

Rhode Island (RI) WIOA Matrix

Employment First State Leadership Mentor Program (EFSLMP)

The state of RI recently negotiated a Consent Decree (CD) and Interim Settlement Agreement (ISA) with the Department of Justice (DOJ) to ensure that Employment First Principles and practices are utilized in planning and service delivery to adults, in-school youth and out-school youth with significant intellectual disabilities (I/DD) who need access to the continuum of Supported Employment Services in order to work. The DOJ court order requires three state agencies:

1. Office of Rehabilitation Services or ORS,
2. The Rhode Island Department of Education or RIDE and
3. The Behavioral Health, Developmental Disabilities and Hospitals or BHDDH to develop and implement a service delivery system that ensures individuals, adults and youth, with I/DD have access to integrated competitive employment opportunities in order to make fully informed choices about work. The three state agencies are developing Cooperative Agreements, Data Exchange Agreements, and joint Continuous Quality Improvement efforts as elements/requirements of the CD and ISA. (Page 23)

Two Memorandum of Understanding (MOU) are in place for RIDE, ORS, and the state Developmental Disability agency - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH). One MOU defines the working relationship between the three parties, and the other MOU addresses data sharing for the state agencies. The Department of Justice (DOJ)/State Consent Decree required that each of these MOUs be developed and implemented to ensure that the responsibility for services and implementation of Employment First principles occurs within RI in a manner consistent with the mandates of the DOJ/State Consent Decree. In-school youth with significant intellectual disabilities are entitled to access to an array of transition planning, career exploration/discovery services, and community-based work experiences prior to graduation from high school. The MOU describes the relationship between the parties and data collection to demonstrate that deliverables of the DOJ/State Consent Decree are occurring as prescribed. (Page 206)

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The CD obligates ORS to

1. Provide in-school youth with I/DD a 120-day Trial Work Experience prior to leaving high school,
2. CRP personnel providing Supported Employment job coaching and job placement services to meet certain criteria/credentials to provide services, and
3. Establishment of a Continuous Quality Improvement review of each agency providing SE services. (Page 212)

As a component of the Pre-ETS program, ORS, in collaboration with other partners, has instituted several Project Search programs within the health care industry sector. The state emphasis and commitment to Employment First principles for individuals with significant intellectual disabilities has helped to facilitate RI Project Search becoming a reality. The first Miriam Hospital Project Search - 2014, was so successful, that the program was replicated with Blue Cross in 2015, and is planning to further expand to an additional site in 2016. In addition, ORS funds summer work experiences for youth since 2010. All of these work experiences are in integrated community based work settings at minimum wage or above. (Page 214)

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Employment related themes included:

- Concern over the continuum of services related to the Employment First Initiative
- Supported employment services, lack of long-term funding options, and service need ratio to staffing
- Impact on individual benefits and services
- Continuity of services for transition-age youth as they move from one system to another (Page 231)

OBJECTIVE 2: Change the culture of the Supported Employment (SE) vendor community to expect integrated competitive employment as the goal of services.

- Develop and implement a Continuous Quality Improvement (CQI) process for vendors working with customers with Developmental Disabilities, as required by the DOJ/State Consent Decree.
- Expand the CQI process to all vendors authorized to provide the array of SE services.
- Implement training opportunities for SE vendors in assessment, job development/coaching, and business relationships.
- Conduct quarterly VR meetings with SE vendors to reinforce and strengthen Employment First principles and practice.
- Support and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings.
- Examine the VR fee structure to ensure it rewards integrated employment outcomes. (Page 245)

Participation in employment experiences for individuals needing Supported Employment, in-school youth and clients attending college/training programs funded by ORS, will be encouraged and included in Individualized Plans for Employment (IPE). ORS will also ensure that services are focused on access to opportunities for real work experiences and integrated competitive employment outcomes at or above minimum wage. ORS will encourage and reinforce, with ORS approved Supported Employment providers and other state entities, Employment First and Recovery principles and practices into service delivery in order to increase expectations that individuals with significant intellectual and psychiatric disabilities can obtain quality employment outcomes in integrated settings at competitive wages. ORS will provide access to information about SSA Work Incentives, Ticket to Work, and other State-specific benefits to customers and their families, CRPs, support staff, and ORS staff in order to support informed choice and employment decisions. (Page 249)

STATE PLAN FOR SE Title VI FFY 2014 and FFY 2015: The State Plan for FFY2014 and FFY2015 incorporated tracking of admissions, service, and employment outcomes for general, transition, underserved, and supported employment customers in order to analyze these data elements. The use of this data was intended to modify, enhance, and/or develop new services and identify staff training needs.

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- **Accomplishments:** The DOJ/State Consent Decree with the state of RI created a state-wide commitment to Employment First principles in planning and service delivery for in-school youth and adult with significant intellectual disabilities. ORS has had a long standing commitment to Integrated Competitive Employment for all individuals with disabilities. However, continued support of sheltered workshops impeded resources being re-directed to employment and long term supports. The DOJ/State Consent Decree mandate forced a realignment of service delivery, funding and collaboration among state agencies. (Page 257)

SUPPORTED EMPLOYMENT SERVICE DELIVERY: ORS has employment services that are available to adults and in-school youth found eligible for Supported Employment Services. The values and principles of ORS to make integrated competitive employment available to all individuals with disabilities has been reinforced by a state of RI DOJ/State Consent Decree. This recently negotiated Consent Decree (CD) and Interim Settlement Agreement (ISA), between RI and DOJ, resulted in a Governor's proclamation declaring that RI is an Employment First state. The principles and practices of Employment First, consistent with the mission of ORS and the mandate of the Rehabilitation Service Administration (RSA), are utilized in planning and service delivery to adults, in-school youth, and out-of-school youth. (Page 260)

Attending to the training needs of CRPs is an ongoing commitment. The CRP Supervisor actively meets with providers/vendors who provide Supported Employment (SE) services in order to re-enforce the philosophy of Employment First. The CRP Supervisor, in collaboration with field supervisors, counselors, and ORS administrators, is actively involved in meetings with potential vendors to discuss becoming a Supported Employment vendor for ORS in order to increase service delivery capacity. These meetings with CRPs provide an opportunity to address concerns and questions as well as clarify the elements of a quality employment outcome. ORS participates on the two Supported Employment Advisory Councils as a means of dedicating resources and reinforcing a commitment to integrated competitive employment for individuals with significant disabilities. (Page 262)

Customized Employment

No specific disability related information found.

Braiding/Blending Resources

Four major factors of network government collaboration must be addressed between all partners included in this plan before the most effective service delivery can be provided. These factors include: clarifying partner roles and implementing an integrated response team model, braiding resources across programs to maximize investments, establishing common standards around client intake and service referrals, and developing an IT infrastructure to support intelligence sharing and effective case management among partner entities, both government and non-government. (Page 78)

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Section 188/Section 188 Guide

Additional information in addition to the requirements listed for training program initial and continued eligibility, training providers must meet the following:

- a. **Non-Discrimination:** All training providers must comply with the nondiscrimination and equal opportunity regulations at 29 CFR Part 37, Implementation of the Nondiscrimination and Equal Opportunity Provisions, and 10 the USDOL Section 188 Disability Reference Guide.
- b. **Accessibility:** Training providers must provide physical and programmatic accessibility and reasonable accommodations/modifications, as required by Section 504 of the Rehabilitation Act of 1973, as amended; the Americans with Disabilities Act of 1990, as amended; section 188 of WIOA; and the regulations implementing these statutory provisions.
- c. **Criteria for Eligibility:**
 - a. State Criteria - In establishing criteria pursuant to WIOA sec. 122(b)(1), the State shall take into account each of the following:
 - i. Performance Accountability and Outcomes
 - ii. Ensure access to training services throughout the State (including use of technology)
 - iii. Dissemination of Performance Outcomes and training information
 - iv. Training must lead to “In-Demand” industry occupations
 - v. State licensing requirements and licensing status of providers. (Page 131)

DEI/Disability Resource Coordinators

Disability Employment Initiative (DEI): This program provides an integrated service system that creates a “One-Stop” entry point for individuals with disabilities to gain entrance to competitive and/or self-employment. This is accomplished by improving coordination and collaboration among employment and training programs implemented at state and local levels, including the “Ticket to Work” program under the SSA that enables disabled individuals to access employment services at an employment network site and other effective community partnerships that leverage public and private resources to better serve individuals with disabilities and improve employment outcomes. The array of services provided to DEI participants include; placement in suitable jobs, job search workshops, counseling, core, intensive, and training services, referral to supportive services, outreach to employers, and outreach to individuals with disabilities by providing services at various locations around the state.(Page 27-28)

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Other State Programs/Pilots that Support Competitive Integrated Employment

Clarifying partner roles and implementing an integrated resource team model is critical in developing a coordinated and collaborative service delivery system. The integrated resource team model started as a pilot model under the Rhode Island Disability Employment Initiative grant. In the pilot participating agencies committed to participating in ad-hoc teams developed around meeting the needs of individual clients. If one agency determined a client needed to be referred to additional services, the agency receiving the referral would commit to participating in a joint case management team with staff from other programs serving the same client. As a result, coordination and collaboration among employment and training programs fundamentally improved through a blending and braiding of resources at a customer level. (Page 78)

3. COORDINATION WITH NONPROFITS, EDUCATION OFFICIALS AND EMPLOYERS

SRC COMMENT: The SRC made several recommendations regarding interagency cooperation and coordination with other entities. At this point ORS has not, pursuant to Attachment 4.2(c) addressed many of these recommendations. Among our recommendations included that ORS update broken links on its website. We also suggested that ORS review its expired MOU between it and RIDE as well as other MOU partners. In addition, we look forward to working with ORS on the revised Comprehensive Needs Assessment to capture WIOA expectations and employer needs. With regard to coordination with employers, we assisted ORS in framing goals. As this is a new attachment, we

Look forward to hearing more about ORS efforts to create new pilot projects such as Project Search expansion and additional partnerships with businesses. We continue to be interested in ORS serving as a leader in requiring Community Rehabilitation Providers (CRPs) to deliver services consistent with the spirit of WIOA. We are interested in ORS efforts to modify fee structures, expand upon the competence of CRPs, and other efforts to change the culture to one that has an expectation that all services should ultimately culminate in competitive employment outcomes for people with disabilities. Again, many of these issues were addressed in our January 19, 2016 communication to ORS. (Page 199-200)

- ORS will use I&E funds to explore development of a performance-based contract specific to the services provided by the SE Vendor community to individuals with significant intellectual disabilities. The purpose of this pilot is to increase the employment outcomes, as per the DOJ/State Consent Decree, for this population of ORS clients. (Page 255)
- I& E funds were used to support the licensing fees for two Project Search pilots as part of the ORS Pre-ETS initiative.
- ORS utilized I&E funds for State Rehabilitation Council and State Independent Living Council activities.
- ORS used I&E funds for CRP trainings. (Page 259)

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Financial Literacy/Economic Advancement

Other criteria the grantee must meet includes the ability to provide services related to media literacy, financial literacy, exposure to emerging career choices, linkages with local after school opportunities, links to post high school opportunities, connection to Regional Vocational Centers, disability service provider and all other required WIOA activities. The grantee must also be capable of providing such services for all youth populations, including younger in-school youth (ages 14-18), younger out-of-school youth (ages 16-18), and older youth (ages 19-24). (Page 138)

Benefits

Rhode Island's goal in WIOA services is to continue to improve training, employment opportunities and outcomes of adults with disabilities who are unemployed, underemployed, and/or receiving Social Security Disability insurance benefits. Staff training is an essential component to ensure compliance and maintain excellent customer service levels. Training has been provided by the RI Commission for the Deaf and Hard of Hearing about the ADA and issues concerning the Deaf and Hard of Hearing Community. Upcoming trainings are to include "Disability Discrimination and the ADA" presented by the RI Commission for Human Rights. In addition to Departmental trainings, the RI Department of Administration has held numerous trainings regarding diversity and inclusion. (Page 115)

In addition, ORS is the lead agency for the ATAP program. The program is structured into three contracts to deliver device loans, device demonstrations, and other mandated AT grant services. The VR program also has a contract with the Sherlock Center of Rhode Island College to build Rhode Island's capacity of Certified Benefits Counselors for individuals receiving SSI and/or SSDI. (Page 205)

Rhode Island has a work incentive program called the Sherlock Plan which enables individuals with significant disabilities to maintain Medicaid while working. The Sherlock Plan is administered by the Department of Human Services. However, the complexities of increased income on other benefits such as the Developmental Disability agency's service cost share, subsidized housing, and food stamps requires considerable coordination among the state agencies. ORS participates on a monthly case coordination team that examines the Sherlock Plan. In addition, the Department of Justice State Consent Decree (CD) and Interim Settlement Agreement (ISA) require all individuals with significant intellectual disabilities receive a complete Benefit Analysis by a Benefits Counselor. ORS is working with Medicaid and Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to examine how the service can be reimbursed by Medicaid. (Page 215)

- Maintain a focus on quality employment outcomes (integrated, competitive employment at minimum wage or higher with benefits) (Page 227)
- Availability of jobs, individual's social skills, personal/home life barriers, and fear of losing SSI and SSDI, medical benefits, and other subsidies, ranked as the top four issues preventing individuals from obtaining employment
- The top four issues preventing individuals from maintaining employment included personal home life barriers, social skills, availability of jobs and availability/cost of transportation

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- Organizations felt unable to meet customers' needs for benefits counseling and off-site retention supports, including long term Supported Employment supports and job coaching. Work trials, internships and situational assessments were also noted, as was job preparation counseling, employment planning/assessments, interview preparation, and case management. (Page 228)

Since the 2011 CNA respondents to the survey indicated ORS has improved in preparing participants to obtain and maintain employment that matches their goals, interest, and abilities. The 2015 satisfaction survey results reflect an increase from the 2014 responses, and continue to reflect improvement over the 2014 data in the areas of better preparing participants for employment and providing information to enable individuals to make informed decisions regarding benefits, Social Security, and state specific benefits. Areas that continue to reflect need for monitoring are ensuring individuals are aware they can re-contact ORS for services after they are closed, continued learning and skill enhancement for advancement, and quality of employment outcomes. Overall respondents continue to indicate that they would refer a friend for family member to ORS services. Results of the satisfaction survey since the 2011 CNA reflect the following areas for continued monitoring: ensuring customers are provided information on work incentives, Social Security and state specific benefits, educating customers on the assessment process and identifying the need for assistive technology. 2015 surveys reflected positive informed choice trends in the areas of identification of interest, abilities and strengths as related to an employment goal and assistive technology assessments/needs. (Page 229)

Exceptions to time limits apply in the instances of:

1. A minor child(ren) living with a single parent who receives SSI benefits, or with two-parents who both receive SSI benefits, and
2. A minor child(ren) living with a legally responsible non-parent caretaker relative who is not in the cash assistance payment. (Page 277)

Rhode Island provides an objective process for the delivery of benefits and the determination of eligibility, for fair and equitable treatment, and for complaints and an appeals process for those recipients that have been adversely affected. Specific details pertaining to the policy and procedures are contained in Rhode Island DHS Manual Sections Civil Rights Compliance and Complaints and Hearings. (Page 300)

School to Work Transition

Additionally, through the Office of Rehabilitation (ORS) an extensive infrastructure is in place with the Rhode Island Department of Education a (RIDE) and every local education authority (LEA) to provide transition services to in-school youth with disabilities. The intent of this partnership is to ensure that youth with disabilities have an opportunity to experience career exploration, real work experiences and a plan for employment after high school. Through a Cooperative Agreement between RIDE and ORS, a Masters level Vocational Rehabilitation Counselor from ORS works with every high school in the state of RI to provide technical assistance, case consultation and function as a referral source. Referrals to ORS occur while youth are still in high school so assessments, community based work experiences and transition planning can occur prior to graduation. This relationship between youth and ORS prior to graduation creates a link for youth to the world of adult services and ongoing movement toward employment. (Page 56)

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A Cooperative Agreement (CA) between RIDE and ORS, an RSA Best Practice, has been the foundation of a robust collaborative relationship focused on school-to-work transition for over 16 years. Incorporated into the ORS Transition and Pre-ETS Program is an expectation that all students who are found eligible for services will have an ORS-approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility. Transition and Pre-ETS focuses on employment-related information and services to in-school youth with significant disabilities, including those students with an IEP or 504 plan. In addition, the State of Rhode Island is obligated to provide an array of transition services based on a Department of Justice (DOJ)/State Consent Decree/Interim Settlement Agreement to in-school youth identified as having a significant intellectual disability (I/DD). (Page 251)

Data Collection

ORS has an Electronic Case File/MIS that is cloud based, proprietary and uniquely designed to meet the data collection requirements of Vocational Rehabilitation (VR) Programs. The product, Libera System 7, provides data security, reporting compliance, project management, case management, integrated authorization & billing, customer service and customization options. This product currently serves at least 14 state VR agencies and is WIOA compliant. The software is specific to State operated VR programs, used nationally by several other State VR Agencies, facilitates the Agency's ability to meet and report on its Federal mandates and captures 392 data elements required by RSA/WIOA - all necessary to maintain Title I and Title VI funding for and function of Vocational Rehabilitation Programs that assist individuals with disabilities to obtain and maintain employment in integrated competitive work settings. (Page 94)

Small Business/Entrepreneurship

No specific disability related information found.

Career Pathways

It is important to understand that career pathways are not linear, nor the opportunities presented under the sector strategy will be unattainable to those individuals with barriers to employment. In fact, sector strategies often result in diverse populations participating in the opportunities generated by the workforce intermediaries. For example, the EARN Maryland program served a total of 912 people between June 2014 and December 2015 in entry level opportunities and of those participants 60% were women and 83% were minorities. Participants in the EARN Maryland program were also diverse in age with 35% served under the age of 30 45% between the ages of 30 and 49, and 20% over the age of 50 including 6 people over the age of 70. (Page 52)

The office of adult education also supports a statewide literacy resource center, the RI Adult Education Professional Development Center (the PDC), established to improve instruction at all of the AEFLA-funded agencies in the state. The PDC has developed, in collaboration with the state office, a statewide system of professional development to support local activities required under 231 (b), including specific focus points on reading instruction, contextualized curriculum as a component of a statewide Career Pathways system, the development of literacy volunteer training,

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and the increasing ability to virtually share promising practices and research based models. The PDC conducts several Professional Learning Community opportunities for program directors, instructors, and volunteers. Particular attention is given to program quality, proficiency based teaching and learning, transitions to college, learning disabilities, reading strategies and English language teaching strategies. (Page 191)

Employment Networks

ORS recognizes the importance of ensuring that staff have the necessary skills and abilities to provide quality services in a professional and timely manner. Examples of areas identified for training included: Motivational Interviewing, Substance Abuse, Ethics in Rehabilitation Counseling, disability specific training, Cultural Diversity, Supported Employment, Ticket to Work, Relationship Building with the Business Community, Social Security Reimbursements, Employment Networks Partnership Plus, 21st Century Best Practices for Job Development and Placement for VR staff, as well as for VR Vendors. (Page 223)

* 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>