Industry, and Labor | 2 | 2/22 |
| Business, Industry, and Labor | 2 | 2/22 |
| Business, Industry, and Labor | 2 | 2/22 |
| Disability Advocacy Groups | Vacant  1 | 2/22 |
| Current or Former Applicants for, or Recipients of, VR services | Vacant  Vacant  1 | 2/22 |
| Section 121 Project Directors in the State (as applicable) | NA |  |
| State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA) | Vacant |  |
| State Workforce Development Board | Vacant |  |
| VR Agency Director (Ex Officio) | Commissioner | Awaiting reappointment |
|  |  |  |
|  |  |  |

##### 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.

The bylaws of the Arkansas State Rehabilitation Council (SRC) indicate the Council is to meet the third Thursdays of March, June, September, and December of each year and for special meetings as called by the Chair. During PY 2022 the SRC met September 15, 2022, December 15, 2022, March 16, 2023, and June 15, 2023.

The SRC Chair assumed the lead role in working with the Governor’s Office to secure appointments/reappointments to the Council. The Chair contacted the Boards and Commissions in December 2023 by telephone to determine who had applied and to make sure the composition of the Council adhered to the requirements. The Chair also inquired as to how the appointment/reappointments process could be expedited. The Chair and the ARS SRC liaison met with Boards and Commissions staff on February 9, 2024. At that time, Boards and Commissions communicated the expectation that appointments/reappointments would occur by the end of February 2024 or sometime in March 2024. The Council and ARS expect to receive notification soon. The Chair indicates that he will reach out to Boards and Commissions to determine the status of appointments/reappointments. The Chair stated that it should be noted that Boards and Commissions has experienced frequent turnover since January 2023 that has affected appointments/reappointments for the over 200 Boards and Commissions for which the Governor’s Office is responsible.

##### 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 Arkansas State Rehabilitation Council (SRC) is a Governor appointed citizen advisory council that partners with the Arkansas Department of Commerce, Division of Workforce Services, Arkansas Rehabilitation Services (ARS) to develop and to carry out the VR State Plan and ARS’ goals and priorities. The SRC assists in shaping and reviewing policy, engages in strategic planning, evaluates the effectiveness of the VR Program, analyzes consumer satisfaction data, and provides guidance when developing and reviewing cooperative agreements.

As the State has recovered from the COVID-19 pandemic, the SRC transitioned from an exclusive virtual meeting application to a combination face-to-face/virtual format when conducting both quarterly and called meetings. The SRC provided input regarding the following:

* The most recent comprehensive statewide needs assessment.
* An approved list of impartial hearing officers.
* The Rehabilitation Services Administration monitoring of ARS and resulting Corrective Action Plan.
* The development and implementation of a new Client Satisfaction Survey.
* The development of new goals and priorities for the PY2024-2027 State Plan.

##### 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.

ARS values its relationship with the Council and the input and recommendations provided by SRC members. During the December 2022 quarterly meeting, the SRC discussed the two Client Satisfaction Surveys utilized at plan development and closure and determined they provided insufficient data to assess client satisfaction. As a result, an SRC sub-committee was formed with select agency staff assigned to provide support. After multiple subcommittee meetings a new Client Satisfaction Survey system was developed and presented at the March 2023 quarterly meeting. Following discussion and approval by the full SRC, ARS accepted the new survey system with the understanding that it would be implemented on a pilot basis to determine whether it achieved desired results. ARS appreciates the hard work of the SRC members that participated in this project.

ARS did not reject any input or recommendations from the SRC.

#### b. Comprehensive Statewide Needs Assessment (CSNA).

##### 1. The VR services needs of individuals with disabilities residing within the State, including:

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

In spring 2022, ARS, in agreement with the State Rehabilitation Council, contracted the University of Arkansas at Little Rock to conduct the most recent Arkansas Comprehensive Statewide Needs Assessment. A mixed method approach was utilized to collect relevant and applicable data including surveys, questionnaires, focus groups, and telephone and face-to-face interviews of ARS’ current and previously served clients, ARS staff including senior leadership, vendors, business partners, and other relevant stakeholders.

Key Findings:

Internal constituencies perceived those individuals who require long-term support and extended services to maintain employment and those individuals with an undiagnosed/diagnosed psychiatric/mental health disability were most likely to have unmet needs. Results indicated that for those with unmet needs, the lack of supportive services likely impacted clients with the most significant disabilities and with multiple disabilities. There were several potential areas where those Individuals with the Most Significant Disabilities, Most Complex, or Multiple Disabilities may have unmet needs or additional needs beyond the general client population. External constituencies were split on whether there were barriers to accessing Arkansas Rehabilitation Services for clients with the most significant disabilities or those with multiple disabilities. However, there was consensus that those populations have additional barriers when it comes to achieving employment goals. Some external participants noted that there were additional needs in the areas of transportation, information about ARS services and programs, and technology access for those with the most significant, most complex, or multiple disabilities.

Recommendations:

* Transportation for those with the most significant disabilities is an issue for the vocational rehabilitation services sector nationwide. A consideration for this and other research questions is to address clients’ needs for transportation to and from ARS services and places of employment – particularly in the rural areas of the state.
* Focus on building opportunities for real-world work experience for individuals with the most significant disabilities through volunteer and/or internship opportunities with businesses in their communities. This focus on real-world skills and experiences not only benefits individuals but can serve to both educate and potentially address social stigmas and perceptions businesses and the community may have about employing individuals with complex or significant disabilities.

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

Key Findings for Individuals with Disabilities Who Are Minorities:

A review of environmental scan data over the past decade shows slight shifts for the state’s racial and ethnic demographics where a growth rate of the population of people identified as White was 2%, while the growth rate of the population of people identified as belonging to another racial category was 10%. Although the overall percentage of Arkansans identifying with another racial category increased by just 1% between 2010 and 2019, the overall percentage of Arkansans identifying as Hispanic/Latino increased by 1.4% (from 6.4% to 7.8%). Similarly, increases in proportions of Hispanic/Latino-identifying Arkansans living in rural counties occurred between 2010-2019. Along with increases in rural counties, Hispanic/Latino-identifying Arkansans grew in urban areas and the highlands, with urban areas growing the most of any region during the decade. Additionally, most of the Marshallese population in the U.S. now reside in the Midwest with a significant number residing in Arkansas. Particular attention should be given to access barriers to ARS services found within these growing and potentially underserved populations.

Recommendations:

* There have been noted increased efforts at providing translation services for non-English speakers or English as Second-Language speakers. There were multiple considerations that arose from the various methodologies related to language barriers. The following may serve to address these issues: hiring more bilingual employees that offer translation services or that primarily serve Spanish-speaking populations, providing other interpretation/translation services (e.g., technology investments), having multi-lingual resources that span administrative silos, or providing resources that assist clients with issues related to documentation.
* A narrower recommendation related to recruitment is the need to employ a workforce representative of the population it serves that may help bolster confidence/trust in the process of service delivery and better represent minority interests related to performance outcomes and fairness of service delivery.

Key Findings for Individuals with Disabilities Who Have Been Underserved or Unserved:

Arkansas is a largely rural state, even with the recent population declines for the state’s rural areas. There was almost uniform consensus across constituency groups that a potentially underserved area/population for the state were rural areas with primary agreement on the need to address the underserved Mississippi Delta Region. Reviewing the county unemployment data, responses from staff perceptions about underserved geographic regions, and other confounding factors related to rurality (e.g., transportation, technology access, limited resources, and employment options) of this region of the state it becomes evident that there is a need for concerted effort to target services to this area. Additionally, the environmental scan data revealed mental disorders represented a large portion of the disabled beneficiaries in the state. Internal and external respondents noted the need to provide services to those with developmental disabilities, cognitive impairments, and other mental health/‘invisible’ disabilities. Additionally, respondents noted additional potentially underserved Arkansas client populations could include those individuals requiring long-term support and extended services to maintain employment – primarily those within adult populations.

Recommendations:

* Given that issues related to rurality and geographical regions of the state were the largest areas of consensus there are multiple potential areas to consider for recommendations including addressing: issues related to transportation, providing access to technology to bridge employment and locality service gaps, and expanding business and service provider networks to improve better access to ARS services and bridge existing gaps.
* Given that there were some expressed concerns related to specific disability diagnostic groups, there are several potential considerations which are proposed including:

1. Improving connections with hospitals, social work departments, and acute care organizations to better reach adults and those with acquired disabilities.
2. Cross-training and procedural coordination with ARS service partners to make sure that both primary and secondary disabilities are being adequately addressed and not lost between multiple agencies.
3. Partnering with academic entities and health sciences (e.g., University of Arkansas for Medical Sciences) for continuing education courses to better understand treatment options and specific disability types/issues.
4. Partnering with graduate programs in counseling/rehabilitation to provide continuing education around rural services as well as adding this focus to graduate training course content.

Key Findings Regarding Centers for Independent Living

While nearly two-thirds of ARS staff understand what the Centers for Independent Living (CILs) in Arkansas do, a third are unsure or unaware of their scope of services offered. Since the Centers for Independent Living in Arkansas operate autonomously and in coordination with ARS this is not surprising from an external evaluation perspective. Similarly, only a third of staff respondents partnered with CILs in Arkansas for their work. Of those ARS staff, the response was that CILs: (1) provide valuable services to citizens with disabilities; (2) offer benefits counseling that is both readily available and accessible; and (3) holistically do a good job of meeting the needs of Arkansas citizens with disabilities. The core services which were deemed to be most effective included information and referral and independent living skills advocacy training.

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

Key Findings:

Regarding integration into the Division of Workforce Services there is seemingly equivalent or better integration and physical proximity between ARS and the parent agency. Internal respondents noted that top-down leadership was collaborative, the relationship was productive, and there have been local integrations into workforce boards. Integration is continuing as ARS is a more specialized workforce entity comprised largely of full-time employees.

The relationship with the Division of Services for the Blind was also examined. While both Arkansas Rehabilitation Services and Services for the Blind are administratively housed in the same location, share policies with performance measures, are appropriated from the same budget, and are focused on vocational rehabilitation, there are numerous areas where the two agencies are incommensurable. Division of Services for the Blind has its own governing board rather than an advisory board, are extremely specialized in-service delivery, and operate under a distinct administrative culture and history from Arkansas Rehabilitation Services.

Recommendations:

Division of Workforce Services:

* Utilization or standardization of practices with a common referral form would be beneficial to make sure potential clients are properly referred to ARS and other providers.
* More regular meetings and communication between institutional partners.
* Common and established deadlines between ARS and DWS may help align varied institutional priorities and processes.
* Given different employee requirements and focuses, continue to utilize ARS expertise of field employees and DWS broad business network and other internal referral processes/ databases.

Services for the Blind:

* More regular meetings and communication between institutional partners.
* It may be beneficial for both ARS and Division of Services for the Blind to collaborate to receive more clients, and ARS would gain greater access to additional rehab services.

###### 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.

Key Findings:

Transition-aged youth (14-24) and Pre-employment transition aged students (16-21) were routinely noted as the most served (i.e., least underserved populations).

The number of actively engaged schools, the overall favorable view of Arkansas Career Development Center (ACDC) in its expanded role for this population, the success in educational support and measurable skill gain programs, and the number of clients served under the age of 24 years-of-age all point to the success of ARS in addressing the needs of youth with disabilities and students with disabilities. The positive gains and outcomes can be largely attributed to an expansion of the mission, more pressures on internal organization with coordinated budgets/ overlapping expenditures and utilizing ACDC to facilitate programming.

Despite the numerous improvements there were some noted difficulties having access to training or education programs related to the physical location of field offices or youths not being able to both travel and stay at remote training/education programs. Additionally, given the focus on job exploration there are potentially avenues for additional training and support in the field for staff related to understanding job exploration and communicating with students, parents, and youth about paths for employment and how to build student’s preferences, interests, strengths and needs.

Recommendations:

* ARS should offer more training to the field counselors and staff that specifically focuses on assisting clients in job exploration and coordinating with parents/caregivers to develop clear employment objectives. Ongoing communications with students and parents starting early can assist in determining paths for employment outcomes.
* Continue exploring online/remote programming as alternatives to traditional face-to-face programs/credentials.

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

Key Findings:

Stakeholders mentioned they need more regular communication from ARS. Stakeholders also mentioned they need more referrals and more talented job coaches. Service providers want to continue to work with counselors they have established relationships with, so an external recommendation from stakeholders/partners was focused on ARS staff retention to maintain service quality and existing network relationships. Internally it was noted that ARS needs to get more feedback from its partners about the skills and abilities they are looking for in potential employees. ARS could use this information on skill and ability preferences to fine-tune the services offered to clients so that they will be able to properly match clients with businesses.

Recommendations:

* ARS should assign a schedule for regular check-ins between field counselors and partners/stakeholders. As part of this check-in process, ARS should gather feedback from partners to ascertain what skills and abilities they are looking for in prospective employees.
* ARS should offer incentives to attract and retain skilled job coaches and counselors to assist with job development, placement, and training.

Findings Regarding the Arkansas Career Development Center

Internally, the Arkansas Career Development Center, and the services offered, were generally considered to be effective and important for ARS’ clients. Through surveys, interviews, and focus groups, the internal populations noted positive programming and related outcomes. While all programs were generally well regarded, the Pre-Employment Transition Services and transition services for students with disabilities were generally more lauded than career and technical education programs. While there have been significant improvements for options with distance learning modalities, some respondents indicated that the Center was geographically removed and not an option, statewide, given the travel requirements. Respondents noted preferences for more short-term and online-training since the commute and physically staying at the Center’s accommodations are not feasible or accessible for their client populations.

Recommendations:

* Continue expanding the online/distance learning and short-term programming to overcome barriers related to accessing services.

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

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

ARS and the State Rehabilitation Council developed and agreed upon goals and priorities based on the 2022 Comprehensive Statewide Needs Assessment and the RSA 2021 Monitoring Report.

ARS will utilize PY2023 data as a baseline when evaluating effectiveness of goals, priorities, and strategies.

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

###### A. Support innovation and expansion activities;

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

###### 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); and

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

**Goal 1: ARS will meet State and Federal accountability and performance requirements.**

* Priority 1: ARS will meet and monitor established performance accountability measures on a quarterly basis to determine progress in meeting federal/state requirements.
  + Strategy 1: Utilize the new Quality Assurance review tool and corrective action process to ensure case management quality and compliance with federal standards, and to address and remedy violations to federal/state requirements in a timely manner.
* Priority 2: ARS will provide career counseling to 14(c) program participants to meet Section 511 requirements.
  + Strategy 1: Track annually the number of individuals receiving career counseling.
  + Strategy 2: Utilize counselors to meet with individuals at the 14(c) to complete the application process within a month of receipt of referrals from career counseling.
  + Strategy 3: Track competitive integrated employment (26 closures) outcomes data annually from career counseling referrals.
  + Strategy 4: Collaborate with the Helen Keller National Center to assure clients who are deaf-blind receive the employment supports needed by 2027.
* Priority 3: ARS will implement additional strategies focused on RSA identified areas of weakness to strengthen data verification requirements.
  + Strategy 1: Assess randomly selected cases at various stages in the VR process to identify areas of non-compliance to detect and incorporate the necessary instruction, training, guidance, etc. with the intent to strengthen data verification requirements.
* Priority 4: ARS will ensure current ARS policy aligns with Federal Requirements.
  + Strategy 1: Review and modify the current ARS policy to ensure it aligns with Federal requirements by October 1, 2024.
  + Strategy 2: After the initial policy modification, periodically assess and identify, and address in a timely manner areas of weakness, imprecision, and lack of compliance with Federal requirements.

**Goal 2: ARS will reserve and use a portion of its funds for the development and implementation of innovative approaches to expand and improve the provision of vocational rehabilitation services.**

* Priority 1: ARS will develop and implement a comprehensive marketing plan.
  + Strategy 1: Inform potential clients, including those who are unserved or underserved of various racial, ethnic, social, and economic backgrounds about the services available through ARS.
  + Strategy 2: Leverage existing partnerships and develop new ones with WIOA partners, employers, secondary/postsecondary educators, and other organizations that provide services to individuals with disabilities to inform them of the different services and programs available through ARS’ Field Services, Access and Accommodations, Arkansas Career Development Center, and the Business Engagement Unit.
  + Strategy 3: Utilize innovation and expansion dollars to support the Arkansas State Rehabilitation Counsel and the Arkansas Independent Living Council.

**Goal 3: ARS will provide pre-employment transition and transition services to students with disabilities as outlined in WIOA.**

* Priority 1: ARS will continue to expand Pre-ETS services through initiating engagement of students prior to the age of 16.
  + Strategy 1: Provide Pre-ETS services to students with disabilities starting at age 14 and begin the VR process as early as the VR need is identified.
  + Strategy 2: Work with human resources to review vacant positions for reclassification to transition counselors to assist with bridging the gap between Pre-ETS to VR.
* Priority 2: ARS will transition at least 15% of the students served to VR.
  + Strategy 1: Introduce students with disabilities to VR services starting at age 14 and begin the VR process at the onset of the students’ junior year in high school.
  + Strategy 2: Work with human resources to review vacant positions for reclassification to transition counselors to assist with bridging the gap between Pre-ETS to VR.
* Priority 3: ARS will expand Pre-ETS, utilizing data, to unserved/underserved populations across the state.
  + Strategy 1: Continue to partner with vendors and schools in all regions to provide Pre-ETS services to unserved/underserved areas.
  + Strategy 2: Continue to partner with Arkansas Transition Services (ATS) to launch exploration programs for students starting at age 14 and provide Work-Based Learning experiences in partnership with local community colleges and employers.
* Priority 4: ARS will increase the number of students engaged in Work-Based Learning, Pre-apprenticeships, and On-the-Job trainings by 15%.
  + Strategy 1: Continue to work with vendors and schools to provide Work-Based Learning, Pre-Apprenticeships, and On-the-Job trainings through informed choice and partnerships with CTE, ATS, and employers.
  + Strategy 2: Engage a minimum of five seniors per year in OJT and Apprenticeship opportunities.
* Priority 5: ARS will increase the number of Transition students that enter employment by having students work-ready upon completion of high school and/or postsecondary training by a target goal of 50% of the total students served and exiting high school.
  + Strategy 1: Work with schools, vendors, and the business engagement team to create and provide more work-based learning activities for students beginning as early as age 14, along with engaging students in more CTE opportunities while in high school to assist with vocational goal setting after exit from high school.

**Goal 4: ARS will increase competitive integrated employment for Arkansans with disabilities.**

* Priority 1: ARS will increase the utilization of apprenticeships and on-the-job trainings by 10%.
  + Strategy 1: Continue to strengthen collaboration efforts with the ARS Business Engagement team to identify potential employers.
  + Strategy 2: Work with the Business Engagement team to place a minimum of ten individuals with disabilities per year into an OJT or apprenticeship program.
  + Strategy 3: Continue to work with WIOA partners including local boards, Office of Skill Development, Arkansas Apprenticeship Coalition, and businesses that provide apprenticeships to identify potential apprenticeship opportunities and individuals for service.
* Priority 2: ARS will increase referrals by 10% through collaborative partnerships with WIOA partners.
  + Strategy 1: Continue to work with WIOA partners to implement a common intake process to help identify potential referrals.
  + Strategy 2: Increase the use of the short referral form to initiate services and decrease attrition.
  + Strategy 3: Adopt the rapid engagement method to move individuals through the VR process in an expediated manner through increased client engagement.
* Priority 3: ARS’ Business Engagement Unit will increase referrals from businesses by 10% annually.
  + Strategy 1: Collaborate with Chambers of Commerce, WIOA partners, businesses, and community partners about Work-Based-Learning, On-the-Job-Trainings (OJT), AT@Work and Stay-at-Work/Return-to-Work, and Disability Etiquette training by providing access to the Business Engagement Short Form Referral.
  + Strategy 2: Collaborate with Chambers of Commerce, WIOA partners, and community leaders to identify skills development training and/or employment referral opportunities for clients that are referred to the BEU from Field Services counselors.
* Priority 4: ARS will increase utilization of VR funds to 90% or higher of the authorized funding.
  + Strategy 1: Work with an outsource entity to assist with research of similar VR programs and rate setting.
  + Strategy 2: Utilize technical assistance to provide training to staff regarding fiscal spending and period of performance.
  + Strategy 3: Revise the current budget allotment structure to remove budget constraints.
* Priority 5: ARS will increase services provided to employers by increasing referrals to the Stay-at-Work/Return-to-Work (SAW/RTW) programs by 10% with the goal of retaining employees with disabilities on the job.
  + Strategy 1: Utilize the SAW/RTW program to participate in, at minimum, one public marketing event per quarter.
  + Strategy 2: Increase services provided to employers by increasing referrals to the Stay-at-Work/Return-to-Work (SAW/RTW) programs.
  + Strategy 3: Utilize the SAW/RTW program to provide semi-annual trainings to field staff across the state on how to incorporate the SAW/RTW program into their current caseloads.
* Priority 6: ARS will provide training to field service staff on the appropriateness and implementation of assistive technology and services throughout the rehabilitation process.
  + Strategy 1: Utilize AT@Work to provide one training per year to each field services region.
  + Strategy 2: Utilize Access and Accommodation staff to present content with regards to the identification and implementation of accommodations at minimum one event widely attended by field services staff.
  + Strategy 3: Utilize ICAN and AFP staff to provide updates on services quarterly to field services district managers during their monthly meetings.
* Priority 7: ARS will increase services provided to unserved/underserved populations by 15%. Services include transportation, access to technology, and expanding business and services provider network to bridge gaps**.**
  + Strategy 1: Continue to work with WIOA partners to implement a common intake process to help identify potential referrals.
  + Strategy 2: Develop new itinerary points and outreach activities to increase awareness with unserved/underserved populations.
  + Strategy 3: Utilize the 2022 CSNA as a baseline for unserved/underserved populations.
  + Strategy 4: Increase the use of the short referral form to initiate services and decrease attrition.
  + Strategy 5: Adopt the rapid engagement method to move individuals through the VR process in an expedited manner through increased client engagement.
* Priority 8: ARS counselors will maintain at least a 90% rate for IPE development.
  + Strategy 1: Increase the use of the short referral form to initiate services.
  + Strategy 2: Adopt the rapid engagement method to move individuals through the VR process in an expediated manner through increased client engagement.
  + Strategy 3: Monitor percentage rates quarterly and continue to provide weekly updates on action alert items.

**Goal 5: ARS will increase successful employment outcomes utilizing Community Rehabilitation Program and Supported Employment vendors.**

* Priority 1: ARS will reach the national average for supported employment closures by PY2027.
  + Strategy 1: Reduce time from vendor referral to IPE development and service initiation to 60 days or less by PY2025.
  + Strategy 2: Revise Supported Employment Services policy and procedures based on direction from the Rehabilitation Services Administration monitoring plan by 2026.
  + Strategy 3: Convene CRPs to participate in identifying, sharing, and promoting supported employment services and the development of a methodology to determine reasonable and effective rates based on direction from the Rehabilitation Services Administration monitoring plan by PY2026.
  + Strategy 4: Collaborate with CRPs on contract changes that incent/reward higher quality outcomes based on established outcome measures by PY2027.
  + Strategy 5: Hose a Supported Employment training opportunity for ARS staff, CRPs, individuals, and families annually by PY2027.
  + Strategy 6: Research digital technology innovations for supported employment and accessibility supports to pilot by PY2027.
  + Strategy 7: Provide region-based training opportunities specific to the new Extended Services policy for ARS staff, CRPs, individuals, families, and other stakeholders once the new policy has been promulgated.
  + Strategy 8: Provide education opportunities on the availability, utilization, and funding of Youth Extended Services by PY2026.
  + Strategy 9: Meet with non-VR funding entities to leverage resources and assure the Extended Services funding available meets the prevailing wage or higher by PY2025.
  + Strategy 10: Produce information on Extended Services and funding sources for youth, individuals, families, and providers including but not limited to Ticket to Work-Employment Network partnerships, natural supports, and Social Security Work Incentives by PY2026.
  + Strategy 11: Request technical assistance support from the Vocational Rehabilitation Technical Assistance Center for Quality Management (VRTAC) on supported employment and extended services.
* Priority 2: ACDC will increase its number of competitive integrated employment outcomes by 10%.
  + Strategy 1: Increase the number of distance learning options by two per year to increase accessibility of training statewide.
  + Strategy 2: Expand public outreach to increase knowledge of ACDC services.
  + Strategy 3: Continue to participate in apprenticeship/pre-apprenticeship committees and network with the entities that develop and provide apprenticeships.
  + Strategy 4: Initiate conversations regarding disabilities and ACDC services to a minimum of three schools with alternative programs per year.

#### d. Evaluation and Reports of Progress: VR and Supported Employment Goals

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

**Goal 1:** ARS will meet performance accountability measures as outlined in WIOA.

Priority 1: ARS will monitor established performance accountability measures.

* ARS set the strategy to utilize all available data (supporting documents) to monitor performance outcomes. IWAGE was utilized to verify employment of clients. ARS used direct unemployment insurance (UI) wage match using IWAGE (applies to status 26 and status 28 closures); federal or military employment records; paystubs; W2 or tax records; written verification using an agency form or a letter from the client, signed and dated from the client and counselor; verification using an agency out-of-state wage form; verification from the employer on letterhead with employment start date and justification; verification form for Self- Employment Income and Expenses. For MSG/Credential attainment counselors will obtain students' grades, copies of degrees attained, and progress reports to provide documentation for reporting purposes.
* ARS set the strategy ARS Field staff will receive ongoing performance accountability measurement training. Performance accountability training is ongoing to reduce errors in the case management system and to ensure more accurate reporting. A new monitoring tool for all performance measures was developed in FY2023 and is now in full production.

Priority 2: ARS will provide career counseling to 14(c) program participants to meet Section 511 requirements.

* ACDC and the University of Arkansas-Fayetteville annually host virtual sessions on career counseling and referral. Career Counseling Information and Referral (CCIR) individuals were referred to the ARS Field for services. The Field and the Community Program Development administrative specialist utilized MS Team for real time updates on referrals and quality assurance of actions by the ARS field related to CCIR referral.

Priority 3: ARS will strengthen data verification procedures.

* ARS set the strategy the QA team will monitor and review randomly selected cases from specific categories for on-site review. During PY 2023, ARS developed and implemented a monitoring tool utilized by the QA team to assist in determining whether performance accountability measure data entered in the case management system is accurate and complete.  Utilization of this tool will continue and be adjusted as necessary. The revised QA monitoring tool will be integrated into the new CMS scheduled to go live in spring 2024.
* ARS set the strategy to train personnel on acceptable data verification criteria and documentation. Training was provided to personnel on acceptable data verification criteria and documentation. Additional training was provided upon request and remedial training was provided based on case review.

**Goal 2:** ARS will provide pre-employment transition and transition services as outlined in WIOA.

Priority 1: ARS will expand and improve Pre-ETS.

* ARS set the strategy to create internships in competitive integrated settings that could lead to on-the-job training and/or job placement. The WOLF, WIN! and vendor programs all support paid internships up to 40 hours per school year. For school year 2022-2023, ARS had 44 schools participating in WOLF, 16 schools enrolled in WIN, and 99 schools enrolled in a vendor program. ARS served an average of 1,318 students.
* ARS set the strategy to expand Pre-ETS programming into underserved populations and regions of the state by increasing availability of service providers and increasing the number of school districts participating in Pre-ETS programming. ARS opened the Pre-ETS vendor application to provide services in counties located in south and southeast Arkansas. ARS accepted an additional five schools into the WOLF and WIN! Programs from south Arkansas.
* ARS set the strategy to identify industry recognized curriculums and train counselors to provide direct services to students. This is a work in progress. There are several mechanisms of access to industry recognized curriculum and opportunities that lead to credentials. ACDC is working closely with field services to integrate training and services that lead to credentials. Examples include Fayetteville and Alma high schools.
* ARS set the strategy to develop partnerships at the local level by contacting Special Education personnel in schools and by attending school functions including student IEP meetings. ACDC contacted schools and asked to attend meetings and offered services. ARS Pre-ETS counselors participated in cross trainings with local school districts throughout the state at Cadre Meetings sponsored by Arkansas Transition Services. ARS Pre-ETS counselors were invited to participate in Universal Design for Learning (UDL) trainings held across the state with CTE and Special Education. Pre-ETS counselors are added to every special education team that registers and attends the Transition Summit sponsored by Arkansas Transition Services.
* ARS set the strategy to create standards and evaluation criteria for each core service for vendors, schools, and counselors to use in identifying the knowledge/skills/abilities gained by students in the program. The standards and evaluation criteria have been developed and incorporated into the yearly Pre-ETS monitoring process and monthly reporting forms are utilized to evaluate student progress.
* ARS set the strategy to increase awareness of viable work options within career fields associated with Career and Technical Education, through a summer pilot program in partnership with CTE and Saline County Career & Technical Center. ARS in association with core partners provided an exploration camp for 15 students entering the ninth grade (age 14) with IEPs.
* ARS set the strategy to promote and track employment outcomes directly from Pre-ETS services. ARS is in the process of implementing new case management software that will allow tracking of employment outcomes directly from Pre-ETS services. The anticipated go-live date of the system is April 2024.
* ARS participated in intensive technical assistance provided by NTACT and continued to support and work within the state team to implement strategies to support students with disabilities as agreed upon on by all parties on the state team.
* The ARS state transition teams met every quarter to work on goals identified on the Transition State Plan. The state team has identified the following areas as needs and is actively working on developing strategies to meet the following goals: Meaningful engagement with parents and students; increased interagency collaboration at the local level; and data sharing agreements at the state level.

Priority 2: ARS will provide Pre-ETS and ensure students with employment and training goals are moved into Vocational Rehabilitation prior to the second semester of the senior year of high school.

* ARS met the requirement to spend 15% of VR case services budget on Pre-ETS for FFY2022.
* ARS set the strategy to direct students with disabilities into classes leading to certifications in Career and Technical Education and concurrent enrollment postsecondary training while in high school. This was accomplished through ACDC programming and the CTE Career Exploration camp. ACDC students are provided information regarding CTE classes and encouraged to participate. Certificate trainings in Servesafe, OSHA, CPR and Professional Guest Services were provided via distance learning to high schools and juvenile justice facilities.
* ARS is required to provide students in Pre-ETS with paid and unpaid work experiences. This is occurring in Pre-ETS through the WOLF, WIN! and Vendor programs at participating high schools. In school year 2022-2023, 159 schools across the state participated in school-based programs. ARS served an average of 1,378 students.
* ARS set the strategy to provide Pre-ETS core services internally or by utilizing external contractors. This is occurring but not all school districts have as many options. Where possible, ACDC provides internal core services to participating schools.
* ARS set the strategy to develop and implement a process for Pre-ETS students to become traditional VR clients and monitor results. ARS Pre-ETS counselors were provided training, resources, and a streamlined process on engaging Pre-ETS participants in the VR process as soon as a need for VR services was identified. Counselors begin initiating the application process at the onset of a student’s second semester of their junior year through the first semester of their senior year.
* ARS will provide support and assistance to students and school districts across the state that are currently participating in and who have agreements to implement CIRCLES (communicating interagency relationship and collaborative linkage for exceptional students) to facilitate transition of students from secondary education to employment and/or post-secondary education. For the last six years ARS has been one of the leading states in the CIRCLES program implementation. Through CIRCLES, ARS engages students and school districts in collaborating with community providers such as mental health agencies, DDS, employers, DHS, Workforce, etc. to provide wrap around services for students with disabilities. ARS uses this program to connect with providers and parents to inform them about VR service, how VR services can help the student, how to apply for VR services, and how we work as a team with other participating supports to assist students with transition from high school to employment or post-secondary training.

Priority 3: ARS will expand and improve Pre-ETS utilizing the resources at ACDC. The new model focuses resources to serve students with disabilities to prepare and guide them toward achieving competitive integrated employment.

* ACDC increased distance learning training options to expand service reach statewide.
* ACDC facilitated work readiness programming and work-based learning activities with juvenile justice incarcerated youth, which expanded from one juvenile justice facility to four.
* ACDC piloted a hybrid Business/Logistics CTE class for high schools. The first class was conducted with Alma high school seniors in 2021-2022. It was well received and is in its third year at Alma. Students who participated in the class and the on-the-job work-based learning were eligible for class credits and industry recognized credentials. Due to the success of the class in preparing youth for employment and developing job opportunities for the graduates, ACDC is exploring other CTE class options.
* ACDC staff worked with juvenile justice clients, who are Pre-ETS students, and facilitated a pre-apprenticeship program. The Juvenile Justice Program includes work-based learning and work-readiness activities. In PY 2021-2022, there were 24 participants and in PY 2022-2023, there were 99 participants.

Priority 4: ARS will increase the number of Transition students that enter employment by having students work-ready upon graduation from high school or postsecondary training.

* ARS set the strategy to develop and support apprenticeships for students prior to graduation. ARS supported pre-apprenticeships, internships, and OJTs for students. A Certified Nursing Aid pre-apprenticeship was initiated in collaboration with Fayetteville High School, and internships for Logistic Technicians were initiated in collaboration with Alma High School. In 2022-2023, four out of six students in the Logistics Technician program were employed following graduation.
* ARS set the strategy to increase credential attainments in high school by moving Pre-ETS-VR ready students to VR services prior to graduation. ARS provided training and continues to provide training to field staff on capturing Performance Measures data as it relates to credential attainment and measurable skill gains. In PY2022, 371 students transitioned to VR services prior to graduation.
* ARS set the strategy to develop and support on-the-job trainings/direct job placement and supported employment with businesses that have Pre-ETS internship sites. This is happening and is an integral part of WOLF, WIN!, and ACDC Pre-ETS services. There were 39 students who obtained direct employment from their Pre-ETS WBL sites during school year 2022-2023.

**Goal 3:** ARS will create effective partnerships to advance employment for Arkansans with disabilities.

Priority 1: ARS will focus on public and private sector employers and increase business and industry awareness of ARS’ services.

* ARS set the strategy to market to employers how ARS can be an effective resource as it relates to the hiring of individuals with disabilities and assisting them in remaining in the workforce. The Business Engagement Unit (BEU) addressed this strategy by using face-to-face contact as their primary source in communicating with customers. In 2022, 1,731 face-to-face visits occurred with 876 as primarily marketing ARS services. In 2023, the BEU met with 2,070 business and community leaders with 1,263 focused on marketing of ARS services. This has provided a higher number of small to medium businesses with more resources to find and retain people with disabilities.
* ARS set the strategy to maintain its partnership with Disability: IN-Arkansas and assist in membership recruitment by leveraging partnerships with existing business customers. Disability: IN-Arkansas along with the Governor’s Council on Developmental Disabilities and sponsors held a NDEAM Business Summit with over 65 businesses present. Disability: IN-Arkansas is currently in the planning stages for future events.
* ARS set the strategy to work with employers to identify opportunities for pre-apprenticeship, Registered Apprenticeship, and On-the-Job programs. This strategy is ongoing with options remaining available through ACDC and Registered Apprenticeship Providers.

Priority 2: ARS will develop and strengthen partnerships with business, workforce development partners, economic development agencies, and community organizations to meet the needs of existing and new business customers.

* ARS set a strategy to utilize state agency transformation to expand relationships with partner agencies within the Department of Commerce. Prior to the COVID pandemic, the BEU was involved with WIOA partnerships consisting of monthly partner meetings, and bi-annual workforce partner summits. Because of COVID ARS and other partners were limited to virtual state-wide partners meeting. The BEU began meeting face-to-face with WIOA partners after the COVID ban was lifted.
* ARS set a strategy to advance relationships with other WIOA partners at both the state and local levels. The BEU continued its efforts to collaborate with other WIOA stakeholders (Arkansas Adult Education, Planning and Development Districts, Deaf and Hard of Hearing, Blind Services, and Division of Workforce Services) regarding employment of people with disabilities through scheduled meetings, events, and meeting the needs of business to increase outcomes for ARS clients.
* Field managers are members of local WIOA boards. ARS provided presentations of available services to partners. Senior management is part of the Executive Board. To increase wrap-around services and reduce duplication of services, ARS has co-located with other Workforce Services partners in Jonesboro, Hot Springs, Searcy, and Harrison with plans underway to do the same with other field offices when opportunities allow.
* ARS set the strategy to conduct joint business service team meetings with all Workforce Development Boards. This strategy remains ongoing with ARS representatives participating virtually.
* ARS set the strategy to develop products and services that meet individual business customer needs. ARS utilized results of the comprehensive statewide needs assessment finalized in PY 22 to address this strategy. During PY22 BEU met with 1,731 business customers to provide various services training, recruitment, and referral.
* ARS set the strategy to work with local workforce boards to identify local in-demand occupations. BEU staff attended monthly meetings of WIOA partners, Chambers of Commerce, and business/partner events to help determine local/regional labor market information and sector strategies, communicating high demand high pay job opportunities to ARS counselors and clients to meet employer needs.
* ARS set the strategy to work with business and industry to establish on-the-job training, work- based learning opportunities, and apprenticeships. Initial training for apprenticeships and OJT were completed in fall 2019. However, the 2020 pandemic impacted the BEU’s ability to pursue and implement this initiative with business customers. During the years 2021-2022, OJT and apprenticeship forms and applications were updated and provided to BEU staff in April 2023.

Priority 3: ARS will increase services provided to public and private sector employers by leveraging Stay-at-Work/Return-to-Work (SAW/RTW) programs to assist employers in keeping the employees with disabilities on the job.

* ARS set a strategy to increase overall number of SAW/RTW and Job Retention clients. With the pandemic still in place many civic and industry liaison groups are still not allowing individuals to present to them in person or are not meeting at all. This has hampered the ability to market SAW/RTW to employers across the state. With that ARS has increased SAW/RTW case closures from 0 in FY2019 to 9 in FY2020 and maintained at 9 in FY2021. ARS served 65 total clients for job retention in FY2021 compared to 72 in FY2020. The SAW/RTW team closed 23 client cases in FY2022 and 26 cases in FY2023 with 26 currently open cases. These numbers indicate that the word is getting out about our services and numbers are continuing to increase as we partner with more and more businesses across the state. We served 122 job retention cases in   FY2022 and 129 job retention cases in FY2023 both of which are all time highs for the programs.
* ARS set a strategy to increase the number of employer referrals for SAW/RTW. ARS increased the number of employers served in FY2021 to 43 from 35 in FY2020. Access and Accommodations currently has the largest number of active cases from outside employers with 14. We currently have 26 active cases, all from outside employers. We served 91 new employers in FY2022 and an additional 61 new employers in FY2023. With our additional collaboration with business engagement, we hope to increase those employer referrals in the coming years.
* A final strategy set was to incorporate SAW/RTW services when business engagement staff interacts with businesses. There have been no client referrals from business engagement staff this reporting period. SAW/RTW staff have been included in three business engagement meetings and two employer meetings facilitated by business engagement in this reporting period. There has been little movement to report in this area. In FY2022 and FY2023, SAW/RTW participated in two joint events marketed to businesses and three employer meetings that were initiated by business engagement. We anticipate more collaboration in this area with the new strategic goals requiring collaborative meetings with measurable requirements on the number and frequency of those events.

**Goal 4:** ARS will increase effectiveness and efficiency of service delivery.

Priority 1: ARS will determine effective methods to serve the underserved/unserved populations.

* ARS is working with the IT Committee for the finalization of the common intake process set to go live in 2024.
* ARS partnered with DWS to host two trainings in PY2022 focusing on service and performance.
* To increase wrap-around services and reduce duplication of services ARS has co-located with other Workforce Services partners in Jonesboro, Hot Springs, Searcy, and Harrison, Fayetteville, Helena, West Memphis, Russellville, and El Dorado.
* ARS collaborated with WIOA core partners to host two state-wide meetings PY2022 with a focus on TANF, Unemployment Insurance, career readiness certificate, and offender re-entry programs.
* ARS set the strategy to partner with local Hispanic and Marshallese communities to increase awareness and availability of services. ARS set up itinerary points in Jonesboro, Fort Smith, and Fayetteville to reach those who may not have access to traditional field offices.
* ARS hosted a resource fair in PY2022 focusing on vendors and partners providing services to the deaf and hard-of-hearing community.
* ARS implemented an AR Deaf Community newsletter providing information on services, resources, assistive technology, and upcoming events.
* ARS continues to partner with Centers for Independent Living to provide information about ARS services throughout the state. Presentations are provided at local office meetings by the CILS for updates on core services provided. These activities provide opportunities for access to services such as advocacy, information and referral resources, independent living skills training, peer support, and transition services.
* ARS set the strategy to partner with Centers for Independent Living to provide information about ARS services in the geographically underserved areas. In PY 2021-2022 CILS provided training at the local offices in counties covered by the CILS. ARS assigned counselors to serve as CIL liaisons who partnered with the CILS in resource fairs.
* ARS utilized Project AWIN to provide benefits counseling to any Pre-ETS student receiving disability benefits who consent to receiving the service. Counseling is provided one on one with the student, guardian, and a Project AWIN CWIC and through group presentations about the advantages of participating in benefits counseling.
* ARS set a strategy to provide training on special populations to include those with serious mental illness and autism spectrum disorders.  ARS placed a spotlight on mental health awareness month for PY2021 and PY2022 by providing information and training from the National Alliance on Mental Illness, training opportunities for mental health first aid certification through Goodwill Industries, and training on Autism was offered through National Pathways to Transition, Emporia State University. ARS spotlights April as Autism awareness month. ARS provided training opportunities for counselors to obtain continuing education in the area of mental health.

Priority 2: ARS will strengthen relationships with WIOA partners and business and industry.

* ARS set the strategy to participate in business and industry Expo/Chamber events with other workforce partners. Once Covid restrictions lifted in 2021, the BEU attended 63 Expos and Chamber events. By 2022, the BEU met and made connections through 137 Expos/Chamber events with RAMs or Field Staff attending 32, leading to a greater understanding of ARS services.
* ARS set a strategy to participate in monthly “Core Four” partner’s meetings with other WIOA partners. The BEU acts as a point of contact for Core Four business services team members meeting monthly with the WIOA business services team discussing the needs of business.
* ARS set the strategy to seek opportunities for rehab area managers and counselors to collaborate with BEU staff through joint business customer visits to meet employer needs. BEU resumed these activities once the pandemic regulations were lifted. BEU collaborated and held multiple meetings with Amazon that also included WIOA partners: Field Services, Adult Education, Workforce, and Central Planning and Development District. The hiring event for the underserved/unserved population resulted in the hiring of seven people with disabilities. BEU also held NDEAM events across the state and attended 28 joint business customer meetings with RAMs and counselors to identify high-demand, high pay employment opportunities for people with disabilities.
* ARS set the strategy for rehab area managers to access local workforce board funding and resources to utilize as a similar benefit in service delivery. This is ongoing. Field managers are members of local WIOA boards and attend meetings to determine programs funded at the local level. Information is passed on to the counselors as a resource for similar benefits. Rehab area managers continue to serve on local WIOA boards that allow information and resources sharing.
* ARS set the strategy to conduct partner meetings with educational training providers on a quarterly basis.

Priority 3: ARS will improve service delivery to job seekers and businesses by consistently providing services that meet individual needs.

* ARS set the strategy to develop and implement a Job Club initiative and collaborate with counselors to support clients in honing soft skills to enhance job readiness. For PY2022, referrals totaled 163; 95 attended and completed Job Club; and 27 completed and became employed for 90 days or more.
* ARS provided training to counselors about using LMI to assist clients in IPE development. LMI assists VR counselors in guiding ARS clients in career choices to promote the achieving of WIOA employment standards.
* As a result of the combined efforts of VR counselors and Business Engagement Unit, in PY2020-2021 there were 458 referrals with 271 successful closures. In PY2021-2022, there were 163 referrals with 97 successful closures. In PY2022-2023, there were 204 referrals with 50 successful closures.
* ARS set the strategy to develop career pathways with input from private industries and educational training providers in the state. ARS developed a model for career pathways for healthcare, logistics, and manufacturing with input from DWS and the local boards; however, funding for implementation of the complete plan was not approved. ARS can support the pathways as offered throughout the State in existing educational institutions.
* ARS has established a continuous partnership with the Bank OZK and Amazon to review employer needs for increased job matches and employment outcomes.

Priority 4: Staff will receive comprehensive training to improve service delivery.

* ARS set the strategy to train field personnel on apprenticeships/pre-apprenticeships, on-the-job training opportunities, and paid work experiences available for students and youth. ACDC provided presentations and training on accessing registered apprenticeship. The process is on-going.
* ARS hosted on-site training for OJT in PY2022.
* ARS staff participated in virtual training for apprenticeships/pre-apprenticeships and OJT through VR-TAC.

Priority 5: ARS will ensure clients have access to assistive technology services by evaluating the need for assistive technology throughout the rehabilitation process, and by making the proper referrals when assistive technology is appropriate.

* Access and Accommodations set the strategy to make the assistive technology/AT@Work referral available in the CMS at the time of intake, plan development, placement, and post-employment checks. ARS is currently in the middle of transitioning to a new CMS. The referral will be available once the new system is fully implemented. This strategy is delayed until the CMS is implemented.
* Access and Accommodations also set the strategy to train staff on the assistive technology services available to clients. Access and Accommodations staff presented to field offices across the state and have participated in two conferences in which a large portion of ARS staff are present. This will continue to be an ongoing process.
* Finally, Access and Accommodation set the strategy to make application forms for various community service programs dealing with assistive technology available in the CMS. ARS is currently in the middle of transitioning to a new CMS. The referral will be available once the new system is fully implemented. This strategy is delayed until the CMS is implemented.

**Goal 5:** ARS will increase the utilization of Community Rehabilitation and Supported Employment providers to achieve employment outcomes.

Priority 1: ARS will increase the effectiveness of current and new external Employment/Supported Employment providers.

During PY2021, ARS Community Program Development:

* Cohosted the Biennial AR APSE Conference with 113 participants, which covered such topics as Medicaid Working Disabled (Keeping Your Insurance), Waiver funded/ARS Supported Employment, Life Charting and Transition Services.
* Participated in a Supported Employment Virtual meeting with ARS Rehabilitation Area Managers to discuss the impact of furloughed provider employment staff during COVID, that SE closures were less than 4%, the lack of referrals and how to locate referrals, vendor recruitment, family member support, career counseling, information and referral at 14(c)s, and Independent Living Services.
* Trained approximately 20 ARS field staff on a PPTX MS Teams and The Box related to CCIR tracking referrals in the Excel spreadsheet.
* Trained field staff on “Why Counselor Liaison Reports Are Necessary.”

During PY2022, ARS CPD:

* Participated in two Medicaid Waiver Employment Summits with statewide participants committed to employment of individuals with the most significant disabilities.
* Participated in a quarterly meeting of the Deaf-Blind Interagency Committee hosted by Children and Youth with Sensory Impairments (CAYSI) and other disabilities, Division of Elementary and Secondary Education (DESE), Special Education Unit. ARS, DSB, Education, parents, and teachers attended training by Griffin Hammis on the Discovery Process.
* Certified seven new employment service vendors. Currently, ARS has 80 vendors.
* Trained 610 participants including ARS field staff, vendors, and Medicaid Waiver managed care funders referred to as PASSEs. The topics included External Employment Services 101: E1st services, Supported Employment Services, Individual Job Coaching, and external Job Placement Services.
* Surveyed 28 attendees to evaluate the External Employment Services Training 101 and for additional input on their training needs. Based on the input training was developed to provide in-person interactive training on the Discovery Process and How to complete the Discovery Staging Record. ARS trained 70 participants.
* Hosted a Supported Employment meeting with ARS Self Employment Consultant, Empower Healthcare funder of Medicaid Waiver, SE provider and RSA funded Griffin Hammis Self Employment Center staff.
* ARS provided Career Counseling Information and Referral services virtually in PY2021 2,175 and PY2022 2,366 subminimum wage employees. ARS received 497 referrals. The CPD team monitored individuals requesting to work through referral to ARS.

Project SEARCH®:

* During school year 2021-2022, 72 individuals entered the Access programs and 59 graduated. In school year 2022-2023, 70 individuals entered the program and 56 graduated.
* During school year 2021-2022, 14 individuals entered the Friendship Community Cares, Inc. program and 13 graduated. In school year 2022-2023, 20 individuals entered the program and 15 graduated.

Priority 2: ARS will expand the availability of community employment providers and partner services that meet the needs of Arkansans with disabilities, including those requiring supported employment.

During PY2021, CPD:

* Surveyed CRPs and the ARS field staff about training needs.
* Provided employment services trainings per region for 544 participants consisting of ARS staff, providers, and other stakeholders.

During PY2022:

* Added seven new CRPs.
* Job Coaches certified 146 in PY2022 and 107 in PY2023.
* Provided technical assistance related to employment for all, which included numerous meetings related to Employment First, the DOL ODEP System change grant, and the Governor’s Council on Developmental Disabilities grant.  Products of these activities included a white paper compilation on E1st activities in Arkansas, and a draft E1st bill. Surveyed 99 CRP staff with 11 responses received to collect information related to the number of employment staff and job coaches, job duties, agency costs, and communication with ARS field counselors or managers. CRPs were asked to provide outreach suggestions, training needs and challenges, and general input. Information provided was used to develop training modules on employment services and career counseling.
* Surveyed ARS field staff with 40 responses related to CRPs. The survey collected information on the field’s connection with providers, counselor caseload identifier related to E1st and Supported Employment, input on building better relationships between the CRPs and ARS, outreach to get referrals, connection to referral sources like high school Special Education teachers, training needs related to Supported Employment Services, E1st Services, Job Placement and ARS’ role in Career Counseling, Information and Referral. Information provided was used to develop training modules on employment services and career counseling.

Priority 3: ARS will transform ACTI to a new service delivery model, ACDC. This model focuses as a hub for training and services to support VR consumers and/or students with disabilities to successfully reach the milestones of their individual plans for employment.

* ACDC increased distance learning training options to expand service reach statewide.
* ACDC facilitated programming with juvenile justice incarcerated youth. The program grew from one juvenile justice facility to now four. Programming provides work readiness and work-based learning activities.
* ACDC piloted a hybrid Business/Logistics CTE class for high schools. The first class conducted with Alma high school seniors 2021-22. The class was well received and is now going into the third year at Alma. Students who participated in class and on the job work-based learning were eligible for class credits and industry recognized credentials. Due to the success of the class in preparing youth for employment and developing job opportunities for the graduates, other CTE class options are being requested and explored by ACDC.

**Outreach: Strategy:** ARS provides outreach activities to individuals from minority backgrounds, individuals with the most significant disabilities, and others who are unserved or underserved.

* Implemented training for counselors and professional assessment staff to learn the cultural values of the state’s Hispanic community and ways to break down cultural and language barriers to accessing VR services.
* Developed alternative strategies including use of virtual technology to connect with the Hispanic and Marshallese communities.
* Continued to partner with the Centers for Independent Living to provide awareness about ARS’ services for individuals with disabilities.
* Continued to work with WIOA partners to more effectively provide services to individuals with disabilities throughout the state. Partnered with DWS to create an internal referral process for UI applicants who have indicated they have a disability.
* Implemented and hosted Spring into Service events providing information on ARS services and employment opportunities.
* ARS hosted a resource fair in PY2022 focusing on vendors and partners providing services to the deaf and hard-of-hearing community.
* ARS implemented an AR Deaf Community newsletter providing information on services, resources, assistive technology, and upcoming events.
* ARS established a rapid engagement process, *Fast Wednesdays*, to take application, determine eligibility, and develop a plan onsite.

##### 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

ARS achieved the following levels on the performance measures as reported on the PY2022 ETA-9169. ARS focused on quality employment outcomes in order to meet this requirement.

|  | Negotiated | Actual |
| --- | --- | --- |
| Employment Rate Second Quarter After Exit | 60.5 | 65.2 |
| Employment Rate Fourth Quarter After Exit | 57.3 | 64.6 |
| Median Earnings | $5,697.00 | $6,728.84 |
| Credential Rate | 28.9 | 35.5 |
| Measurable Skills Gain | 55.6 | 59.4 |

##### 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).

During PY2022, ARS utilized I&E dollars to support the State Rehabilitation Council, the State Independent Living Council, and to support marketing activities targeting potential Pre-ETS students as well as unserved/underserved populations. Marketing activities included radio and television broadcasting, bus advertising, and social media posting.

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

##### 1. Acceptance of title VI funds:

(A) VR agency requests to receive title VI funds.

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

ARS has developed the following goal to increase successful employment outcomes utilizing Community Rehabilitation Programs and Supported Employment vendors:

ARS will increase successful employment outcomes utilizing Community Rehabilitation Program and Supported Employment vendors.

* Priority 1: ARS will reach the national average for supported employment closures by PY2027.
  + Strategy 1: Reduce time from vendor referral to IPE development and service initiation to 60 days or less by PY2025.
  + Strategy 2: Revise Supported Employment Services policy and procedures based on direction from the Rehabilitation Services Administration monitoring plan by 2026.
  + Strategy 3: Convene CRPs to participate in identifying, sharing, and promoting supported employment services and the development of a methodology to determine reasonable and effective rates based on direction from the Rehabilitation Services Administration monitoring plan by PY2026.
  + Strategy 4: Collaborate with CRPs on contract changes that incent/reward higher quality outcomes based on established outcome measures by PY2027.
  + Strategy 5: Host a Supported Employment training opportunity for ARS staff, CRPs, individuals, and families annually by PY2027.
  + Strategy 6: Research digital technology innovations for supported employment and accessibility supports to pilot by PY2027.
  + Strategy 7: Provide region-based training opportunities specific to the new Extended Services policy for ARS staff, CRPs, individuals, families, and other stakeholders once the new policy has been promulgated.
  + Strategy 8: Provide education opportunities on the availability, utilization, and funding of Youth Extended Services by PY2026.
  + Strategy 9: Meet with non-VR funding entities to leverage resources and assure the Extended Services funding available meets the prevailing wage or higher by PY2025.
  + Strategy 10: Produce information on Extended Services and funding sources for youth, individuals, families, and providers including but not limited to Ticket to Work-Employment Network partnerships, natural supports, and Social Security Work Incentives by PY2026.
  + Strategy 11: Request technical assistance support from the Vocational Rehabilitation Technical Assistance Center for Quality Management (VRTAC) on supported employment and extended services.

##### 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.

**Quality**

ARS refers individuals for Supported Employment services to one of 69 certified CRPs. Supported Employment services are provided to individuals with a most significant disability, including youth with a most significant disability. The services are individualized and customized, consistent with the unique preferences, interests, needs, supports (PINS), and informed choice by the individual. Supported Employment processes assist job seekers with job development, job placement, stabilization on the job, transition to Extended Services for 90 days or more to successful employment. Extended services are funded by other entities or by ARS for a youth under 25 up to four years.

**Scope of Services**

ARS determines eligibility for SE services then develops a SE IPE with the milestones. ARS refers the client to the CRP services set out in the plan. CRPs provide the SE services toward competitive integrated employment. The CRPs are funded based on Milestone outcomes listed below.

**Milestone 1 – Referral/Job Development (VR funded):** A CRP meets with the client and the jointly agree to work together. The CRP accepts the referral by sending a Referral Acceptance Memo to ARS. During this service, the CRP provides career readiness activities (seeking employment, filling out applications, and interviewing skills, etc.) and assistance in the development, creation, or identification of paid competitive integrated work in a community business or self-employment setting.

**Milestone 2– Job Placement (VR funded):** CRPs assist an individual in obtaining a job in a competitive integrated setting based on his/her interests, abilities, needs, and informed choice. The individual is placed in a competitive integrated employment setting with supports for a period of time needed and is compensated commensurate with others in the same position at minimum wage or above.

**Milestone 3 – Stabilization (SE/VR funded):** This service time frame assures an individual has learned their essential job functions with supports to meet the demands of the competitive integrated work setting in assurance of long-term job success. The individual works successfully for the minimum number of hours per week that the individual has agreed upon in the IPE or amendments. ARS assures the transition to Extended Services for 90 days or more.

Extended services begin after supported employment services are completed and when the individual is stable on the job. ARS works with the client and others to identify the funding source. ARS may be the extended services provider to a youth with a most significant disability until the youth reaches age 25 or has received four years of extended services. Once ARS can no longer provide extended services directly to a youth with a most significant disability, ARS will seek funding from another service provider to continue the services.

The counselor and the client jointly determine the need for Extended Services and the appropriate funding stream at the original IPE development. The individual will complete the vocational rehabilitation funded supported employment services when place in employment.  The transition to the extended services occurs after the individual has become stable in the work setting meeting the essential job functions for the hours stated in the original IPE and/or amendments. After the transition to extended services, the individual must maintain employment for 90 days or more before the individual’s case is a successful closure.

ARS Youth Extended Services policy allows ARS to fund support services for up to four years or until the youth reaches age 25 if funding is not available through another source. ARS will fund Youth Extended Services through Individualized Job Coaching Services on an as needed basis after job placement. The Extended Services supports youth to ensure on-going stability, job longevity and includes onsite visits twice a month with the individual and the employer. Once the individual reaches the age of 25, ARS must assure extended service funding resources or natural supports are available through another source.

Youth receiving extended services funded by ARS will remain in stabilization status until the service is no longer needed and the youth is considered successfully employed or until four years of this service expires or the youth reaches the age of 25.

Once the case is closed successful (status 26), and support services are still needed, this service is transitioned to the entity responsible for funding, which may include payment through the individual’s Home and Community Based services waiver plan for employment funded by the Provider-led Arkansas Shared Savings Entity (PASSE), the provider in kind donation, SSA Work Incentive Programs, Employment Networks, or other identified supports.

##### 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 provision of SE services including extended services is addressed in the MOU and the SE provider contract.

The MOU is a cooperative agreement to foster coordination between partners, which includes ARS, DSB, and Arkansas Department of Human Services – Division of Developmental Disabilities Services, Division of Adult, Aging, and Behavioral Health Services, and the Division of Medical Services to ensure competitive integrated employment is the preferred option for individuals with significant disabilities, who are eligible for more than one publicly-funded program administered by the parties.

The SE Provider contract outlines effective dates, program operational standards, referral requirement, vendor responsibilities, reporting requirements, monitoring and evaluation, and service definitions.

#### f. Annual Estimates

##### 1. Estimates for next Federal fiscal year—

###### 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) |
| --- | --- | --- | --- | --- |
| NA | 8,929 | 7,653 | $29.3 Million | NA |

###### 

###### 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) |
| --- | --- | --- | --- | --- |
| NA | 528 | 453 | $1,425,000 | NA |

#### g. Order of Selection

##### 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.

##### 2. For VR agencies that have defined priority categories describe—

###### A. The justification for the order

**Arkansas Rehabilitation Services is not under an Order of Selection.**

###### 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

**Arkansas Rehabilitation Services is not under an Order of Selection.**

###### 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.

**Arkansas Rehabilitation Services is not under an Order of Selection.**

##### 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?

**Arkansas Rehabilitation Services is not under an Order of Selection.**

#### h. Waiver of Statewideness.

Not applicable.

#### i. Comprehensive System of Personnel Development.

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

###### A. The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and

###### B. The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;

###### C. Projections of the number of personnel, broken down by personnel category, who will be needed by the VR agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

| Personnel Category | No. of Personnel Employed | No. of Personnel Currently Needed | Projected No. of Personnel Needed in 5 Years |
| --- | --- | --- | --- |
| Access and Accommodation | Total 24 –  Administration (0)  Evaluation (15)  Admin. Support (3)  Extra Help (1)  Vacant (5) | Total 24 –  Administration (1)  Evaluation (19)  Admin. Support (3)  Extra Help (1) | Total 24 –   Administration (1)  Evaluation (19)  Admin. Support (4) |
| ACDC | Total 23 –  Administration (1)  Counseling (1)  Training (4)  Evaluation (0)  Other (3)  Admin. Support (1)  Vacant (13) | Total 23 –  Administration (2)  Counseling (2)  Training (10)  Evaluation (3)  Other (3)  Admin. Support (3) | Total 23 –  Administration (2)  Counseling (2)  Training (10)  Evaluation (3)  Other (3)  Admin. Support (3) |
| Field Services | Total 225 –  Administration (7)  Managers (13)  Counselors (78)  Interpreters (1)  Admin. Support (56)  Extra Help (8)  Vacant (50) | Total 225 –  Administration (7)  Managers (16)  Counselors (94)  Interpreters (4)  Admin. Support (82)  Extra Help (8) | Total 196 –  Administration (8)  Managers (14)  Counselors (94)  Interpreters (4)  Admin. Support (58)  Extra Help (4) |
| Central Office | Total 66 –  Commissioner’s Office (2)  BERs (12)  PPD&E (12)  IT (14)  Finance (9)  Communication (5)  HR (8)  Admin. Support (3)  Extra Help (3)Vacant (10) | Total 66 –  Commissioner’s Office (3)  BERs (14)  PPD&E (13)  IT (14)  Finance (15)  Communication (5)  HR (9)  Admin. Support (4)  Extra Help (3) | Total 65 –  Commissioner’s Office (3)  BERs (14)  PPD&E (13)  IT (14)  Finance (15)  Communication (5)  HR (8)  Admin. Support (4)  Extra Help (3) |
|  |  |  |  |
|  |  |  |  |

###### D. Ratio of qualified VR counselors to clients:

1 to 138

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

17,247

##### 2. Data and information on personnel preparation and development, recruitment and retention, and staff development, including the following:

###### 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 |
| --- | --- | --- | --- |
| University of Arkansas - Fayetteville | MRC | 36 (FT); 12 (PT) | 6 |
| University of Arkansas - Little Rock | MRC | 79 (FT); 118 (PT) | 5 |

###### 

###### 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.

ARS focuses on the successful recruitment, preparation, and retention of qualified personnel, and maintains a working relationship with colleges, universities, and higher education programs within the state. ARS provides information about agency benefits such as tuition assistance and loan forgiveness to partner universities that have vocational rehabilitation programs.

ARS provides opportunities for students with an appropriate VR background preparing for a career in the field of vocational rehabilitation.  Practicum and Internships are available state-wide.

ARS is planning to propose other initiatives to attract and retain skilled employees, such as telework and leadership development that is inclusive of a class and compensation grid to allow for professional growth.

ARS maintains staff liaisons with the university programs at the University of Arkansas- Fayetteville, the University of Arkansas-Little Rock, the University of Arkansas-Pine Bluff, and Arkansas Tech University, and meets quarterly with the universities to provide vocational rehabilitation field updates, and to give practitioner input.

The agency actively recruits minorities and students with disabilities and encourages students to join professional rehabilitation organizations such as the National Rehabilitation Association and the National Association of Multicultural Rehabilitation Concerns. These rehabilitation professional organizations provide scholarship opportunities to individuals, including minorities, who major in the field of rehabilitation.

ARS partners in job fairs, maintains a positive relationship with the community and its representatives, and utilizes online recruitment efforts.

###### 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.

ARS utilizes an online learning management system for continuous training. Currently, ARS is in the process of migrating to a new platform. Staff is provided training opportunities through the Arkansas Rehabilitation Association Training Conference, Special Topics Training, Administrative Assistants Training Conference, online training, and webinars. Training is also available through the state Interagency Training Agency, the University of Arkansas CURRENTS program, CRC training, certification and licensure training in the professions, and training provided internally by the agency in case management and policy and procedures compliance.

Access and Accommodations works with counselors in collaboration with ICAN and community partners to provide training about assistive technology and related programs and services available to clients to assist in the home, at work, or in school.

Training and alliances with local and national organizations are used for the acquisition of significant knowledge. Information gained through training and development is shared at all levels of leadership and staffing through various platforms, including department meetings, annual managers meetings, email communications, and site visits. Policy updates, federal mandates, training information, targeted informational tops, and other significant information are shared through “BLAST’ announcements, newsletters, and weekly communication within the agency from the Commissioner. This dissemination of information addresses the important changes in the agency, upcoming events, and staff milestones and birthdays. The Commissioner also ensures the staff is provided CSAVR updates.

##### 3. Description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency professional and paraprofessional personnel are adequately trained and prepared, including—

###### 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 State of Arkansas has minimum standards for the vocational rehabilitation counselor position. ARS has a goal for all rehabilitation counseling positions to meet the master’s degree in Rehabilitation Counseling with Certified Rehabilitation Counselor (CRC) standard. The agency seeks to hire MRC/CRC counselors as a priority. In situations where the agency is unable to recruit and hire an MRC/CRC, ARS has a minimum hiring standard of a master’s degree in a field of study related to vocational rehabilitation counseling or a baccalaureate degree in a field of study reasonably related to vocational rehabilitation plus a minimum of three years of demonstrated work or service experience in a vocational rehabilitation setting. Individuals employed as counselors who have not achieved the MRC/CRC designation or standard are provided ongoing training to prepare for the CRC and/or MRC.

ARS provides staff training, especially to those providing direct services to clients. Professional qualifications for counselors are monitored to ensure current certification and to track educational progress for those achieving certification. Counselors access continuing education hours and CRC credits through the cloud-based learning management system.

The Deputy Chief of Field Services reviews curriculum for rehabilitation counseling higher education programs and provides input on current educational needs for incoming counselors. The ARS Commissioner is a member of the WIOA Board, the Chief of Field Services is a member of the executive WIOA Committee, and rehab area managers are members of the local workforce boards. These individuals provide updates on labor force initiatives at both the state and local levels to agency personnel. They also have the responsibility of educating other board members about the needs of individuals with disabilities.

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

ARS provides access and contracts as needed to employ personnel or obtain outside sources who communicate in the native languages of applicants and clients with limited English-speaking ability. ARS also provides special communication modes such as interpreters, captioned videos, specialized telecommunication services, and materials for individuals who are deaf and deaf-blind, as well as other specialized media systems for individuals with disabilities. Interpreters are provided for the deaf and hard of hearing. Sign language skills are included as a minimum qualification for positions providing services to persons who are deaf or hard of hearing.

##### 5. As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

ARS staff participates in state, regional, and national transition meetings and conferences. ARS Field Program staff attends the annual National Secondary Transition Technical Assistance Center (NSTTAC) Conference. In addition, they help plan, coordinate, and facilitate the bi-annual State Transition Summit, and help lead the planning and coordination of local transition fairs and parent’s nights with assistance from rehab area managers and local VR counselors. Counselors receive educational information and training on providing transition services to students with disabilities through the learning management system.

#### j. Coordination with Education Officials.

##### 1. Describe plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities, that are designed to facilitate the transition of the students with disabilities from the receipt of educational services in school to the receipt of vocational rehabilitation services, including pre-employment transition services.

A pre-employment transition services (Pre-ETS) counselor is assigned to the high schools in each county. Counselors provide direct services to students in the school setting under the core service categories for Pre-ETS. They also provide counseling and guidance and assist with transitioning potentially eligible students to VR services prior to exiting secondary education.

ARS partners with private vendors to provide Pre-ETS services to schools. Vendors submit an application to provide services. The application is reviewed by the Pre-ETS leadership team. If approved, an agreement to operate within the school system is developed and approved by the vendor, school, and the local Pre-ETS counselor. Vendors are required to submit monthly progress reports documenting students’ progress, attendance, and services (activities) provided. Vendors are monitored up to twice per year to review curriculum and quality of services.

ARS partners with school systems to provide Pre-ETS school-based programs such as Work-based Learning Opportunities Leading to Future Employment (WOLF) and Working for Independence Now (WIN!). School systems complete proposals to provide services, which delineate Individuals with Disabilities Education Act (IDEA) and WIOA responsibilities. The partnership includes measurable criteria, a reporting structure, and a monitoring guideline.

* ARS is responsible for transition planning and vocational rehabilitation services for eligible and potentially eligible youth and Pre-ETS counselors make every effort to develop and maintain cooperative working relationships with state and local secondary education staff, post-secondary education staff, workforce development partners (e.g., Workforce Development Centers), and other vocational service providers to coordinate pre-employment transition services.
* Provides outreach and coordination activities that include, but are not limited to:
  + Participating in Individualized Education Program (IEP) meetings for eligible, not yet eligible, and potentially eligible students. Staff participate in person or by teleconference, when invited and available.
  + Attending person-centered planning meetings for students (i.e., Wraparound).
  + Encouraging referral sources to refer students with disabilities in secondary education at least two years prior to high school exit or earlier as outlined in the ARS Pre-ETS Policy Manual.
  + Assigning counselors as liaisons and points of contact for each public high school in Arkansas.
  + Providing accurate information to referral sources, students, and families regarding the referral and application process for vocational rehabilitation services and for Pre-ETS.
  + Attending local career fairs.
  + Working with other WIOA programs and employers to develop work-based learning experiences for students with disabilities.
* School officials are responsible for providing a free and appropriate public education to include transition services required under IDEA.

**Referral Process for Pre-ETS:**

Pre-ETS counselors directly assigned to the school provide Pre-ETS referral packets to all students and schools. Students who are interested in services complete the referral packet with their parent/guardian with assistance from the Pre-ETS counselor. The Referral packet includes:

* Pre-ETS Program Participation & Referral Form
* Benefits Planning Consent Form (if applicable)
* Social Security Administration 3288 Consent Form (if applicable)

**Procedures for Timely Development and Approval of Individualized Plans for Employment for Transition Students**

The Pre-Employment Transition counselor attends the potentially eligible student’s IEP meeting. During this meeting, the counselor explains how the student can benefit from VR services, the VR process, and documentation required for the student to apply for VR services.

The Pre-Employment Transition counselor facilitates a referral to the vocational rehabilitation counselor for transitioning from Pre-ETS to general VR.

**Age for Pre-Employment Transition Services**

Arkansas Rehabilitation Services has agreed to begin Pre-Employment Transition Services as early as age 14 through age 21.

2. Describe the current status and scope of the formal interagency agreement between the VR agency and the State educational agency. Consistent with the requirements of the formal interagency agreement pursuant to 34 C.F.R. § 361.22(b), provide, at a minimum, the following information about the agreement:

###### 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;

###### 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;

###### 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;

###### 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;

###### E. Coordination necessary to satisfy documentation requirements set forth in 34 C.F.R. part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and

###### F. Assurance that, in accordance with 34 C.F.R. § 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 C.F.R. § 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.

ARS has a Memorandum of Understanding with the Arkansas Department of Education, Division of Elementary and Secondary Education, Office of Special Education for students in public schools. The parties agree to participate in technical assistance and in-service training to assist educational agencies in planning and coordinating services to ensure eligible individuals receive timely and appropriate supports and services. ARS Transition policy requires counselors to engage school personnel to generate student referrals and to develop an IPE for each student determined eligible. ADE is financially responsible for the delivery and coordination of secondary education as set forth through IDEA. ARS is responsible for coordinating Pre-ETS services, initiating the VR application process, determining eligibility, and providing vocational rehabilitation services for individuals determined eligible for general VR services. The Memorandum of Understanding between the agencies was signed by the Department of Education, Special Education Unit on 12/13/17, by the ARS Commissioner on 1/11/18, and the Division of Services for the Blind on 1/30/18, effective 1/30/18 when the last party signed.

Consultation and Technical Assistance

To improve the transition of students with disabilities from school to postsecondary education and employment, ARS and DSB support the following transition services to vocational rehabilitation personnel, the Arkansas Department of Education, Division of Elementary and Secondary Education, Office of Special Education, and the local education agencies by:

* Providing instruction to vocational rehabilitation counselors, school transition personnel, and other persons supporting students with disabilities through group conferences, instructional materials and guidelines, reporting forms, webinar training, and telephone/email communications.
* Coordinating public speaking and training activities on transition services provided by local education agencies under IDEA.
* Developing model transition demonstration projects and establishing or supporting partnerships involving the local education agencies to achieve the goals of improved transition outcomes.
* Expanding Pre-ETS in schools throughout the State and at the Arkansas Career Development Center (ACDC). ACDC provides training and services to support VR clients and/or students with disabilities to successfully reach the milestones of their individual plans for employment.

ARS, LEAs, ADE, and VR service providers receive technical assistance and professional development from the National Technical Assistance Center on Transition: the Collaborative (NTACT: the Collaborative) on topics like implementing evidence-based practices and preparing graduates for success in postsecondary education and employment.

ARS provides eligibility determination according to ARS policy, and consultation and technical assistance to educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services when requested and appropriate. ARS counselors meet with special education teachers during the school year and provide information to schools about VR services, and ensure schools have appropriate forms and information for students to apply for services. ARS works with schools to assist the student with significant disabilities in identifying, selecting, and pursuing appropriate career objectives.

Partner high schools agree to work cooperatively with ARS to provide appropriate transition services to students to equip them for entry into the workforce, postsecondary education or training, and independent living. Schools carry out all required transition planning provisions mandated by the IDEA and state regulations, conduct regular staff development training regarding transition requirements and include ARS counselors in the training when appropriate, provide referrals to counselors, provide private space for counselors to meet with students, include counselors in students’ IEP meetings with authorization by parents or guardians and student knowledge, communicate regularly with counselors, and provide copies of school records.

ARS provides accommodations as needed to aid in successful completion of the vocational education program for VR eligible youth in accordance with their respective IPEs unless these accommodations are the responsibility of the LEA pursuant to Free and Appropriate Public Education (FAPE) regulations. ARS provides technical assistance to local education agencies to ensure all youth and students with disabilities have equal educational opportunities to participate in programs, activities, and job opportunities, and to analyze, identify, and change policies and activities that impede the achievement of equal opportunities for all individuals.

The Interagency Agreement between the Arkansas Department of Education, Special Education Unit – Arkansas Transition Services, Division of Career and Technical Education, and ARS defines each party’s responsibilities to ensure FAPE for eligible students, ages 16-21, and younger when appropriate, which are identified as having a disability in accordance with IDEA.

Arkansas Department of Education, Division of Elementary and Secondary Education, Office of Special Education, ARS, and DSB jointly agree to the following:

* The Arkansas Department of Education, Division of Elementary and Secondary Education, Office of Special Education is the agency responsible for ensuring that FAPE is made available to eligible students pursuant to IDEA (20 U.S.C. § 1412(a)(1).
* School districts have the primary planning, programmatic, and financial responsibilities for the provision of education transition services and related services for students as a component of FAPE and these services are provided to eligible students with disabilities, ages 16 to 21, and younger when determined appropriate through the implementation of the IEP. The parties acknowledge Arkansas Department of Education, Division of Elementary and Secondary Education, Office of Special Education has general supervisory responsibility over the educational program of any public agency providing FAPE to individuals with disabilities, ages birth to 21, as defined in state and federal statutes.

The distinction between transition and related services that are the planning, programmatic, and financial responsibility of the school district is determined based on a delineation of the customary services the school provides under IDEA Part B. These distinctions describe the activities, supports, and funding ARS provides to support Pre-ETS in partner school settings or during the school day.

ARS is financially responsible for providing Pre-ETS to students who meet the definition of students with a disability as defined by WIOA. ARS works cooperatively to ensure individuals with disabilities have access to the training and necessary supports to transition successfully from secondary school to postsecondary activities, including but not limited to vocational training and employment, and completing an IPE before leaving the school setting. ARS agrees the student and/or designated party has informed choice in the development of the IPE.

ARS counselors attend IEP and transition planning meetings, career fairs, back to school nights, group orientations, and transition fairs, and make presentations to schools and families throughout the year with partner agencies like Arkansas Transition Services, Department of Youth Services, Department of Human Services, Adult Education, Workforce Services, and the Division of Services for the Blind. ARS collaborates with partner agencies through shared recruiting and the application processes for special programs outreach. These outreach efforts provide creative programs like the Youth Leadership Forum, the Inclusion Film Camp, the Transition Employment Program, and the Work-based Learning Opportunities Leading to Future Employment to identify students and get them interested in work and in participating in the full array of transition services. ARS goes directly to educational settings in Department of Youth Services facilities, where youth who are at-risk are identified and provided Pre-ETS and are given an opportunity to apply for full vocational rehabilitation services. ARS provides brochures and introductory meetings to explain available services for youth seeking competitive-integrated employment outcomes.

Transition stakeholders and partners participate in NTACT: the Collaborative’s sponsored capacity building activities, such as *The Capacity Building Institute* and related regional and/or national meetings. Arkansas utilizes a state implementation team to support personnel development opportunities for Arkansas educators and service providers. The implementation team participates in data review, problem solving, and strategic planning that informs personnel development opportunities.

**Number of Potentially Eligible in the State**

Each school year, ARS requests data from the Arkansas Office of Information Technology that provides a total count of students, aged 16-21, on Individual Education Plans and on 504 plans within the Arkansas public school system.

**Set-aside Process for Authorized Activities**

Each state fiscal year, ARS utilizes the technical assistance centers’ guidance formulas for determining the total amount of funds that can be expended on authorized activities. First, the total number of students with disabilities in the state which includes those students eligible for the VR program as well as those “potentially eligible” students with disabilities is determined using data collected from the Arkansas Department of Education Statewide Information System. Next, ARS determines the number of students with disabilities that need pre-employment transition services (required and coordinated activities) and subtracts the percentage of those who are not receiving services. ARS then finds the cost per student on coordination and core services using expenditures from the prior fiscal year. Funds used on auxiliary aids and services (34 CFR 361.65(a)(3)(i)) needed by a student with a disability to access pre-employment transition services are applied to the cost per student for coordination and core services. The cost of the following services used to support eligible students to receive core Pre-ETS services are also factored into the cost per student: transportation, assessment, maintenance, PCA services, rehabilitation technology, family services, and coaches for work-based learning. Next, ARS multiplies the cost per student by the total number of potentially eligible individuals. This amount is subtracted from the funds reserved from the VR grant for the provision of Pre-ETS. If the result is negative, ARS focuses on core and coordination activities, without expanding to authorized activities. If the amount is positive, then ARS moves to authorized activities. In all events, ARS ensures the state-wideness of the program in the provision of required activities, provides core services directly from counselors assigned to the public high schools in each school district to provide direct services, and provides fee-for-service vendors throughout the state to offer core services.

**Pre-ETS Students and Section 511**

1. ARS has developed a subminimum wage flow process and forms located on the ARS shared drive. If a youth with a disability is seeking subminimum wage and has completed secondary education and is 24 years old or younger, he/she cannot start working for less than minimum wage until he/she has had the opportunity to:  
    A. Receive Pre-employment transition services under WIOA, or  
    B. Transition services under the Individuals with Disabilities Education (IDEA)  
    C. Applied for ARS services, in accordance with 34 CFR 361.41(b), and determined—  
         i. Ineligible for vocational rehabilitation services in accordance with 34 CFR 361.43;  
        ii. Eligible for vocational rehabilitation services, in accordance with 34 CFR361.42; and  
             a. The youth with a disability had an approved individualized plan for employment, in accordance with 34 CFR 361.46; and  
             b. The youth with a disability was unable to achieve the employment outcome specified in the individualized plan for employment, as described in 34 CFR 361.5(c)(15) and 361.46, despite working toward the employment outcome with reasonable accommodations and appropriate supports and services, including supported employment services and customized employment services, for a reasonable period of time; and  
             c. The youth with a disability’s case record, which meets all of the requirements of 34 CFR 361.47, is closed.
2. ARS has a contract in place to ensure that youth with disabilities receive career counseling, and information and referrals supports designed to enable the individual to explore, discover, experience, and attain competitive integrated employment.

**Section 511 Documentation and Assurances**

Once ARS determines a student cannot benefit from services leading to competitive integrated employment in the community, the following is provided to the student before he/she leaves the school setting:

1. Documentation of the completion of appropriate pre-employment transition services and/or transition services (ARS Transition Form 511/SMW-1).
2. Documentation from the appropriate school personnel responsible for the provision of transition services to the VR counselor of the receipt of transition services under IDEA. This documentation must be provided to the VR counselor when a case is opened and may include a copy of the IEP and progress reports on transition services received.
3. Documentation of the application of VR services with the result that the student was either determined ineligible for VR services or determined eligible and had an approved individualized plan for employment but was unable to receive the employment outcome and the case was closed.
4. Documentation from VR of receipt of career counseling and information and referral to other federal and/or state programs. This is completed using ARS Transition Section 511 SMW-2 form Career Counseling, Information and Referral, Student/Youth Services.
5. Documentation of the refusal of services; ARS Transition Section 511 SMW-3 form completed for those students, parents, and guardians that refuse services.

The following assurances are in effect:

1. The SEA nor the LEA will enter into an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purposes of operating a program in which students or youth with disabilities are paid subminimum wage.
2. Before a 14(c) entity may begin compensating a youth with a disability at subminimum wage, the youth must complete Pre-Employment Transition Services through VR or the youth must present documentation showing completion of transition services under IDEA from the school system.
3. The LEA will refer a student with a disability known to be seeking subminimum wage employment to the VR program prior to referring that student to a subminimum wage program.

#### k. Coordination with Employers

The Business Engagement Unit (BEU) is responsible for employer outreach. The BEU builds relationships with industry leaders through Chambers of Commerce, local Workforce Development Boards, personal business visits, career expos, and/or job fairs to identify and provide solutions to assist businesses in overcoming the challenges of recruiting, retaining, and developing talent, and provides disability awareness and sensitivity training. The BEU provides counselors with information about labor market, job vacancies, skills necessary to obtain jobs in high demand occupations, and earning potential and advancement opportunities in various occupations to increase opportunities for achieving competitive integrated employment.

The BEU markets ARS to businesses and community members to increase awareness of ARS services to businesses, people with disabilities, and community partners.

The AT@Work and Stay-at-Work/Return-to-Work programs are designed to assist ARS clients and referring vocational rehabilitation counselors in selecting and obtaining the appropriate assistive technology to facilitate the achievement of the clients’ established vocational goals and attain successful, competitive integrated employment outcomes. Services through the AT@Work program include assistive technology and accommodation evaluation and assessment, assistive technology device selection and procurement, training and technical assistance, and occupational abilities assessments. These services are primarily directed as it relates to education, school, training programs, vocational and technical education programs, and job retention efforts. AT@Work is a statewide program staffed by occupational therapists and an accommodations specialist.

The SAW/RTW program is designed to provide support to employers and employees when an employee is experiencing an injury or illness that results in a disabling condition, inhibiting the employee from remaining at work or returning to work as soon as it is safe and medically feasible. Program staff include a SAW/RTW coordinator and an administrative assistant. They can also recruit the assistance of evaluation staff located in the AT@Work program.

SAW/RTW provides access to professionals who have expertise in the areas of: vocational counseling to assist an employee in the process of adjusting to a disability and the importance of remaining positive as it relates to stay-at-work/return-to-work efforts; specialized vocational assessments that help identify an employee’s vocational strengths and weaknesses as it relates to successful job performance; job site assessment to determine how an employee’s presenting disability interferes with task performance and with the identification of potential modifications to the work environment; job analysis to identify the specific functions of a job and the mental and/or physical requirements needed for successful job performance; and individualized employee training regarding the correct use of any new technology or equipment introduced to assist in work performance. Staff can also provide general ergonomic assessments and training targeted toward employees in jobs that may present the likelihood of occurrence of injury or illness that leads to disability.

The SAW/RTW coordinator works with the employee and the employer to develop a SAW/RTW plan that, if required, addresses the need for accommodation in the workplace; identifies successful performance indicators with employer assistance; outlines the process to return or maintain the employee’s employment; or after investigation may determine potential assignments for transitional employment.

ARS provides and/or procures transition services including Pre-ETS for students and youth with disabilities through community rehabilitation programs and local education agencies that place students into paid work experiences with employers throughout the state depending on the vocational interests of the student or youth. Pre-ETS counselors, vendors, and school-based providers, facilitate opportunities in group settings and individually with job exploration counseling, work-based learning experiences, and workplace readiness training. Employers are contracted to provide on-the-job training experiences, job placement, supported employment, and customized employment opportunities. ARS provides assistive technology assessments and training to assist students transitioning from school to postsecondary training or to work.

#### l. Interagency Cooperation with Other Agencies

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

ARS is the lead agency for the Arkansas Assistive Technology (AT) program. AT initiatives supported through the Increasing Capabilities Access Network (ICAN) program include device demonstration, loan, and reutilization activities.

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

ARS has no cooperative agreements with programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture. The ARS field program provides information and contact names to potential clients that may qualify for SNAP benefits. ARS field offices collaborate with local SNAP liaisons to provide updates to field staff on SNAP processes.

##### 3. Non-educational agencies serving out-of-school youth;

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

* Arkansas Workforce Development Boards (state and local)
* Governor’s Council on Developmental Disabilities
* Behavioral Health Planning and Advisory Council
* SoundStARt
* The Arkansas Independent Living Council
* The Governor’s Commission on People with Disabilities
* Arkansas Trauma Rehabilitation Program
* Arkansas Apprenticeship Coalition
* Disability: IN – Arkansas

##### 4. State use contracting programs;

ARS has no state use contracting programs.

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

The Arkansas Department of Human Services operates the State Medicaid program. ARS, the State Medicaid program, and other agencies have in place a MOU that delineates roles and responsibilities related to referrals and sequential funding for combined waiver programs for individuals participating in employment related activities under WIOA.

##### 6. State agency responsible for providing services for individuals with developmental disabilities;

The Department of Human Services – Division of Developmental Disabilities Services (DDS) is responsible for providing services to individuals with developmental and intellectual disabilities. ARS, DDS, and other agencies collaborate as members of the APSE Association and the Employment First Committee initiatives. ARS, DDS, and the other agencies have in place a MOU that delineates roles and responsibilities related to referrals and sequential funding for combined waiver programs for individuals participating in employment related activities under WIOA.

ARS determines eligibility for vocational rehabilitation. All parties may refer common customers for work incentives benefits counseling. ARS assures statewide coverage for the provision of ARS-funded VR, employment first, and supported employment services and programs. ARS funds services leading to competitive integrated employment for eligible individuals referred to ARS. ARS notifies the appropriate party representative who can arrange for long-term supports to maintain competitive integrated employment after ARS-funded job supports end. ARS assists DDS in planning, designing, and budgeting for new programs/services or modifications to existing programs.

7. State agency responsible for providing mental health services; and

The Department of Human Services – Division of Adult, Aging and Behavioral Health Services (DAABHS) is responsible for providing mental health services. ARS, DAABHS, and other agencies have in place a MOU that delineates roles and responsibilities related to sequential funding for combined waiver programs for individuals participating in employment related activities under WIOA. DAABHS offers very limited employment service opportunities. The funding source for Medicaid Waiver services is through the PASSEs.

ARS determines eligibility for vocational rehabilitation. All parties may refer common customers for work incentives benefits counseling. ARS assures statewide coverage for the provision of ARS-funded VR, employment first, and supported employment services and programs. ARS funds services leading to competitive integrated employment for eligible individuals referred to ARS. ARS notifies the appropriate party representative who can arrange for long-term supports to maintain competitive integrated employment after ARS-funded job supports end. ARS assists DAABHS in planning, designing, and budgeting for new programs/services or modifications to existing programs. ARS provides training and technical assistance to the PASSEs regarding supported employment services.

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

ARS collaborates and coordinates services with federal, state, and local agencies that contribute to the vocational rehabilitation and independent living of Arkansans with disabilities.

* Arkansas Department of Education, Division of Elementary and Secondary Education, Office of Special Education – Arkansas Transition Services - ARS provides Pre-ETS and Transition services, and technical assistance and consultation to ADE-SE personnel. ARS designates personnel as liaisons with LEAs and informs LEA personnel, students, and families about VR eligibility requirements, the application process, and the scope of services available to all eligible and potentially eligible individuals.
* Department of Human Services - Division of Adult, Aging and Behavioral Health Services, Working Disabled Medicaid Program, and Division of Developmental Disabilities Services.
* Community Rehabilitation Programs Developmental Disability Providers -ARS contracts with CRPs for job placement and supported employment services and offers yearly training on topics such as the discovery process.
* Supported Employment Vendors - ARS contracts with SE vendors to provide supported employment services and offers training topics such as the discovery process.
* Arkansas APSE - ARS is a member of Arkansas APSE and assumes an active role in the planning and execution of the Arkansas APSE conference held every other year.
* Social Security Administration Ticket to Work - ARS participates in the SSA Ticket to Work Program and engages with Employment Networks within Arkansas and across the United States.
* Arkansas Spinal Cord Commission - ARS sends and receives referrals for individuals that can potentially benefit from services provided by the Spinal Cord Commission.
* Centers for Independent Living - ARS is the DSE for the Arkansas Independent Living program and provides technical assistance to the CILs and SILC in the development of their state plan and in the completion of the annual report.

##### 9. Other private nonprofit organizations.

* ACCESS Group, Inc. Project SEARCH® sites:

1. UAMS -Little Rock
2. ACH – Little Rock
3. CHI St. Vincent – Hot Springs
4. Mercy Hospital – Fort Smith
5. St. Bernards Regional Medical Center – Jonesboro
6. Ouachita County Medical Center – Camden
7. UAPB – Pine Bluff

* Friendship Community Cares, Inc.

1. Saint Mary’s Regional Medical Center – Russellville
2. Embassy Suites NW – Rogers

The ARS director of Transition Services is the statewide coordinator for Project SEARCH®. The coordinator recruits host businesses and markets the program. The coordinator and counselors connect participants to benefits counseling and other trainings. Counselors determine VR eligibility, participate in interviews and assessments of applicants, attend monthly steering committee meetings, and participate in employment planning meetings for each of their clients/participants.

#### Assurances

| The State Plan must include |
| --- |
| 1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act. |
| 2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140. |
| 3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: |
| 3.a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act. |
| 3.b. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. |
| 3.c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act. |
| 3.d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3). |
| 3.e. as applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. |
| 3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. |
| 3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. |
| 3.h. the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act. |
| 3.i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act. |
| 3.j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act. |
| 3.k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act. |
| 3.l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A). |
| 3.m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act. |
| 4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will: |
| 4.a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act. |
| 4.b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act. |
| 4.c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act. |
| 4.d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act. |
| 4.e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act. |
| 4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act |
| 4.g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act. |
| 4.h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act. |
| 4.i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs. |
| 4.j. With respect to students with disabilities, the State, |
| 4.j.i. has developed and will implement, |
| 4.j.i.A. strategies to address the needs identified in the assessments; and |
| 4.j.i.B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and |
| 4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113). |
| 4.j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services. |
| 5. Program Administration for the Supported Employment Title VI Supplement to the State plan: |
| 5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act. |
| 5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act. |
| 6. Financial Administration of the Supported Employment Program (Title VI): |
| 6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(H) and (I) of the Rehabilitation Act. |
| 6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act. |
| 7. Provision of Supported Employment Services: |
| 7.a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act. |
| 7.b. The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act. |

Do you attest that these assurances will be met?  
Yes

#### Vocational Rehabilitation (Combined or General) Certifications

##### 1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by title IV of WIOA[1], and its State Plan supplement under title VI of the Rehabilitation Act;

###### Enter the name of designated State agency or designated State unit, as appropriate

Arkansas Rehabilitation Services

##### 2. In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (designated State agency or the designated State unit when the designated State agency has a designated State unit)[2]agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[3], the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations[4], policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;

###### Enter the name of designated State agency

Division of Workforce Services

##### 3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency, or the designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the administration of the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[5], the Rehabilitation Act, and all applicable regulations[6], policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;

##### 4. The designated State unit or, if not applicable, the designated State agency has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c);

##### 5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

##### 6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

##### 7. The (enter the name of authorized representative below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;

###### Enter the name of authorized representative below

Joseph Baxter

##### 8. The (enter the title of authorized representative below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;

###### Enter the title of authorized representative below

Commissioner, Arkansas Rehabilitation Services

##### 9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

##### Footnotes

##### Certification Signature

| Signatory information | Enter Signatory information in this column |
| --- | --- |
| **Name of Signatory** | Joseph Baxter |
| **Title of Signatory** | Commissioner, Arkansas Rehabilitation Services |
| **Date Signed** | February 29, 2024 |

#### Vocational Rehabilitation Program Performance Indicators

| Performance Indicators | PY 2024 Expected Level | PY 2024 Negotiated Level | PY 2025 Expected Level | PY 2025 Negotiated Level |
| --- | --- | --- | --- | --- |
| Employment (Second Quarter After Exit) | 64.0% | 64.0% | 65.0% | 65.0% |
| Employment (Fourth Quarter After Exit) | 63.0% | 63.0% | 65.0% | 65.0% |
| Median Earnings (Second Quarter After Exit) | $6,800 | $6,800 | $6,870 | $6,870 |
| Credential Attainment Rate | 35.5% | 36.5% | 36.0% | 37.5% |
| Measurable Skill Gains | 57.5% | 58.5% | 58.0% | 59.0% |
| Effectiveness in Serving Employers | Not Applicable [1](#footnote-1) | Not Applicable [1](#footnote-1) | Not Applicable [1](#footnote-1) | Not Applicable [1](#footnote-1) |

*1*

*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

#### GEPA 427 Form Instructions for Application Package - Vocational Rehabilitation

##### 1. Describe how your entity’s existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

Arkansas Rehabilitation Services' (ARS) mission is to prepare Arkansans with disabilities to work and lead productive and independent lives. ARS is governed by rules and regulations as outlined by the reauthorization of the Rehabilitation Act of 1973 included as part of the Workforce Innovation and Opportunity Act. Enacting state legislation indicates the policy and scope of ARS shall be to provide increased employment of individuals with disabilities through the provision of individualized training, independent living services, educational and support services, and meaningful opportunities for employment in integrated work settings to maximize employment, economic self-sufficiency, independence, and integration into society. Pursuant to this, rehabilitation services shall be provided to individuals present within the state and the rehabilitation plan adopted shall be in effect in all political subdivisions of the state. Consistent with ARS policy, program eligibility requirements will be applied in compliance with Titles VI and VII of the Civil Rights Act, The Americans with Disabilities Act, and without regard to age, religion, disability, sex, race, color, or national origin. Eligibility requirements are applicable without regard to the particular service need or anticipated cost of services required by an applicant or the income level of an applicant or applicant’s family. ARS does not impose a residence duration requirement.

##### 2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

The most recent Comprehensive Statewide Needs Assessment identified barriers to populations ARS serves, specifically individuals with disabilities including those with significant disabilities and individuals with disabilities who are unserved or underserved. Barriers identified were specific to an individual or population but could also be common to other individuals or populations within the state. They include such things as lack of adequate transportation, lack of technology access, lack of or difficulty accessing programs, social biases, or communication/language barriers. ARS is also confronted with the barrier of adequate staffing as is common with a significant number of other state vocational rehabilitation programs. It includes both the hiring of qualified staff and staff retention.

##### 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?

While specific barriers might affect other populations, ARS can only address such barriers on an individual basis consistent with the implementation of an Individual Plan for Employment. Barriers faced by individuals not eligible for ARS services would require intervention by another program or through a local or state government initiative.

As to staffing, ARS understands that part of the issue is pay. It is anticipated that a labor market survey will be completed to determine adequate compensation. If the need for additional compensation is indicated, ARS will request assistance from the Office of Personnel Management to determine how to proceed with implementation. ARS also recognizes that making sure that staff are sufficiently trained to do their job well can be an issue. This will be addressed as part of the implementation of our new electronic case management system.

As part of counselor training the importance of identifying barriers to employment is, and will continue to be, a major emphasis, specifically as part of the IPE development process. Services identified on the IPE should include what a client needs to achieve their agreed upon vocational goal. Examples could include services that help address barriers such as a lack of adequate transportation, lack of technology access, communication/language barriers, and difficulty accessing other programs that support the achievement of the client’s vocational goal.

##### 4. What is your timeline, including targeted milestones, for addressing these identified barriers?

ARS will address barriers for individuals eligible for services throughout the life of the Individual Plan for Employment, which may continue beyond the new state plan time frame.

ARS is currently working to resolve the staffing issues; however, the labor market survey will be completed after July 1, 2024, and before the end of program year 2025. ARS will evaluate the staff training issues before the two-year state plan update, which will begin as soon as the new case management system is in place.

#### 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.

Arkansas Rehabilitation Services' (ARS) mission is to prepare Arkansans with disabilities to work and lead productive and independent lives. ARS is governed by rules and regulations as outlined by the reauthorization of the Rehabilitation Act of 1973 included as part of the Workforce Innovation and Opportunity Act. Enacting state legislation indicates the policy and scope of ARS shall be to provide increased employment of individuals with disabilities through the provision of individualized training, independent living services, educational and support services, and meaningful opportunities for employment in integrated work settings to maximize employment, economic self-sufficiency, independence, and integration into society. Pursuant to this, rehabilitation services shall be provided to citizens throughout the state and the rehabilitation plan adopted shall be in effect in all political subdivisions of the state. Consistent with ARS policy, program eligibility requirements will be applied in compliance with Titles VI and VII of the Civil Rights Act, The Americans with Disabilities Act, and without regard to age, religion, disability, sex, race, color, or national origin. Eligibility requirements are applicable without regard to the particular service need or anticipated cost of services required by an applicant or the income level of an applicant or applicant’s family. ARS does not impose a residence duration requirement.

##### 2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

The most recent Comprehensive Statewide Needs Assessment identified barriers to populations ARS serves, specifically individuals with disabilities including those with significant disabilities and individuals with disabilities who are unserved or underserved. Supported employment (SE) clients fall into the unserved or underserved category. Barriers for SE individuals include lack of SE providers, lack of adequate staffing regarding job coaches, and lack of adequate training of job coaches. Since Covid, the Section 511 participants who were enrolled in a program no longer attend or are not interested in working at this time. ARS recognizes that we lag regarding our percentage of SE closures.

##### 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?

ARS has set a goal to increase successful employment outcomes utilizing Community Rehabilitation Program and Supported Employment vendors. ARS has set a priority to reach the national average for supported employment closures by PY2027 and had identified eleven strategies to accomplish this goal.

As part of counselor training the importance of identifying barriers to employment is, and will continue to be, a major emphasis, specifically as part of the IPE development process. Services identified on the IPE should include what a client needs to achieve their agreed upon vocational goal. Examples could include services that help address barriers such as a lack of adequate transportation, lack of technology access, communication/language barriers, and difficulty accessing other programs that support the achievement of the client’s vocational goal.

##### 4. What is your timeline, including targeted milestones, for addressing these identified barriers?

The timeline for strategy implementation is identified within goal five, priority one. Some of the key milestones include:

* By 2025, ARS plans to reduce time from vendor referral to IPE development and service initiation.
* By 2026, ARS will have revised policies and procedures and will have convened partners to identify, share, and promote SE services.
* By 2027, ARS will provide training opportunities to providers and staff and research digital technology innovations for supported employment and supports.