



Pennsylvania (PA) WIOA Matrix

Employment First State Leadership Mentor Program (EFSLMP)

“Employment First” will be the policy of all commonwealth executive branch agencies under the jurisdiction of the governor in serving persons with disabilities. This policy reflects the Governor’s goal of making the commonwealth a model state when it comes to creating a climate hospitable to workers with disabilities. (Page 33)

The Secretaries of PDE, DHS and L&I will, working with other commonwealth agencies and executive office officials, create a written plan that implements Employment First as the policy of all commonwealth executive branch agencies; aligns funding, policy, and practice toward an emphasis on competitive integrated employment; prioritizes competitive integrated employment as the first consideration and preferred outcome of all publicly-funded services for all Pennsylvanians with a disability; and creates the conditions that lead to a material increase in the number of Pennsylvanians with a disability who are employed in a competitive integrated job. (Page 49)

OVR Response: OVR is represented on the PA Developmental Disabilities Council, the Governor’s Special Education Advisory Panel and the Employment First State Leadership Mentoring Project, all of which are comprised of representatives from partnering agencies. (Pages 163)

As a key member of the PA Employment First State Leadership Mentoring Project currently sponsored by a grant administered by the Office of Disability Employment Policy, OVR will partner with agencies within the Department of Human Services to ensure that the employment needs of individuals with disabilities are met, that cost services are comprehensive, effective, innovative and not duplicative, and that every individual with a disability who wants to work to achieve self-support will be given the opportunity to do so. (Page 190)

OVR representatives regularly attend the Special Education Advisory Panel, Pennsylvania Developmental Disabilities Council, and the Pennsylvania Employment First State Leadership Mentoring Project with members of other agencies in order to collaborate with agency partners in order to coordinate services to mutual customers. (Page 225)

With the Employment First Initiative, it is more apparent now than ever to have as many resources in place to help those with disabilities seeking competitive and integrated employment. (Page 389)

It is positive that Employment First is noted up front in the goals... especially as there are a lot of mentions of training programs in this plan. (Page 392)

The establishment of Employment First when developing individual plans for service for persons with an intellectual disability. (Page 397)

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Joanna Greco from Beaver County Rehabilitation Center offered the following comment: I am writing concerning the “Employment First” initiative.

The “Employment First” initiative is commendable in supporting competitive employment as a choice for individuals with disabilities. BCRC has promoted and placed individuals in competitive community employment for over 50 years. (Page 400)

This section highlights the policy that the Commonwealth be an “Employment First” state. (Page 432)

Therefore, we support the current state WIOA plan draft’s strong emphasis on offering OVR consumers informed choice in employment options, although we strongly recommend more clarifying language around this topic. As an competitive IT and Contact Center enterprise with a mission to advance employment for persons with disabilities, we both applaud and support both the policy and priority of “Employment First” as expressed in the State Plan. (Page 451)

Customized Employment

Technical assistance, agency cross-training and resource sharing will be required to assist LEAs to end utilization of sub-minimum wage employment as a model for transition planning. Discovery and customized employment as well as other innovative approaches will be utilized to assist the students with the most significant disabilities to exit secondary school with the goal of achieving competitive, integrated employment. (Page 170)

Discovery and customized employment as well as other innovative approaches will be utilized to assist the students with the most significant disabilities to exit secondary school with the goal of achieving competitive, integrated employment. (Page 177, 184 and 188)

SE services secure employment for individuals with the most significant disabilities who would not experience an employment outcome from less intensive job placement methods. OVR has a number of changes planned for individuals receiving SE services, such as expanding Discovery and Customized Employment pilots. The following improvements listed are intended to be considered OVR goals for title VI funds. (Page 215)

Developing innovative and collaborative programs and services such as Discovery and Customized Employment as well as funding for Comprehensive Transition Programs that will help divert individuals away from subminimum wage employment. (Page 221)

OVR reviews the performance standards and indicators monthly. As an agency we constantly strive to meet or exceed the standards and indicators through training, policy development, and the addition or creation of new and innovative programs that will benefit our customers. We are also going through an extensive CSNA that will help guide us regarding service provision and to address system gaps to ensure that as many positive outcomes are achieved as possible. We are also exploring services such as customized employment and implementing interagency agreements that will assist with federal match generation to serve additional customers. OVR will continue to monitor the standards and indicators and incorporate stakeholder input into our program to ensure a cycle of constant reflection and program improvement. (Page 222)

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The inclusion of customized employment services as a tool used alongside SE services can allow more intensive services to be offered for individuals with disabilities who are seeking competitive, community–integrated employment and historically may not have been able to benefit from VR services disabilities. (Page 228)

Also, SE services have been provided on a broader basis since the late 1990’s to persons who are deaf via contracting with SE CRPs fluent in American Sign Language. The use of SE for customized employment (CE) cases is being piloted in 2015 to expand the breadth of SE services OVR offers. The use of CE in addition to SE will allow OVR to assist individuals who require very intensive services but are interested in and working towards competitive community integrated employment. (Page 235)

There are other forms of training, including Discovery and Customized Employment trainings, that would be more current to promote Employment First principles, and do not necessarily require the credentials called for in the Plan. Again, flexibility is key to promoting the innovation that is the hallmark of WIOA.

Braiding/Blending Resources

Service coordination, resource leveraging and braiding of funding; and 4. quality assurance and improvement resulting in the collective accountability and performance measurement needed to substantially increase the numbers of Pennsylvanians in competitive integrated employment. (Page 190)

The braiding of WIOA Title I–B funded programs with other youth–directed state and local entities allows comprehensive services to be offered to all eligible low–income populations under WIOA. Available TANF funding will continue to support WIOA year–round services and summer employment activities. (Page 49)

Additionally, we applaud OVR for its shift towards blending customized employment and supported employment services – helping providers become certified to provide customized employment services is key to ensuring the quality of customized employment services for people with the most significant disabilities. (Page 144)

We remain concerned that despite efforts to anticipate staffing needs of OVR in the coming years (Page 123)

Overall the agency needs a greater staff contingency to take on the increased responsibilities under WIOA. (Page 579)

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Section 188/Section 188 Guide

WIOA Section 188 Nondiscrimination and Equal Opportunity NPRM, 29 CFR Part 38 proposes to revise federal regulations to ensure access to the workforce system by people with disabilities by bringing the regulations in line with updated disabilities civil rights law and ADA compliance recertification guidelines for the one-stop centers. (Page 528)

Response: We appreciate the comment and support the requirement under Section 188 for all PA CareerLink® centers to be physically and programmatically accessible for all job seekers, including individuals with disabilities.

- L&I OVR and Community Health Choices (CHC) – Most consumers who currently and would receive physical disabilities services through PA Department of Human Service (DHS) Office of Long Term Living (OLTL) –with the exception of Act 150 consumers and a few other target populations (Page 533)

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will comply with section 188 of WIOA. (Page 86)

DEI/Disability Resource Coordinators

No disability specific information found regarding this element.

Other State Programs/Pilots that Support Competitive Integrated Employment

SE services secure employment for individuals with the most significant disabilities who would not experience an employment outcome from less intensive job placement methods. OVR has a number of changes planned for individuals receiving SE services, such as expanding Discovery and Customized Employment pilots. (Page 215)

We appreciate the comment. OVR continues to identify and develop innovative strategies and supports for individuals with disabilities such as expansion of Customized Employment and Discovery pilots while we await the release of final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage. (Page 579)

Financial Literacy/Economic Advancement

WIOA added five new program elements to ones originally outlined under WIA, including: financial literacy education; entrepreneurial skills training; the provision of labor market and employment information about in-demand industry sectors or occupations available in a local area; activities that help youth prepare for and transition to post-secondary education and training; and education offered concurrently with and in the same context as workforce preparation activities and training for a special occupation or occupational cluster.(Page 119)

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Benefits

BSTs also have access to a plethora of labor market information that can be helpful to employers in setting wages and benefits that will attract high-quality candidates. BSTs will communicate and collaborate with other agencies of state government which may have direct liaison activities with employers and regional economic development partners to avoid business fatigue from multiple contacts and ensure coordination of services. (Page 362)

CILs can also help those who do not qualify for OVR services. Employment Networks under the Ticket to Work Program can also help. Employment Networks were created to give people with disabilities on Social Security benefits more options. (Page 389)

With over 725,000 working aged adults and 75,000 youth with disabilities, PA has an ever growing caseload of residents receiving disability related benefits from the Social Security Administration (SSA). Since 2001, SSA has operated two distinct programs in every state to promote and facilitate employment and increased earnings among individuals with disabilities who are otherwise dependent on government benefits. We appreciate the comment. The commonwealth will continue to focus efforts on those with barriers to employment, including individuals with disabilities as defined in WIOA. Additionally, the Department of Human Services (DHS) agrees that people with a disability receiving DHS-funded Medicaid waiver home and community-based supports often cite as a barrier to seeking employment the concern that earning wages will make them ineligible for basic supports that enable them to live independently in the community rather than a more costly institutional setting. DHS is exploring adding benefits counseling (Work Incentives Planning Assistance) as a service that would be paid under its Medicaid HCBS waivers. (Page 391)

Those that participate in our work force has many concerns if they are forced into competitive employment, such as, the fear of losing medical benefits, loss of SSI checks, inability to work a 40 hour week or even part time, transportation issues to and from work or shift work that does not coincide with public transportation. And the fear of the world of work: failure, being unaccepted, taken advantage of, pressure of the job itself. (Page 400)

Particularly impacted by these changes are people with disabilities who face difficulty finding employment, yet do not qualify for SSI or other benefits programs. (Page 422)

Build the capacity of PA's employment professionals to support people with the most significant disabilities and to address barriers to employment which are related to misunderstandings about the relationship between SSA benefits and working.

- The Combined Plan should lay out specific training strategies to build the capacity of employment specialists to successfully obtain and maintain employment for people with the most significant disabilities. (Page 456)

In fact, Maryland's WIOA Plan analyzes by region the correlation between people with disabilities and those who had Individualized Education Plans (IEPs). Regionally, the data showed that areas with a strong IEP system and more people who had IEPs in school, later had less dependence on entitlement benefits. (Page 471)

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School to Work Transition

The PA SLT has recommended that the IDEA Memorandum of Understanding be revised to incorporate changes in Transition Services regulated by WIOA and the Rehabilitation Act of 1973 as amended. OVR representatives meet regularly with representatives from the Pennsylvania Department of Education's Bureau of Special Education and Bureau of Career & Technology Education to review policies, procedures, initiatives, and projects to ensure that eligible students with disabilities who are still enrolled in secondary education and youth with disabilities who are no longer engaged in secondary education are receiving the vocational rehabilitation services that they need to successfully transition from school to work and independence. (Page 174)

Understanding pertaining to transition from school to work and adult services. Technical assistance, agency cross-training and resource sharing will be required to assist LEAs to end utilization of sub-minimum wage employment as a model for transition planning. Discovery and customized employment as well as other innovative approaches will be utilized to assist the students with the most significant disabilities to exit secondary school with the goal of achieving competitive, integrated employment. (Page 177)

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Data Collection

Data collection, sharing and reporting; (Page 190)

The current data collection system is under revision and by the end of Perkins IV, the system will reflect required data elements. The data elements will include data that allows for analysis that evidences continuous improvement at the postsecondary level. (Pages 259)

New to the data collection is 1P1 Technical Skill Attainment. The current data collection system needs to change in order to collect relevant data. Until the change occurs, the State will use grade point average. (Page 260)

In regards to graduation rate-4S1*, multiyear identification of CTE students will begin in 2007-2008 utilizing PDE's unified data collection system which uses a unique student identifier, entitled Pennsylvania Information Management System, (PIMS) to establish graduation rates by the 2012 school year. PDE is still ascertaining a valid collection vehicle to obtain 4S1 data. (Page 280)

Student Graduation Rates (4S1)* – Individual student data collection will begin with the 2007-2008 school year, high school graduation rates will not be available using PAMSecureID information until February 2012 for the Class of 2011. (Page 284)

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Any data collection or reporting that is conducted will be vetted and reviewed to ensure FERPA compliance. Under FERPA, there are exceptions to data collection when the data is to be used for program evaluation, which these data collections would fall under. Therefore the commonwealth believes that the programs will be able to function without violating the provisions of FERPA. (Page 417)

Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs.

- Data Collection ROI & Market Penetration (p. 32 table): While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. (Page 424)

Small Business/Entrepreneurship

No disability specific information found regarding this element.

Career Pathways

Career pathways must be diverse with multiple entry and exit points allowing individuals of varying abilities, including low-skilled adults and youth with multiple barriers to employment, to have realistic access to pathways.

Comment: The application of multiple entry points within career pathways is a very positive approach that we can operationalize for varying individual employment plans. Response: We appreciate the comment in support of our approach.

- The commonwealth will mainstream job seekers with barriers to employment to the maximum extent possible by offering realistic entry points into career pathways and by ensuring necessary supportive services are in place and coordinated across agencies, so that those individuals with the most significant barriers to employment are successful in accessing and navigating career pathways. (Page 460)

The commonwealth recognizes the need to have a variety of service providers working together to ensure that individuals with barriers to employment receive the services they need to benefit from career pathways opportunities. (Page 460)

We strongly support this. We urge the Pennsylvania Department of Labor & Industry to retain the above provisions in the final state plan, with the clarifying edits suggested by CLS and CJP in their more detailed comments.

Response: We appreciate the comments in support of the State Plan, including: your recognition of the important role our adult basic education services provide in career pathways for low income adults; your comment in support of ensuring that career pathways are accessible to individuals with basic skills needs; your comments in support of the Priority of Service and Career Pathways provisions in the State Plan; and your comment in support of the transitional jobs requirements in the State Plan. Dr. Madeline Seltzer, Manor College, offered the following comment: I am against this combined plan at this time. Parts of the plan are not clear. I would like the Perkins Career and Technical Education parts to be reworked. In addition, I would like implementation to be postponed until Perkins 5 comes up for approval. (Page 489)

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Employment Networks

This new plan continues with the same concept when Careerlinks and other partners are missing two valuable resources that can help a person with a disability: Centers for Independent Living (CIL), and also Employment Networks. CILs offer a plethora of learning opportunities for people with disabilities. They offer core services (information and referral, advocacy, peer counseling, and independent living skills training). Employment Networks under the Ticket to Work Program can also help. Employment Networks were created to give people with disabilities on Social Security benefits more options. Many Employment Networks assist individuals who don't qualify for OVR services. There are many individuals with disabilities who do not meet the specifications for Order of Selection. (Page 389)

Response: We appreciate the comment in support of the plan and acknowledge the valuable resources available for individuals with a disability from partners such as Centers for Independent Living (CILs) and Employment Networks. (Page 389)

* All enclosed information is cited directly from final state plan as of February 23, 2017

Find your local state plans here: <https://www2.ed.gov/about/offices/list/osers/rsa/wioa/state-plans/index.html>