

MINNESOTA
VR PORTION OF THE COMBINED STATE PLAN
PYS 2024-2027

**PROGRAM-SPECIFIC REQUIREMENTS FOR STATE VOCATIONAL REHABILITATION
(COMBINED OR GENERAL)**

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

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:

Select A or B:

(A) is an independent State commission

(B) has established a State Rehabilitation Council

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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.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	1	11/2023
Parent Training and Information Center	1	11/2023
Client Assistance Program	no term limit	05/2020
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	1	2/2022
Community Rehabilitation Program Service Provider	vacant	
Business, Industry, and Labor	vacant	
Business, Industry, and Labor	1	2/2022

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Business, Industry, and Labor	1	2/2022
Business, Industry, and Labor	1	11/2023
Disability Advocacy Groups	1 + 1 seat vacant	12/2023
Current or Former Applicants for, or Recipients of, VR services	2 2 1 + 1 seat vacant	01/2023 05/2020 12/2023
Section 121 Project Directors in the State (as applicable)	No term limit + 1 seat vacant	5/2020
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	1	11/2023
State Workforce Development Board	2	1/2023
VR Agency Director (Ex Officio)	No term limits	

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.

Currently, 6 of the 13 voting members disclose a disability. We strive to meet the requirement of 50% or greater representation by individuals with disabilities. The recent end of terms for a couple of members caused us to dip below that mark. The State Rehabilitation Council has made recommendations to the Governor's office staff for current vacancies that would put the council back into compliance. We expect those appointments to be made in the next month.

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.

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 Minnesota State Rehabilitation Council-General meets as a full council 10 times per year. Each meeting is planned to provide its members with education about VRS programs and projects, as well as to inform the council on status and trends. Much of the input from the SRC comes through dialogue that occurs during meetings and are captured in meeting minutes.

- Public Awareness was identified as an area of focus so the individuals we serve reflects the population of the State of Minnesota. During meetings held specifically around this topic and analysis of the Comprehensive Statewide Needs Assessment, the SRC identified the following underserved populations for which there should be additional outreach efforts.
 - Late diagnosed individuals with autism
 - Students in a virtual school setting, private schools and home schooled
 - Individuals who identify as Black, Indigenous, or People of Color
- Following analysis of VRS efforts around staff recruitment and retention, the SRC made recommendations around maintaining internal talent.
 - Improve recruitment efforts and application process for VR positions
 - Develop internal business resource groups
- During an annual review of community partnerships, the following recommendations were made to bolster relationships with external partners:
 - Ensure statewide coverage of community partners
 - Train providers on customized employment
 - Continue to build strong relationships with tribal nations
 - Educate employers about supporting employees with disabilities at all levels
 - Reach out to business DEI divisions and talent managers more frequently
 - The job coach shortage was identified as critical
- The SRC provided input during a focused session on the application to eligibility process at the April 2023 meeting.
 - Recommendations to improve services in general:
 - Involve youth and adults with disabilities in decision making
 - Ensuring consistent benefits coaching for participants
 - Recommendations to improve the application to eligibility process:
 - Improve communication and make it simple to understand
 - Develop an online portal for participants to track application status online

- Make paperwork as painless as possible
- The SRC approved the opening of Category 4 at its June 2023 meeting.
- The SRC approved a moratorium on Consumer Financial Participation (CFP) at its June 2023 meeting, to be re-evaluated in March 2024.
- Reducing ethnic/racial disparities in service provision and outcomes was identified as a top priority in January 2023.
- The SRC would like VRS to explore the relationship between credential attainment of measurable skills gains (MSGs) and employment outcomes.
- At its October 2023 meeting, the SRC approved the purchase of virtual reality goggles for each VRS office to be used for career exploration. The council also suggested using them for skill verification in the discovery process.

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.

List each recommendation/input followed by the VR agency response

- Provide additional outreach efforts to identified groups.
 - VRS Response: VRS recognizes the need to provide additional outreach efforts to the groups identified as underserved in the CSNA and plans to bolster efforts in this area. A Communications & DEI Manager was hired to lead this work. VRS is very focused on building a workforce that best represents the participants we serve. VRS is actively hiring more employees with disabilities to fill open positions including through the C700 State of Minnesota Disability Hiring initiative. The C700 program ensures a non-competitive interview for people with disabilities who have a C700 certification through the State of Minnesota. Once on board, the C700 candidate has up to 700 hours to demonstrate their ability to meet the essential job functions. VRS is also building a workforce that represents BIPOC and 2SLGBTQIA participants through hiring efforts that include creative and expansive recruitment efforts. VRS works closely with our DSA Human Resources Specialists who are connected to an expansive array of marketing options to reach underrepresented communities. VRS recognizes that many underserved groups are hesitant to work with the government or consider entering a government building. VRS developed an In-Home Services workgroup to discuss, develop, pilot and implement training and guidance for VRS staff to meet with participants in their home. VRS' goal is to expand the meeting location options for staff to meet with participants in order to create more person centered options, including where they are most comfortable.
- Improve recruitment efforts and application process for VR positions.
 - VRS Response: VRS has made great improvements in this area already through a number of measures, including:
 - Resources
 - Hiring dedicated HR recruitment/hiring staff – 2 for VRS in centralized agency

- Designating a dedicated HR liaison with VRS to streamline communications, maintain an organizational chart, track all positions and vacancies, and navigate the internal personnel transaction record system
- Process
 - Updating job posting language to remove VR jargon, with more plain language.
 - Using continuous postings versus time limited
 - HR is sharing an agency-wide weekly bulletin listing all job vacancies
 - HR created a landing webpage for DEED jobs, separated from all State of MN jobs
 - Reconsidered minimum qualifications, including degree requirements for some positions
 - Created an entry level Counselor role primarily to serve Pre-ETS
- Culture
 - VRS leaders hold weekly meetings with HR and share a digital workspace
 - Established telework/hybrid work environment and more flexibility
 - Initiated pay equity reviews
 - Initiated Pay Range Reassignment for multiple positions including counselors
 - Developed a staff engagement model utilizing focus groups
 - Are strengthening internal training and mentorship to develop skills and experience
 - Creating career pathways utilizing the existing classification pathways
- Monetary Incentives
 - Paid graduate level internships
 - Instituted hiring and referral incentives
 - Relocation expense reimbursement
 - Tuition reimbursement (75%) for VR graduate school courses
 - Achievement Awards
- Bolstered recruitment efforts

- Linked-in recruiting
 - Non-profit and free job boards
 - Career Fairs – Veterans, Disability, People of Color
- Develop internal business resource groups
 - VRS Response: VRS is not opposed to this suggestion but believes creation of business resource groups are best when they form organically. There is a general DEIA group that was created and formalized in the past year.
- Ensure statewide coverage of community partners
 - VRS Response: VRS is looking across the state to see where there are pockets without community partner choices. VRS is networking with staff, school personnel, and others in the field to encourage additional providers to become Community Rehabilitation Providers or Limited-Use Vendors. VRS is holding Community Rehabilitation Partner in-person meetings to ensure that VRS is listening and aware of the opportunities and challenges for Community Rehabilitation Providers. VRS is being intentional in setting expectations for VRS staff to be aware of and utilize vocational services available by providers that specialize in serving un-served and underserved populations.
- Train providers on customized employment
 - VRS Response: VRS continues to receive referrals of participants who are either earning or considering earning subminimum wages. Over 4,000 people continue to work in subminimum wages each year. This number does not include the hundreds of students VRS serves who have significant barriers to working in competitive, integrated employment. DEED-VRS partners with Minnesota State Operated Community Services (MSOCS) to deliver Minnesota Customized Employment (MN-CE) Training to interested providers statewide. Until FFY24, the customized employment trainers consisted of both Department of Human Services (DHS) and VRS employees. Participants were charged \$725 per person to attend training. VRS receipted these funds as program income and those dollars were used to pay for the wages and fringe benefits of VRS staff who conducted the CE training. VRS accounting used actual payroll data for the specific employees who were to conduct the training to determine a fee that would enable recovery of payroll costs as closely as possible. Beginning in FFY24, DHS assumed all costs for CE training, and VRS is not funding this training to providers at this time. This training is now offered at no cost to providers as an opportunity to engage more providers. MN-CE training is offered virtually at least three times per year. Each MNCE participant completes 9 training sessions, is connected to a “learning partner” who is a VRS participant in need of a Customized Employment Discovery process. MN-CE participants also receive mentoring hours to support the practical application learning and ensure that the learning partner has a completed CE-Discovery process. The MN-CE Training is Association of Community Rehabilitation Educators (ACRE) certified. Minnesota was the first state agency to become ACRE certified in Customized Employment. To provide Customized Employment services, Community Rehabilitation Provider practitioners must have completed ACRE certified Customized Employment training. In addition, the practitioner must pass a

Competency Review Process which includes a review of the completed CE Discovery document. VRS' Customized Employment Specialist utilizes a rubric to determine whether the CE practitioner meets standards.

- Continue to build strong relationships with tribal nations
 - VRS Response: VRS has recently renewed efforts to engage with tribal nations. Currently VRS' relationship with the White Earth nation is strong and effective. VRS' efforts to engage with the Red Lake Nation has been growing thanks to the efforts of Red Lake Schools teachers and VRS staff who are ensuring Pre-ETS and full-service VR are being provided to students. VRS' DSA has an American Indian liaison who is native. He has overall excellent relationship with many tribal nations in Minnesota. He has developed a process of communication with many of the tribal nations that is effective and respectful of tribal leaders' meeting expectations. VRS is meeting with the DSA tribal nation liaison to attend Tribal Nations meetings to share information about VRS. VRS is very interested in marketing its employment opportunities to the Tribal colleges as we are very interested in recruiting more native people to work for VRS.
- Educate employers about supporting employees with disabilities at all levels
 - VRS Response: VRS Program Specialists in Placement engage with employers on a regular basis and provide education on supporting employees with disabilities at all levels using tools like DEED's Disability inclusion: Bite-sized learning for employers modules and other disability resources. View here: <https://www.careerforcemn.com/disability-inclusion-bite-sized-learning-modules>
- Reach out to business DEI divisions and talent managers more frequently
 - VRS Response: VRS Program Specialists in Placement try to reach out to business DEI divisions on a regular basis to identify opportunities to partner.
- The job coach shortage was identified as critical
 - VRS Response: The workforce shortage of qualified disability employment services staff continues to be a significant challenge. VRS is in consistent communication with community rehabilitation providers regarding their workforce shortage challenges. One of the key challenges is having trained staff to deliver competent job coaching services. Community Rehabilitation Providers developed a job coach training prior to 2020, but the training has not been shared or provided. VRS is aware of another state VR program who developed a Job Coaching Training and will be exploring options to offer job coaching training to interested Community Rehabilitation providers.
- Involve youth and adults with disabilities in decision making
 - VRS Response: VRS continues to include participants in decision-making through its State Rehabilitation Council and focus groups. The VRS Youth Team is in planning stages to convene a youth advisory committee comprised of students/youth with disabilities.
- Ensuring consistent benefits coaching for participants

- VRS Response: VRS continues to include benefits coaching as an integral service to help individuals understand their benefits and the impact of work on benefits. This will be accomplished for staff by offering opportunities through both internal and external trainings and resources to support or increase their knowledge of SSA, state and local public benefits. This echoes the agency strategies and key messages listed on the MN HUB website (<https://disabilityhubmn.org/for-professionals/benefits-planning/get-ready/agency-strategies/#article-start>), which also includes an opportunity to join the MN benefit planning learning community. All MN VRS individuals identified as receiving SSA, state and local public benefits will be informed of the Benefit Planning and options for services. These options may include basic information up to a complete analysis of their benefits, reflecting their current state of the benefits to demonstrating the impact of earnings or other income on their benefits.
- Improve communication and make it simple to understand
 - VRS Response: VRS completed a comprehensive review of all printed materials in 2020 to ensure the use of plain language. This practice will be ongoing. Additionally, VRS will undertake a digital transformation in the upcoming year to ensure its programs and forms are more easily located and accessible to a wider audience.
- Develop an online portal for participants to track application status online
 - VRS Response: VRS appreciates this input and will be exploring the creation of an online portal in the upcoming year.
- Make paperwork as painless as possible
 - VRS Response: VRS completed focus groups with staff and the SRC to gather input and will be reviewing its application and other forms in the upcoming year to streamline. Some of the ideas generated include:
 - Aligning the order of fields on the paper application and the case management system to streamline data entry.
 - Only including required fields on the application to streamline the intake process.
 - Eliminating the need for participants to enter the same information on multiple forms
 - Creating a one-pager describing the application to eligibility process with easy-to-follow visuals
- The SRC approved the opening of Category 4 at its June 2023 meeting.
 - VRS Response: Category 4 officially opened, effective October 1, 2023.
- The SRC approved a moratorium on Consumer Financial Participation (CFP) at its June 2023 meeting, to be re-evaluated in March 2024.
 - VRS Response: The moratorium on CFP was effective July 1, 2023. VRS plans to watch data closely and re-evaluate with the SRC in March 2024.
- Reducing ethnic/racial disparities in service provision and outcomes.

- VRS Response: VRS agrees this is a priority area and is taking several measures to decrease disparities in service provisions and employment outcomes.
 - VRS initiated a workgroup called Vocational Rehabilitation Services Youth Equity Workgroup (VYEW) specifically to look at the ethnic and racial disparities in the numbers of students/youth that VRS serves, service provision, and outcomes. VRS is being intentional in taking steps to improve and increase the numbers of BIPOC students served, increasing the services they receive and increasing the number of employment outcomes that result. VYEW meets monthly to review and discuss key topics related to serving and supporting BIPOC students with disabilities, review metrics and make recommendations to the VRS Executive Leadership Team. VYEW is ongoing and the review of metrics is ongoing.
 - VRS is committed to hiring and retaining a diverse staff to better reflect the participants that we serve.
 - Diversity, Equity, Inclusion & Accessibility (DEIA) group was created and meets regularly.
 - DEIA manager was hired in 2023.
 - VRS has increased its training opportunities around serving underrepresented populations.
- Explore the relationship between credential attainment of measurable skills gains (MSGs) and employment outcomes.
 - VRS Response: VRS agrees this is an important area but thinks this may be better examined at a national level.

B. COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT (CSNA).

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

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;

Several initiatives are underway to serve individuals with the most significant disabilities. E1MN is Minnesota's state agency partnership to advance Employment First outcomes for youth (students) and adults with disabilities. The Minnesota Department of Human Services, Department of Education, and the Department of Employment and Economic Development work together to deliver a more seamless and timely employment support system. The second year of the E1MN initiative recently concluded. Over 3,100 individuals on a Medicaid waiver received Vocational Rehab Services/State Services for the Blind (VRS/SSB) services last year, an 18% increase from the first year. Over 550 of those individuals found stable employment, a 49% increase from the year prior. Nearly half of all individuals who exited from VRS/SSB did so successfully.

In the 2021 special legislative session, the Minnesota Legislature set up the Task Force on Eliminating Subminimum Wages (Task Force). The Task Force completed its legislative report in February 2023, including twenty recommendations. Some of the recommendations include: improving transitions between VRS/SSB and waiver services and increasing collaboration and opportunities for work experiences between schools and VRS/SSB. Between 4,000 and 4,800 Minnesotans earned subminimum wages in 2022, one of the highest rates of subminimum wage earning in the country. In 2022, Minnesota received a six year, \$13M Disability Innovation Fund (DIF) grant, to serve individuals working or contemplating working in subminimum wage jobs.

One area of need is adults with serious mental illness. Minnesota VR has seen a decrease in adults applying for VR services and a need for additional engagement and training for new staff.

B. INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES AND INDIVIDUALS WITH DISABILITIES WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

Minnesota has identified racial disparities in the percent of VR applicants who complete their employment plan. Among youth, Hispanic/Latino youth are well represented but Black/African American youth are slightly underrepresented. Under the E1MN initiative, a comparison of VR participants with a Medicaid waiver with the overall waiver population indicates that Black/African American and Asian adults are underserved.

C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE WORKFORCE DEVELOPMENT SYSTEM; AND

In Minnesota, the statewide workforce system is known as CareerForce. WIOA and state-funded employment programs collaborate to serve a diverse group of career-seekers. In particular, the Minnesota WIOA and state youth (student) programs serve a high percentage of young people with disabilities and have high employment outcomes. The area of greatest opportunity is to increase the number of individuals with a disability using general Wagner Peyser career services, and their employment outcomes.

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.

Youth and students are a growing percent of VR participants served in addition to serving potentially eligible students. Extensive coordination occurs with individual schools as well as the Minnesota Department of Education, under a memorandum of understanding and a branded initiative known as E1MN. Statewide, a large gap in post-secondary completion exists for students with a disability. Stakeholders identified the following underserved groups:

- Students with the most significant disabilities, who need work experiences
- Students with mental health issues
- Students who are learning remotely and are harder to connect with
- Students who are in institutions (mental health or chemical dependency)
- Students who move frequently
- Individuals with a late diagnosis of Autism (after school age) who have limited supports

- Students with disabilities who don't have an IEP

Additional systemic needs or barriers were identified, including:

- Rural and suburban youth, in particular, struggle with transportation
- Families require education and support, including mental health support
- Need for more job coaching, especially evenings and weekends
- Need for more specialists trained in mental/behavioral health, chemical dependency, and learning disabilities.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

Vocational Rehabilitation Services has the following areas of capacity building with its community rehabilitation partners:

1. VRS purchases placement and retention services through a Performance Based Agreement (PBA) structure that was implemented in 2004. VRS has made several adjustments to the PBA structure to increase compensation to providers, however the overall rate amount of the PBA structure has remained the same since 2009. Due to inflation, including significant increases in cost of staffing and transportation, Community Rehabilitation Providers struggle to find highly skilled placement specialists at the current PBA rates. As VRS looks to increase the number of individuals served in Minnesota and reach underserved communities, it must review its current payment structure to build capacity of skilled placement professionals ready to connect jobseekers and employers.
2. Another challenge is finding long term work site supports. VRS is a time limited service. VRS provides funding for job coaching services until the participant/employee no longer require intensive supports, however, long terms worksite supports, funded by Medicaid can continue indefinitely. Another workforce shortage challenge for Community Rehabilitation providers is the lack of staffing to support participant's ongoing worksite support needs. Funding is provided by Medicaid funding which is woefully inadequate to cover staffing costs. Unfortunately, the burden falls to the participant/employee/person and to VRS. VRS often continues to pay hourly job coaching hours to the community rehabilitation provider which is significantly higher than the Medicaid reimbursement rate.
3. There remains a great need to increase the resource of Benefit Planning (BP) to ensure the SSA beneficiaries in MN are aware of, including how to access, agencies in the MN BP network. In addition to the SSA beneficiaries, other support agencies, staff and the individual's family members often are not clear as to the local resources to help navigate the path of benefits. Lack of knowledge, or inaccurate shared information, can result in a negative situation of a possible overpayment and potential termination of benefits. Each benefit has its own set of rules which need to be followed to avoid negative or unplanned occurrence. Benefit planning helps identify the individual's specific benefit and what potential Work Incentives may be applicable for this person's situation. Transition aged students and their families often are not aware their work activities can have a potential impact on their SSA benefit. There is a need to engage students early in their receipt of SSA benefits and to re-engage often during their employment journey. A youth/student specific Work Incentive is often missed due to

lack of awareness. As MN moves towards the elimination of sub-minimum wage, many will choose a competitive employment option and there are not enough BP Coaches/Planners to meet the need in assisting individuals identify how their benefits will be affected by earnings.

4. In general, families and other caregivers would benefit from additional education and support to assist them to navigate systems of care, including the MNChoices Assessment, waiver services, Medical Assistance, and other public benefits. To advocate for and with individuals with disabilities, support for caregivers should address potential barriers such as low income, unemployment, mental health, transportation, language, and citizenship status, in addition to managing the complexity of these benefit systems.
5. VRS operates as the designated State unit in Minnesota. Due to circumstances within the State and consistent with the requirements of 34 C.F.R. § 361.29(a)(1)(ii), VRS has determined it necessary to engage in activities to establish, develop, or improve facilities for community rehabilitation programs (CRPs) (hereinafter “establishment projects”) in the State for the purpose of providing vocational rehabilitation (VR) services to applicants and eligible individuals, as well as pre-employment transition services to students with disabilities who are eligible or potentially eligible for the VR program. In assessing the need for establishment projects in the State, VRS has determined it may be necessary to incur capital expenditures to acquire equipment or improve field offices, which satisfy the definition of a CRP at 34 C.F.R. § 361.5(c)(7), in order to ensure the continuity of quality service delivery to individuals with disabilities seeking to receive services under the VR program. The State assures it will submit requests for prior written approval to RSA for those costs that exceed the capital expenditure threshold applicable to the State, or for any capital improvements necessary to ready the space for its intended use under the VR program, consistent with requirements set forth in 2 C.F.R. part 200.
6. VRS plans to purchase and implement the use of virtual reality goggles in one location in each of three regions of the state for career exploration. This program would be led and supported by VRS staff, primarily staff serving Pre-ETS students, though the costs will not be charged to the Pre-employment transition reserve.

C. GOALS, PRIORITIES, AND STRATEGIES

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

1. DESCRIBE HOW THE SRC AND THE VR AGENCY JOINTLY DEVELOPED AND AGREED TO THE GOALS AND PRIORITIES AND ANY REVISIONS; AND

VRS took into account all input from the SRC while developing its goals and priorities. The SRC Chair was present at the first review of the goals and priorities with VRS leadership. Additional input was offered at SRC’s September 2023 meeting, and the final draft was approved by the council at its December 7, 2023 meeting.

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.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

The Objectives describe our goals, and the Key Results are definable outcomes against which we measure our success on a 0-1 scale.

OBJECTIVE #1: PUBLIC AWARENESS – Expanding awareness of VR and its services to both adults and youth from the wider population of Minnesotans with disabilities who could benefit from services.

- Rationale for inclusion in the State Plan: We want to increase outreach to create greater awareness and serve more people. We intend to use renewed resources to reverse the trend of decreased applications which was accelerated by COVID, and to effectively counteract the message of previously closed categories. Minnesota’s VR program had been impacted by Order of Selection restrictions to varying degrees since 1998. In 2023, all categories were open for the first time in almost 25 years. Additionally, WIOA’s intense focus on the most significant disabilities resulted in less focus on other categories. Beginning in 2016, staff capacity and attention was also drawn to addressing Section 511 and new Pre-ETS services which reduced program resources available for the wider population of Minnesotans with disabilities.

1994 – Minnesota established its Order of Selection

1998 – Category 4 closed

2002 –2005 – Categories 2 and 3 closed

January 2004 – July 2005 – Category 1 closed

2011– Categories 2 and 3 closed

2014 – Waiting list cleared but Categories 2, 3 and 4 remain closed

2020 – Categories 2 and 3 opened

2023 – Category 4 opened

Key Result 1: VRS has increased the total number of applicants for services.

Supporting strategies:

- Research other state's rebranding strategies.
- Dedicate resources for targeted outreach.
- Develop more ways for people to engage with VRS services.

Key Result 2: VRS has an increased number of applicants from underserved youth and adult populations.

Supporting strategies:

- Dedicate resources for targeted outreach to expand public awareness.
- Increase the number of partner relationships to promote greater awareness of VR program resources.

Key Result 3: VRS has an increased number of applicants from the fuller range of disabilities including disability populations who may not be familiar with VR services.

Supporting strategies:

- Continue to gather data on Minnesotans with disabilities (500,000 people self-reporting/11% of population) to better understand and apply the information that's available.
- Dedicate resources for targeted outreach.
- Increase the number of partner relationships to promote greater awareness of VR program resources.

Key Result 4: VRS has an increased number of applicants/participants interested in career advancement.

Supporting strategies:

- Review and apply learning from other states' career advancement service models to benefit Minnesota.
- Shift the agency culture to one that moves beyond assisting participants in securing an initial job and embraces career long services.
- Dedicate resources for targeted outreach to employers and previous participants.
- Develop career advancement services information and materials to share with both participants and employers.
- Develop career advancement service training for staff.
- Promote the new Employer Reasonable Accommodation Funds (ERAF) program and connections with business engagement services in VRS.

OBJECTIVE #2: PEOPLE - Creating and sustaining a strong network of internal talent and external partners whose shared passion accelerates the delivery of seamless disability employment and independent living services.

- Rationale for inclusion in the State Plan:
 - Internal talent: Effective disability employment and independent living services require talented people - talent with special expertise, training, and experience to help people with disabilities achieve their competitive integrated employment hopes and dreams, and to help Minnesota prepare and employ a nimbler and more responsive workforce. In recent years, VRS has experienced increasing competition for high potential/high performing talent and this trend is likely to become even more challenging due to multiple factors including retirement demographics, fewer people entering the VR field, and other competing career options. VRS needs to continue to strengthen its ability to recruit, develop and retain talent and to better represent the full diversity of the communities we serve.
 - External partners: Partners provide a critical extension of staff expertise and capacity to provide essential VR services and help VRS meet the federal requirement of providing access to quality services throughout the state. Partners also enhance the diversity of populations and communities served with desired/needed services.

Key Result 1: VRS talent is well positioned to deliver services by maintaining 90% or greater staffing capacity.

Supporting strategies:

- Increase targeted recruitment. Hiring will prioritize recruiting and retaining staff that represent the diversity of the individuals and communities VRS serves.
- Continue to resource and fully utilize HR resources.
- Continue to explore hiring and retention incentives.

Key Result 2: Develop a team of highly effective VR professionals to increase employment outcomes and results for youth (students) and adults.

Examples of supporting strategies:

- Continue to enhance and standardize VRS talent onboarding and mentoring programs.
- Develop resources and training to support ongoing staff development and ensure delivery of quality services, including mentor training/structure, based on a person-centered practice.
- Review/analyze competencies for staff providing services, clarify expectations and create performance expectations and success measures.

Key Result 3: Improved retention of VRS talent to best represent the full diversity of the communities we serve.

Supporting strategies:

- Leverage the DEIA committee and consultants to identify strategies to enhance recruitment and retention.
- Provide and promote leadership, career development, and advancement opportunities.
- Develop and utilize stay surveys and exit surveys to learn more about reasons for staying or exiting the agency.

Key Result 4: Strengthen relationships with community partners to increase choice of providers and access to quality services.

Supporting strategies:

- Recruit new community partners: Services that are culturally informed, affirming, and appropriate to the served individual's lived experience.
- Increase capacity and retain Community Partners
- Facilitate relationship building between VRS Staff and Community Partners.

Key Result 5: VRS has increased the number of businesses providing paid work experience and employment opportunities for VR participants.

Supporting strategies:

- Position VRS as a trusted expert source of information and services on disability employment for businesses.
- Develop inclusive worksite training and certification for employers.
- Increase outreach and engagement with businesses to develop and grow our relationships with employers.
- Frame our outreach to businesses on the benefits of employing people with disabilities.
- Implement new resources such as ERAF to support employers.

OBJECTIVE #3: PROCESS - Customer-focused design drives improvement of our internal and workforce system processes.

- Rationale for inclusion in the State Plan: Leveraging insights gained from multiple sources including the Minnesota State Rehabilitation Council as well as a recent VRS participant survey, VRS is committed to simplifying what can be an overwhelming process for people seeking information and services from VRS and the broader workforce system. Continuous improvement priorities include supporting staff in effective design and delivery of person-centered services, engaging employees to improve processes such as the VRS application to eligibility experience, updating technologies, and modernizing tools and resources to better engage and serve more people through a wide variety of options. VRS is always actively researching, exploring, and implementing ways to make a greater impact.

Key Result 1: Increase customer satisfaction with VR processes.

Supporting strategies:

- Research and evaluate customer satisfaction approaches and techniques.
- Develop a comprehensive participant feedback process.

Key Result 2: Improve process and customer experience through digital transformation.

Supporting strategies:

- Evaluate and enhance the electronic interest form and rapid engagement workflow.
- Explore, evaluate, and recommend VRS technology enhancements for internal and participant use.
- Prioritize and implement initial round of VRS technology enhancements.

Key Result 3: Streamline, strengthen, and share a statewide VRS-school coordination process that ensures opportunity for students with disabilities.

Supporting strategies:

- Youth in Transition Toolkit (housed on Disability Hub MN), a set of resources for professionals serving students with disabilities
- Implement Workforce One (WF1) student tracking system
- Maintain and support the VRS Youth Equity Workgroup (VYEW) to address the inequities in service provision and outcomes for students with disabilities
- Create a Youth Council or platform to illicit feedback from those who received VRS services while students

Key Result 4: Increased interagency coordination and alignment among the broad network of partners to create a 'no wrong door' approach for individuals or employers engaging in the workforce system.

Supporting strategies:

- Continue to manage and collaborate through effective Memorandum of Understandings (MOUs) with key partners.
- As a member of the GWDB, effectively engage and coordinate with required WIOA partners for one stop comprehensive job opportunity centers around the state.

OBJECTIVE #4: PERFORMANCE - Achieving the goal of more jobs for more people and meeting our federal requirements with fiscal integrity.

- Rationale for inclusion in the State Plan: As Minnesota's VR general agency, VRS is entrusted with federal funds to improve the lives of people with disabilities. Increasing performance outcomes is an important way we demonstrate the relevance of our program and the positive impact that results from federal funding. We know the numbers and statistics reflect our ability to meet the needs of real people and businesses around the state. Performance measures help VRS staff and partners gauge our effectiveness in assisting people with all types of abilities and career goals to move forward with their career goals and to meet the needs of Minnesota's businesses. To further enhance our performance, VRS is studying data on Minnesotans with disabilities to better understand where we can have greater impact as an agency and as part of the greater system to promote and expand opportunities for people with disabilities. Finally, the rigor and complexity of compliance with both state and federal fiscal requirements and grant programs requires the highest level of fiscal integrity to ensure

the funds entrusted to VRS are fully utilized for the benefit of individuals with disabilities and communities throughout the state.

Key Result 1: Effective funds management based on customer data and trends for improved performance and federal compliance.

Supporting strategies:

- Forecast expected spending levels for staffing and case services.
- Utilize funds not spent on case services for strategic projects designed to improve employment outcomes for people with disabilities.

Key Result 2: Minnesota's moving towards becoming the national leader in the employment rate of people with disabilities.

Supporting strategies:

- Promote VR's role in employment for people with disabilities.
- Work with employers to create flexible job options customized for individuals with disabilities.

Key Result 3: Assess and understand disparities in service provision as identified in the Comprehensive Statewide Needs Assessment.

Supporting strategies:

- Train staff to recognize and understand implicit bias to reduce negative impacts on service delivery and experiences.
- Create mechanisms for applicants/students/participants/businesses to share feedback about their experience with VR and a platform to review and learn from that feedback.

Key Result 4: Improved effectiveness of Pre-ETS for potentially eligible and VR eligible students in order to increase successful employment outcomes.

Supporting strategies:

- Establish initial student performance benchmarks and identify best practices.
- Develop reports that are accessible to all staff for monitoring data quality and performance.
- Implement a communication plan to review data with internal and external stakeholders.
- Provide annual staff training and ongoing support for analyzing data and reports.
- Evaluate effectiveness of service provision and address system-wide disparities.
- Purchase and implement the use of virtual reality goggles in one location in each of three regions of the state for career exploration. This program would be led and supported by VRS staff, primarily staff serving Pre-ETS students.

D. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority,

applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

1. PROGRESS IN ACHIEVING THE GOALS AND PRIORITIES IDENTIFIED FOR THE VR AND SUPPORTED EMPLOYMENT PROGRAMS;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

GOAL 1. Provide quality services to youth (students) and adults with disabilities for exploration, development and advancement in careers.

Objective 1: Quality pre-employment transition services are provided to potentially eligible students

Key Results:

- Pre-ETS Representative data reports demonstrate that outreach is provided to every school district/charter school in Minnesota.
 - This data is not collected in our case management system. However, a list was developed and is updated twice yearly that identifies the lead special education teacher, the Pre-ETS Rehab Representative, and the Transition Counselor for every school in the state. This ensures continued collaboration and availability of Pre-ETS across the state.
 - VRS also added new positions to support this work with students:
 - A Youth Services Manager was hired to oversee Pre-ETS and activities for students.
 - Four Youth Specialists were hired to support the learning, mentoring and training of Pre-ETS Representatives and teams at a regional level. They have strong connections with the Department of Education, including at the state district and school levels to support the needs of students with disabilities.
 - Additional Pre-ETS Representatives were added to several teams across the state.
- Students and families are satisfied with the services they receive
 - Satisfaction surveys were given to students and families involved in Project Search.
 - Summary of results:
 - Number of sites evaluated in 2023: 6
 - Number of students who completed the survey: 12
 - Overall, 100% were somewhat or very happy with the help they received from the Provider Agency staff.
 - Number of parents/guardians who completed the survey: 15

- Overall, 72.5% were somewhat or very happy with the help their son/daughter received from the Provider Agency staff.
- Baseline is established and annual goals are established and met for numbers of students served
 - Goal setting for numbers served was greatly impacted by the pandemic. The numbers of potentially eligible and eligible students have recovered and increased since the pandemic. The graph below shows the number of new students who enrolled in services each year.

New Student Applications Served with Pre-ETS Services Each Year

Case Type	PY2017		PY2018	PY2019	PY2020	PY2021	PY2022
Potentially Eligible	530		729	906	389	842	1,013
Participant	2,101		1,925	1,577	1,391	1,606	1,626
Participant from P.E.	109		111	202	163	257	85

- VRS spent considerable time developing and implementing a Pre-ETS strategic plan
- Objective 2: Annual goals for numbers of students served were established
- - Compliance standards are established/defined via case reviews
 - Goal setting for numbers served was greatly impacted by the pandemic. However, we can point to the increase in the number of students being served over the past year, and in PY22, 60.3% of all participants served by VRS were youth between the ages of 15 and 24.
 - Participants are satisfied with the serves they receive
 - Progress in developing a comprehensive satisfaction survey were interrupted by the pandemic. VRS will be continuing this work with our updated goals/priorities.
 - Baseline is established and goals set for post-secondary education/training and obtainment of measurable skills gains
 - VRS eliminated Consumer Financial Participation (CFP) and anticipates supporting more people in post-secondary education.
 - MSG rates were negotiated with RSA
 - A system for measuring career advancement is established and annual goals are established and met

- VRS is aware of this need, especially with focus in the past few years on other populations, such as youth and individuals on Medicaid waivers, and recognizes more work needs to be done in this area.
 - Goals are established and met for statewide employment outcomes and job retention
 - Goal setting was greatly impacted by the pandemic. While youth tend to have a lower rate of employment at exit, they have overall higher employment performance outcomes at Q2 and Q4 after exit. For PY2022, performance results for youth were 910 successful exits with employment, 59.9% employment in Q2 and 61.5% employment in Q4. For PY2021, performance results for youth were 960 successful exits with employment, 57.6% employment in Q2 and 54.0% employment in Q4.

GOAL 2. Strengthen business engagement.

Objective 1: Connect VRS participants to competitive integrated employment

Key Results:

- Develop and utilize tools to be able to search VRS's talent pool to efficiently connect VRS's job seekers to job opportunities
 - We reviewed and evaluated tools and will be implementing Salesforce software for the DIF grant GoMN! pilot in 2024.
- Build new employer relationships and prioritize nurturing long-standing employer relationships statewide. Leverage Business Engagement Networks and opportunities to assist businesses with increased hiring needs
 - Business Engagement Networks continue to be the main way to connect our community partners and VRS staff to businesses who are interested in hiring people with disabilities.
 - VRS added three Business Engagement Specialist positions to ensure statewide connectivity.
- Increased competitive integrated employment outcomes.
 - VRS focused on increasing the number of 245D licensed providers in our network of providers to coordinate services and provide consistent support to increase competitive integrated employment outcomes for people on Medicaid waivers.
 - VRS and the departments of Education and Human Services collaboratively developed the employment first (E1MN) framework, which spells out which agency pays for what and when.
 - In the past year, VRS has increased its Pre-ETS Representative capacity, which has allowed us to have students considering employment options at a younger age. Early exposure and experiences result in higher success moving into competitive integrated employment.

Objective 2: Connect students with disabilities to work experiences

Key Results:

- A mechanism for tracking work-based experiences is established and baseline data is collected
 - Workforce One, VRS' client management application, is the mechanism for tracking work-based experiences. In 2023, VRS created a new report for staff to track the hours remaining on authorized work experience services. This report saves staff time and reduces errors. Close to 1800 individuals received a work experience service in FFY22, up 500 from FFY21.
- Develop and facilitate a disability employment collaborative to meet the needs of businesses
 - A business advisory council was never developed, due to disruption by the pandemic.
- Competitive work-based learning opportunities for students with disabilities
 - There has been a shift over the past few years away from in-house/enclave employment. With very few exceptions based on individual need, all of VRS work-based learning placements are competitive.
- Increased awareness about the benefits of hiring people with disabilities
 - VRS, along with some business representatives from Mayo Health System, developed "Bite-size Learning" modules that feature the benefits of hiring people with disabilities.
 - VRS is very active and engage businesses during National Disability Employment Awareness Month (NDEAM). In the most recent year, VRS and SSB hosted an event honoring 31 employers selected by VRS and SSB staff who are considered leaders by in employment of individuals with disabilities.

GOAL 3. Build a healthy organization in order to achieve our mission.

Objective 1: Fiscal stability

Key Results:

- Reduction in purchasing violations
 - Field Operations Specialists monitor the purchasing violations that occur in VRS. If an item or service has a cost, state agencies must first encumber (set aside) funds before entering into an agreement to purchase an item or a service. Common situations when an agreement to purchase occurs include: ordering goods, authorizing services, registering for training or conferences. Purchasing violations occur when an "Authorization/Work Order" is not completed prior to a service being performed.
 - Each time a violation occurs, staff must determine how the violation will be avoided in the future. There is also a statewide plan and recommendations on how to reduce purchasing violations, which will be implemented.

- VRS has made significant progress in reducing the number of purchasing violations, 195 in CY2023, compared with 205 in CY2022 and 311 in 2019.
- Fiscal dashboards created and monitored to make decisions AND Actual spending reasonably tracks budgeted amounts
 - VRS has developed a new position for a director of financial forecasting and evaluation, hired in November 2023.
 - Financial reporting is being developed using financial statement activity to identify sources and uses of funds, spending trends and future needs to analyze projected surplus/shortfalls.
 - The leadership team plans to share and communicate financials with all staff.
 - A financial strategies workgroup meets bi-weekly to review the reporting and plan projected spending.
- Full 15% of Federal award is spend on Pre-ETS
 - VRS exceeded the 15% spending for Pre-ETS for FFY2023. We also have a stable plan to continue to meet the 15% requirement. Approximately 25% of the federal award was spent on qualifying pre-ETS expenditures during FFY2023.

Objective 2: Employee engagement

Key Results:

- Staff burden is reduced through technology development
 - There was a shift for all staff (n=422) to a hybrid work environment.
 - All staff now have a laptop bundle for portability.
 - All staff can work remotely and plug into a universal docking station in their primary work location.
 - iPhones – 393 total in rotation for staff
 - iPhone Replaced Project in Phase 1 - 104
 - iPhone Projected Replacement in Phase 2 - 142
 - 144 Portable Printer and Scanners – support roles and transition counselors in schools have portable printer/scanners for working remotely.
 - A mobile app for VRS' case management system was developed and released, available to staff and customers.
 - Electronic signature functionality was built into the case management system.
 - WF1 implemented the e-signature with AdobeSign for most common documents to give greater portability in obtaining signature from participants without having to print documents.
- Staff are trained in conflict resolution

- All new staff are trained in Motivational Interviewing, which is a technique for conflict resolution.
- The DSA offered conflict management training to all staff.
- Courses are available in Yes LMS (learning management system) for conflict resolution:
 - Resolving Conflict, Creative Problem Solving,
 - Productive Disagreements - Leading Difficult Conversations,
 - Civility in the Workplace.

Objective 3: Build collaboration within VRS and across DEED

Key Results:

- A project management tool (Monday.com) is used to track and report progress on projects to enable collaboration between units
 - Monday.com was replaced with Microsoft Teams, which was rolled out to State staff statewide.
 - VRS is also using Visio to create org charts and position tracking to aid with HR processes

Objective 4: Build human resource capital

Key Results:

- Plan developed to expand recruitment of qualified staff
 - VRS worked with HR partners to enhance hiring from 25% to 6% vacancy rate over the past year
 - Minimum qualifications for positions were reviewed and adjusted to recruit a broader candidate pool.
 - Job postings were reviewed and enhanced, including using plain language, to draw potential candidates.
 - Retention and recruiting bonuses were implemented.
 - A VRS DEIA committee was formed to play a pivotal role in creating culture that's more inclusive. This helps to recruit and retain more diverse staff at all levels of the organization. BIPOC hiring has increased
 - Efforts have been made to wider and targeted recruitment. This includes the use of the Handshake platform, which improves outreach and recruitment of staff at colleges/schools nationally
 - VRS implemented compensation for counselor interns.
- Counselors have effective and professional counseling skills
 - Motivational Interviewing training is required for all new staff

- VRS began using YesLMS (learning management system) platform with lots of resources
- We proactively promote external opportunities for professional development
- VRS implemented a CRC budget increase for elective trainings
- VRS expanded its minimum qualifications to include related fields in addition to VR
- Managers are responsible and hold expectations for mentoring, monitoring and developing counseling skills
- VRS is offering Transformational Leadership training for leaders, increasing capacity to support staff in counseling,
- DEED and other areas combine to build manager capacity
- Counselors are proficient in aspects of disabilities for frequently served populations
 - VRS promotes available resources and training for staff on an ongoing basis
There is a wide range of topics available in the learning management system, YesLMS
 - VRS shares internal and external training opportunities with counselors
 - VRS has staff specialists in areas of the largest populations we serve: Autism; Mental health, IDD
 - There has been an increase in waiver services training.

GOAL 4. Strengthen collaboration through partner engagement.

Objective 1: Coordinate and align services

Key Results:

- Map of providers and services
 - VRS has attempted to create maps of providers and services, however, due to the increased complexities in service provision, we are exploring other ways to collect and maintain good provider information. VRS keeps a comprehensive list in SharePoint, which is available to staff.
- Referral and funding decision tree (who should pay for the service)
 - Under the E1MN initiative with the Departments of Education and Human Services, a process map was developed called the Engage, Plan, Find, Keep framework which clarifies roles and determines funding of services for those on Medicaid waivers.
 - The Disability Hub Work Toolkit has a section on Supporting People on Waivers that provides tools and resources to support understanding on the Engage, Plan, Find, Keep framework.
 - E1MN Training was launched in 2023 to support the E1MN referral and funding decisions for all roles.

Objective 2: Timely and relevant communication and training

Key Results:

- Fewer contract related inquiries and issues
 - VRS increased the size of its community partners team.
 - VRS launched monthly Partner Forums.
 - All communications to partners are sent via GovDelivery as well as posted to the website for community partners to easily find and access.
 - DSA Commissioner and Assistant Commissioner are actively interacting with local communities.
- More resources (FAQs, etc.) available to partners
 - A VRS Community Partners Committee with members from community partners across the state has provided strategic advisory to VRS on partner needs, issues and opportunities.
 - VR Community Learning Connections training series launched with LGBTQ+ series. The next topic will be on Unconscious Bias.
- Partners are trained in delivering Pre-Employment Transition Services and report satisfaction
 - Pre-ETS training has been developed for new and existing partners, as well as a “Guide on Pre-ETS.”

Objective 3: Engage State Rehabilitation Council for input and feedback

Key Results:

- Input and feedback provided to VRS leadership after each meeting for dissemination to VRS staff as needed
 - The SRC coordinator, and VRS senior leaders attend all monthly SRC meetings, as well as other key staff, who are scheduled to deliver information and answer questions.
 - The SRC chair presented and participated at the May 2023 Statewide VRS Managers Meeting.
- VRS regularly reports back to the SRC on how the council’s feedback is utilized
 - All reports for which SRC input was requested, such as the CSNA and Combined State Plan, are shared with the council for final approval before disseminating or submitting to RSA.
 - At the request of the council and as relevant, topics are revisited at subsequent meetings to provide updates.

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

Minnesota General and Blind agencies combined met or exceeded all common performance measures for PY2022. Minnesota General contributed significantly to these successful outcomes by working with participants and employers to identify and be hired into quality jobs that promote longer-term employment outcomes. Minnesota also monitored the MSG rate throughout the year and encouraged staff to collect all possible documentation prior to PY2022 final reporting.

	PY2022 Actual Levels	PY2022 Negotiated Levels	Difference
Employment (Second Quarter After Exit)	57.8%	51.5%	6.3%
Employment (Fourth Quarter After Exit)	57.8%	49.6%	8.2%
Median Earnings (Second Quarter After Exit)	\$3,723	\$3,411	\$ 311
Credential Attainment Rate	44.0%	31.0%	13.0%
Measurable Skill Gains	50.6%	50.3%	0.3%

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).

Vocational Rehabilitation Services (VRS) operates as the designated State unit in Minnesota. Due to circumstances within the State and consistent with the requirements of 34 CFR 361.29(a)(1)(ii), [the name of the DSU] has determined it necessary to engage in activities to establish, develop, or improve facilities for community rehabilitation programs (CRPs) (hereinafter “establishment projects) in the State for the purpose of providing vocational rehabilitation (VR) services to applicants and eligible individuals, as well as pre-employment transition services to students with disabilities who are eligible or potentially eligible for the VR program. In assessing the need for establishment projects in the State, Vocational Rehabilitation Services has determined it may be necessary to incur capital expenditures to acquire equipment or improve the field offices of VRS, which satisfy the definition of a CRP at 34 CFR 361.5(c)(8), in order to ensure the continuity of quality service delivery to individuals with disabilities seeking to receive services under the VR program. The State assures it will submit requests for prior written approval to RSA for those costs that exceed the capital expenditure threshold applicable to the State, or for any capital improvements necessary to ready the space for its intended use under the VR program, consistent with requirements set forth in 2 CFR part 200.”

The needs of the SRC and SILC were fully funded.

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.

(A) Estimate of the number of persons to be served

During Program Year 2024, about 500 individuals will be served with Title VI, Part B funds supplemented by Title I funds. Under the administrative rule that sets forth Minnesota's priority-for-service categories, all persons receiving supported employment have three or more serious functional limitations.

(B) The contribution of state funding

Title VI B funds are used to provide supports after placement and before closure. Minnesota receives a state appropriation match for federal VR funding, which includes match for Title VI B funds. Additionally, the state legislature provides appropriations for three other programs that provide extended employment supports. The state-funded Extended Employment (EE) program that provides ongoing employment supports using state funding of \$18.325 million annually that flows to community rehabilitation programs. More than 80 percent of this state funding provides extended services for persons in competitive integrated employment with supports. The Minnesota Extended Employment program serves all disability groups. An additional annual state appropriation of \$2,555,000 is dedicated to extended supported employment services for persons with serious mental illness since it has been historically difficult to obtain ongoing support services for this population. Another appropriation provides \$1,000,000 annually to provide long-term supported employment services for persons who are deaf, deaf blind or hard- of-hearing.

(C) System complexity and limited capacity

Funding for supported employment, within which Title VI Part B funds play a relatively small part, is governed by myriad federal and state laws and rules covering many categories of services. For example, a network of private, not-for-profit organizations, licensed by the Minnesota Department of Human Services Disability Services Division, provides day training and habilitation services that may include supported employment. People with mental illness may receive work-related support through the State Comprehensive Mental Health Act. In these instances, each county determines the level of service that will be provided. Title VI B supported employment funds are distributed on a fee-for-service basis under fee schedules developed with service providers. VRS collaborates with the Departments of Education and Human Services and county and local service providers to facilitate access to other funding and service resources. During development of a vocational rehabilitation employment plan, the vocational rehabilitation participant and the service team design a supported employment framework that best meets the participant's needs. Planning for eventual long-term supports in the community is a crucial part of planning during VRS' time- limited period of service.

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.

VRS collaborates with MDE, DHS, and county and local service providers to offer statewide supported employment services. VRS is a partner in several state-level agreements that provide long-term supports. During development of an employment plan, VRS counselors and other service team members help consumers to select supported employment services that meet their needs. They identify which services will be provided by VRS, as well as the source of long-term supports in the community. VRS provides time-limited supports for up to 24 months, but an employment plan may be amended if additional time is needed to achieve job stability.

Transition from time limited supported employment services to extended services occurs when the individual:

- has completed time limited supported employment services on the individual plan for employment;
- has made substantial progress toward meeting the hours per week work goal established in the Supported Employment Plan; and
- is stable on the job.

The primary funding resources for long-term supports in the community following VRS case closure are county case managers, the state Extended Employment Program, DHS Medicaid-waiver funded services, and the Social Security Administration's Impairment-Related Work Expense exclusions and Ticket to Work funding for persons on SSI and/or SSDI. When necessary, VRS funds extended services to youth with the most significant disabilities for a period not to exceed four years, or until such time that the youth reaches age 25 and no longer meets the definition of a youth with a disability, whichever occurs first.

In FFY 2023, Minnesota served 410 individuals through supported employment services, spending approximately \$660,000 in title 1 or title VI funds. 35% of the individuals served were youth. In FFY 2025, Minnesota plans to serve an increased number of youth through supported employment services and a greater amount of expenditures overall. All persons receiving supported employment services will have three or more serious functional limitations (priority category one) and approximately half of the individuals will be youth with the most significant disabilities.

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).

Under the designated state unit's strategic goal for effective partnerships, VRS seeks to expand its collaboration with other employment and disability services system partners to better coordinate and align services and assist business partners in building inclusive workplaces and developing best practices for recruitment and retention for individuals with disabilities requiring workplace supports.

VRS collaborates with MDE, DHS, and county and local service providers to offer statewide supported employment services for students, youth, and adults. VRS is a partner in several state level agreements that provide long-term supports. During development of an employment plan, VRS counselors and other service team members help consumers to select supported employment services that meet their needs. They identify which services will be provided by VRS, as well as the source of long-term supports in the community. VRS provides time-limited supports for up to 24 months, but an employment plan may be amended if additional time is needed to achieve job stability.

Transition from time-limited supported employment services to extended services occurs when the individual:

- has completed time-limited supported employment services on the individual plan for employment;
- has made substantial progress toward meeting the hours per week work goal established in the Supported Employment Plan; and
- is stable on the job.

State-funded Extended Employment Program:

Minnesota's Extended Employment Program, administered by VRS, provides ongoing employment support services for individuals to maintain and advance in employment. The program is funded by a state appropriation of \$18,328 million per year. The direct services are delivered by a network of 27 VRS Community Partners under performance-based contracts with VRS. These collaborations contribute significantly to the quality, scope, and effectiveness of the state's supported employment efforts. Minnesota General uses services provided through the program to youth with the most significant disabilities for state match purposes.

Individuals with Serious Mental Illness:

Minnesota VRS has been a leader in implementing the Evidence Based Practice of Supported Employment for persons with serious and persistent mental illness known as Individual Placement and Support (IPS). IPS receives \$5,055,000 in dedicated state funding, which is used for grants to local partnerships of mental health programs and employment providers (Community Rehabilitation Programs). These funds provide ongoing supports to persons with serious mental illness who are receiving community mental health services. Minnesota's programs utilize the IPS fidelity scale (2008) to guide program development and implementation as well as program evaluation and outcome measurement.

Individuals who are Deaf or Hard-of-Hearing:

A dedicated state appropriation provides up to \$1,000,000 annually to provide long-term supported employment services for persons who are deaf, deaf blind or hard-of-hearing.

F. ANNUAL ESTIMATES

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 C.F.R. § 361.29(b), annual estimates must include the following projections:

1. ESTIMATES FOR NEXT FEDERAL FISCAL YEAR—

A. VR PROGRAM; AND

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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)
1	12200	11052	\$18,148,000	0
2	1708	1611	\$1,564,000	0
3	639	603	\$592,000	0
4	4	4	\$500	0

B. SUPPORTED EMPLOYMENT PROGRAM.

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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)
1	3865	3355	\$3,800,000	0

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.

* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

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

VRS is not implementing its Order of Selection but will maintain its priority categories to identify whether an eligible individual is an individual with a significant disability or an individual with the most significant disability.

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

1. Priority Categories

- Priority Category One (first priority for service) includes all individuals with a most significant disability, that is, persons whose condition results in serious limitations in three or more functional areas.
- Priority Category Two (second priority for service) includes all individuals with a significant disability that results in serious functional limitations in two functional areas.
- Priority Category Three (third priority for service) includes all individuals with a significant disability that results in a serious functional limitation in one functional area.
- Priority Category Four (fourth priority for service) includes all other eligible customers. These customers have a disability that makes them eligible for services, but they do not have a serious limitation in a functional area.

2. Functional Areas

Serious limitations in life skills in one or more of the following areas, as defined:

- Communication: the ability to effectively give and receive information through words or concepts, such as reading, writing, speaking, listening, sign language, or other adaptive methods
- Interpersonal skills: the ability to establish and maintain personal, family, and community relationships as it affects, or is likely to affect, job performance and security.
- Mobility: the physical and psychological ability to move about from place to place inside and outside the home, including travel to and from usual destinations in the community for activities of daily living, training, or work.
- Self-care: the skills needed to manage self or living environment, such as eating, toileting, grooming, dressing, money management, and management of special health or safety needs, including medication management, as they affect an individual's ability to participate in training or work—related activities.
- Self-direction: the ability to independently plan, initiate, organize, or carry out goal-directed activities or solve problems related to working.
- Work skills:
 - the ability to do specific tasks required to carry out job functions; and
 - the capacity to benefit from training in how to perform tasks required to carry out job functions.

- Work tolerance: the capacity or endurance to effectively and efficiently perform jobs requiring various levels of physical demands, psychological demands, or both.

3. Serious Limitation

- A serious limitation in a functional area means that, due to a severe physical or mental impairment, the individual's functional capacities in the specific area are restricted to the degree that they require services or accommodations not typically made for other individuals in order to prepare for, enter, engage in, or retain employment. Accommodations are defined as special working conditions, job re-engineering, rehabilitation technology, or substantial support and/or supervision.

4. List of Physical or Mental Disabilities

Physical or mental disabilities resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, head injury, heart disease, hemiplegia, hemophilia, respiratory or pulmonary dysfunction, intellectual disabilities, mental illness, multiple sclerosis, muscular dystrophy, musculoskeletal disorders, neurological disorders including stroke and epilepsy, paraplegia, quadriplegia, and other spinal cord conditions, sickle cell anemia, specific learning disability, and end-stage renal disease, or another disability or combination of disabilities determined on the basis of an assessment for determining eligibility and priority for services to cause comparable serious functional limitation.

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.

All priority categories are open.

3. HAS THE VR AGENCY ELECTED TO SERVE ELIGIBLE INDIVIDUALS OUTSIDE OF THE ORDER OF SELECTION WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT?

No

H. WAIVER OF STATEWIDENESS.

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

Not applicable

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT.

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

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.

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Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Admin Director/Managers	13	16	18
Rehabilitation Area Managers	21	22	25
Rehabilitation Specialists	31	41	46
Rehabilitation Counselor	163	168	188
Rehabilitation Representatives (Pre-ETS and Counselors-in-Training)	62	68	76
Placement Coordinators	27	31	35
Vocational Rehabilitation Technician	79	84	94
Administrative & Financial Support	11	12	13
Data Team Members	2	4	5

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Other Field/Admin positions	5	5	6

D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:

1:52 counselors to participants

E. PROJECTED NUMBER OF INDIVIDUALS TO BE SERVED IN 5 YEARS:

About 16,500 participants. As we serve more and more students, the total percentage of applicants completing a plan has been decreasing slightly. VRS has outlined strategies to address this trend in description (c)(A).

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.

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Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
St. Cloud State University	MS Rehabilitation Counseling	25 first year students, 21 second year students	11
University of Wisconsin - Stout	MS Rehabilitation Counseling	15	15

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.

Internships commonly lead to permanent counseling positions. The staff development specialist devotes approximately 5% time as the point of contact for managers, professors, interns, supervising counselors, and Human Resources to coordinate intern placement and supervision, and for counselor recruitment. Other activities include presentations to students and informing university personnel of counselor vacancies. VRS staff development is an active member of graduate counseling advisory committees at the University of Wisconsin - Stout and St. Cloud State University and communicates regularly with counseling program directors.

VRS provides tuition reimbursement for staff pursuing graduate degrees in rehabilitation counseling. Employees in the St. Cloud program and UW - Stout program also have access to the RSA grant to assist with some tuition costs.

VRS posts its vacancies at the State of Minnesota personnel openings website, Handshake, LinkedIn, MinnesotaJobs.com, and sometimes on the Minnesota counsel for nonprofits, RSA PIMS, Ramsey County Job Connect.

Minnesota post-retirement option: The post-retirement option, which permits a state retiree to work up to half time without losing insurance or retirement benefits, is a component of VRS retention and succession planning strategies.

As a key strategy for staff retention, VRS pays close attention to organizational vitality and staff morale. VRS works to maintain a high level of employee engagement through statewide staff communication about the vision, mission, values, strategic goals and agency achievements, and a robust training and development program. Specific strategies that VRS uses to support employee engagement include: monthly virtual All Staff Meetings, a DEI&A Committee, VRS Works and a variety of leadership opportunities, including the Emerging Leaders Institute and the Transformational Leadership Training. All Staff Meetings are important to keep all employees engaged in what's happening around the agency, learn about updates, hear from leadership, connect with each other, and share best practices. VRS Works are listening sessions, available for any staff to participate in and intended to facilitate discussion around what's working, what needs improvement, and cultivate creative solutions targeted to specific areas of the work. In addition, DEED completed an Employee Engagement survey in early 2023 and it's complete yearly. Survey response rate for VRS employees was 72% this administration. Findings indicate strong employee engagement on the key indicators measured. For example, 88% of VRS employees agreed that they look forward to coming to work each day, 98% agreed that they understand how their role contributes to the mission of VRS, and 95% agreed that they are continually learning in their current role. Staff also provided suggestions for specific improvements at DEED that would increase their job satisfaction; response themes addressing caseload sizes for counselors, increasing salary/pay to be competitive, and hiring more staff in a timely manner. DEED plans to repeat the survey annually as a measure of employee engagement and as a tool to identify needed improvements in organizational effectiveness.

Counselors and other staff are recruited and hired under Minnesota's competitive civil service system, including affirmative action to recruit and hire individuals with disabilities and members of the state's diverse cultural and ethnic populations. Voluntary disclosure of ethnic and cultural status provides the following 2023 data: 1% of VRS employees identify themselves as American Indian/Alaska Native, 4% Asian, 4% Black/African American, 2% Hispanic/Latino, 84% identify themselves as White, and 6% are non-specified or undisclosed. At present, 24% of VRS employees voluntarily disclose a disability. The State of Minnesota aspires to be a leader in employing individuals with disabilities. As a key strategy, the State of Minnesota offers the Connect 700 program. Connect 700 allows eligible individuals with disabilities the opportunity to demonstrate their ability to perform a specific position for up to 700 hours on the job.

Dedicated staff in the metro area offer vocational rehabilitation services to refugees who recently immigrated to Minnesota from countries such as Somalia, Ethiopia, Jamaica, Turkey, Congo, Guyana, Iraq, Nigeria, Egypt, Pakistan, Sudan and Eritrea. The New Americans staff consists of a rehabilitation counselor and one placement coordinator. They are themselves refugees from East African countries. Each member of the New Americans staff is multi-lingual and provides intensive supports from application through employment closure to the VRS consumers they serve.

VRS is working on increasing vocational rehabilitation services to the Twin Cities American Indian community. This work is led by a counselor who is a White Earth Anishinaabe Band Member. This counselor has extensive knowledge in providing services to both youth and adults with disabilities will enhance on- going learning and service provision not only American Indian youth and adults but American Indian programs focused on training, career development and employment. This counselor also provides ongoing consultation with VRS teams, VRS staff and co-counseling as needed with American Indian participants and those interested in applying for vocational rehabilitation services. In addition, VRS is making efforts to enhance and increase our VR presence and service delivery to the tribal nations statewide. VRS managers and staff serving these communities attend the yearly Minnesota Tribal Nations training.

Coordination with professional associations: VRS staff serve on the board of the Minnesota Rehabilitation Association (MRA) and serve on MRA conference planning committees. A significant number of staff attend MRA conferences each year. VRS encourages staff membership in professional associations, and many serve as officers and work on association committees.

For more on recruitment, reference section (d)4 above.

C. DESCRIPTION OF STAFF DEVELOPMENT POLICIES, PROCEDURES, AND ACTIVITIES THAT ENSURE ALL PERSONNEL EMPLOYED BY THE VR AGENCY RECEIVE APPROPRIATE AND ADEQUATE TRAINING AND CONTINUING EDUCATION FOR PROFESSIONALS AND PARAPROFESSIONALS:

I. PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

II. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO VR AGENCY PROFESSIONALS AND PARAPROFESSIONALS AND FOR PROVIDING TRAINING REGARDING THE AMENDMENTS TO THE REHABILITATION ACT MADE BY THE WORKFORCE INNOVATION AND OPPORTUNITY ACT.

The Staff Development team coordinates training and develops training programs to meet needs, as identified through interviews with staff, reports from area managers, regional directors, subject matter experts, recommendations from staff groups and committees, and consultations with the Executive Leadership Team (ELT). QA case review also yields training needs information. Staff Development and field managers meet regularly, as does the Policy Learning Team, to develop and guide staff development activity. In addition, the Staff Development and Quality Assurance Director is a member of the ELT. Training strategies can include 1:1 mentorship from agency subject matter experts, managers, and peers, on-demand and live courses in our learning management system, all staff meetings, quality assurance case reviews on individual case work, and policy transmittals. The Policy Learning Team is focused

on increasing appropriate application and compliance with VRS policy and guidance through ongoing development and implementation of effective learning strategies, tools and dissemination. The team membership is made up staff who hold various roles throughout the agency and serve different areas of the state, bringing their diverse perspectives to training. The training is brought to leadership and managers first, then cascades out to staff. Quality Assurance work connects to these training topics and is a part of the strategic learning loop, and at times follow up with additional training.

New VRS employees are provided a robust onboarding training program, covering topics related to their unique role, agency culture, mission, and values. Required courses that are offered in a live virtual or in-person format include: VRS New Employee Orientation, Data Practices, Ethics, Person Centered Foundations, Cultural Awareness, Mental Health First Aid, Case Note Fundamentals, Transition 101, Introduction to Motivational Interviewing, and Purchasing Policies and Procedures. In addition to live courses, new employee onboarding includes training from the mentorship team, where they learn hands on the core components of their job. The mentorship team is led by the hiring manager and includes a peer mentor and subject matter expert. To supplement the learning from the mentorship team, there is also on-demand course work in our learning management system (YesLMS). There are currently 100 courses in YesLMS. Courses in YesLMS that new employees are required to take include: Employment Plan, Assessment of VR Needs, Closures and Exit Reasons, Informed Choice, Supported Employment, Data Security, Mandated Reporting, Violence and Disruptive Behavior Policy, and Pre-ETS Modules. Additional examples of courses available if needed for their individual development include: Medical Aspects of Disability, Intersecting Identities, Power, Privilege, and Implications for VR, History of Vocational Rehabilitation, Negotiation Skills for Employer Engagement, Disability Language and Etiquette, and an Overview of the ADA.

VRS offers tuition reimbursement for employees obtaining a graduate degree, certification program, or series of courses as long as the coursework ties directly to the business and programmatic needs of VRS.

Staff are encouraged to participate in leadership opportunities. VRS supports the DEED Emerging Leadership Institute and the Senior Leadership Institute. Currently, VRS is supporting all managers and some specialists to attend the Transformational Leadership Training. In addition to formal leadership programs, staff have opportunities to lead as peer mentors, participate in agency wide committees, co-lead staff training, act in liaison roles, and share best practices at all staff meetings.

In addition, annual performance reviews between supervisor and employee include a review of training and development needs of the employee. Every employee is required to develop and Individual Development Plan to assist in acquiring new knowledge, skills, and abilities on the job. Each employee is expected to attend a minimum of one elective continuing education program per year. VRS covers the cost of elective continuing education for staff, up to \$500 per fiscal year.

Looking forward, VRS plans to further enhance the current training and development opportunities. VRS will take the first steps towards building a robust counseling curriculum so counselors will have access to fundamental counseling skills practice to advanced level skills practice. VRS also plans to have on-going continuous improvement to the onboarding process and training, with initial focuses on enhancing our peer mentorship and training curriculum. A specific topic area of focus is career advancement for our customers. VRS also plans to offer statewide opportunities for teams to come together for team building, learn about their

individual strengths, the strengths of the team, and how they can best work together. VRS also plans to continue to explore VR leadership training opportunities for staff at all levels.

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.

Vocational rehabilitation counselors and other professional staff are hired through competitive process under the Minnesota civil service system.

Rehabilitation Counselors

- Master's degree in Rehabilitation Counseling, Counseling, Human Services, Sociology, Education, Social Work, Psychology, or other closely related field
- All of the agency's vocational rehabilitation counselors meet the state's standard.

Rehabilitation Representative

- Bachelor's degree in Rehabilitation Counseling, Counseling, Human Services, Sociology, Education, Social Work, Psychology, or other closely related field

Placement Coordinator

- One year professional experience in which the primary focus was the provision of vocational services to persons with disabilities; or
- Bachelor's degree in Behavioral Science, Counseling, Vocational Evaluation, Job Placement, Vocational Rehabilitation, Education, Human Services, or a closely related degree; or
- Three years of paraprofessional experience in which the primary focus was the provision of vocational services to persons with disabilities. A Bachelor's degree substitutes for half of the experience requirement.

Vocational Rehabilitation Technician

- Software applications such as Microsoft Office Suite to manage, track, and report expenses, financial transactions, and invoices
- Basic accounting sufficient to review, analyze, and verify financial records, calculate monthly fees, and prepare financial summaries and reports
- Math (arithmetic) sufficient to add, subtract, multiply, and divide whole numbers, fractions, decimals; and calculate percentages

- Keyboarding to enter data in a database or spreadsheet comparable to the State's accounting system (SWIFT) and Workforce One platforms
- Communication to provide prompt, courteous, and accurate information to coworkers and all stakeholders
- Human relations to negotiate, collaborate, build, and maintain positive working relationships with coworkers, jobseekers, and vendors

Pre-ETS Representative

- Bachelor's degree in Rehabilitation Counseling, Counseling, Human Services, Sociology, Education, Social Work, Psychology, or other closely related field or,
- High school diploma/GED and one year experience working with students with disabilities related to employment services in one or more of the following areas: job exploration counseling, work-based learning, counseling on post-secondary options, workplace readiness training, and/or instruction in self-advocacy.

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.

VRS ensures that personnel and methods are available so that staff may communicate with individuals in a preferred language or other means of communication. Substantial numbers of VRS customers use languages other than English, including Cambodian, Lao, Vietnamese, Somali, Spanish, and American Sign Language. Translation of forms, information brochures and the availability of purchased interpreter services or a multilingual staff member ensures effective communication statewide.

Deaf and Hard of Hearing services are provided by highly qualified VRS staff including one State Coordinator for Deaf Services (who is also in a dual role as a Manager) and 21 staff who are conversationally fluent in American Sign Language. We have two Regional Directors, two VRS managers/supervisors, eight counselors, one placement specialist, three VR technicians, two Rehabilitation Representatives, an Office and Administrative Specialist, and two Occupational Communication Specialists (who are also certified sign language interpreters). Counselors and staff are using a variety of video options such as Zoom, MS Teams, videophones, FaceTime and texting to communicate with people and providers who use our services. Staff can use video remote interpreting by requesting them through interpreter referral agencies on the state master contract and then incorporating their services virtually through the participant's chosen platform. Counselors are also using videophones, FaceTime, Microsoft Teams, Google Meets and texting to communicate with people and providers who use our services.

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.

VRS provides personnel development for staff no less than one time annually on the topics of Understanding the Special Education Evaluation Report and IEP Basics for staff working with students in accordance with the Individuals with Disabilities Education Act (IDEA). The training is available to Transition Counselors and Pre-ETS Representatives, though the focus is on building knowledge and understanding of IDEA for counselors with students who are VRS participants with full services. During the training sessions, IDEA provisions of Free

Appropriate Public Education (FAPE), Appropriate Evaluation for a student with a disability, the Individualized Education Program, Least Restrictive Environment (LRE), Parent/Guardian and Student Participation in the IEP Process and Decision-Making and the requirement of Procedural Safeguard are addressed. Notably in Minnesota, the legislature recently increased the age of students who are eligible for FAPE under IDEA from 21 years old to students up to 22 years old. This change was significant for students with disabilities in schools. In order to ensure that our staff were prepared to participate as part of the IEP team, we provided them with the knowledge and guidance from the Minnesota Department of Education and information regarding this change in August of 2023.

J. COORDINATION WITH EDUCATION OFFICIALS.

In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act—

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.

DEED-VRS and SSB are partners with the Minnesota Departments of Education (MDE) and Human Services (DHS) in the Employment First Minnesota (E1MN) effort. E1MN works toward a seamless system of employment services and supports being available to all persons with disabilities, including students. State-level leadership and staff meet regularly to plan for training, technical assistance, resource development, and problem-solving related to collaboratively serving students and adults with disabilities. E1MN efforts are focused on eliminating barriers for accessing services and supports needed to prepare for, find, keep, and advance in competitive integrated employment.

This year E1MN partners created a Minnesota Transition Framework which defines high-quality transition programming, and a Youth in Transition Toolkit (housed on the Disability Hub MN website) which supports the framework. The toolkit is a one-stop shop for professionals to learn about the Transition Framework, understand the basics for transition programming (i.e., laws, roles, agency plans and policies), and get resources and tools to serve youth/students and families.

Furthermore, E1MN is planning for a new structure for regional work between the three agencies and local professionals that provide transition services to students with disabilities, which will launch in early 2024. The goal is to invite all school, VR, waiver, and employment service provider staff in each region to learn about the Minnesota Transition Framework and Youth in Transition Toolkit, to assess where they are at with transition programming, and create plans for improvement. State staff will provide training and technical assistance to teams as they implement their plans.

Throughout the State of Minnesota, we are committed to providing students with disabilities Pre-ETS to meet their needs. VR transition services assist eligible youth to plan for and make the transition from secondary school to competitive integrated employment. Ultimately, VRS assists students in choosing a post high school employment goal and ensures that they receive the services needed to reach that goal. Each school is assigned a Counselor and a Pre-ETS Representative who work in collaboration with school staff to provide services to students with disabilities. Some of the ways that VR staff support the needs of students include, attending IEP meetings, providing group services and instruction to prepare for employment, arranging work

experiences or job try outs for students, and any activity that aligns with the Pre-ETS categories below that will meet the need of a student and fill in the gaps of what the school is unable to provide.

As a part of these efforts, any of the 5 Pre-ETS to students who are potentially eligible (served by Pre-ETS Representatives) and eligible for VR (served by VR counselors):

- Job exploration counseling
- Work-based learning experiences
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education
- Workplace readiness training
- Instruction in self-advocacy

Additionally, as needs arise throughout the State, the E1MN Team works together with the Minnesota Department of Education to address changes on the policy level and down to the school level to meet the needs of students with disabilities. Specifically, we meet regularly with school districts who are struggling to engage with VR Services to develop a better system of coordination for overall service provision. The results of these meetings include improved student engagement in VRS.

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.

DEED-VRS and State Services for the Blind (SSB) have a Memorandum of Understanding (MOU) in place with the Minnesota Department of Education (MDE) which was signed in June 2020. This MOU outlines all topics required in 34 CFR 361.22(b). As was noted in the section prior, E1MN is the initiative that brings our agencies together, along with the Department of Human Services (DHS- the state's Medicaid agency) to plan and support for a seamless system of employment services and supports for students, youth, and adults with disabilities. The E1MN effort (which includes the Minnesota Transition Framework, Youth in Transition Toolkit (YITT), and E1MN regional structure) is also the means by which the MOU is put into action.

Specifically, topics within the MOU are being addressed as follows:

- Consultation and technical assistance: The E1MN regional effort will be a venue for “teams” (consisting of school, VR, county, and provider staff) to plan for system improvement and identify/request the technical assistance needs they have.
- Transition planning: One “shared practice” within the Transition Framework describes the “Youth Planning Process” and what steps should be taken by all partners in creating and implementing Individualized Education Programs (IEPs) and other agency plans. This will be emphasized in the E1MN regional work.
- Roles and responsibilities, including financial responsibilities, of each agency: The YITT has a section that reviews roles and responsibilities. This will be a central focus of the kickoff of the E1MN meetings.
- Procedures for outreach to and identification of students: The YITT, VRS outreach materials, VRS website, and school training presentations make clear that VRS can serve students age 14 and older and that early referrals are encouraged. It is rare, but VRS has also served students younger than age 14. VRS has two staff assigned to every high school and 18 to 22 transition program in the state, and it is the expectation that these staff meet with all possible school referring staff to explain: VRS services, how to make a referral, and how school and VRS can best collaborate in serving students. When referrals are made, VRS staff meet with students and parents/guardians (as applicable) to explain services and eligibility, provide an application packet, and discuss what next steps would be. Staff also do outreach in other creative ways such as attending school or community events, connecting with other youth-serving organizations, and more.
- Coordination with schools related to documentation requirements related subminimum wage employment: In the spirit of E1MN, VRS works with schools to message to students and families the expectation that all students with disabilities can achieve goals

for competitive integrated employment. In the cases where a student and parents/guardians (as appropriate) have indicated a desire to pursue subminimum wage employment, VRS works with the student and their “team” (typically their IEP team) to review the documentation requirements. VRS has materials and a webpage to share with all parties that explains the process.

- Assurance that, in accordance with 34 CFR 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage: Minnesota schools that have MDE approved work-based learning programs must sign an assurance that they will follow, among other things, 34 CFR 397.31 (i.e. will not contract for nor support subminimum wage work experiences).

K. COORDINATION WITH EMPLOYERS

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

Work-based learning experience (WBLE) for students with disabilities is the top pre-employment transition service that VRS provides. These experiences are coordinated with employers through internal placement coordinators and specialists and external contracted Pre-ETS providers. In both cases, VR counselors (serving students who are eligible for VR) or Pre-ETS representatives (serving students who are potentially eligible for VR) will refer a student to the internal or external staff, a meeting is held together with the student (and parent/guardian and other student supporters such as school as applicable) to talk through the needs and interests of the student related to the WBLE, and then the internal or external provider will then take the lead in developing and supporting the WBLE (with VR counselors and Pre-ETS Reps checking in and monitoring progress). Internal and external placement and Pre-ETS staff have many ways in which they work closely with employers to make WBLEs happen. Many have developed relationships with employers in the community and know those who are willing and able to support WBLEs. In cases where an employer relationship does not exist, they reach out to develop them. Furthermore, Business Engagement Networks (BENs) are another forum where placement and Pre-ETS providers come together as partners to share information about employer relationships in order to assist in job placements and Pre-ETS WBLEs. Finally, VRS co-leads three regional Pre-ETS Communities of Practice (CoP) with our contracted provider community. These are monthly meetings between VRS counselors, Pre-ETS representatives, and placement staff and external contracted Pre-ETS providers. The mission of the Pre-ETS CoPs is to build relationships and a shared understanding of Pre-ETS. During these meetings best practices in developing Pre-ETS opportunities, such as WBLEs with employers, are also discussed.

Excellence in job placement and retention services is fundamental to more fully living into DEED’s vision statement of “a healthy economy, where all Minnesotans have or are on a path to meaningful employment and a family sustaining wage, and employers are able to fill their ‘in demand’ jobs.” Coordination with employers is also key to VRS’ priority to embrace employers as key customers resulting in increased employment outcomes. This is accomplished in the following ways:

- Implementing and refining a VR client talent pool structural framework within the electronic case management system. The talent pool will be developed to gather and tap information to facilitate matching VRS clients to employment opportunities. VRS will secure approval and resources to develop the client talent pool structural framework as part of a larger rewrite of the case management system. Minnesota's electronic case management system has capacity to identify talent pool. VRS staff input key talent pool identification data which greatly enhances the ability for Placement staff to identify pools of candidates based on employer needs. VRS staff will benefit from training to correctly utilize the talent pool refinement tools available in WF1. DEED-VRS is currently piloting Salesforce as a part of the Disability Innovation Grant demonstration project as a way to track employer engagement. This pilot will allow VRS to see if Salesforce might meet our greater need to track our engagement with businesses.
- Developing and implementing low risk Hiring and retention options designed to increase employment outcomes and workforce diversity. DEED-VRS updated the process, policies guidance and definitions for an array of low risk hiring and retention options which are referred to as On-the-Job Work & Training Options in Policy and Guidance Manuals. This information, along with the Connect 700 hiring initiative was shared with Community Rehabilitation Partners through statewide training to ensure consistency of understanding and application.
- Leading and convening Business Engagement Networks (BEN's) focused on meeting the needs of business by providing a talent pool of candidates that can meet the needs of business utilizing a Single Point of Contact (SPOC) coordinated approach with VRS, Community Rehabilitation Providers, and Special Education Work Coordinators. WIOA Common Performance Measure 6 (effectiveness in serving employers) will be developed and addressed in an annual report. Following is a report of progress on the revised priorities: Minnesota VRS supported throughout the state to provide a Single Point of Contact (SPOC) to meet the needs of business and to enhance the skills of placement professionals. continue to reflect the needs of business representing the local areas of Minnesota including urban, metro and greater (rural) areas of the state as well as provide joint training to maintain qualified staff. BEN's also share job leads and plan events that connect job seekers to Business like tours, job fairs, and other opportunities to for placement staff to meet with local businesses.
- Disability Inclusion Bite-Sized Learning Modules are resources for employers that takes a topic and breaks it into short modules that can be presented in about 20 minutes. Each module features a video, the PowerPoint presentation used in the video and a takeaway card to reinforce learning and provide links to additional resources. There are 5 current modules on DEED's CareerForce website on the following topics:
 1. Module 1: Defining Disability and the Americans with Disabilities Act
 2. Module 2: Recognizing and Implementing a Request for Reasonable Accommodations
 3. Module 3 – Self ID: Building a More Inclusive Culture
 4. Module 4: Inclusive Communication
 5. Module 5 – Mental Health Matters: Let's Talk
- Both internal and external placement and Pre-ETS staff have many ways in which they work closely with employers to coordinate services. Many have developed relationships

with employers in the community and know those who are willing and able to support students with disabilities. In cases where an employer relationship does not exist, they reach out to develop them. Furthermore, Business Engagement Networks (BENs) are another forum where placement and Pre-ETS providers come together as partners to share information about employer relationships in order to assist in job placements and Pre-ETS WBLEs.

L. INTERAGENCY COOPERATION WITH OTHER AGENCIES

In accordance with the requirements in Section 101(a)(11)(C) and (K), describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

1. STATE PROGRAMS (DESIGNATE LEAD AGENCY(IES) AND IMPLEMENTING ENTITY(IES)) CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

The Minnesota STAR (System of Technology to Achieve Results) Program: The STAR Program, a program within the Minnesota Department of Administration, is funded by the Department of Health and Human Services in accordance with the Assistive Technology Act of 1998, as amended. Vocational Rehabilitation often refers people to STAR for a device demonstration. This allows consumers to compare benefits and features of a particular device or category of devices. Once a decision on a device is made, the person can borrow the device for 45 days to make sure it meets their needs before VR purchases the item. VR also maintains an agreement with STAR to provide VR assistive technology specialists with commonly used devices for use in doing assessments with consumers.

VRS ensures that a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis through a rehabilitation Assistive Technology (A/T) Specialist. The VRS A/T Specialist provides onsite assistive technology assistance to staff and consumers. They also coordinate with the Minnesota Department of Education (MDE) to promote inclusion of assistive technology in Special Education services and transition plans. The A/T specialist is supported by one local Assistive Technology (AT) liaison on each VR team across the state. Placement coordinators offer assistance to employers in using rehabilitation technology to resolve employment barriers. Placement Coordinators connect with the VRS A/T Liaison or Specialist to ensure the employer receives the information and technology they require to remove employment barriers for their employee. The VRS website has an assistive technology page with links to nationally recognized websites. VRS coordinates closely with the STAR Program which operates an equipment loan program that allows consumers to try the assistive technology for 30 days before VRS purchases the equipment.

2. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

There currently is no formalized working relationship between the Department of Agriculture and Vocational Rehabilitation Services. The Minnesota USDA Rural Development Office does use technical economic and forecasting information provided by DEED to develop and market its services.

3. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH;

As two critical CareerForce partners, DEED-VRS and Workforce Development Areas (WDAs)/WIOA Title I programs (which are mandated to expend 75% of their federal funds on out-of-school youth) come together on the local and regional level to ensure needs of out-of-school youth are met. Cross referrals and dual enrollment happens as appropriate. Additionally, six of the sixteen Minnesota WDAs have a professional and technical contract with DEED-VRS to provide Pre-Employment Transition Services. Although these services are for in-school students, the benefit of this partnership ensures that if/when students are no longer in school, these youth can continue services through WIOA Title I and VR collaboratively as appropriate.

4. STATE USE CONTRACTING PROGRAMS;

Since the mid-1990s, Minnesota state agencies have been legislatively encouraged to purchase goods and services from small businesses operated by individuals with disabilities. In 2007, the Legislature enacted a set-aside program, providing that 19 percent of the total value of all state janitorial contracts be awarded to community rehabilitation organizations approved by VRS as service providers under the VRS Extended Employment Program. During the 2010 legislative session, the set-aside program was expanded to include document imaging, document shredding, mailing, collating, and sorting services. Further, the amount of each contract awarded under this section may exceed the estimated fair market price for the same goods and services by up to 6 percent.

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 State Medicaid plan under Title XIX of the Social Security Act; Medical Assistance, the state's Medicaid program, is administered by the Department of Human Services (DHS) Disability Services Division (DHS-DSD). Vocational Rehabilitation Services (VRS) and State Services for the Blind (SSB) collaborate closely with DHS in the provision of services for individuals who are on home and community-based waivers. In September 2019, DHS-DSD, VRS, and SSB signed a Memorandum of Understanding. The terms of the MOU are specific to individuals on a Medicaid waiver who are interested in competitive, integrated employment. Employment First and Person-Centered principles form the basis of the shared vision for how DEED-VRS/SSB and the Medicaid agency agree to provide employment services for people with disabilities in a coordinated manner. The purpose of the MOU and interagency cooperation is to align systems so that common customers – those who receive home and community-based service disability waivers and vocational rehabilitation services from VRS or SSB – can get seamless and timely supports to make informed choices and meet their competitive integrated employment goals. Implementation of the MOU agreements began July 1, 2021. DEED-VRS/SSB and the Medicaid agency have developed communication, stakeholder involvement, training and resources to ensure understanding of the responsibilities for each party supporting the person on a Medicaid waiver.

Under the MOU, the following coordination of services occurs:

1. Payment of Services

DEED-VRS/SSB is the primary payer for job-related services (services supporting job development, placement and employment stability) for common customers. Once employment stability is established, DHS-DSD will continue to pay for long-term supports to maintain employment for customers of all ages. DHS-DSD will also pay for services that assist people in making informed choices and developing informed employment goals.

2. Interagency Planning and Policy Development

DHS-DSD and VRS/SSB will use strategic planning, troubleshooting, consultation and technical assistance to ensure successful implementation of this agreement. Key areas include goal setting, systems development, coordination of services, quality assurance, data and stakeholder involvement. We will:

- Meet as an interagency steering committee to provide MOU oversight, set goals, review program services and financing options, identify promising practices and resolve disputes
- Support program liaisons from VRS/SSB and DHS-DSD to coordinate joint efforts in communication, quality assurance, training, and coordination of services, policies and procedures
- Create work groups as needed to provide advice and share expertise regarding practice enhancements
- Hold periodic staff meetings across agencies to ensure coordinated communication and address policy issues
- Establish an advisory committee that includes stakeholders from VRS/SSB, DHS-DSD, lead agency, and providers of both vocational rehabilitation services and waiver services to discuss progress and challenges with the MOU
- Jointly meet with stakeholders to collect feedback and identify areas for improvement
- Understand employment outcomes in our respective programs and develop a shared understanding of outcome measures and reporting procedures
- Promote the use of evidence-based practices and/or promising approaches to create a more closely aligned employment service system, increase quality and gather shared data on employment outcomes
- Identify common customers and practices that support positive employment outcomes

3. Eligibility, Referrals, and Customer Flow

DEED-VRS/SSB and DHS will continue to implement and refine the processes and practices developed under the Engage, Plan, Find, Keep framework. This includes promoting regional and local collaboration, E1MN training curriculum, and the tools and resources to support this work on the Disability HUB work toolkit.

4. Service Provider Networks

DEED-VRS/SSB and DHS will continue to work together to increase our statewide, shared network of employment service providers to improve access, support seamless transitions, and expand individuals' choices to high quality employment services. As part of this work, we agree to:

- Evaluate strategies for a common employment service provider pool. We will continue to explore options for creating a shared job search service provider pool to support seamless service delivery and prevent unnecessary interruptions as people move between supports funded by VRS/SSB and supports funded by DHS-DSD.
- Encourage dual enrollment of employment service providers. While DHS and DEED will continue to maintain separate employment service provider licensure/accreditation standards, we will make it easier for providers to understand our respective standards

and develop strategies to provide ongoing communication and technical assistance to those interested in enrolling.

- Align and streamline process and efforts. We will explore opportunities to better align and streamline each agency's business processes and requirements to create consistency and efficiencies for dually enrolled employment service providers.
- Coordinate communications and training. We will coordinate service provider communications and training to maintain consistent messaging and increase understanding of each agency's respective system and the shared customer flow outlined in this agreement.
- Measure and promote provider performance. We will explore methods to assess and provide information on service provider performance to people with disabilities and their families to support informed selection of service providers.
- Develop new providers. We will analyze data, set goals and collaborate on the development of employment service providers in underserved populations and areas of the state.

6. STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES;

The primary Minnesota agency responsible for services for individuals with disabilities is the Department of Human Services (DHS). In Minnesota, the Governor's Council on Developmental Disabilities serves to advocate for all persons with developmental disabilities by carrying out activities in major areas of emphasis. Minnesota's Olmstead Plan supports freedom of choice and provides a framework and a series of key activities that must be achieved to ensure Minnesotans with disabilities have opportunities to live, learn, work, and enjoy life in the most integrated setting desired by the person. Former Governor Mark Dayton appointed an Olmstead Subcabinet to develop and implement this plan. The Subcabinet consists of representatives of the MnSIC agencies listed above, the Housing Finance Agency, the Department of Transportation, the Ombudsman for Mental Health and Developmental Disabilities, and the Executive Director of the Governor's Council on Developmental Disabilities. VRS is involved in the following joint project with the above agencies:

Minnesota Customized Employment Training:

Customized Employment (CE) is an evidence-based alternative for helping people with significant disabilities to become successfully employed. At the foundation of CE is Discovery, which is a process for uncovering a person's strengths, interests and the conditions under which they will be successful in employment. DEED-VRS and DHS-Minnesota State Operated Community Services developed an Association of Community Rehabilitation Educator (ACRE) certified Customized Employment curriculum and training. It also includes mentoring supports to DEED, Community Rehabilitation Partner and School District staff to reach competent, practitioner level delivery of Customized Employment Services for persons requiring it that is sustainable, ongoing and cost effective for the state disability employment system. This training is offered at no cost, multiple times each year.

7. STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES; AND

The Minnesota Department of Human Services (DHS) is responsible for coordinating mental health services for adults and youth. Minnesota's Mental Health system is a state mandated, county operated system. The State Mental Health Authority is responsible for ensuring that

Minnesota's 87 counties, the local mental health authority, provide an array of community mental health services including: Basic clinical services, community services and supports, hospitalization and residential treatment. Funding for Minnesota's mental health system comes from health care insurance, including Medicaid, private insurance and MinnesotaCare, as well as county local tax levy funds, state mental health funds and Federal Block grant funds. The Minnesota VRS program has a long history of innovative collaboration with the State Mental Health Authority. This includes VR representation on the State Mental Health Advisory Council and the State Behavioral Advisory Council. The two agencies have collaborated to implement, sustain, and expand the evidence-based practice of supported employment, Individual Placement and Support (IPS). Starting with 4 local partnerships between mental health and employment providers in 2006, the IPS provider network in Minnesota, funded in part with state appropriations dedicated to IPS, has expanded to 20 IPS programs (partnerships between mental health agencies and employment service agencies) in 45 of Minnesota's 87 counties. Minnesota's VR and Behavioral Health Division are partners in the International IPS Learning Community.

8. OTHER FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS OUTSIDE THE WORKFORCE DEVELOPMENT SYSTEM.

Minnesota VR has a statewide network of eight private, nonprofit centers for independent living that operate in partnership with us. Each of these regional centers provides four core services: Information and Referral, Skills Training, Peer Counseling, and Advocacy. Additionally, these 8 IL centers are contracted to complete our Workforce Innovation and Opportunity Act (WIOA), Section 511 work on the limitations on the use of subminimum wages. WIOA requires an annual conversation with individuals who are earning less than the federal minimum wage (\$7.25) about work options, career counseling, information, and referral information.

9. OTHER PRIVATE NONPROFIT ORGANIZATIONS.

The VR program provides specialized, one-on-one employment services for individuals with disabilities. While VR program state-staff provide some services directly, the VR program also partners with businesses and organizations in local communities throughout the state to provide employment services. A Community Partner must have a Professional/Technical Master Contract (P/T Contract) with the VR program to provide services as a Community Partner for an individual in the VR program. The P/T Contract is the mechanism that contains the employment services structure, expectations, purchases, and pricing. The VR program purchases services such as vocational evaluation, skill training, internships, job development and job placement, on-the-job training, and time-limited job coaching. Services must be consistent with an individualized plan for employment developed between counselor and participant, based on the participant's informed choices and offered in competitive, integrated settings.

Community Partners:

Minnesota distinguishes between two categories of community rehabilitation providers: a "limited-use vendor" (LUV) and the unlimited use community rehabilitation program (CRP). This arrangement permits wide selection of services and system flexibility and emphasizes the use of providers accredited by the national Commission on Accreditation of Rehabilitation Facilities (CARF).

Community Partners designated as Community Rehabilitation Programs (CRPs) are accredited by CARF. Accreditation represents an industry assurance that the CRP meets or exceeds nationally and internationally recognized service standards and is focused on delivering the most favorable results for persons served. Per state rule, service providers that are CARF

accredited have no pre-determined maximum budget cap for their P/T contract. A budget maximum is negotiated with the VR program as part of the contract application and negotiation process.

Community Partners designated as Limited-Use Vendors (LUVs) are service providers that are not CARF-accredited. Per state rule, VRS must limit the amount of business it does with LUVs through funding limits and shorter contract terms. Upon negotiation with the VR program, LUVs may conduct business up to \$100,000 a year with VRS after a Professional and Technical (P/T) Services Master Contract has been approved. Limited use providers (those without CARF accreditation) introduce competition and choice to the rehabilitation marketplace and provide an entry point for new providers in response to an unmet or emerging service need.

Written Assurances:

Providers must provide written assurances about their organizational missions, operations (including audits and lines of authority), staff development and qualifications, services, fees, populations served, standards of professional practice, and adherence to customers' employment plans. They must also provide written assurance regarding vendor compliance with the Americans with Disabilities Act, Minnesota Human Rights Act and other employment law on individual rights, accessibility, occupational health and safety, and data privacy.

VRS Support for Community Partners:

VRS employs 4 program specialists to help maintain a mutually supportive professional relationship and to negotiate modifications to agreements with Community Partners. VRS and Community Partners work together to promote mutually held goals, including:

Develop and maintain choices for participants.

- Meet workforce needs identified by the state's employers.
- Ensure that services are provided in competitive and integrated settings.
- Facilitate state-level planning and coordination of training needs of Community Partner staff.
- Facilitate communication between VRS and Community Partner staff at the administrative level.
- Increase Community Partner awareness of vocational rehabilitation issues at state and national levels.
- Identify and provide training for Community Partner and VRS staff.

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner, that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

The VR agency must select the "Edit" button to review and agree to the VR State plan 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.

The State Plan must include
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

The State Plan must include
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

The State Plan must include 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

States must provide written and signed certifications that:

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;

[1] Public Law 113-128.

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Minnesota Department of Employment and Economic Development

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;

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

ENTER THE NAME OF DESIGNATED STATE AGENCY

Minnesota Vocational Rehabilitation 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;

^[5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

^[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

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

DSU Director Dee Torgerson

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

DSU Director Dee Torgerson

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

[1] Public Law 113-128.

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

[5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

CERTIFICATION SIGNATURE

To review and complete the Certification section of the VR portion of the State plan, please select the "Edit" button.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Signatory information	Enter Signatory information in this column
Name of Signatory	Dee Torgerson
Title of Signatory	Vocational Rehabilitation Services Director
Date Signed	3/4/2024

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan’s approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	57.7	58.0	57.7	58.5
Employment (Fourth Quarter After Exit)	55.6	57.9	55.6	58.0
Median Earnings (Second Quarter After Exit)	3,850.00	3,850.00	3,850.00	4,042.00
Credential Attainment Rate	44.0%	44.5	44.0%	45.0
Measurable Skill Gains	48.0%	50.7	48.0%	51.2
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

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

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - VOCATIONAL REHABILITATION

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that

provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
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?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

State applicants must respond to four questions.

The first of four questions is:

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

Minnesota Department of Employment and Economic Development (DEED) Vocational Rehabilitation Services (VRS) is committed to cultivating a culture that encourages collaboration, flexibility, and fairness to enable all individuals to contribute to their full potential. Our mission, philosophy, and values embody equitable access to, and participation in, the Vocational Rehabilitation Program. We have Accessibility Champions imbedded into our agency who are dedicated staff trained on accessibility. In the past year, VRS has hired dedicated staff and formalized a Diversity, Equity, Inclusion and Accessibility committee to develop initiatives to recruit and retain staff that is reflective of our customer base. We are also in early stages of developing an outreach plan to increase public awareness and recognize the need to specifically target underrepresented groups. Our State Rehabilitation Council shares our commitment to diversity. DEED policies strictly prohibit any form of harassment or discrimination based on the following protected classes:

1. Race
2. Color
3. Creed
4. Religion
5. National origin
6. Sex* (includes pregnancy, childbirth, and related medical conditions)
7. Marital Status
8. Familial Status
9. Receipt of public assistance
10. Membership or activity in a local human rights commission
11. Disability
12. Age
13. Sexual orientation
14. Gender identity
15. Gender expression
16. For employees, genetic information

VRS staff are actively engaged in various boards and workgroups where we are able to advocate for individuals with disabilities, including the Governor's Workforce Development Board, the Olmstead Implementation Advisory Group, Minnesota Council on Disability, and Minnesota Governor's Council on Developmental Disabilities.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE
EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER
BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

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

1. Economically disadvantaged:
 1. May be unable to afford transportation, assistive technology, broadband Internet service, childcare, housing, or other support services that contribute to accessing VR services or participating in a rehabilitation program.
2. Gender:
 1. May face gender bias (unintentional or otherwise) or stereotyping.
 2. May not be presented with the full range of programs and services available to them because of bias or preconceived ideas about abilities.
3. Race, ethnicity, color, national origin, language, migrant status:
 1. May face prejudice, bias, stereotyping, or cultural insensitivity.
 2. Maybe unaware of VR services because of a lack of information or outreach in their native language.
 3. May need language interpreters for effective communication with VR or other service delivery staff.
 4. May need written communication generated by VR or agencies in their native language.
4. Disability:
 1. May have a barrier to transportation that is not accessible.
 2. May need AT to access programs and services.
 3. May need information in alternate formats.
 4. May need interpreters for communication.
 5. May face physical accessibility issues at some service providers or community businesses.
 6. May face discrimination or stereotyping in the community.

5. Rural status:
 1. May face barriers due to lack of transportation
 2. May have limited broadband connectivity.
 3. May have limited services available in the community due to a lack of providers.
 6. Age:
 1. May experience bias or stereotyping.
 2. May need AT or physical restoration services to access programs and services.
 7. Homeless status or housing insecurity:
 1. May experience all of the barriers faced by low-income individuals.
 2. Lack of a stable living environment may affect ability to receive communication.
 3. May experience bias or stereotyping.
 4. Lack of access to treatment for behavioral health issues may affect ability to access services and sustain engagement.
 8. Pregnancy, parenting or caregiver status:
 1. May face childcare or caregiving issues that limit ability to participate in programs or services.
 2. May experience bias or stereotyping.
 9. Sexual Orientation:
 1. May face bias and discrimination.
 2. May have experienced trauma and resulting mental health concerns.
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?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

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?

VRS seeks to address barriers in several ways:

- VRS puts a high priority on and will continue to provide training to our staff to promote awareness of and to address potential barriers. We provide several training opportunities throughout the year and have a plethora of asynchronous trainings available through our learning management system. One area of focus will be to train staff to recognize and understand implicit bias to reduce negative impacts on service delivery and experiences.
- VRS will promote the use of assistive technology “labs” in 20 offices across the state, allowing individuals to try out and determine what AT works best for them.
- VRS will expand public awareness of our services to both adults and youth from the wider population of Minnesotans with disabilities who could benefit from services.
- VRS will create and sustain a strong network of internal talent and external partners whose shared passion accelerates the delivery of seamless disability employment and independent living services.
- VRS will work to improve process and the customer experience through digital transformation.
- VRS instituted a policy of meeting people where they prefer, including in private residences. This alleviates many of the barriers identified above.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

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

- VRS will work through calendar year to implement an outreach strategy and to develop a digital roadmap in PY25.
- Staff training is ongoing, and related courses are available to staff throughout the year. Specifically, new employees are required to take "Awareness, Belonging, and Courageous Leadership Part 1" training within 6 months of hire. Additionally, ethics training, in which there is a cultural component, is also required for new staff and then every five years.
- The assistive technology “labs” will be fully in place by the start of PY25.

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - SUPPORTED EMPLOYMENT
EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
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?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of

Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

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

Minnesota Department of Employment and Economic Development (DEED) Vocational Rehabilitation Services (VRS) is committed to cultivating a culture that encourages collaboration, flexibility, and fairness to enable all individuals to contribute to their full potential. Our mission, philosophy, and values embody equitable access to, and participation in, the Vocational Rehabilitation Services program. Supported Employment (SE) services are provided to individuals with the most significant disabilities, specifically to those accessing Medicaid Waivers. Through appropriate modes of communication, each applicant and recipient of VR Services must be given the information necessary to make informed choices on who they want to access for supported employment services. Individuals who need assistance in exercising informed choice must be made aware that support services are available. Our State Rehabilitation Council shares our commitment to diversity. DEED policies strictly prohibit any form of harassment or discrimination based on the following protected classes:

1. Race
2. Color
3. Creed
4. Religion
5. National origin
6. Sex* (includes pregnancy, childbirth, and related medical conditions)
7. Marital Status
8. Familial Status
9. Receipt of public assistance
10. Membership or activity in a local human rights commission
11. Disability
12. Age
13. Sexual orientation
14. Gender identity
15. Gender expression
16. For employees, genetic information

VRS staff are actively engaged in various boards and workgroups where we are able to advocate for individuals with disabilities, including individuals with most significant disabilities, such as the Governor's Workforce Development Board, the Olmstead Implementation Advisory Group, Minnesota Council on Disability, and Minnesota Governor's Council on Developmental Disabilities.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

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

- Funding for supported employment, within which Title VI Part B funds play a relatively small part, is governed by myriad federal and state laws and rules covering many categories of services. This makes it difficult to spend the funds.
 - Due to regulations, the inability to spend more on adults than we do on youth is a barrier to utilize these funds. We are not able to spend significant funds on youth because they are not in long term jobs.
- Lack of job coaches, especially during evenings and weekends
- Lack of specialists trained in mental/behavioral health, chemical dependency, and learning disabilities
- Lack of transportation
- Lack of providers
- Lack of understanding or misunderstanding of how the three state agencies can partner together to support individuals with disabilities on waivers (MDE, DHS, DEED)
- Lead Agency/county level and waiver case managers not understanding our partnership or how to best support individuals with employment supports.
- Employers who are willing to hire people with disabilities, especially those with most significant disabilities.

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?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

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?

Several initiatives are currently underway to serve individuals with the most significant disabilities. The most prominent one is E1MN, Minnesota's state agency partnership to advance Employment First outcomes for youth and adults with disabilities currently on Medicaid waivers. The Minnesota Department of Human Services Disability Division (DHS-DSD), Department of Education (MDE), and the Department of Employment and Economic Development (DEED) are working together to deliver a more seamless and timely employment support system for those on waivers. Key areas include a framework that outlines and clarifies the roles and responsibilities for professionals, training resources for all partners, tools, resources, and technical assistance to support collaboration at the local level across the state. The Department of Human Services received funds in FY23 to conduct an interagency alignment study dissecting ways to better align our systems values, rates, data practices, and more to more efficiently support individuals on waivers who access services from all three agencies.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

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

This work is underway as DHS prepares to engage with a consultant to help with the work through FY25. The goal of this work is to eliminate unnecessary barriers to accessing employment services. Additionally, the E1MN planning team has been coordinating regional meetings across the state during FY23 and FY24 to bring together key professionals to facilitate collaboration and address barriers in specific communities for individuals with disabilities seeking employment services.