

MONTANA VOCATIONAL REHABILITATION
PROPOSED 2026 MODIFICATIONS
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

(B) has established a State Rehabilitation Council

2. IN ACCORDANCE WITH ASSURANCE (A)(1)(B), IF SELECTED, PLEASE PROVIDE INFORMATION ON THE CURRENT COMPOSITION OF THE COUNCIL BY REPRESENTATIVE TYPE, INCLUDING THE TERM NUMBER OF THE REPRESENTATIVE, AS APPLICABLE, AND ANY VACANCIES, AS WELL AS THE BEGINNING DATES OF EACH REPRESENTATIVE'S TERM.

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)	1st Term (JH)	04-01-2024
Parent Training and Information Center	1st Term (HG)	12-01-2024
Client Assistance Program	1 st Term (EB)	12-19-2024
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	2nd Term (CC)	11-15-2024
Community Rehabilitation Program Service Provider	2nd Term (DM)	10-09-2025
Business, Industry, and Labor	1st Term (WD)	2-24-2025
Business, Industry, and Labor	1st Term (AK)	10-9-2025

Business, Industry, and Labor	2nd Term (CM)	10-09-2025
Business, Industry, and Labor	1 st Term (SS)	10-09-2025
Disability Advocacy Groups	2nd Term (LK)	11-15-2024
Disability Advocacy Groups	1 st Term (MM)	4-01-2024
Disability Advocacy Groups	1 st Term (JM)	10-09-2025
Disability Advocacy Groups	1 st Term (LZ)	10-9-2025
Disability Advocacy Groups	1 st Term (AS)	2-13-2025
Section 121 Project Directors in the State (as applicable)	2nd Term (JW)	10-09-2025
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	1 st Term (DJ)	11-15-2024
State Workforce Development Board	1 st Term (TH)	10-9-2025
VR Agency Director (Ex Officio)	1 st Term (CH)	04-01-2024
Current or Former Applicants for, or Recipients of, VR services	2nd Term (BT)	11-15-2024
Current or Former Applicants for, or Recipients of, VR services	1 st Term (RB)	10-9-2025
Current or Former Applicants for, or Recipients of, VR services	1 st Term (GB)	1-1-2023
Current or Former Applicants for, or Recipients of, VR services	1 st Term (SB)	8-14-2023
Current or Former Applicants for, or Recipients of, VR services	1 st Term (MN)	12-15-2025
Current or Former Applicants for, or Recipients of, VR services	1 st Term (TB)	12-15-2025

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.

There are currently no vacancies on Montana's state rehabilitation council.

Additionally, the SRC continues to meet quarterly.

In 2025, meeting dates for the SRC were:

- February 13 & 14, 2025 – in Helena, mt
- May 12 & 13, 2025 - in Missoula, mt
- August 7 & 8, 2025 – in Havre, mt
- October 23 & 24, 2025 – in Hamilton, mt

In 2026, meeting dates for the SRC will be:

- January 29 & 30, 2026 – in Helena, mt
- April 29 & 30 & may 1, 2026 – in Helena, mt
- Summer dates and location to be determined
- Fall dates and location to be determined

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.

SRC input on the services and operations of the VRBS program and the State Plan is regularly collected during quarterly meetings. Consumer satisfaction survey results, strategic plan updates, and state plan progress are standing agenda items for SRC and are usually addressed at the first, second, and third quarterly meetings of the year respectively. Typically, the topics are presented on by VRBS staff by reminding the SRC of the purpose and process associated with each activity and then current data and progress updates shared. Throughout the presentations, SRC members are welcome to ask questions and/or provide comments and feedback. After the VRBS staff presentation, further time for questions, discussion, and feedback is offered. The SRC is welcome to make formal motions related to topics and tasks they would like us to pursue further.

Of particular interest to the SRC members over the last couple of years due to extremely low response rates (ex. 4 total responses were collected in 2023), has been the Consumer Satisfaction Survey. Montana's SRC has a sub-committee assigned to overseeing the dissemination of the consumer satisfaction surveys and the data collected from VRBS participants. This sub-committee has worked closely with VRBS staff in recent years to generate and implement ideas to improve response rates. Those ideas have included re-writing and re-formatting the survey, utilizing a data collection platform, emailing the survey as opposed to mailing out paper surveys, and providing QR codes to access the survey instead of links among others. Despite best efforts, this has not proved overly successful. During the summer 2023 meeting of the SRC following a sub-committee report to the full council on Consumer Satisfaction Survey, a motion was made by an SRC member to pursue utilizing appropriate Montana procurement practices to secure a contractor to manage this process and function in hopes of receiving statistically significant response rates. This motion was unanimously passed, and

the sub-committee has been actively engaged with VRBS staff to acquire a contractor through Sole Source procurement. It is possible the procurement method could change, but at this time, VRBS has identified a potential contractor that is believed to be uniquely qualified to perform this task.

The Montana State Rehabilitation Council convened on February 13 and 14, 2025, during which Vocational Rehabilitation and Blind Services (VRBS) management presented preliminary forecasting data indicating that the agency would need to consider Order of Selection (OOS) due to resource limitations. Recognizing the significance of this issue and the impact on service delivery, the Council determined that a special meeting was necessary to engage in a more detailed discussion.

On March 27, 2025 the Council reconvened, and VRBS provided a comprehensive presentation outlining the key components of OOS. This presentation covered the priority categories, the criteria for identifying individuals with the most significant disabilities, the administration and implementation process of OOS, and a fiscal forecasting analysis demonstrating the agency's financial position and the necessity of moving forward with OOS.

Following the presentation, the Council conducted a formal vote, during which a quorum of members affirmed the decision to pursue Order of Selection, closing categories two and three, with the Rehabilitation Services Administration (RSA). This step ensures that VRBS can allocate resources in a manner that prioritizes services for individuals with the most significant disabilities while maintaining program sustainability.

In the 2025 SRC Annual Report, the following recommendations were given:

1. Establish clearer criteria and counseling practices to ensure VR participants pursuing post-secondary education demonstrate commitment and readiness for academic success.
2. Continue collaboration with the Harkin Institute and advocate for Employment First policies that promote Competitive Integrated Employment for individuals with significant disabilities.
3. Increase awareness and utilization of On-the-Job-Training as a powerful tool for skill-building and employment placement.
4. Develop a Memorandum of Understanding between VR and Montana's American Indian Vocational Rehabilitation Services (AIVRS) that establishes referral procedures, service coordination, data sharing, and joint planning to ensure seamless collaboration, eliminate duplication, and maximize resources for shared customers.
5. Ensure effective communication access is provided for all consumers, including Deaf and Hard of Hearing individuals, through qualified interpreters and accessible communication methods as defined by the ADA.
6. Promote equity in service delivery by addressing disability-specific access needs (e.g., communication, mobility, sensory, and behavioral health supports) to ensure all Montanans can participate fully.
7. Prioritize individualized, student-centered services to ensure Pre-ETS funding is used in ways that directly benefit students.
8. Provide robust career counseling and postsecondary planning to youth, ensuring informed decisions that support successful transitions into adulthood.
9. Enhance Pre-ETS to more effectively support students with disabilities in college environments, ensuring continuity of services and successful outcomes.
10. Develop a Memorandum of Understanding between VR and Montana's American Indian Vocational Rehabilitation Services (AIVRS) regarding Pre-ETS that establishes referral procedures, service

coordination, data sharing, and joint planning to ensure seamless collaboration, eliminate duplication, and maximize resources for shared customers.

11. Invest in tools and training that help VR job seekers build essential soft skills and equip counselors with resources to deliver these effectively.
12. Update VR strategies to reflect the evolving labor market, emphasizing real-world competencies beyond academic credentials.
13. Continue rebranding initiatives to improve public perception, outreach, and stakeholder engagement.
14. Incorporate feedback from Consumer Satisfaction Survey to improve services.
15. Implement a staff engagement survey to assess employee engagement and incorporate feedback into future planning.

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

1. Establish clearer criteria and counseling practices to ensure VR participants pursuing post-secondary education demonstrate commitment and readiness for academic success.
 - Vr response:
2. Continue collaboration with the Harkin institute and advocate for employment first policies that promote competitive integrated employment for individuals with significant disabilities.
 - VR response:
3. Increase awareness and utilization of on-the-job-training as a powerful tool for skill-building and employment placement.
 - VR response:
4. Develop a memorandum of understanding between VR and Montana's American Indian Vocational Rehabilitation Services (AIVRS) that establishes referral procedures, service coordination, data sharing, and joint planning to ensure seamless collaboration, eliminate duplication, and maximize resources for shared customers.
 - VR response:
5. Ensure effective communication access is provided for all consumers, including deaf and hard of hearing individuals, through qualified interpreters and accessible communication methods as defined by the ADA.
 - VR response:

6. Promote equity in service delivery by addressing disability-specific access needs (e.g., communication, mobility, sensory, and behavioral health supports) to ensure all Montanans can participate fully.
 - VR response:
7. Prioritize individualized, student-centered services to ensure Pre-ETS funding is used in ways that directly benefit students.
 - VR response:
8. Provide robust career counseling and postsecondary planning to youth, ensuring informed decisions that support successful transitions into adulthood.
 - VR response:
9. Enhance Pre-ETS to more effectively support students with disabilities in college environments, ensuring continuity of services and successful outcomes.
 - VR response:
10. Develop a memorandum of understanding between VR and Montana's American Indian Vocational Rehabilitation Services (AIVRS) regarding Pre-ETS that establishes referral procedures, service coordination, data sharing, and joint planning to ensure seamless collaboration, eliminate duplication, and maximize resources for shared customers.
 - VR response:
11. Invest in tools and training that help VR job seekers build essential soft skills and equip counselors with resources to deliver these effectively.
 - VR response:
12. Update VR strategies to reflect the evolving labor market, emphasizing real-world competencies beyond academic credentials.
 - VR response:
13. Continue rebranding initiatives to improve public perception, outreach, and stakeholder engagement.
 - VR response:
14. Incorporate feedback from consumer satisfaction survey to improve services.
 - VR response:

15. Implement a staff engagement survey to assess employee engagement and incorporate feedback into future planning.

- VR response:

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;

The most recent Comprehensive Statewide Needs Assessment (CSNA) was completed by Bloom Consulting as a result of a request for proposal (RFP). Bloom Consulting commenced the Montana CSNA project on August 1, 2022 and completed the project with a final written report to Montana VRBS on December 31, 2023. Summary findings and recommendations listed throughout section b. Comprehensive Statewide Needs Assessment (CSNA) have been pulled directly from Bloom Consulting's final report.

SUMMARY FINDINGS

- Customized employment is the most salient need identified for individuals with the most significant disabilities, including those needing supported employment. Montana is reshaping its approach to customized employment to support increased access and use of this service.
- Supported employment and extended employment are considered effective; however, access is mixed. VRBS and DDP stakeholders work to coordinate supported and extended employment services for clients. Access is hindered by limited staff and job coach capacity, especially in rural areas.

PEOPLE WITH SIGNIFICANT DISABILITIES

VRBS staff, CRP, and partner respondents were asked to consider the adequacy and quality of training and career services for people with significant disabilities. More respondents across all respondent groups were more likely to disagree or strongly disagree than agree or strongly agree that the availability and quality of training and career services for people with significant disabilities is adequate. Partner respondents were less familiar with the availability and quality of training and career services for people with significant disabilities needing supported employment; a larger share of partner respondents responded, "don't know," which influenced their overall assessment of services.

CUSTOMIZED EMPLOYMENT: Some of the perceived inadequacy of training and career services is related to limited access to customized employment services for people with the most significant disabilities, including those needing supported employment. In January 2024, Montana will be shifting its approach to a model that has proven successful in comparable states. In this new approach, people with the most significant disabilities, including those needing supported employment, will start with customized employment services, without first struggling with mainstream VRBS career services.

Recommendation: *Analyze outcomes associated with the new customized employment approach and adjust as needed through a continuous improvement process.*

TRANSPORTATION AND JOB-RELATED CHALLENGES: Survey respondents provided additional details on challenges serving people with the most significant disabilities, including those needing supported employment, reflecting feedback about basic needs and job-related challenges shared earlier in the report.

These challenges included transportation, aligning client skills and abilities with jobs, limited job opportunities in small towns and rural areas, and employer reluctance to hire people with the most significant disabilities.

COORDINATING SERVICES AND RESOURCES: People with the most significant disabilities are typically served by VRBS and DDP in addition to other potential supporting agencies, requiring coordination of service delivery and funding sources, which complicates serving this population. Limited resources in smaller or more rural communities make this harder.

EXTENDED EMPLOYMENT: Stakeholders felt that the extended employment program is valuable. Extended employment services have the same coordination requirements as supported employment providing long-term supported employment services to individuals with the most significant disabilities who do not have access to Medicaid waivers available in Montana.

STAFF AND CONTRACTOR CAPACITY: CRP staffing shortages and VRBS staff capacity limitations impact people with the most significant disabilities, including those needing supported employment, in many ways that are similar to impacts on the broader VRBS client population, including inability to provide sufficient one-on-one job coaching support needed by this population. VRBS agency investments and CRPs will be discussed in more detail in later sections of the report.

Implementing an Order of Selection will reduce the number of eligible individuals that receive services, but not for those with Most Significant Disabilities as Montana VRBS does not currently project the need to close Category 1. It is projected that 2538 individuals with most significant disabilities will receive services in FFY25, including 175 of those 2538 who will receive supported employment services.

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

SUMMARY FINDINGS

- Working age Native Americans and people who identify as two or more races experience the highest rates of disability among racial/ethnic groups in Montana. Latinos have the third highest rate of disability.
- Individuals who are Native American and those who identify as English language learners identified increased barriers to success and challenges in accessing services. Barriers include lack of jobs, transportation, housing, and service providers.
- More VRBS staff, CRP, and partner respondents considered people with behavioral health disabilities and brain injuries to be unserved or underserved compared to people with other types of disabilities. However, respondents felt every type of disability was underserved or unserved to some degree.
- More staff, CRPs, and partners considered people living in rural areas of the state and those experiencing homelessness to be unserved or underserved compared to other groups. As with disability type, respondents said every subgroup was underserved or unserved to some degree.
- Improving transportation options was the top action recommended by staff and CRP respondents to improve service provision for unserved and underserved people.

PREVALENCE BY RACE/ETHNICITY

Working age Native Americans and people who identify as two or more races experience the highest rates of disability among racial/ethnic groups in Montana. Approximately 1 in 7 working age Native Americans have a disability (14.5% of all Native Americans). This is followed by people who identify as two or more races, of which 13.3% have a disability. Latinos have the third highest rate of disability; 1 in 8 Latinos (12.6% of all Latinos) experience disability, which is higher than the national rate of 8.5%. The rate of disability among the

working age white population of Montanans (10.9%) is roughly on par with the national rate 10.4% for the white working age population. At the other end of the continuum, racial groups that had lower rates of disability compared to other racial or ethnic groups in Montana include people who identify as Pacific Islander, Black, Asian and some other race. However, it should be noted that the estimates for these comparatively small populations in Montana have a high margin of error; therefore, disability prevalence rate estimates for these groups are unstable.

VARIATION IN BARRIERS AND SERVICE RECEIPT AMONG RACIAL AND CULTURAL SUBGROUPS

The share of individuals who identified barriers to success varied somewhat by subgroup within the VRBS client population. American Indians were more likely to identify barriers to basic needs than non-American Indians, and English language learners were more likely to report job-related challenges compared to non-English language learners. Similarly, access to needed services varied among individuals from racial and cultural subgroups within the VRBS and Pre-ETS client population. English language learners were more likely to identify challenges accessing needed Pre-ETS services compared to non-English language learners, and American Indian respondents were more likely to identify gaps in accessing needed supportive services and Pre-ETS services compared to respondents who did not identify as American Indian.

As noted in the un/underserved section below, interviewees and focus group participants agreed with staff, CRP, and partner survey respondents that American Indians, especially people living on reservations, faced increased barriers related to lack of jobs, transportation, housing, and service providers. Additionally, there are service delivery challenges related to tribal and state WIOA and health and human services program coordination, cultural competency, and federal requirements for tribal jobs.

Recommendation: Develop organizational performance measures focused on racial and cultural equity.

BY DISABILITY TYPE: Staff and Partner respondents identified people with behavioral health disabilities as most unserved/underserved.

Feedback from focus group participants and interviewees aligned with feedback from survey respondents in terms of which disabilities are underserved or unserved.

BEHAVIORAL HEALTH: Staff, CRP, and partner stakeholders in focus groups noted that people with behavioral health needs are hard to serve and serving them is often made harder because of compounding issues such as housing and transportation.

Clients with behavioral health needs make up approximately one-third of the VRBS client population. This is a considerable percentage of clients with complex, compounding needs that are hard to serve well. VRBS is implementing an Individual Placement and Support (IPS) model in collaboration with State of Montana mental health and Medicaid to improve services to individuals with serious mental illness. IPS is expected to be an effective approach to serving the unserved and underserved population. Partners and staff expressed excitement about this new service coming online.

BRAIN INJURY: Brain injuries can cause physical dysfunction, including vision and hearing issues, cognitive challenges, and behavioral health issues. This complexity means it is hard to ascertain the number of people with brain injuries served by VRBS in the RSA data. Clients with brain injury often must work across additional partner agencies to access the full range of needed services. VRBS staff reflected on the complexity of serving these individuals in focus groups. Clients with brain injury who responded to the survey identified relatively more VRBS service gaps than those without brain injury and relatively more challenges than those without brain injury.

INTELLECTUAL AND DEVELOPMENTAL DISABILITIES (IDD): Over one-third of VRBS clients have a cognitive disability as their primary disability type. Staff and partners discussed how individuals with IDD receive limited DD services while waiting for a DD waiver slot, and thus are more reliant on VRBS services while waiting. VRBS

/ Pre-ETS are not designed to meet the full range of needs for individuals with IDD. Clients with IDD who responded to the survey said they had more service gaps and more challenges than respondents without IDD.

DEAFNESS: About four percent of VRBS clients have auditory or communicative disabilities as their primary disability type. Only approximately one percent of clients were deaf (44 clients, 1.3%) in the fourth quarter of program year 2022. Interpretation needs create a barrier to service for people who are deaf. Survey respondents who were deaf said they experienced relatively more VRBS service gaps and more challenges than did respondents who were not deaf.

DEAF-BLINDNESS: RSA data show that VRBS serves a very small number of people who have deaf-blindness (seven in program year 2022, quarter 4). Staff believe the actual number of deaf-blind people served is higher and there are issues causing this disability to be miscategorized in the data. Staff also say this is a challenging population to serve well because of extremely diverse needs. VRBS has a project focused on improving services to this population through a holistic tool to better serve this population.

BLINDNESS: Approximately four percent of the client population has visual impairments as their primary disability category, with about half being blind (72 clients, 2.2% in program year 2022, quarter 4). Staff discussed challenges in serving this population, including transportation challenges for VRBS staff who are also blind (“I can’t serve clients in our outer counties because I am blind and don’t drive,”) transportation challenges for clients, and stigma associated with receiving benefits in the older blind population. Survey respondents who were blind also felt underserved in terms of VRBS service gaps, reporting relatively more VRBS service gaps than respondents who were not blind. Blind respondents also reported more challenges than did respondents who were not blind.

SIGNIFICANT DISABILITIES: As discussed in the previous report section, many staff and partners feel that people with the most significant disabilities are underserved.

HOMELESS: VRBS clients who said they are homeless represent about five percent of the 2022 point-in-time count of people who are homeless. While people who are homeless are only a small number of overall VRBS clients, staff in focus groups echoed survey respondents in their concerns about this population being underserved. It can be hard for unhoused people to participate in VRBS services because they do not have a stable place to live, may not have a consistent way to communicate and may have compounding factors such as basic needs challenges, behavioral health conditions, and physical health needs that require a holistic, team-based approach to fully address. The assessment of people experiencing homelessness as underserved by staff, CRPs, and partners aligns with the participant identification of service gaps; survey respondents who said they were unhoused identified the most significant perceived gaps in services compared to other subgroups. This respondent population also identified more challenges than respondents who were not unhoused or transient.

RURAL: Focus groups participants and interviewees reflected on the challenges of serving rural populations. Clients living in rural areas identified relatively more service gaps than clients not living in rural areas; however, people with disabilities in rural areas identified fewer overall challenges than survey respondents not living in rural areas.

AMERICAN INDIAN: As noted above, American Indian clients identified more service gaps and more challenges than survey respondents who were not American Indian, and stakeholders noted additional challenges for this group of clients, including lack of jobs, transportation, housing, and service providers, and insufficient tribal and state WIOA and health and human services program coordination, cultural competency, and federal requirements for tribal jobs.

YOUTH IN OR EXITING THE FOSTER SYSTEM: VRBS serves very few individuals (1% or 37 people) who are in or are known to have aged out of the foster system. One interviewee reflected on how youth exiting the foster system are often underserved because these youth are not being identified as former foster children.

REFUGEES: Focus group participants in Missoula shared that they have a large refugee population and that these individuals can be underserved because of language barriers.

HISPANIC/LATINO: Clients who said they were English language learners identified more VRBS service gaps and more challenges than respondents who were not English language learners and preliminary cost and outcome data suggest possible opportunities for improved service delivery for this client group.

LGBTQ+: Although staff, CRPs, and partners were less likely to say this subgroup was underserved than others, clients and non-participants identified significantly more challenges, and clients who are LGBTQ+ said they experienced more service gaps than respondents who did not identify as LGBTQ+.

VRBS staff and CRP respondents provided input on the actions that VRBS can take to improve provision of services to unserved and underserved people. Improving transportation options was identified by the vast majority of both staff (80%) and CRP (74%) respondents. Substantial proportions of staff (42%) and CRP (46%) respondents also suggested increasing interagency collaboration to better serve unserved and underserved individuals. CRP respondents also suggested increasing training regarding specific disabilities (46%) or diagnosis and increasing staff outreach to clients (36%).

Focus groups, interviews, and open-ended survey responses provide more detail to these recommendations for increasing access to VRBS services for underserved and unserved populations.

Recommendations:

- *Seek prior approval to utilize establishment authority to implement and expand IPS programs and services to better serve individuals with behavioral health disabilities.*
- *Collaborate with Behavioral Health and Developmental Disabilities to determine how to strengthen vocational services within the newly defined, less intensive Assertive Community Treatment service requirements. This could include VRBS training or centralized VRBS services for ACT teams.*
- *Participate in HB872/Behavioral Health System for Future Generations committee meetings to understand and influence behavioral health funding decisions.*
- *Analyze approaches to better serving individuals with brain injury in collaboration with partner agencies. Consider the need to develop a brain injury waiver or other focused program to coordinate diverse service needs.*
- *Support Developmental Disabilities Program efforts to reduce the 0208 DD Medicaid waiver waiting list, including processes to ensure Pre-ETS participants are on the waiting list.*
- *Work with partners to consider innovative, collaborative models of shared service delivery for rural and tribal regions. This may include cross-training, job sharing, or cross-agency service pathway development.*
- *Increase advocacy for and provide more supportive services.*
- *Analyze opportunities to better serve people with disabilities who identify as Hispanic/Latino, including hiring multi-lingual staff, having forms and online information in Spanish, and conducting increased outreach through partner organizations working with this population.*
- *Identify youth who are in or have exited the foster system and communicate this information to colleges.*
- *Reach out to partner agencies focused on serving people who identify as LGBTQ+ to determine approaches to better serving this population.*
- *Increase awareness and understanding of VRBS and enhance relationships with partners, tribes, businesses, people with disabilities, and families.*

- *Increase investment in cultural competency training for staff, consulting with partners about effective professional development options.*
- *Build program capacity to serve the vocational needs of people with disabilities through increased hiring and retention of staff and CRPs.*
- *Increase case review communication for clients receiving services from multiple agencies.*

VRBS will implement an Order of Selection on July 1, 2025. This action will result in 660 unserved individuals by the end of FFY26 (397 in Category 2 (Individual has a significant disability) and 263 in Category 3 (Individual has a disability that is not a significant or most significant disability). VRBS counselors refer individuals waiting for services to appropriate federal and state programs, including other components of the statewide workforce development system to assist with employment, training, housing, food and clothing needs.

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

SUMMARY FINDINGS

- VRBS staff identified a strong partnership with Job services, post-secondary schools, and Adult Education. Clients are satisfied with how well their VRBS counselors connected them with other community organizations to help them get the services they need.
- Collaboration and shared service delivery across partners could be improved. VRBS staff and partners want more communication and collaboration to better serve shared clients and better use collective program resources. Collaboration challenges include understanding partner programs and how they overlap/intersect, communication and data sharing, and limited staff capacity.

WIOA PROGRAM INVOLVEMENT

Over the last two years, WIOA program participation has generally declined as a proportion of overall vocational rehabilitation participation, from 12 percent to 8 percent. However, participation for most programs has increased in absolute terms, growing by 9 percent across all programs and as high as 136 percent growth in Job Corps. The Dislocated Worker and Wagner-Peyser Employment programs also saw robust growth (100% and 89% growth, respectively). Adult Education grew 12 percent. In contrast, Youth program involvement fell 49 percent and adult program involvement fell 24 percent.

VRBS staff were asked to assess the strength of their partnership with community agencies. More than 50 percent of staff characterized their relationship with the following agencies as “strong”:

- Job Services (67%)
- Post-secondary schools (60%)
- Independent Living (53%)
- Montana Developmental Disabilities Program (52%)
- Adult Education (52%)

Roughly one-third of staff respondents sometimes (35%) or frequently (31%) refer clients to Job Services for employment-related services. The most common service referrals are from job search or referral activities or resume writing and interview preparation. Despite a positive view of the partnership between VRBS and Job Services, stakeholders noted the impact of turnover in both agencies on maintaining awareness of the services Job Services and VRBS provide.

Stakeholders reflected on the challenges associated with the current data sharing and referral processes, including not using the designated Job Services point of contact for referrals and the manual process for referring clients. Moreover, WIOA stakeholders, as well as other partner stakeholders, reflected on the challenges of effectively serving dispersed, rural communities. One interviewee suggested cross-training staff in VRBS and Job Services to improve services to clients.

One-third of staff respondents sometimes referred clients to Adult Education for employment related services (35%), and nearly one-third frequently or always did (29%). Most VRBS staff respondents (90%) indicated referring clients to Adult Education for HiSET classes. Other common Adult Education referral purposes included:

- TABE test (73%)
- Basic computer classes (65%)
- Occupational or vocational certification (55%)
- Remedial education classes (53%)

Adult education partners, like Job Services, expressed a desire for more communication and coordination.

Recommendations:

- *Continue or reinvigorate WIOA training and awareness activities.*
- *Institute or reinvigorate process to give and receive updates across WIOA programs.*
- *Evaluate opportunities to more effectively share information across disparate data systems, including leveraging functionality developed as part of the MPATH (Montana's Program for Automating and Transforming Healthcare) project and the common client and provider indices.*
- *Analyze opportunities to support a shared or universal application across WIOA programs, as well as potentially other health and human services partner agencies.*
- *Explore the possibility of developing shared WIOA counselor positions to address service delivery challenges in rural areas.*

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.

SUMMARY FINDINGS

- Nearly half (49%) of Montana's accredited high schools have a Pre-ETS contract. VRBS has a total of 76 Pre-ETS school contracts in 73 percent of counties and 17 Pre-ETS provider contracts. In the context of locally controlled school districts, high school engagement is based on relationships with school administrators and special education teachers.
- Students with disabilities have inconsistent access to vocational services because of this limited, but growing number of school contracts, and inconsistencies across schools' capacities to implement Pre-ETS services.
- Students with disabilities are less served in the summer and after school. Pre-ETS services are primarily provided by schools, with limited contractor engagement to supplement special education capacity.

Students with disabilities often don't receive vocational services in the summer or after school unless they are enrolled in VRBS.

YOUTH DISABILITY PREVALENCE AND CHARACTERISTICS

Multiple population and administrative data sources provide a picture of Montana youth with disabilities:

- Six percent of Montana youth ages 5 through 17 have a disability.
- Over five years, there has been a 12 percent increase in the number of teens and young adults with IEPs and a 36 percent increase in the number of teens and young adults with 504 Plans.
- The count of students with disabilities with IEPs declines with age, while the count of students with 504 Plans is relatively steady until age 18.
- A higher proportion of mixed-race Montana youth have disabilities compared to the national average.
- The most common disability types among youth are cognitive difficulties and self-care difficulties.
- Learning disabilities are the most common type of disability among Montana students.

CHALLENGES TO PRE-ETS SERVICES

In the two-year period between July 2021 and June 2023, the number of students with disabilities reported and the number and percentage receiving Pre-ETS has increased. The needs assessment collected information regarding challenges to Pre-ETS services from diverse stakeholders.

Students receiving Pre-ETS services, parents of students with disabilities, staff, and partners identify transportation and awareness of and connection to resources as students leave high school as the primary Pre-ETS challenges. Because Pre-ETS services are integrated with special education services for students in participating schools, student responses reflect the combined universe of special education and Pre-ETS services. In focus groups, students were often unfamiliar with the term Pre-ETS.

More than one-third of VRBS staff, CRP, and partner respondents indicated that “most” or “all” of youth under 18 with disabilities face the following barriers to Pre-ETS services:

- Lack of information or confusion about available services
- Transportation challenges
- Not knowing where to get help or find services after high school
- Lack of job skills
- Concern over impact on Social Security benefits

Stakeholders also discussed the following challenges to Pre-ETS services:

1. **TRANSITIONS**: Students in focus groups said they would go to their special education teachers or parents with questions about navigating services after high school. Those who were planning to pursue post-secondary education, particularly in schools they had visited within their Pre-ETS/special education programs, felt surer of their next steps than others. Students in the psychiatric residential treatment facility focus group expressed less certainty about their post-high school options.
2. **TRANSPORTATION**: Students, parents, and staff shared perspectives on transportation challenges and their impact on youth and their families or caretakers. Young people said it was hard to participate in vocational activities outside of school because of transportation challenges. Parents reported transporting their children creates additional burdens on them. Driver's education is generally hard to

access for all students, regardless of disability. Staff felt that private coaches are likely the best option for addressing this challenge.

3. SELF-CONFIDENCE: Students talked about how their worries and lack of confidence negatively impact them.
4. FAMILY ENGAGEMENT: Staff discussed how family engagement and family attitudes varied, particularly as it relates to transitioning students into VRBS services for ongoing support.

PRE-ETS SERVICES RECEIPT

ADMINISTRATIVE INFORMATION:

Montana's Pre-ETS program is serving a growing number of students with disabilities with an increasing number of services. The most common and fastest growing service is job exploration counseling, growing 24 percent between program year 2021 and 2022. This is followed by 23 percent growth in counseling on post-secondary enrollment opportunities and 19 percent growth in both instruction in self-advocacy and work-based learning experiences. Workplace readiness training services grew 18 percent.

STUDENT PERSPECTIVE:

VRBS participants eligible for or receiving Pre-ETS services were both more likely to indicate receipt of pre-ETS services compared to adult clients and also more likely to identify that they needed but did not receive distinct Pre-ETS services. The Pre-ETS services identified as received by the largest share of respondents were learning about good work habits (84%) and exploring what their job interests are (82%). Across all Pre-ETS services, smaller shares of respondents received work-based learning services, and the largest shares of respondents received career exploration and workplace readiness services.

- Students learned about post-secondary options but identified gaps in receipt of application assistance. Two-thirds (62%) of Pre-ETS participant respondents said they had learned about different post-secondary options and half (51%) had learned which post-secondary options would help them get the career they want. One-fifth of respondents needed to learn how to apply for college or their chosen post-secondary option but had not received the service (20%) or needed to learn how to apply for financial aid but had not received the service (22%).
- Relatively high proportions of Pre-ETS participants received career exploration services. Most respondents (82%) explored their job interests, and about seven in ten learned about available jobs (71%) or learned which jobs are a good fit (70%). About half of respondents (52%) listened to guest speakers talk about their jobs.
- Work-based learning services were less accessed. Pre-ETS respondents were less likely to identify receipt and more likely to identify a service gap (they needed but did not receive a service) for work-based learning services versus other Pre-ETS services. Some focus group participants echoed the survey respondents' desire for more work based learning services.
- Students received workplace readiness services. Most Pre-ETS respondents (84%) indicated receipt of services to help them learn about good work habits, and a majority had received the breadth of workplace readiness options. The greatest services gap was noted for services to learn about budgeting (20% of respondents said they needed but did not receive the service) and practice interviews (19% needed but did not receive the service).
- Students were informed about their accommodations. More than half (57%) of Pre-ETS respondents had learned about the accommodations they needed. Half (50%) learned how to talk about their disability. Fewer indicated leading their own IEP (26%) or learning to schedule their own appointments (38%).

LEARNING ABOUT POST-SECONDARY OPTIONS: Students in focus groups shared their positive experiences exploring options for education, training, or work after high school. Students in one focus group talked about how they wish they had a career center that could support them learn about different career pathways, including nursing and automotive skillsets.

Recommendation: Explore opportunities to develop career or innovation centers.

COLLEGE APPLICATIONS: Some Pre-ETS focus group participants expressed a desire for more college application support.

FINANCIAL AID APPLICATIONS: Students talked about how they would like to learn about financial aid options and how to apply for them.

FINANCIAL LITERACY: Like survey respondents, many Pre-ETS focus group participants expressed a desire for financial literacy classes, specifically naming that they want to know how to pay taxes, write checks, and balance a checkbook. Multiple students said they wanted the opportunity to take life skills courses with this content.

Recommendation: Clarify the scope of financial literacy services to increase consistency of services. Work with WIOA partners to ensure that a full continuum of financial literacy courses is available to meet diverse needs.

WORK HABITS: Students commonly said they learned good work habits from working. Students shared many successful experiences they had through support from their special education teachers.

STAFF, CRP, AND PARTNER PERSPECTIVE:

Despite VRBS staff and partner respondent perception of widespread need for Pre-ETS services, they indicated limited-service adequacy to address the needs of students and youth under 18 with disabilities. Adequacy of services in general varies by who is delivering the services. Schools with motivated special education teachers provide the majority of Pre-ETS services. Some regions use contracts to support service provision, which often results in fewer available services because of limited contractor provider capacity or limited willingness to provide youth services if also contracted for adult VRBS services.

PRE-ETS SPECIALISTS: Eight Pre-ETS specialists cover the entire state, with most traveling across large geographic areas to develop and maintain relationships with contracted high schools. Most staff also maintain a caseload for students who receive VRBS services in addition to Pre-ETS, with a cap of 50 clients. Pre-ETS specialists, like VRBS staff in general, express a sense of being overwhelmed and unable to complete their responsibilities successfully.

HIGH SCHOOL ENGAGEMENT AND CAPACITY: Schools with Pre-ETS contracts generally integrate Pre-ETS services with special education programming. Pre-ETS specialists reflected on the variable capacity of schools to serve students with disabilities in general and to take on Pre-ETS programming on top of special education responsibilities. Pre-ETS specialists talked a lot about the importance of relationships with school administrators and special education teachers, teacher willingness to engage in work outside of the classroom, and the importance of understanding how Pre-ETS services can benefit schools and their students. However, turnover with school staff and Pre-ETS specialists makes consistent relationships and teacher/school understanding of Pre-ETS services harder.

Recommendation: Continue to build relationships with statewide and local education entities to increase awareness and understanding of Pre-ETS services and how they benefit schools and students with disabilities. Consider creating tools to help schools understand the program, developing detailed instructions for how to use funds, and sharing data with schools and teachers to understand the impact of Pre-ETS funding.

STUDENT RECORDS: Stakeholders suggest that rural schools don't want to share student SSNs, which are needed for Pre-ETS services, so special education teachers have to talk to parents individually to understand

why their child's SSNs had to be shared and how they would keep this information secure, which can be a barrier for some students to participate.

Furthermore, special education and RSA disability codes do not align. Special education can use a general category of health impairment, which is not an RSA category. Pre-ETS specialists need to go back to teachers to get a specific disability listed.

Recommendation: Analyze options for more efficient, automated Pre-ETS application and enrollment with built-in business rules and error coding.

PRE-ETS FUNDING: Pre-ETS has a tiered reimbursement rate based on school classification. AA school districts receive a lower reimbursement than class A, B, or C districts. In addition, the CRP section of the report reflects on contracting challenges for Pre-ETS services because of, at least in part, lower reimbursement rates for Pre-ETS compared to VRBS. Lower reimbursement rates may be less of an issue for larger schools; however, additional funding flexibility and external supports could improve service delivery. Some mid-sized and smaller schools developed new services or programs because of Pre-ETS contracts.

Recommendations:

- *Analyze Pre-ETS costs and outcomes by school district classification to evaluate the effectiveness of tiered reimbursement rates.*
- *Consider contracting mechanisms to engage special education teachers and school staff in summertime and after school Pre-ETS service provision as part of the broader re-evaluation of Pre-ETS contracting approaches.*

OVERLAP WITH VRBS: Some students with disabilities apply for and receive VRBS services to obtain services that are only paid through VRBS for individuals with IPEs. Pre-ETS specialists shared varied approaches to communicating with schools, teachers, and students about why and when students should be referred to VRBS. Staff expressed that increased Pre-ETS contractor capacity may lessen the demand for VRBS services by high school students.

Recommendations:

- *Determine if there are more efficient and effective approaches to layering VRBS and Pre-ETS funding to provide services to broadly needed by Pre-ETS participants, like driver's education and summer training.*
- *Support consistent staff understanding of and communication about VRBS referrals for Pre-ETS participants.*

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

The most recent Comprehensive Statewide Needs Assessment (CSNA) was completed by Bloom Consulting as a result of a request for proposal (RFP). Bloom Consulting commenced the Montana CSNA project on August 1, 2022 and completed the project with a final written report to Montana VRBS on December 31, 2023. Summary findings and recommendations listed throughout section b. Comprehensive Statewide Needs Assessment (CSNA) have been pulled directly from Bloom Consulting's final report.

SUMMARY FINDINGS

- All counties have at least one CRP serving clients in that county. Missoula County has nine CRP contracts serving the county, the highest number among counties. Over one in three counties have two contracts (36%), and about one in five have three contracts (21%) or one contract (18%).

- Staff and CRP respondents consider CRPs successful in helping individuals get and keep jobs. The vast majority of VRBS staff and CRP respondents agreed or strongly agreed that CRPs help people get and keep jobs, and that CRPs are knowledgeable about providing appropriate services for VRBS clients. Most respondents in both groups also noted that there are an inadequate number of CRPs to meet the needs of people with disabilities seeking employment, and that CRP agencies have inconsistent staff and struggle with staff turnover.
- CRPs face similar caseload challenges. Like VRBS staff respondents, the majority of CRP respondents identified high caseloads as a challenge to providing vocational rehabilitation services. Utilizing establishment authority to train existing and bring on additional CRP providers to support improved client access and outcomes.
- VRBS clients report positive experiences with job coaches. Clients considered job coaches to be knowledgeable, able to see them quickly, and respectful of their culture and background.

CRPs were asked to provide input on their experience as a CRP and VRBS staff were asked to share their experience working with CRPs. The vast majority of VRBS staff and CRP respondents agreed or strongly agreed that CRPs help people get and keep jobs, and that CRPs are knowledgeable about providing appropriate services for VRBS clients. Most respondents in both groups noted that there are an inadequate number of CRPs to meet the needs of people with disabilities seeking employment, and that CRP agencies have inconsistent staff and struggle with staff turnover. Both staff and CRPs also disagreed that it is easy to coordinate services between VRBS and CRPs and disagreed that the VRBS contracting process is easy for CRPs. Perspectives between staff and CRP respondents varied somewhat on other measures. Almost half (49%) of staff respondents felt that CRP staff have the skillsets to work with individuals with various types of disabilities, compared to 87 percent of CRP respondents. Thirty-six percent of staff agreed or strongly agreed that CRP staff have the skillsets to work with individuals from diverse backgrounds, compared to 87 percent of CRP respondents, and one-third (34%) of staff agreed or strongly agreed that CRPs understand the vocational services delivered by VRBS, compared to two-thirds (68%) of CRP respondents.

Focus group attendees and interviewees consistently discussed the lack of CRPs as problematic for client service delivery. Opening up the order of selection increased the number of VRBS clients and the caseloads of CRPs and staff supporting them. When there are not enough CRPs to serve clients or cover a region, VRBS counselors fill this role. This creates an inconsistent delegation of responsibilities for VRBS staff across the state, and even within one regional office.

Recommendation: Consider developing a self-direction services option to increase capacity of CRPs. This could be modeled after self-direction in other Montana Medicaid waiver and state plan services.

Recommendation: Utilize establishment authority to train existing and new CRPs as well as add new CRPs to enhance service-delivery capacity.

VRBS does not have any state owned or operated CRPs. Nevertheless, there are several nonprofit community rehabilitation programs in Montana per the definition of nonprofit in 34 CFR 361.5(c)(36): Nonprofit, with respect to a community rehabilitation program, means a community rehabilitation program carried out by a corporation or association, no part of the net earnings of which inures, or may lawfully inure, to the benefit of any private shareholder or individual and the income of which is exempt from taxation under section 501(c)(3) of the Internal Revenue Code of 1986.

Per 34 CFR 361.5(c)(16)(iii), VRBS plans to seek prior approval in PY 2024-2027 for the “improvement of a public or nonprofit community rehabilitation program that are necessary to make the program functional or increase its effectiveness in providing vocational rehabilitation services to applicants or eligible individuals but are not ongoing operating expenses of the program.”

(16) Establishment, development, or improvement of a public or nonprofit community rehabilitation program means—

(iii) Other expenditures and activities related to the establishment, development, or improvement of a public or nonprofit community rehabilitation program that are necessary to make the program functional or increase its effectiveness in providing vocational rehabilitation services to applicants or eligible individuals, but are not ongoing operating expenses of the program.

Some CRPs are also contracted to provide services to students participating in Pre-ETS services. Many of these Pre-ETS CRPs are less likely to take youth referrals because of the lower rate paid for serving this population (\$15/hour less than paid for VRBS services) and because of the inconsistencies associated with young people (e.g., high no-show rate), making it hard to estimate the workload.

Recommendation: Reconsider the contracting approach for Pre-ETS services outside of schools. This may include a focus on contracting with youth-focused agencies and/or considering a deliverable-based payment approach versus using an hourly reimbursement.

VRBS clients report positive experiences with job coaches. Roughly one-third (32%) of clients reported using services from a job coach. Among those clients, 59 percent said that their job coach helped them to get or keep a job (not shown in figure). Clients were generally satisfied with their services from job coaches, with 77 percent agreeing or strongly agreeing that their job coach respected their culture and background, 69 percent agreeing or strongly agreeing that their job coach was knowledgeable about the supports they needed, and 66 percent agreeing or strongly agreeing that their job coach was able to see them quickly after their referral. Clients in focus groups who were able to use CRP services agreed with this positive feedback.

Like VRBS staff respondents, CRP respondents reported high caseloads as the most commonly endorsed challenge (59%) to providing vocational rehabilitation services. More than half of CRP respondents also identified lack of community services (54%), lack of financial resources, the increased number of individuals with multiple disabilities, and too much paperwork and data entry as challenges to service provision (51% each).

COLLABORATION: CRP respondents were asked how collaboration between CRPs and VRBS could be improved. Some said they would like to increase the sense of shared ownership for cases and their success with VRBS staff. Some requested more regular meetings (e.g., monthly) between VRBS counselors and CRP staff, with CRPs reimbursed for meeting participation. Others wanted improved frequency and quality of communication from VRBS counselors to CRPs with clarity around service requests, appropriate referrals, and needed information. Joint trainings with CRPs and VRBS counselors were also suggested as a way to increase collaboration.

Recommendation: Analyze opportunities to improve communication and collaboration with CRPs, including regular case review meetings, improved referral processes, data sharing through Madison, and joint trainings.

COMPENSATION: As the cost of living has rapidly increased throughout Montana, wages struggle to keep up. CRPs and VRBS staff both felt that CRP rates needed to increase to retain and ideally expand CRP capacity.

Recommendation: Continue to increase CRP rates.

DATA SYSTEMS AND PROCESSES: Many of the issues and recommendations included in the VRBS staff section above apply to and would benefit CRPs, specifically regarding authorizations, case notes, and invoicing. CRPs would also like streamlined billing requirements.

Recommendation: Work with partners to enhance Madison system to support shared service delivery and coordination through Madison, including centralized/consolidated case notes, authorized hours, utilization of authorized hours, and invoicing.

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

In 2022, VRBS posted a Request for Proposal to hire a contractor to complete the Comprehensive Statewide Needs Assessment (CSNA). Prior to pursuing this activity, the idea was shared with the SRC at a quarterly meeting and the SRC were unanimously supportive of VRBS pursuing this idea. Once the procurement process was complete and a contractor was selected, the contractor was added to the agenda of the summer 2022 SRC meeting where the contractor presented to the SRC on the process and timeline for the CSNA and SRC members' input and feedback was solicited. Additionally, SRC was included in data collection by receiving and completing surveys as well as participating in focus groups.

Following the completion of the CSNA in December 2023, VRBS held a strategic planning session on January 5, 2024 and invited various stakeholders, including the entire SRC, to participate. Approximately 8 SRC members attended and participated in developing a new strategic plan. During the strategic planning session, the findings and recommendations from the CSNA were comprehensively reviewed with the attendees as well as the previous strategic plan goals and strategies. Attendees, including SRC members, then participated in discussions related to refining goals and prioritizing strategies that align with VRBS' vision, mission, and core values.

Following the strategic planning session on January 5, 2024, VRBS leadership met twice to further discuss and refine the strategic plan goals and associated strategies. VRBS leadership then presented the strategic plan to the full SRC on February 8, 2024 at the first quarterly meeting for their review, feedback, revisions, and approval.

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

For 2024-2027, the SRC and VRBS jointly agreed upon the following goals using the CSNA, performance accountability measures, SRC recommendations, and strategic planning to guide goal development:

1. Equitable Access and Quality. All Montanans with disabilities can access high-quality competitive, integrated employment.

Objectives	Strategies	Basis
1.1 Increase awareness and understanding of VRBS.	1.1.1 Develop and implement a plan to continue to enhance relationships with partners, tribes, businesses, and people with disabilities, including satellite office hours or increased outreach.	B. Overcome barriers to accessing VR and supported employment services;
1.2 Improve quality and delivery of VRBS services.	<p>1.2.1 Identify an approach for more consistent soft skills/workplace readiness training skills and collaborate with Workforce Innovation and Opportunity Act (WIOA) partners to implement.</p> <p>1.2.2 Provide consistent benefits counseling services to more individuals, including those not yet employed.</p> <p>1.2.3 Explore how to make the Transportation Coordinator position best serve individuals needing transportation services.</p> <p>1.2.4 Explore and promote innovative, collaborative transportation service options, including volunteer programs.</p> <p>1.2.5 Analyze opportunities to increase access to driver's education instruction.</p> <p>1.2.6 Build a robust blind vendor program that is accessible statewide.</p> <p>1.2.7 Maintain momentum on the implementation of Individual Placement and Support (IPS) services.</p>	<p>B. Overcome barriers to accessing VR and supported employment services;</p> <p>D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.</p>
1.3 Increase the percentage of VRBS clients employed, retained, and	1.3.1 Work with partners to define a statewide Employment First policy	B. Overcome barriers to accessing VR and supported employment

Objectives	Strategies	Basis
promoted in competitive, integrated jobs	<p>1.3.2 Continue to move people out of sheltered workshops and day programs and into competitive, integrated employment, with the goal of no longer needing sheltered workshops in Montan.</p> <p>1.3.3 Analyze program outcomes, including wages after exit, by race, ethnicity, and disability type.</p>	<p>services;</p> <p>D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.</p>

Montana VRBS will gauge its success toward Goal 1 on Access and Equity and its associated objectives and strategies by monitoring progress and completion of the following work tasks associated with Goal 1:

- Reach out to Wayne Dagle, AIVRTTAC's Director, to begin collaboration on tribal activities and engagement.
- Review, re-write and execute tribal MOUs that address and include Pre-ETS and Business Services.
- Regularly meet and review local WIOA work plans to remain engaged.
- Continue to review data from dashboards to look for improvement from the local WIOA work plans.
- Outreach to each of the tribal health organization clinics to ensure access to BLV services.
- Explore the best procurement option for obtaining soft skills statewide for VRBS participants.
- Review and analyze current benefits counseling methodology to determine if it is accurate.
- Outreach to other organizations that provide benefits counseling to learn the best ways to contract.
- Update deliverables in the benefits planning contract and explore other partners.
- Pilot Desiree (internal staff with benefits planning certification) taking 2 benefits planning referrals and report back on process.
- Explore how to make the Transportation Coordinator position best serve individuals needing transportation services.
- Assign project for researching and analyzing driver's' education options in Montana to Transportation Coordinator and monitor progress.
- Write procedure and internal controls for Blind Enterprise Program
- Complete audit on previous BEP vendor.
- Establish 2 new BEP vendors.
- Continue to follow up with, encourage, and support Many Rivers to implementation of IPS program.
- Finalize VR's IPS procedure.
- Serve 100 individuals through VR-IPS.
- Implement 3 new IPS providers by end of this plan.

- Draft administrative rules to present to DDP and SDMI to start the discussion on Employment First in Montana.
- Write 2 EPPs, one that eliminates sub-minimum wage and one that eliminates sub-minimum wage and addresses segregation and submit to DPHHS Director for inclusion in House Bill 2.
- Create and present report for analyzing program outcomes including wages after exit, by race, ethnicity, and disability type.

2. Youth Engagement. Montana youth with disabilities are effectively engaged in vocational exploration and work readiness training.

Objectives	Strategies	Basis
2.1 Increase participation of students (14-21) with disabilities engaged in high quality Pre-ETS.	<p>2.1.1 Continue to build relationships with statewide and local education entities to increase awareness and understanding of Pre-ETS services and how they benefit schools and students with disabilities.</p> <p>2.1.2 Develop tools to share information with youth, families, educators, and service providers about available services.</p> <p>2.1.3 Explore additional community agencies to provide Pre-ETS services</p>	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
2.2 Increase participation for youth in foster system.	<p>2.2.1 Enhance the approach to capturing and analyzing data to better identify and serve foster youth.</p> <p>2.2.2 Engage with partners in the foster care network to identify and engage youth who could benefit from VRBS.</p>	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

Montana VRBS will gauge its success toward Goal 2 on Youth Engagement and its associated objectives and strategies by monitoring progress and completion of the following work tasks associated with Goal 2:

- Leverage work-based learning collaborative and capacity building institute to build partnerships.
- Develop a strategy to working with people on 504s including developing training with SEAs and LEAs to ensure they understand the 504 process.
- Kick off the first annual disability mentoring week in 2024.
- Utilize transition-readiness toolkit pre- and post- surveys to measure the effectiveness of Pre-ETS provided.
- Analyze MSDB's O&M needs and develop plan to support but not supplant services.

- Hire Training and PR Specialist in DETD.
- Work with Training and PR Specialist to develop outreach materials and tools to share and update Pre-ETS website.
- Implement project with CBI to make it more comprehensive to include all transitions.
- Reach out to community organizations with intention including, YMCAs, Boys & Girls Clubs, United Ways, etc. that are already serving youth in this manner to determine ways to better collaborate and serve more students.
- Analyze and enhance the approach to capturing and analyzing data to better identify and serve foster youth.
- Attend meetings regularly with Brandy and Rhonda and strategizing on ways to reach those students.

3. Coordination. Montana's workforce system is coordinated to effectively support people with disabilities and their employers.

Objectives	Strategies	Basis
3.1 Increase coordination with partner organizations.	<p>3.1.1 Develop and implement an approach to sharing resources and work with partners doing related work with shared clients in smaller/rural communities.</p> <p>3.1.2 Analyze options to develop a coordinated, streamlined WIOA referral process.</p> <p>3.1.3 Hold regular collaboration meetings with partners, including a focus on partner and VRBS services and trainings.</p> <p>3.1.4 Continue to engage with Job Service Employers' Committees (JSEC) and Community Management Teams (CMTs) local committees.</p>	<p>B. Overcome barriers to accessing VR and supported employment services;</p> <p>D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.</p>
3.2 Enhance coordination with businesses/employers.	<p>3.2.1 Provide increased training to employers to understand the benefits of hiring people with disabilities.</p> <p>3.2.2 Continue to manage collecting employer data in the Madison data system.</p> <p>3.2.3 Identify a solution for the VRBS counseling staff to follow through</p>	<p>B. Overcome barriers to accessing VR and supported employment services;</p> <p>D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.</p>

Objectives	Strategies	Basis
	with business connections made through the business services team	

Montana VRBS will gauge its success toward Goal 3 on Coordination and its associated objectives and strategies by monitoring progress and completion of the following work tasks associated with Goal 3:

- Implement an approach to sharing resources and work with WIOA and Tribal partners with shared clients in smaller/rural communities.
- Implement universal referral form for all WIOA partners
- Reconvene with DLI and Adult Ed to reinvigorate partner meetings across the state.
- Schedule meetings with tribal partners and establish regular meeting cycle.
- Determine where VR staff are already engaged with JSEC and CMTs and fill gaps with Central Office staff.
- Assign Business Services team members as well as Business Services Specialists to attend as many career/job fairs in Montana as possible.
- Provide training to VRBS staff on the importance and benefits of customized training.
- Assign Business Services Specialists to meet with all the MT colleges in their respective areas for the purpose of connecting industry, education, and training to advance employment fill employment gaps for PWD.
- Continue to manage collecting employer data in the VR case management system, Madison.
- Identify a solution for the VRCs to follow through with business connections made through the Business Services team.

4. Organizational Sustainability. VRBS is a stable, sustainable organization.

Objectives	Strategies	Basis
4.1 Increase staff recruitment, retention, and professional development.	<p>4.1.1 Improve the onboarding and orientation process to integrate new hires into our organizational culture and provide support.</p> <p>4.1.2 Refine training for adult learners and create tools and trainings in different modalities to increase understanding and integration.</p> <p>4.1.3 Define the training and support needs for VRBS support staff and implement improvements.</p> <p>4.1.4 Continue to integrate the VRBS culture into everything we do. Talk with staff about our mission, vision,</p>	<p>B. Overcome barriers to accessing VR and supported employment services;</p> <p>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</p> <p>D. Improve the performance of the</p>

Objectives	Strategies	Basis
	and values, and how this relates back to the individuals VRBS serves.	VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.
4.2 Increase CRP capacity.	<p>4.2.1 Explore options to increase to CRP capacity through establishment authority.</p> <p>4.2.2 Continue to explore developing a self-direction services option to increase capacity of CRPs.</p>	<p>A. Support innovation and expansion activities;</p> <p>B. Overcome barriers to accessing VR and supported employment services;</p> <p>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</p> <p>D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.</p>
4.3 Enhance Madison	<p>4.3.1 Continue to improve Madison's functionality by looking for and implementing efficiencies and providing training on new work processes.</p> <p>4.3.2 Include CRP invoicing in Madison.</p> <p>4.3.3 Explore artificial intelligence interfaces with Madison.</p>	<p>B. Overcome barriers to accessing VR and supported employment services;</p> <p>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</p> <p>D. Improve the performance of the VR and Supported Employment programs in assisting individuals</p>

Objectives	Strategies	Basis
		with disabilities to achieve quality employment outcomes.
4.4 Increase organizational and fiscal stability.	<p>4.4.1 Focus on achieving excellence on the WIOA performance measures.</p> <p>4.4.2 Continue to enhance internal controls for financial monitoring.</p>	<p>B. Overcome barriers to accessing VR and supported employment services;</p> <p>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</p> <p>D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.</p>

Montana VRBS will gauge its success toward Goal 4 on Organizational Stability and its associated objectives and strategies by monitoring progress and completion of the following work tasks associated with Goal 4:

- Implement quarterly cycle of Foundations (VRBS' VRC basics training).
- Develop a training timeline for staff and supervisors.
- Develop an internal checklist for VR specific training.
- Complete an analysis of VR 101 Modules to determine effectiveness and impact with focus group of newer staff.
- Identify training for all managers to do to understand adult learning methods and get that training completed in the next year.
- Post, recruit, and fill support staff lead positions in Billings and Missoula.
- Revisit and update the support staff task list.
- Continue to integrate the VRBS culture into everything we do, including talking with staff about our mission, vision, and values, and how they relate back to the individuals VRBS serves.
- Determine amount and type of establishment grants needed to support IPS implementation.
- Get Establishment Authority through the 2024 State Plan.
- Follow appropriate State procurement to award establishment grants.
- Separate out business plan writing from the CRP contract into its own contract with its own scope of work and fee schedule.

- Separate out soft skills from the CRP contract into its own contract with its own scope of work and fee schedule.
- Separate out driver's training from the CRP contract into its own contract with its own scope of work and fee schedule.
- Implement newly developed, ACRE-certified Customized Employment training.
- Target recruitment of CE providers from different populations (outside traditional CRPs), such as paraprofessionals, teachers, retired teachers, parents, etc.
- Schedule a meeting with CIL Directors to discuss self-directed service option.
- Continue to improve Madison's functionality by looking for and implementing efficiencies and providing training on new work processes.
- Include CRP billing in Madison.
- Explore artificial intelligence interfaces with Madison.
- Provide ongoing training to staff related to 6 common performance measures
- Weave the 6 performance measures into the perspective of all things VR to inform but not direct decision making in performance appraisals, touch base meetings, case reviews, etc.
- Every staff can list the 6 common performance measures.
- Continue to enhance internal controls for financial monitoring.

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: Equitable Access and Quality - All Montanans with disabilities can access high-quality competitive, integrated employment.	
Goal 1, Objective 1: Increase awareness and understanding of VRBS.	
Strategies	Progress
1.1.1 Develop and implement a plan to continue to enhance relationships with partners, tribes, businesses, and people with disabilities, including satellite office hours or increased outreach.	<p>VR Leadership and Data Unit regularly review the RSA 911 data dashboards to look for improvement from the local WIOA work plans.</p> <p>VR Data Unit provided mini refresher-training on each of the data reporting forms in the case management system.</p> <p>Montana's WIOA partners met with Wyoming's WIOA partners, who do not have a shared data warehouse either, to share ideas on how to efficiently and effectively coordinate data among the partners.</p> <p>VR Data Unit developed a data comparison dashboard for Montana's data on the six common performance measures for all the WIOA programs.</p>

	<p>This was presented to Montana's WIOA partners and will be updated on an ongoing basis.</p> <p>VR Data Unit completed an in-depth analysis using the RSA 911 data to determine the return on investment (ROI) for the 4-Year College Training service. Through that analysis it was learned that there is very little ROI for this service and VR Leadership are currently engaged in an intensive rewriting process for the College Training procedure to ensure effective career counseling and college preparation are occurring prior to providing college training services to participants.</p> <p>VR Data Unit currently working on developing individual 911 data dashboards for the 9 local VR field offices.</p> <p>Blind and Low Vision (BLV) staff are engaging in targeted efforts with Crow Tribe and Blackfeet Nation through their Tribal Health Organizations to ensure access to BLV services.</p> <p>VR intentionally collaborating with the Director of the American Indian Vocational Rehabilitation Training and Technical Assistance Center (AIVRTTAC). The AIVRTTAC Director was officially appointed to Montana's SRC in 2025 and is an active member of Montana's Employment 1st Workgroup.</p>
Goal 1, Objective 2: Improve quality and delivery of VRBS services.	
Strategies	Progress
1.2.1 Identify an approach for more consistent soft skills/workplace readiness training skills and collaborate with Workforce Innovation and Opportunity Act (WIOA) partners to implement.	<p>VR implemented a soft skills workgroup that includes VR leadership, VR counseling staff, and Department of Labor and Industry (DLI) partners. This group has listened to presentations on various soft skills curriculums and virtual platforms offering soft skills classes and is currently collaborating with DLI to ensure ease of access to DLI soft skills tools available including Jobs for Montana Graduates (JMG) program.</p> <p>VR soft skills workgroup is in the process of developing a soft skills tool kit for VR counseling staff, a soft skills procedure, and clarifying CRP-provided soft skills services.</p>
1.2.2 Provide consistent benefits counseling services to more individuals, including those not yet employed.	<p>VR piloted getting one Central Office staff trained in Benefits Planning to assist with service provision. This was not a successful project.</p> <p>VR contracted with the local Work Incentives Planning and Assistance (WIPA) program to hire one certified benefits planner to serve only VR referrals. This pilot was semi-successful, but it was determined that the contract needed to be re-written to clarify desired VR deliverables.</p> <p>As of early 2026, VR has a new contract with the local WIPA program to provide benefits planning on a fee-for-service basis. If successful, VR plans to offer benefits planning contracts to other programs in Montana that have certified benefits planners.</p>

1.2.3 Explore how to make the Transportation Coordinator position best serve individuals needing transportation services.	Restructuring in Disability Employment and Transitions Division (DETD) occurred, moving supervision of the Transportation Coordinator out of the Operations Bureau and into the VR Field Bureau under the Deputy Division Administrator.
1.2.4 Explore and promote innovative, collaborative transportation service options, including volunteer programs.	No progress updates.
1.2.5 Analyze opportunities to increase access to driver's education instruction.	Transportation Coordinator created a VR transportation resource that is updated regularly and lists all available transportation vendors including all Driver's Education program in Montana that can provide services to VR participants.
1.2.6 Build a robust blind vendor program that is accessible statewide.	<p>An audit of the previous contracted Business Enterprise Program (BEP) administration was completed.</p> <p>BEP experiencing significant transition as all contracted services have been brought in-house.</p> <p>BEP will complete the limited-solicitation purchase of 8 new vending machines for replacing existing Blind Vendor outdated, irreparable machines. This procurement has been ongoing for several months.</p> <p>BEP will launch a Request for Proposal to contract with a vendor for long-term, ongoing purchase and repair of vending machines in 2026. The procurement process has been ongoing for several months.</p> <p>BEP Program Manager building relationships with BEP programs in other states and has connected with Rehabilitation Services Administration BEP expert to assist with reviewing and publishing new BEP policy and procedure in Montana.</p> <p>There are three BLV participants currently interested in establishing a vendor route. Two participants completed Chicago Lighthouse and one is currently in Chicago Lighthouse. All are exploring vendor route business feasibility.</p>
1.2.7 Maintain momentum on the implementation of Individual Placement and Support (IPS) services.	<p>VR, Mental Health, Medicaid, and contracted IPS trainers meet biweekly with the newest IPS Program to provide support and guidance through implementation. The IPS Program experienced considerable difficulties with getting the program going including hiring and maintaining staff. As of late 2025, an employment specialist and an employment specialist supervisor were hired and actively referring clients to VR for IPS services.</p> <p>VR, Mental Health, Medicaid, and contracted IPS trainers will continue meeting biweekly with the new IPS Program to ensure full implementation and sustainability of the program.</p> <p>VR, Mental Health, and Medicaid are applying for the newest iteration of National Expansion of Employment Opportunities Network (NEON)</p>

	through the federal Department of Labor (DOL) to gain ongoing technical assistance to grow the number of IPS programs in Montana.
Goal 1, Objective 3: Increase the percentage of VRBS clients employed, retained, and promoted in competitive, integrated jobs	
Strategies	Progress
1.3.1 Work with partners to define a statewide Employment First policy.	<p>Montana applied for and was selected as a Core State for the final year of the previous iteration of NEON. From January 2025 through August 2025, Montana VR Leadership worked with subject matter experts complete an environmental scan for preparedness to adopt Employment 1st policy.</p> <p>Prior to the end of NEON in 2025, VR entered into a contract with the Harkin Institute to continue the Employment 1st work. A workgroup for Employment 1st has been established and met in-person twice. One virtual and two more in-person workgroup meetings are scheduled to occur in 2025 with an end goal of developing an Employment 1st Strategic Plan.</p> <p>The Employment 1st work group has created and published an Employment 1st white paper. A Montana Employment 1st website is in development as well.</p> <p>Montana is also applying for the newest iteration of National Expansion of Employment Opportunities Network (NEON) through the federal Department of Labor (DOL) to gain ongoing technical assistance to maintain progress towards Employment 1st policy.</p>
1.3.2 Continue to move people out of sheltered workshops and day programs and into competitive, integrated employment, with the goal of no longer needing sheltered workshops in Montana.	<p>VR Director proposed two ideas to the Governor's Office prior to the 2025 legislative session, one asking for elimination of sub-minimum wage only and one asking for elimination of sub-minimum wage while addressing segregated work settings. Neither proposal was adopted into the Governor's budget.</p> <p>Employment 1st workgroup is actively addressing sheltered employment and viable pathways to CIE in Montana.</p>
1.3.3 Analyze program outcomes, including wages after exit, by race, ethnicity, and disability type.	No progress updates.

Goal 2: Youth Engagement - Montana youth with disabilities are effectively engaged in vocational exploration and work readiness training.
Goal 2, Objective 1: Increase participation of students (14-21) with disabilities engaged in high quality Pre-ETS

Strategies	Progress
<p>2.1.1 Continue to build relationships with statewide and local education entities to increase awareness and understanding of Pre-ETS services and how they benefit schools and students with disabilities.</p>	<p>Pre-ETS team engaged with the Capacity Building Institute (CBI) and participated in training applicable to students with disabilities, including students with 504 plans.</p> <p>Pre-ETS Bureau Chief developed transition materials with Office of Public Instruction that included information for schools on 504.</p> <p>On an individual and ongoing basis, Pre-ETS Specialists meet with schools and remind them to include students with 504s in Pre-ETS activities and training.</p> <p>Pre-ETS team actively engaged with Work-Based Learning Collaborative (WBLC). Pre-ETS staff have participated in annual retreats and utilize the relationships built to connect with different programs and provide cross-training on services.</p> <p>In 2024, Pre-ETS team piloted the Transitions Readiness Toolkit (TR) pre- and post- surveys with various schools across Montana and eventually added the TRT as a requirement to the Pre-ETS contracts with the schools. By 2025, the TRT has been added as a requirement to all Pre-ETS contracts. Pre-ETS Bureau Chief and Data Unit are actively working on a plan to manage, analyze, and share the data collected.</p> <p>Intentional engagement with Montana School for the Deaf and Blind has been ongoing to ensure that sufficient orientation and mobility (O&M) services are being provided to students and that VR is providing support that does not supplant services.</p> <p>In October 2024, VR launched Disability Mentoring Week to celebrate Disability Employment Awareness Month. Over 100 students signed up to participate across Montana. Students were able to job shadow, participate in worksite tours and have business professionals come into their classrooms. VR Director presented on the Montana Disability Mentoring Week activity at the Monthly Council of State Administrators of VR (CSAVR) meeting.</p> <p>In October 2025, VR facilitated the second annual Disability Mentoring Week. 117 students signed up to participate in work experiences and job shadows across the state. The 2025 event included zoom calls where individuals working in several different occupations presented to students who had the opportunity to ask questions.</p>
<p>2.1.2 Develop tools to share information with youth, families, educators, and service providers about available services.</p>	<p>Hired a Training and Public Relations Specialist.</p> <p>Pre-ETS team with Training and Public Relations Specialist, developed new and improved Pre-ETS rack cards and have started working on overhauling the Pre-ETS website.</p> <p>Pre-ETS Bureau Chief and Capacity Building Institute implemented a project to overhaul the Montana Youth Transitions website to be more comprehensive. The updated website has been modernized and provides access to resources for students, parents, teachers, and professionals.</p>

	Pre-ETS team, in partnership with CBI, Montana’s Department of Labor and Industry (DLI), and the Rural Institute for Inclusive Communities, developed transition guides and shared them broadly across stakeholders.
2.1.3 Explore additional community agencies to provide Pre-ETS services.	Targeted, intentional outreach to collaborate with other programs serving youth in Montana has been completed by the Pre-ETS team. Local Boys and Girls Clubs have been targeted as well as Reach Higher Montana. Current community outreach for Pre-ETS is focused on Big Brothers, Big Sisters.
Goal 2, Objective 2: Increase participation for youth in foster system.	
Strategies	Progress
2.2.1 Enhance the approach to capturing and analyzing data to better identify and serve foster youth.	VR’s Data Unit and the Pre-ETS Bureau Chief developed and implemented an enhanced, two-pronged process: First, the Pre-ETS Bureau Chief collects data from CHAFEE, Montana’ Foster Care Independence Program, and provides it to the Data Unit. The Data Unit matches the CHAFEE data with enrollments in Pre-ETS or VR and provides the matched data back to the Pre-ETS Bureau Chief. Second, the VR Data Unit added a field to the Pre-ETS Student Request Form to capture foster care affiliated youth and an associated report in the VR case management system was developed to view the data cohesively.
2.2.2 Engage with partners in the foster care network to identify and engage youth who could benefit from VRBS.	<p>A goal was established with the Governor’s office to achieve a 50% increase in the number of foster youths aged 14 and older participating in VR and/or Pre-ETS. This goal was achieved twice over with a 109% increase in number of foster youth served (baseline served: 33: total served at time of goal completion: 69).</p> <p>Pre-ETS team completed the following outreach activities:</p> <ul style="list-style-type: none"> • Presented to Behavioral Health Alliance of Montana and were invited back to follow-up with the group in person • VR/Pre-ETS, WIOA Youth, Reach Higher, CHAFEE, Youth Demonstration Project, OPI presented information to foster care providers • WIOA Youth Connections Presentation • Added Pre-ETS connection into recently updated “older youth” procedure for Child Protective Services. • Shared Pre-ETS info with resource families in newsletter • Provided info about the goal and the benefits of Pre-ETS for the Child and Family Services Division (CFSD) newsletter • Shared info on Summer Camps for VR and Pre-ETS youth with Foster Care families, CHAFEE providers and CFSD. • Pre-ETS Specialists attended monthly meetings with CHAFEE providers where everyone broke into groups based on areas served and asked groups to explore and share ideas about how they can/will work together locally

	<ul style="list-style-type: none"> • Met with Youth Homes staff, AWARE, Confederated Salish and Kootenai Tribes (CSKT) program, WEX opportunities for students who work on the Youth Homes Farm, etc. • Billings Pre-ETS Specialist scheduled to teach a Life Skills Class at Tumbleweed, a CHAFEE provider
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Goal 3: Coordination - Montana's workforce system is coordinated to effectively support people with disabilities and their employers.

Goal 3, Objective 1: Increase coordination with partner organizations

Strategies	Progress
3.1.1 Develop and implement an approach to sharing resources and work with partners doing related work with shared clients in smaller/rural communities.	VR staff are engaging in targeted efforts to engage with tribal communities, including
3.1.2 Analyze options to develop a coordinated, streamlined WIOA referral process.	WIOA partners implemented use of a single release of information (ROI) that has all WIOA partners listed on the ROI to ensure communication and accurate reporting are taking place.
3.1.3 Hold regular collaboration meetings with partners, including a focus on partner and VRBS services and trainings.	WIOA workforce partners meet quarterly to collaborate on joint efforts, dual enrollment, and federal reporting.
3.1.4 Continue to engage with Job Service Employers' Committees (JSEC) and Community Management Teams (CMTs) local committees.	<p>VR leadership have joined Chamber of Commerce groups in their local areas including Havre, Miles City, Kalispell, Great Falls, Helena, and Billings.</p> <p>Business Services Specialists are actively engaged members of Society for Human Resource Management (SHRM).</p> <p>VR staff in the 9 field offices have one or more staff attending and participating in Community Management Team (CMT) and Job Service Employer Committee (JSEC) meetings locally.</p>

Goal 3, Objective 2: Enhance coordination with businesses/employers.

Strategies	Progress
3.2.1 Provide increased training to employers to understand the benefits of hiring people with disabilities.	VR Business Services Specialists participated in statewide Assistance for Business Clinics (ABCs) and provided presentations on VR's Business Services.

3.2.2 Continue to manage collecting employer data in the Madison data system.	
3.2.3 Identify a solution for the VRBS counseling staff to follow through with business connections made through the business services team	

Goal 4: Organizational Sustainability - VRBS is a stable, sustainable organization.	
Goal 4, Objective 1: Increase staff recruitment, retention, and professional development	
Strategies	Progress
4.1.1 Improve the onboarding and orientation process to integrate new hires into our organizational culture and provide support.	
4.1.2 Refine training for adult learners and create tools and trainings in different modalities to increase understanding and integration.	
4.1.3 Define the training and support needs for VRBS support staff and implement improvements.	
4.1.4 Continue to integrate the VRBS culture into everything we do. Talk with staff about our mission, vision, and values, and how this relates back to the individuals VRBS serves.	
Strategies	Progress
4.2.1 Explore options to increase to CRP capacity through establishment authority.	

4.2.2 Continue to explore developing a self-direction services option to increase capacity of CRPs.	
Strategies	Progress
4.3.1 Continue to improve Madison's functionality by looking for and implementing efficiencies and providing training on new work processes.	
4.3.2 Include CRP invoicing in Madison.	
4.3.3 Explore artificial intelligence interfaces with Madison.	
Strategies	Progress
4.4.1 Focus on achieving excellence on the WIOA performance measures.	
4.4.2 Continue to enhance internal controls for financial monitoring.	

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

Performance Indicator PY2022	Negotiated Level PY2022	Actual Level PY2022	Explanation for Discrepancies
Employment (second Quarter After Exit)	63.3%	54.6%	VRBS' negotiated level of 63.3% was an ambitious goal, given the legacy data system that it was calculated from was less reliable than the current data system and that the PY2021 Actual Levels of this measure was 23.7%. VRBS moved case management systems on 7-1-21, and with the new

Performance Indicator PY2022	Negotiated Level PY2022	Actual Level PY2022	Explanation for Discrepancies
			case management system, has greater visibility and reliability into the data calculations in this measure. Concentrated efforts are being made within VRBS to both 1) ensure the post-exit data remains accurate and 2) focus on high-quality and lasting employment outcomes when exiting our participants
Employment (Fourth Quarter After Exit)	45.5%	44.3%	VRBS was very close to meeting this performance measure in PY2022, only 1.2 points away. Additionally, the PY2021 Actual Level of this measure was 14.6%, so there has been tremendous improvement in PY2022. Concentrated efforts are being made within VRBS to both 1) ensure the post-exit data remains accurate and 2) focus on high-quality and lasting employment outcomes when exiting our participants
Median Earning (Second Quarter After Exit)	\$3775	\$3456	VRBS has analyzed this decline in median earnings and will continue to work on high quality employment outcomes in PY2024-2027 to reflect this work
Credential Attainment Rate	38.9%	26.4%	VRBS' analysis of this rate has revealed that staff were not properly inputting some of the data elements that go into this measure in PY2022, so VRBS does not believe this

Performance Indicator PY2022	Negotiated Level PY2022	Actual Level PY2022	Explanation for Discrepancies
			rate is a true reflection of the performance in Montana. In PYs 2024-2027, the data elements that comprise this calculation will be accurate.
Measurable Skill Gains	37.5%	55.3%	Met Negotiated Level
Effectiveness in Serving Employers	Not applicable	Not applicable	

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).

For the most recently completed program year, PY 2024 ending 6-30-25, a total of \$55,328, was spent from the funds reserved for innovation and expansion activities. Activities supported specifically by innovation and expansion funds include the SRC's consumer satisfaction survey and meetings plus project costs for the State Rehabilitation Council (SRC) and the Statewide Independent Living Council.

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.

The goal of the state's supported employment program is to maintain a system whereby individuals, including youth, with the most significant disabilities are afforded the opportunity to participate in competitive integrated employment.

Supported employment services are provided on a statewide basis through the Title VI, Part B funds. Individuals eligible for supported employment are those individuals with the most significant disabilities for whom competitive integrated employment has not historically occurred, or for whom competitive integrated employment has been interrupted or intermittent as a result of a significant disability, and who, because of the nature and severity of their disabilities, has had supported employment identified as the appropriate employment service followed by long term supports after the VR case is closed. Fund allocation on a statewide basis ensures an equitable statewide service delivery.

Vocational Rehabilitation and Blind Services (VRBS) will continue to encumber Title VI, Part B funds on a fee-for-service basis. When supported employment services exhaust Title VI, Part B funds, then Title I funds will be utilized to provide needed supported employment services. At this time and in recent years, this procedure has made it possible to provide all planned supported employment services for individuals receiving VRBS services. If in the future VRBS determines that there are inadequate funds to provide all needed supported employment services for individuals on the VRBS caseload then supported employment will be funded with Title I dollars.

In addition, VRBS prioritizes the use of supported employment models that maximize integration of persons with the most significant disabilities in real work sites, doing meaningful work. Most recently, VRBS has created a fee schedule, procedures, processes, and specialized contracts offered to Montana mental health centers to provide evidence based IPS services to individuals involved in their mental health treatment teams who are also VRBS participants. Title VI funds will be used to purchase IPS services for these individuals.

VRBS has implemented a new, in-house Customized Employment training system. This system is based on the system implemented by the State of Minnesota, who trained Montana and assisted Montana with ACRE certification. VRBS continues to issue CE-specific contracts to providers in Montana who have employees that have participated in Montana's newly developed in-house, ACRE-certified Customized Employment and providers with Discovery and/or Customized Job Development certifications from Marc Gold & Associates. Title VI funds may be used to purchase Customized Employment services for VRBS participants if it is determined that the client meets supported employment eligibility criteria and long-term supports will be needed despite the customized job created for the client.

VRBS does not support the use of segregated bench work, sheltered, enclave or segregated crew models.

Montana estimates 175 individuals with most significant disabilities will receive supported employment services with an estimated \$605,000 of Title I and VI funds to be used in FFY2025 on supported employment services (\$300,000 are Title VI funds and \$305,000 are Title I funds.)

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.

VRBS most commonly enrolls supported employment providers who:

- are Developmental Disabilities Program (DDP) supported employment providers,
- have staff with Discovery and/or Customized Job Development certifications through Marc Gold & Associates, or
- are Community Mental Health Centers (CMHC)s,

Providers who do not fall into the aforementioned categories are individuals or organizations who have been enrolled to provide services for a limited number of participants in rural areas where there are no other established providers.

VRBS participants eligible to receive Title VI Part B funded supported employment services are those individuals with the most significant disabilities:

1. for whom competitive integrated employment has not historically occurred, or
2. for whom competitive integrated employment has been interrupted or intermittent as a result of a significant disability, and
3. who, because of the nature and severity of their disabilities, has had supported employment identified as the appropriate employment service followed by long term supports after the VR case is closed.

Once it is determined that a participant meets supported employment eligibility criteria, Supported Employment Services (SES) are listed in the participants Individualized Plan for Employment (IPE) and Data Element 49 "Supported Employment Goal on Current IPE" is marked as "1=Individual has a supported employment goal on the current IPE". If the participant is also a youth (age 24 and under), Extended Services is also listed on the IPE. Once the participant has gained employment, VRBS begins using Title IV Part B funds for the client's SES.

Quality of services is continually monitored by the VRBS counselors through regular meetings with employment specialists serving clients and monthly review of provider case notes. Additionally, VRBS counselor supervisors meet quarterly to monthly with providers in their areas to discuss service provision and address issues as needed. The Program Manager conducts regular reviews of the providers' supported employment services.

Extended Services are available through VRBS for youth, age 24 or under for up to 48 month and for all other exiting participants are available through the Developmental Disabilities Program (DDP), the Extended Employment Program (EE), other Medicaid-funded waivers (ex. Severe Disabling Mental Illness [SDMI] waiver), and private pay for individuals exiting VRBS. VRBS may also fund Extended Services for youth, age 24 or under for up to 48 months. The vast majority of supported employment participants utilize DDP or EE for Extended Services.

When a VRBS participant receiving Title IV Part B or Title 1 funded supported employment has access to Medicaid-funded waiver services through DDP, the Vocational Rehabilitation Counselor (VRC) obtains a signed cooperative agreement form from DDP indicating DDP agrees to fund the long-term supported employment. The VRC also coordinates with DDP to ensure DDP has all needed information and processes completed to take on funding the supported employment and a transition date is mutually agreed upon. The transition date is communicated to the supported employment provider. Once an individual transitions to DDP funded supported employment, the VRBS case remains open for a minimum of 90days to ensure seamless transition before the VRBS case is exited.

When a VRBS participant receiving Title IV Part B or Title 1 funded supported employment does not have access to a Medicaid waiver to fund their supported employment, they transition to EE. The VRC obtains a signed cooperative agreement from the EE Program Manager indicating EE agrees to fund the long-term supported employment and the EE Program Manager provides a transition date to the VRC and supported employment provider. Once an individual transitions to EE, the VRBS case remains open for a minimum of 90days to ensure seamless transition before the VRBS case is exited.

VRBS may provide supported employment services using Title VI Part B funds for a period not to exceed 24 months (for over-24 years old) or 48 months (for youth 16-25th birthday). The "time clock" starts ticking when the individual is hired and stops when the client is no longer employed, or when the VRBS case is exited. The time clock re-sets at zero should the client be hired at a different employer. Should an individual re-open a new VRBS case, the time clock again starts at zero.

VRBS staff are expected to keep a tally of how many months have been used in each of their cases and notate this in their case documentation. The length of time that VRBS funds this service before moving to another funding source depends on several factors*:

1. Whether the individual has a long-term funding source immediately available (for example, Extended Employment (EE), Developmental Disabilities Program (DD) or Severe Disabling Mental Illness (SDMI) Wavier,
2. The amount and availability of Title VI Part B and Title 1 funds the VRBS program has designated for supported employment,
3. The age of the individual, and
4. How many months of the "time clock" the individual has already used.

*VRBS does not limit or delay the start of any service to any individual based on the above criteria.

After VRBS is no longer funding the individual's supported employment services (coded as SES in the IPE), the individual then transitions into the Extended Services needed for job maintenance. The Extended Services that VRBS funds for youth continue to count towards the individuals' accumulated months on the "time clock" and cannot exceed 48 months or the individual's 25th birthday, whichever occurs first.

Exceptions: In rare instances, the individual may exceed the 24 and 48-month provision if the VR counselor and the individual have determined that such services are needed to support and maintain the individual in SE. Should SE take longer than 24/48 months, it must be approved by the Counselor Supervisor and SE Program Manager, documented on the Individualized Plan for Employment (IPE) and in a case documentation note.

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).

As mentioned above, when the appropriate funder for the participant's extended services has been identified, the VRBS Counselor is responsible for getting a cooperative agreement signed by the funder and the provider of the extended services. The cooperative agreement states:

"As funded by the source noted below, the undersigned service provider agrees to provide ongoing and other support services needed to maintain the designated individual's competitive integrated employment. Services will:

1. Be based on the needs of the individual as specified in the Individualized Plan for Employment (IPE) and
2. Include, at a minimum, twice-monthly monitoring of the individual to assess employment stability."

A copy of the signed cooperative agreement is provided to the supported employment provider, the extended services funder, and the VRBS counselor for inclusion in the case file.

See sections I(5), I(6), and I(7) for cooperative agreements between VRBS, Medicaid, and mental health as well as between VRBS and DDP that are in effect or in draft respectively.

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)
Priority Category 1	2538	2538	\$8,632,000	0
Priority Category 2	1980	1583	\$5,542,000	397
Priority Category 3	414	151	\$52,000	263

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)
Priority Category 1	175	175	\$605,000 (\$305,000 from Title I)	0-All Priority 1 individuals will receive services
Priority Category 2	Not Served with Supported Employment	Not Served with Supported Employment	Not Served with Supported Employment	n/a
Priority Category 3	Not Served with Supported Employment	Not Served with Supported Employment	Not Served with Supported Employment	n/a

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 implementing an order of selection with one or more priority categories closed.

2. FOR VR AGENCIES THAT HAVE DEFINED PRIORITY CATEGORIES DESCRIBE—

A. THE JUSTIFICATION FOR THE ORDER

Montana VR's fiscal projections, shown below, indicate that the agency will be unable to serve all eligible individuals with resources currently available, despite the cost containment measures described below.

<u>Category</u>	<u>FFY25</u>	<u>FFY26</u>
<u>Cost Per Case including</u>	<u>\$6552</u>	<u>\$7188</u>
<u>Staff salaries, admin, etc.</u>		
<u>VR Participants (estimated)</u>	<u>5300</u>	<u>5912</u>
<u>Total Expenses</u>	<u>\$34,725,600</u>	<u>\$42,495,456</u>
	<u>FFY25</u>	<u>FFY26</u>
<u>Federal Award (includes CPIU</u>	<u>\$15,423,546</u>	<u>\$15,823,546</u>
<u>and not carryforward)</u>		
<u>Match</u>	<u>\$4,174,352</u>	<u>\$4,282,612</u>
<u>Ticket to Work Projected</u>	<u>\$1,098,873</u>	<u>\$1,206,328</u>
<u>Income</u>		
<u>Total Revenue</u>	<u>\$20,696,771</u>	<u>\$21,312,486</u>
	<u>FFY25</u>	<u>FFY26</u>
<u>Total Expenses</u>	<u>\$34,725,600</u>	<u>\$42,495,456</u>
<u>Total Revenue</u>	<u>\$20,696,771</u>	<u>\$21,312,486</u>
<u>Revenue Surplus/Deficit</u>	<u>(\$14,028,829)</u>	<u>(\$21,182,970)</u>

Cost Containment Measures taken include:

- **6% vacancy savings imposed**

- Overtime no longer allowed
- All staff events transitioned from in-person to virtual
- Analysis of comparable benefits usage completed
- Staff will utilize Job Service, One-Stop centers more for Job Placement activities
- Community Resource lists have been updated
- Requests for Proposals pulled back
- Contracts that were in progress have been pulled back
- Every agency purchase not included in an IPE is reviewed and approved daily by the Disability Employment and Transition Administrator. This includes office supplies, employee travel, etc.
- All high-risk purchases require Bureau Chief approval. Examples include: graduate-level training, out-of-state training, private school training, purchases of goods exceeding \$3000, and client reimbursements

B. THE ORDER (PRIORITY CATEGORIES) TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES ENSURING THAT INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

The order (priority categories) to be followed in selecting eligible individuals to be provided VRBS services ensures that individuals with the most significant disabilities are selected for services before all other individuals with disabilities. Eligible individuals are placed into one of the following priority categories:

Priority Category 1: An individual with the most significant disability as defined below.

Priority Category 2: An individual with a significant disability as defined below.

Priority Category 3: An individual with a disability as defined below.

Definitions:

Priority Category 1, Most Significantly Disabled (MSD): Eligible individual(s) with a most significant disability that results in serious functional limitations in three or more functional capacities, and who will require multiple services.

Priority Category 2, Significantly Disabled (SD): Eligible individual(s) with a significant disability that results in serious functional limitations in one or more functional capacities, and who will require multiple services.

OR

The individual is a recipient of Social Security Disability Benefits (SSDI) or Supplemental Security Income (SSI) as a result of disability who is presumed to be eligible for VR services and an individual with a significant disability.

Priority Category 3, Not Significantly Disabled (NSD): All other eligible Individuals with disabilities.

VRBS serves eligible individuals with the most significant disabilities (Priority Category 1) first. Eligible individuals with significant disabilities (Priority Category 2) are served next after Priority Category 1 is open and no individuals are on the waitlist, followed by eligible individuals with disabilities (Priority Category 3) after Priority Category 2 is open and no individuals are on the waitlist. Regardless of which category closure scenario is in effect, eligible individuals will be released from the statewide waiting

list first by priority category, most significant to least significant; and then by order of application date, oldest to newest.

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.

VRBS will continue to provide services to individuals currently receiving services in an IPE as of the effective OOS implementation date until resources become available and the priority category is opened.

When OOS is in effect, counselors will continue to take applications and make eligibility determinations. VRBS will provide all eligible individuals who are put on the OOS waiting list with information about, and referral to, other federal or state programs (including components of the statewide workforce investment system) that can assist them in preparing for, securing, retaining or regaining employment.

VRBS will notify each individual determined eligible, in writing of:

(A) The priority categories.

(B) The individual's assignment to a particular priority category classification.

(C) Any reclassification of priority category assignment due to changes in the individual's circumstances, or due to any misclassifications.

(D) The individual's right to appeal the category assignment; and

(E) The availability of assistance from the Client Assistance Program.

Individuals on the OOS waiting list will be contacted at least once in the first 180 days after being placed on the waiting list, and every 180 days thereafter.

The order of selection shall in no way affect the provision of pre-employment transition services to students with disabilities who were receiving such services prior to being determined eligible for VR and were placed in a closed category.

The method in which Montana VR will manage the waiting list will be by serving eligible individuals with the most significant disabilities (Priority Category 1) first. Eligible individuals with significant disabilities (Priority Category 2) are served next after Priority Category 1 is open and no individuals are on the waitlist, followed by eligible individuals with disabilities (Priority Category 3) after Priority Category 2 is open and no individuals are on the waitlist. Regardless of which category closure scenario is in effect, eligible individuals will be released from the statewide waiting list first by priority category, most significant to least significant; and then by order of application date, oldest to newest.

Montana VR's projected timeline to open Priority Category 2 is 24 months and Priority Category 3 is 24 months.

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?

VRBS has elected not to implement a policy regarding the provision of specific services or equipment for eligible individuals to maintain employment.

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
Division Administrator	1	1	1
Deputy Administrator	1	1	1
Bureau Chiefs (Program Support, Field Services, Pre-ETS, & Blind and Low Vision)	3	4	4
Program Managers (Independent Living, Deaf, Social Security,	6	6	6

Transportation, Business Services)			
Central Office Admin Support Staff	.75	1.75	1.75
Counseling Staff (counselors and Counselor Supervisors for both General and BLVS programs)	40	44	50
Pre-ETS Specialists	8	8	9
Rehabilitation Technicians	8	8	8
Orientation and Mobility Specialists	3	4	4
Vision Rehabilitation Therapists	5	5	5
Field Administrative Support	19	20	20
Technical Support (Budget Analyst, Business Analyst, Technology Assistant, Contract Specialist)	6	6	6

D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:

As of January 1, 2026 VRBS served a total of 4013 clients with 31 Counselors and 13 Counselor Supervisors across the agency. The average caseload per Counselor is 104 and the average per Counselor Supervisor is 57.

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

4,000

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
Western Michigan University	Vision Rehabilitation Therapy	3	0
Western Michigan University	Orientation and Mobility Specialist	0	1
Utah State University	Rehabilitation Counseling	1	1
St Cloud University	Rehabilitation Counseling	0	1
George Washington University	Rehabilitation Counseling	2	2
Montana State University Billings	Rehabilitation Counseling	4	1
University of Alabama	Rehabilitation Counseling	1	0
Virginia Commonwealth University	Rehabilitation Counseling	1	1
University of Wisconsin - Stout	Rehabilitation Counseling	2	0

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.

Montana VRBS works to recruit qualified personnel in a variety of ways including working closely with Montana State University-Billings, to share open positions with students of their rehabilitation counseling program. VRBS works with all colleges across the state in order to recruit individuals from minority backgrounds, including Montana’s tribal population and people with significant disabilities. Recruitment efforts also include posting positions to Handshake at universities nationwide that offer rehabilitation counseling programs, posting positions to the RSA PIMS recruitment site and the CRCC recruitment site. Additionally, positions are posted to LinkedIn and also shared with networks including local partners to include Job Service, the State Rehabilitation Council and professional associations.

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.

Montana VRBS utilizes a Comprehensive System of Personnel Development (CSPD) to monitor and track staff development. This is maintained by the Deputy Administrator and is comprised of all staff who are working toward a master's degree in rehabilitation counseling, vision rehabilitation therapy and orientation and mobility. The CSPD tracking spreadsheet includes information for all personnel in the following respective CSPD statuses: 1) those who hold a master's degree and CRC or other certification, 2) those who are in training assignments and working toward a master's degree and certification, 3) those who have been newly hired and are preparing for graduate studies.

The Deputy Administrator tracks CSPD progress through this spreadsheet and updates when a new staff member is hired, signs a CSPD agreement, enters graduate school, earns a master's degree, and obtains a credential (e.g., CRC). This information is regularly shared with the program administrator to assist in staffing decisions.

Additionally, all staff participate in ongoing staff development and training. All new employees undergo VRBS Foundations Training to establish an understanding of the values that inform the mission of our profession and best practices to promote efficiency and excellence in service of our consumers. VRBS also entered into a contract with YesLMS to provide continuing education and staff will have access to the extensive YesLMS library. Training staff will also have the ability to develop original content within this platform and plan to create custom learning modules catered to the training needs within the agency.

Additional staff training opportunities include access to continuing education through the VR-TACs and other training opportunities. VRBS staff have the opportunity to engage in professional development such as the Leaders program through UA Currents, courses through the Stout Vocational Rehabilitation Institute and the GWU Center for Center for Innovative Training. Leadership staff also engage in training and development through the National Rehabilitation Leadership Institute (NRLI). Yearly, VRBS also holds an All Staff providing training for professional and paraprofessional staff to remain up to date on policies, procedures and activities necessary to provide high quality services to Montanans with disabilities seeking competitive, integrated employment.

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.

Montana VRBS utilizes a Comprehensive System of Personnel Development (CSPD) to monitor and track staff development. This is maintained by the Deputy Administrator and is comprised of all staff who are working toward a master's degree in rehabilitation counseling, vision rehabilitation therapy and orientation and mobility. The CSPD tracking spreadsheet includes information for all personnel in the following respective CSPD statuses: 1) those who hold a master's degree and CRC or other certification, 2) those who are in training assignments and working toward a master's degree and certification, 3) those who have been newly hired and are preparing for graduate studies.

The Deputy Administrator tracks CSPD progress through this spreadsheet and updates when a new staff member is hired, signs a CSPD agreement, enters graduate school, earns a master's degree, and obtains a credential (e.g., CRC). This information is regularly shared with the program administrator to assist in staffing decisions.

Additionally, all staff participate ongoing staff development and training. All new employees undergo VRBS Foundations Training to establish an understanding of the values that inform the mission of our profession and best practices to promote efficiency and excellence in service of our consumers. VRBS also entered into a contract with YesLMS to provide continuing education and staff will have access to the extensive YesLMS library. Training staff will also have the ability to develop original content within this platform and plan to create custom learning modules catered to the training needs within the agency.

Additional staff training opportunities include access to continuing education through the VR-TACs and other training opportunities. VRBS staff have the opportunity to engage in professional development such as the Leaders program through UA Currents, courses through the Stout Vocational Rehabilitation Institute and the GWU Center for Center for Innovative Training. Leadership staff also engage in training and development through the National Rehabilitation Leadership Institute (NRLI). Yearly, VRBS also holds an All Staff providing training for professional and paraprofessional staff to remain up to date on policies, procedures and activities necessary to provide high quality services to Montanans with disabilities seeking competitive, integrated employment.

The Certified Rehabilitation Counselor credential is preferred. VRBS incentivizes this credential by providing a pay raise to those who earn their CRC credential. Additionally, in order to ensure that staff are continuing to meet the standards of adequate training, VRBS provides financial assistance for continuing education to maintain certification and provides staff development opportunities both internally through ongoing training and externally promotes opportunities through partners including several vocational rehabilitation training institutes such as The Centre for Rehabilitation Counseling Research at George Washington University and UA Currents. VRBS also has strong relationships with several national technical assistance centers (VR-QMTAC and OIB TAC; Rural Institute on Disability) that produce training focused on best practices and emerging knowledge in the field.

VRBS ensures that standards for training opportunities align with certifying bodies credentialing bodies by maintaining a continuing education provider account with CRCC to provide continuing education credits to certified staff. VRBS applies for and has been granted continuing education credits for training and provides these continuing education credits to any qualified staff who attend. VRBS has also become a continuing education provider with ACVREP to provide continuing education opportunities internally to our Orientation and Mobility Specialists and Vision Rehabilitation Therapists. The Deputy Administrator also maintains a tracking system for all staff who are either working to obtain a degree or certification and follows up to ensure that staff are participating in continued education opportunities to maintain the necessary professional development to maintain those credentials.

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.

Montana VRBS utilizes several methods of communication to ensure that applicants or consumers are able to effectively communicate with staff. When a person speaks a language other than English, staff have access to Language Link interpretive services which allows for communication. VRBS also hires sign language interpreters to assist applicants and eligible individuals who are Deaf or Hard of Hearing to communicate and engage in the vocational rehabilitation process. VRBS also has dedicated staff who work specifically with these consumers. Applicants and eligible individuals are also able to communicate with staff through a variety of methods including meeting in person, email and text communication and phone calls and can access teletype communication. Alternate formats and other accommodations are also routinely used by VRBS to ensure effective communication and staff consult with the consumer to determine their preferred method of communication.

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.

VRBS is committed to coordinating the agency's comprehensive system of personnel development with the personnel development activities of the state education agency whenever possible. Training and education will be identified for staff regarding service provision, coordination and best practices in serving students with disabilities. Training opportunities offered by VRBS which are relevant to both educators and vocational rehabilitation professionals will be opened to school staff for participation when applicable.

A Pre-ETS Specialist is assigned to actively participate on the Montana Special Education Advisory Panel, which promotes interagency cooperative planning, information sharing, and the collaborative use of resources at the state and local level. This panel works to ensure that training needs are adequately identified and then addressed through shared training opportunities.

VRBS staff and OPI staff routinely give transition presentations at events such as the Montana Youth Transitions Conference. This event brings together students with disabilities, parents, public educators, VR staff and other programs. The Office of Public Instruction (OPI), VRBS and other agencies are currently planning joint transition panel presentations at the OPI Summer Institute and Montana Council for Exceptional Children Conference.

Montana VR and the Office of Public Instruction (OPI) coordinate the Designated State Unit's Comprehensive System of Personnel Development (CSPD) with personnel development under the Individuals with Disabilities Education Act (IDEA) through joint participation in the National Technical Assistance Center on Transition's (NTACT) Capacity Building Institute (CBI).

This collaboration ensures alignment between vocational rehabilitation and educational personnel development by focusing on shared objectives that strengthen transition services for youth with disabilities. Through the CBI, Montana VR and OPI work together to:

- Increase knowledge of effective secondary transition-focused practices among staff across both systems.
- Use relevant secondary transition data to evaluate and improve current practices.
- Update or develop interagency strategic plans that integrate CSPD and IDEA requirements.
- Foster youth engagement and leadership to inform personnel development priorities.
- Develop new and strengthen existing partnerships with other states and entities to share best practices and resources.

By engaging in these activities, Montana VR and OPI create a coordinated approach that supports professional development for personnel in both systems, ensuring consistency in service delivery and improved outcomes for students transitioning from school to employment.

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.

VRBS created a Pre-ETS Bureau in 2019 which included 7 Pre-ETS Specialists, 1 Data Technician and the Bureau Chief. In June of 2022, a Pre-ETS Specialist position was added for the Bozeman area, one of Montana's fastest growing communities. The Pre-ETS Specialists routinely meet with their assigned high schools sharing resources and working together to provide Pre-ETS to students with disabilities. There is also a VRBS Vocational Rehabilitation Counselor assigned to each high school in Montana to ensure a smooth transition into adult services.

Each year, VRBS reaches out to all accredited high schools in Montana to give them the opportunity to collaborate in providing Pre-ETS to students with disabilities. Every accredited high school has the opportunity to enter into a contract and receive funding from VRBS to provide Pre-ETS. School districts develop scope of work plans to describe how they will provide the five required components of Pre-ETS and receive funding quarterly based on the number of Pre-ETS services provided to students with disabilities who request the services. The school districts are required to provide VRBS with the documentation of Pre-ETS services they are providing to students with disabilities. VRBS offers this opportunity to all schools including those located in institutional settings, the juvenile justice system and the Department of Military Affairs.

A Pre-ETS Bureau staff member is assigned to actively participate on the Montana Special Education Advisory Panel, which promotes interagency cooperative planning, information sharing, and the collaborative use of resources at the state and local level. This Panel works to ensure that training needs are adequately identified and then addressed through shared training opportunities. Additionally, the Pre-ETS Bureau Chief has been asked to present at the Special Education Director's meetings during their Spring meeting for the past few years.

Montana partnered with several states, Penn State University, and Utah State University on a national grant to develop the Transition Readiness Toolkit (TRT). The TRT includes survey instruments designed to measure the impact of Pre-ETS services through pre- and post-surveys administered to students receiving these services. Schools and providers now use TRT surveys to ensure their Pre-ETS programs are making a measurable difference. Pre-ETS staff collaborate with schools and providers to analyze survey results and use the data to continuously improve program quality and outcomes for students.

Working through the National Technical Assistance Center on Transition: the Collaborative (NTACT:C) Montana has pulled together a Capacity Building Institute (CBI) interagency team to focus on strategic planning around transition. NTACT:C is a jointly funded RSA and OSEP technical assistance center focused on collaboration between special education and vocational rehabilitation and other stakeholders. Some of the CBI focus areas include student-focused planning, student development, family engagement, program structures and interagency collaboration. Working together, this CBI team is developing panel presentations on transition for the Montana Council on Exceptional Children and the Office of Public Instruction Summer Institute. In a recent meeting with the new State Special Education Director, we discussed how to work together to provide

cross training to our respective staff members to ensure that they were aware of the content of the MOU and available transition resources.

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.

The State Special Education Director position at the Office of Public Instruction (OPI) remained vacant for an extended period, which delayed updates to the formal interagency agreement with the state educational agency. After the position was filled, VRBS collaborated closely with the new Director and OPI staff to revise and finalize the Memorandum of Understanding (MOU).

The following is from the most recent MOU with OPI that details the technical assistance responsibilities of each agency. It includes suggested revisions for the current MOU that is in development.

- VRBS will provide consultation and technical assistance to assist LEAs in planning for the transition of students with disabilities from school to post-school activities including Pre-ETS.
- Pre-ETS Specialists will consult with and provide technical assistance to LEA administrators, school counselors, transition specialists, families, individuals, public and private stakeholders, community agencies, and teachers including those who work in special education, general education, career technical fields, etc.

- VRBS will provide consultation and technical assistance through informational sessions, face to face meetings, phone calls, video conferencing, virtual meetings, webinars, brochures, rack cards, and shared information on the agency website.
- LEA and VRBS staff will be encouraged to collaborate through their Regional Youth Transition Committees and Comprehensive System of Personnel Development (CSPD) Meetings in planning and implementing efforts that are focused on the transition of students with disabilities.
- Pre-ETS Specialist will provide consultation and technical assistance during their routine visits to the LEAs, during IEP meetings, at conferences, at training activities, and at other times as requested by OPI or LEAs.
- VRBS will disseminate information about transition services, Pre-ETS, processes for outreach, VR eligibility, scope of VR services, effective practices, training opportunities, funding strategies, assistive technology, and other relevant topics.
- LEA and VRBS staff will inform each other about policies or procedural changes that may impact transition services.

In addition, VRBS has an MOU with Office of the Commissioner of Higher Education (OCHE).

The purpose of this MOU is to develop and adopt principles which will guide the planning and delivery of support services to individuals with disabilities who are mutual clients of VRBS and students enrolled in the Montana University System (MUS). This MOU has provisions which include:

1. VRBS and the units of the MUS maintain different requirements for determination of eligibility, documentation of disability, and the provision of services or accommodations. This MOU does not require either VRBS or MUS to alter its policies for providing services or supports, and this MOU is not to be used as a basis for determining eligibility for VRBS or MUS services.
2. The units of the MUS through the guidance of the OCHE are required to provide services and accommodations to VRBS' clients to the same extent as they are provided to other students with disabilities, in accordance with Montana state law, the Americans with Disabilities Act of 1990 (PL 101-336) and Section 504 of the Rehabilitation Act (PL 93-112, as amended).
3. VRBS is not prohibited in this agreement from contracting with units of the MUS to provide services or support for VRBS' clients beyond those required to assure equal access to equal educational opportunities.
4. The MOU will provide both parties with the opportunity to enhance communication and the exchange of information regarding services offered by VRBS and the various campuses of the MUS.
5. VRBS and the units of the MUS will work together to enhance cross-referrals of individuals with disabilities, as appropriate to each individual's needs. Personal information about the individual will not be shared without an appropriate release of information.
6. The MUS will not require students who have a disability to apply for VRBS before providing services or support. For students who have applied for VRBS, the MUS will not deny or delay the provision of services or support while VRBS is in the process of determining eligibility for services.
7. VRBS are provided pursuant to an individualized plan for employment (IPE) which is developed jointly by the rehabilitation counselor and the eligible individual. In those situations where referral has been made to campus disability support services, the appropriate disability services staff may also be involved in helping to develop the IPE.

8. The VRBS' rehabilitation counselor and the MUS campus disability support services staff will respect the individual's right and responsibility to fully participate in all decisions regarding his or her vocational future. The IPE shall be developed and implemented in a manner that allows the individual an opportunity to exercise informed choice in selecting an employment outcome, the specific vocational rehabilitation services that are to be provided, the entity that will provide those services, and the methods that will be used to procure the vocational rehabilitation services.

The following is from the most recent MOU with OPI that details the transition planning responsibilities of each agency. It includes suggested revisions for the current MOU that is in development.

- VRBS and OPI agree to work collaboratively to facilitate and coordinate the smooth transition of students with disabilities from school to post-school activities, including the receipt of Pre-ETS, transition services, and other vocational rehabilitation services.
- Pursuant to 34 CFR 300.321(b)(3), to the extent appropriate, with consent of the parent or adult student, VRBS will be invited to participate in IEP development meetings for shared students with disabilities, depending on availability. VRBS may participate in person or through use of alternative means such as video conferencing or other methods. When VRBS is unable to attend the IEP meeting, LEA and VRBS will communicate regarding IEP goals and needed transition services after the IEP meeting.
- VRBS will provide assistance in transition planning for students with disabilities to facilitate the development and completion of their IEPs. VRBS will also provide information, technical assistance, case consultation, and information or referrals as needed for eligible or potentially eligible students.
- In conjunction with the IEP, which addresses transition, an Individualized Plan for Employment (IPE) will be developed for all individuals determined eligible by VRBS, which will document their vocational goal and the course of action designed to enable the student to achieve the stated goal, as well as timelines. The development of the IPE requires active participation from the student and may involve participation and support from the parent and/or guardian. Participation from appropriate school personnel may also be encouraged in the development of this plan.
- The IPE must be developed prior to exit and within 90 days from the date of eligibility determination, agreed to, and signed by the student or the student's representative, and the VR counselor as early as possible in the transition process, but no later than the time the eligible student leaves the school setting. Section 101(a)(11)(D) of the Rehabilitation Act. The same applies for those able to be served if an Order of Selection is in effect. Section 101 (a)(9)(A) of the Rehabilitation Act; 34 CFR 361.22(a).
- VRBS and LEAs will collaborate on the provision of ongoing joint staff training on topics such as the development and implementation of IEPs, Pre-ETS, accommodations under Section 504, and limitations on youth entering employment paying sub-minimum wage.
- VRBS and LEAs will collaborate to facilitate potential employers' local engagement in providing job shadows, paid and unpaid work-based learning opportunities, and other services for students with disabilities.
- VRBS, in collaboration with LEAs, will provide or arrange for the provision of Pre-ETS to all students with disabilities identified as requiring these services.

The following is from the most recent MOU with OPI that details the roles and responsibilities of each agency. It includes suggested revisions for the current MOU that is in development.

Joint Responsibilities of OPI and VRBS:

- OPI and VRBS shall jointly sponsor training for their respective staff members and LEA personnel. Training shall focus on existing and new State or Federal requirements or initiatives that impact the provision of services by both entities concerning education of individuals with disabilities, their transition from school to employment, vocational rehabilitation services, assistive technology, and the substance of this MOU.
- OPI and VRBS shall ensure that timely notice of training is provided to each other and to the LEAs as appropriate.
- OPI and VRBS shall each designate a single point of contact who will serve as the lead person to coordinate joint training programs, communicate with the respective programs and for collaboration of pre-employment transition services and transition activities.
- OPI staff and VRBS will be available to give joint presentations on transition services at conferences such as MYTransitions.
- Provide a copy of this Agreement to the following key stakeholders:
 - all LEA superintendents
 - all directors of Special Education
 - all VR administrative staff
 - VR State Rehabilitation Council

Responsibilities of OPI:

- OPI shall provide supports necessary for LEAs to facilitate and coordinate the smooth transition of students with disabilities from school to post-school employment-related activities, including working with VRBS to ensure the receipt of appropriate Pre-ETS, secondary transition services, and competitive, integrated employment.
- OPI shall host an Annual Joint Stakeholders meeting to network, collaborate, communicate and discuss issues regarding services for students and youth with disabilities.
- OPI shall disseminate information regarding relevant training and workshops to VRBS, including courses available through the Teacher Learning Hub.
- The OPI Data Operations Team will provide the most recent Special Education State Child Count data upon request. A data-driven estimate of the number of students receiving 504 accommodations in the state will also be provided upon request. The OPI Annual Performance Report, which includes exit data information for students with disabilities, will be shared with VRBS.
- OPI shall provide support to LEAs on how to inform VRBS of students with disabilities who may need secondary transition or pre-employment services through VRBS.
- OPI shall provide technical assistance to LEAs concerning the provision of FAPE, including the responsibility to provide assistive technology to assist with the education of students approaching transition to independent living and employment as appropriate.
- OPI shall provide support to LEAs on how to coordinate vocationally related services with VRBS for eligible and potentially eligible students. Coordination should commence in the early stages of secondary transition. Vocationally related service coordination and corresponding agency responsibilities should be identified in the IEP and included on the student's IPE when appropriate.
- OPI shall provide technical assistance and reference materials to LEAs on how to inform VRBS of IEP meetings in advance to allow sufficient time for VRBS to participate, subject to parental approval. The development of vocational goals and objectives shall occur in collaboration with the IEP Team.

- OPI will provide technical assistance and reference materials to LEAs on how to identify transition services needed, including, as appropriate, connections with other entities (e.g., mental health agencies, Social Security Administration) beginning at age 14. OPI will also provide support to LEAs on how to work closely with VRBS to ensure that interested students with disabilities are identified and referred for Pre-ETS at an early age.

Responsibilities of VRBS:

- VRBS shall encourage former students who are still eligible for IDEA services to reenroll in school for further study and training to enhance their opportunities for employment. Such former students shall also be eligible for vocational rehabilitation services customarily provided by VRBS to adults over the age of 21.
- VRBS will provide assistive technology services relevant to functions outside those assistive technology services required to access the educational program.
- After termination of enrollment at the LEA, VRBS will continue to provide the eligible individual with vocational services, i.e., vocational assessment, career exploration, job shadowing, vocational guidance and counseling, and other required services outlined in the IPE.
- VRBS will accept referrals of students with disabilities during the secondary transition planning process for the provision of Pre-ETS. Students are not required to apply for VRBS services to receive Pre-ETS.
- VRBS will provide consultation with LEA district staff on secondary transition planning to prepare a student to move from school to work or post-secondary education in accordance with the student's unique needs as determined through the IEP process and provision of Pre-ETS.
- An IPE which is consistent with, and which takes into consideration the eligible student's IEP, strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice will be developed within 90 days of the VRBS eligibility determination.
- Students with disabilities who: apply for VRBS, are determined eligible, and complete an IPE may receive, but are not limited to, services such as: evaluation, career guidance and counseling, medical or psychological services, training, job development and placement services, rehabilitation technology, and/or other services to help them enter and maintain employment.
- VRBS Staff will provide consultation to assist in the identification of eligible and potentially eligible students with disabilities and assessment of their individual needs for Pre-ETS.
- VRBS is responsible for providing information to parents and/or guardians, students, and teachers regarding VR eligibility, vocational assessment for employment and postsecondary planning, and the Client Assistance Program.
- VRBS will offer students who wish to apply for VRBS the opportunity to complete and sign a VRBS application form. The student will provide access to available information necessary to determine eligibility and priority for services. Eligibility for VRBS will be determined within 60 days from the date of application. Students who are only interested in Pre-ETS and do not wish to apply for VRBS services will be given the opportunity to complete and sign the Student Request Form. Verification of disability and student status will be included on the Student Request Form or provided by the student. For students under age 18, the application and Request Form will be signed by a parent or guardian. VR services (e.g., transportation and maintenance) necessary for students to participate in pre-employment transition services may only be provided to VR eligible students with IPEs.
- VRBS will obtain written consent for the release of confidential information, pursuant to VRBS policy and procedures, federal and state laws, and regulations regarding confidentiality.

- VRBS will share information regarding policies, procedures, guidelines, programs, and services for the purpose of improving the access to and availability of secondary transition services.
- VRBS will provide brochures and materials about the VR process and services to the LEAs for distribution to students, parents, legal guardians, teachers, and others. VRBS staff will also be available to provide information on changes in the law or VRBS policy regarding secondary transition services.
- VRBS will promote employer participation in providing opportunities for work-based learning for students with disabilities.
- VRBS is responsible for coordinating the provision of Pre-ETS.
- VRBS's Pre-ETS Bureau Chief shall coordinate with OPI and LEAs to develop and promote a seamless transition system. The Pre-ETS Bureau Chief will take the lead in working with OPI and LEAs to ensure that students with disabilities receive Pre-ETS to prepare them for life after high school.
- The Pre-ETS Bureau Chief and Pre-ETS Specialists will meet with staff and other interested parties to develop Pre-ETS contracts, initiate joint training, share best practices and facilitate communication between the parties. The Pre-ETS Bureau Chief will be the contact person for any questions regarding the provision of services under the Pre-ETS contracts.

Financial Responsibilities:

Montana is a local control state in which LEAs are financially responsible for the costs of services they are mandated to provide under the IDEA and Section 504.

- OPI and VRBS commit to the implementation of complementary programs to assist with the provision of secondary transition and Pre-ETS to students with disabilities in the state, including students with the most significant disabilities, to enable them to achieve an employment outcome in a competitive, integrated setting.
- The IEP team, including VRBS, will utilize the IEP process to determine services necessary for the student to reach his or her identified post-school outcome and outcome for employment as written in the IEP and IPE and will negotiate and identify the programmatic and financial responsibility of IEP team members, if any.

Specific criteria are used to determine which agency (LEA or VRBS) has primary responsibility for providing and paying for transition-related services for students with disabilities. These criteria are:

- Purpose of the service—Determine if the service is associated with an employment outcome or educational attainment.
- Customary service—Determine which agency “customarily” provides the service to students.
- Eligibility for services—Determine how the student with a disability is eligible to receive services.
- VRBS will provide or arrange for the provision of services required by the IPE when the student has been determined eligible for VR, and the services are specific to his/her employment outcome and are not services customarily provided to the student by the LEA under the IDEA.
- VRBS is financially responsible for the cost of services for eligible VR students where the purpose of the services is to support an employment goal.
- Under 34 C.F.R. §361.53, the availability of Comparable Services and Benefits, as defined in 34 C.F.R. §361.5(c)(8), will be determined by VR unless such a determination would interrupt or delay the progress of the individual toward achieving the employment outcome identified in the IPE; an

immediate job placement; or the provision of VR services to individual determined to be at extreme medical risk.

The following is from the most recent MOU with OPI that details the procedures for outreach to and identification of students with disabilities needing transition services.

- VRBS assigns a Vocational Rehabilitation Counselor and Pre-ETS Specialist to each public high school in the state. Counselors shall inform students, families, special and regular education teachers, school administrators, advocacy groups, and others about VRBS.
- VRBS Counselors and Pre-ETS Specialist will give presentations and distribute both print and electronic materials that explain transition and pre-employment services along with traditional vocational rehabilitation services. The information provided will include a description of the purpose of VRBS, eligibility requirements, application procedures and scope of services that may be provided to eligible and potentially eligible individuals.
- Students who wish to apply for VRBS services will be offered the opportunity to complete and sign a VRBS application form. The student will provide access to available information necessary to determine eligibility and priority for services. Eligibility for VRBS will be determined within 60 days. Students who are only interested in Pre-ETS and do not wish to apply for VRBS services will complete and sign the Student Request Form. Verification of disability and student status will be included on the Student Request Form or provided by the student. For students under 18 years of age, the application and Request Form will be signed by a parent or guardian.
- VRBS will reach out to eligible and potentially eligible students with disabilities who are in need of transition services and Pre-ETS as early as possible through outreach activities such as information sharing at IEP's, transition planning meetings, career fairs, orientations, back to school nights, work with parent support groups, and other activities.
- VRBS Counselors and Pre-ETS Specialists will work with LEA staff to identify and reach out to all students with disabilities to include those served in special education, those receiving an accommodation under Section 504 of the Rehabilitation Act of 1973, and other students and youth with disabilities. Outreach activities will include students with disabilities receiving school psychological, health, nursing or social work services, and students with disabilities enrolled in an educational program and not in special education. VRBS will also reach out to youth with disabilities who have dropped out of an education program or students who are at risk of dropping out of high school.
- VRBS will inform students with disabilities about the availability of and opportunities to exercise informed choice; including the availability of support services for individuals with the most significant disabilities who require assistance in exercising informed choice throughout the vocational rehabilitation process;
- The designated Pre-ETS Specialist will work closely with each LEA to coordinate, identify students and implement Pre-ETS. VRBS will provide the necessary forms and templates for required documentation including Student Request Forms for Pre-ETS.
- VRBS will work with the LEA to ensure collaboration between transition services provided under IDEA and the Pre-ETS provided by VRBS through direct provision of services or through contracts with LEAs and other providers.
- OPI will provide written guidance to LEAs that Pre-ETS funds can only be used to provide the required Pre-ETS to students with disabilities and that Pre-ETS funds are for additional services to students with disabilities, not to pay for the services required under the IDEA. OPI will continue to work with LEAs to ensure that they follow this guidance.

- Not all eligible or potentially eligible students with disabilities will require all five core Pre-ETS services, however, they should receive all requested services, as determined through informed choice and consultation with each student based on their strengths and needs and consistent with their IEP, when applicable.

The following is from the most recent MOU with OPI that details the coordination and documentation requirements for students and youth with disabilities who are seeking subminimum wage employment.

Coordination and Documentation for Subminimum Wage Employment (Section 511(d) of the Rehabilitation Act of 1973):

Under section 511 of the Rehabilitation Act of 1973, no entity, including businesses that hold a special wage certificate as described in Section 14(c) of the Fair Labor Standards Act of 1958, may compensate any individual with disabilities who is 24 years of age or younger at subminimum wage, unless they have met specific requirements including evidence of participation in Transition or Pre-ETS, application for VRBS and receipt of career counseling, information, and referral services. The purpose of Section 511 is to ensure that individuals with disabilities have access to information and services that will enable them to achieve competitive integrated employment.

Responsibilities of OPI and LEAS under Section 511(d) of the Rehabilitation Act of 1973

- OPI or LEAs may not enter into a contract or other arrangement with an entity for the purpose of operating a program for an individual age 24 or younger under which work is compensated at subminimum wage.
- OPI will provide guidance to LEAs that when a student with a disability is known to be seeking subminimum wage employment, the LEA will share the specific requirements with the student, parents, guardians, and teachers as soon as possible. This information should also be shared with participants during IEP meetings for transition planning.
- The student will be referred to VRBS, and the Vocational Rehabilitation Counselor will be informed by the LEA that the student is known to be seeking subminimum wage.
- Pursuant to 34 CFR §397.30(b)(1), the LEA will provide VRBS with documentation that contains at a minimum, the: (i) Youth's name; (ii) Description of the transition services under IDEA and Pre-ETS completed; (iii) Name of the provider of the required service or activity; (iv) Date required service or activity completed; v) Signature of LEA personnel documenting completion of the required service or activity; (vi) Date of signature and (vii) Signature of LEA personnel transmitting documentation to VRBS; and (viii) Date and method (e.g., hand-delivered, faxed, mailed, e-mailed, etc.) by which document was transmitted to VRBS. The LEA Personnel must provide the documentation to VRBS as soon as possible upon completion of the required actions, but no later than 30 calendar days after completion of the required action or 60 days of additional time is needed due to extenuating circumstances. 34 CFR § 397.30(c)(1)(i). Extenuating circumstances should be interpreted narrowly to include unexpected lengthy absences due to illness or family emergency of LEA personnel necessary to produce the documentation due to illness or family emergency or a natural disaster. 34 CFR § 397.30(c)(1)(i)(B). When the LEA personnel transmits the final determination or activity completed to VRBS, as required by 34 CFR §397.20 and 397.30(a), the LEA personnel must provide a cover sheet that itemizes the documentation that has been provided to VRBS regarding that student.
- When a student refuses to participate in transition services, the LEA will provide VRBS with documentation of the refusal to participate. Pursuant to 34 CFR §397.30(b)(2) such documentation must at a minimum contain the: (i) Youth's name; (ii) Description of the refusal and the reason for such refusal; (iii) Signature of the youth or, as applicable, the youth's parent or guardian; (iv) Signature of the

LEA personnel documenting the youth's refusal; (v) Date of signatures; (vi) Signature of LEA personnel transmitting documentation of the refusal to the designated State unit; and (vii) Date and method (e.g., hand-delivered, faxed, mailed, emailed, etc.) by which documentation was transmitted to VRBS. The LEA must provide this documentation to VRBS within 5 calendar days of the youth's refusal to participate. 34 CFR § 397.30(c)(1)(ii).

- The LEA must retain a copy of all documentation provided to VRBS.
- The transmittal of all documentation from the LEA to VRBS will be consistent with the confidentiality requirements of the Family Education Rights and Privacy Act (FERPA) (20 USC 11232g(b) and 34 CFR 99.30 and 99.31) and IDEA (20 USC 1417(c) and 34 CFR 300.622).

Responsibilities of VRBS under Section 511(d) of the Rehabilitation Act of 1973

- Pursuant to 34 CFR § 397.20(a) documentation of the activities listed below must be provided by VRBS to the student in an accessible format, as soon as possible after completion of the required action, but no later than 45 calendar days after determination or completion of the required activity or service or within 90 calendar days if additional time is needed due to extenuating circumstances. 34 CFR §397.10(c)(2). Extenuating circumstances should be interpreted narrowly such as unexpected lengthy absence of VRBS personnel necessary for the production of the documentation due to illness, family emergency or natural disaster. 34 CFR § 397.10(c)(2)(i)(B).
 - The individual has received transition services under (IDEA) or Pre-ETS through VRBS or the LEA.
 - The individual has applied for VR services and been found ineligible; or applied and was found eligible for VR services and;
 - Had an approved IPE;
 - Had been working toward an employment outcome with appropriate supports and services for a reasonable period of time (determined on an individual basis, but up to 24 months for an individual with a supported employment outcome identified in their IPE) without success; and
 - The individual's case is closed, and
 - Has been provided career counseling, information and referrals to Federal and State programs and other resources in the individual's geographic area that offer employment-related services and supports designed to enable the individual to explore, discover, experience, and attain competitive integrated employment.
- If a youth with a disability or, as applicable, the youth's parent or guardian refuses, through informed choice, to participate in the activities required by section 511 or the implementing regulations in part 34 CFR part 397, documentation must, at a minimum:
 - Contain the information in 34 CFR § 397.10(a)(2); and
 - The documentation of the youth's refusal must be provided to them in an accessible format within 10 calendar days of their refusal to participate. 34 CFR §397.10(c)(2)(ii).

- The youth will be informed that their right of refusal to participate in the required activities outlined in this section will result in their inability to engage in employment at a sub-minimum wage.
- VRBS will coordinate with non-educational agencies such as juvenile justice, treatment facilities, or foster care programs for referrals of out-of-school youth with disabilities. These youth will be encouraged to participate in transition services and programs to improve future employment opportunities.
- VRBS will inform LEA teachers of community events such as job fairs, transition fairs, and career days to introduce students with disabilities to possible career goals.

The following is from the most recent MOU with OPI that includes the assurance that neither the SEA nor the LEA will enter into a contract with an entity for the purpose of operating a program under which youth with a disability are engaged in work compensated at a subminimum wage.

- Neither OPI nor the LEA will enter into an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a youth with a disability is engaged in work at a subminimum wage.

VRBS contracts with LEAs to provide Pre-ETS to students with disabilities. The assurance that the LEA will not enter into a contract with an entity for the purpose of operating a program under which youth with a disability are engaged in work compensated at a subminimum wage is included in the current Pre-ETS School Contract as outlined below:

- The Contractor is prohibited from entering into a contract or other arrangement with any entity who is a 14(c) certificate holder as defined by Section 14(c) of the Fair Labor Standards Act under the U.S. Department of Labor for purposes of operating a program in which students with disabilities are employed at subminimum wage.
- A “14(c) Certificate Holder” is any employer which has been authorized under Section 14(c) of the Fair Labor Standards Act, after receiving a certificate from the Wage and Hour Division, to pay Subminimum wages - wages less than the Federal minimum wage - to workers who have disabilities for the work being performed.

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.

VRBS provides multiple services to businesses across Montana. These services include Recruitment, Training, Retention, and Incentives.

Recruitment/Acquisition Services include accommodation services for employees, ADA Training, consultation and evaluation for employees; identify potential employees using multiple methods (eSkill that is employer specific, etc.); assisting with basic skill preparation for candidates through the use of WIOA partners (Adult Education, Job Service, etc.); Customized Training- train clients to meet industry standards through a variety of training situations; On-The-Job training; On-The-Job Evaluations; Apprenticeship; job description/essential functions of job; employee recruitment; Disability related policies/ handbook; Disability awareness/sensitivity

training/ consultation. Other acquisition services include Work Opportunity Tax Credits, Federal bonding program, and Section 503 letters.

Disability Management Services involve providing accommodation/ergonomic training/consultation and referrals, ADA training/consultation and referral, ADA Accessibility guideline referral, Disability Awareness/Sensitivity Training, Job/Task Analysis, and Windmills.

Retention Services involve providing accommodation services for retention, ADA Training, Consultation, Job coaching for Retention, Other Retention Services, Vocational Counseling for Retention, and EOP (Emergency Operating Plan) for Retention.

All of these services are available to employers regardless of whether they are hiring VRBS clients or Pre-ETS students. Employer are an additional client of VRBS to help meet their workforce needs.

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;

Disability Employment and Transitions Division (DETD), which houses Montana's Vocational Rehabilitation and Blind Services (VRBS) program, acted as the Lead Agency contracting with MonTECH (the Implementing Agency) housed at the University of Montana (UM) to provide the required services of the Assistive Technology (AT) Act of 1998 through September 30, 2022. Following multiple conversations between MonTECH and DETD leadership regarding the benefits and implications of shifting the Lead Agency from the State of Montana to MonTECH, DETD sought approval from the Governor to pursue transfer of Lead Agency role to MonTECH. It was determined that redesignating UM as the Lead Agency for the AT Grant would improve efficiency in managing MonTECH's budget and other administrative tasks. The existing contractual, financial management, and administrative processes were reviewed and it was agreed the change was in the best interest of the stakeholders of the AT program, would be the most effective way to simplify processes, and would have minimal impact to the well-established working relationship between DETD and MonTECH. On June 13, 2022, Montana's Governor sent a letter to the Administration for Community Living formally requesting the transfer. On July 29, 2022, a response letter from ACL was received granting the transfer of Lead Agency to MonTECH.

Since the transfer has taken place, no formal memorandum of understanding or cooperative agreement has been developed between the two agencies. In the coming years, VRBS will pursue an MOU with MonTECH. Despite no formal agreements being in place, VRBS views MonTECH as an integral partner and stakeholder and the programs have continued to cooperate through:

- Having a VRBS representative on the MonTECH advisory board,
- Having a MonTECH representative on the VRBS Assistive Technology Team.
- Training VRBS counselors in available assistive technology and how to access consumer evaluations related to assistive technology.

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

Montana has attended the Agribility Conferences. Montana is actively involved in discussions with partners and stakeholders on the possibility of creating an Agribility program in Montana.

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

VRBS continually seeks opportunities for interagency cooperation with non-educational agencies serving out-of-school youth. While VRBS works closely with statewide workforce development system agencies to serve out-of-school youth, there are non-WIOA agency partnerships as well. The monthly VRBS Youth Services Team meetings routinely include presentations from different agencies that provide services to youth including out-of-school youth. VRBS is also partnering with Child Protective Services (CPS) and Chafee providers to reach foster care youth with disabilities.

4. STATE USE CONTRACTING PROGRAMS;

State agencies may purchase supplies and services from sheltered workshops or work activity centers. Such purchases are exempt from competitive bidding laws and rules. The Montana Department of Administration maintains a list of certified sheltered workshops or work activity centers located in the state. The list includes the supplies and services provided by each sheltered workshop or work activity center. (Administrative Rules of Montana 2.5.607).

VRBS does not currently make purchases related to this agreement.

5. STATE AGENCY RESPONSIBLE FOR ADMINISTERING THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT (42 U.S.C. 1396 ET SEQ.);

In late 2022, Montana VRBS, in collaboration with Montana's mental health block grant program, applied for the Office of Disability Employment Policy's Advancing State Policy Integration for Recovery and Employment (ASPIRE) project. In early 2023, Montana was one of seven states selected to receive tailored, targeted, and intensive technical assistance for integrating state policy, program and funding infrastructures to expand the evidence-based Individual Placement and Support (IPS) model to address the supported employment needs of individuals with serious mental health conditions. Montana's assigned ASPIRE Subject Matter Experts (SMEs) encouraged the Montana ASPIRE team to reach out to and partner with our State Medicaid leadership. The team connected with and enrolled Isaac Coy, the Treatment Bureau Chief, into the Montana ASPIRE team and collaboratively developed the following MOU between VRBS, Mental Health Block Grant (Prevention Bureau), and Medicaid (Treatment Bureau):

Section 1. Parties and Purpose of Agreement:

1.1 The Memorandum of Understanding ("MOU") is entered between the Department of Public Health and Human Services, Disability Employment and Transitions Division (DET), Vocational Rehabilitation and Blind Services ("VRBS") and Department of Public Health and Human Services, Behavioral Health and Developmental Disabilities Division (BHDD), Prevention Bureau ("BHDD-Prevention") and Department of Public Health and Human Services, Behavioral Health and Developmental Disabilities Division (BHDD), Treatment Bureau ("BHDD-Treatment")

1.2 This agreement is predicated on the beliefs that employment contributes to better overall health and well-being and is a critical mental health intervention for individuals with Serious Mental Illnesses ("SMI") Individual Placement and Supports ("IPS") is an evidence Based Practice demonstrating improved employment outcomes for individuals with SMI and must be offered in more locations and by more Community Mental Health Centers ("CMHC") across Montana to improve access to competitive integrated employment for Montanans with SMI.

1.3 The purposes of this MOU are to:

- 1.3.1 Describe financial obligations and clarify roles and responsibilities of VRBS, BHDD-Prevention, and BHDD-Treatment.
- 1.3.2 Share efforts in order to improve competitive integrated employment outcomes for individuals with SMI and enrolled in Individual Placement and Supports (“IPS”) programs.
- 1.3.3 a collaborative framework of coordinated, cost efficient employment services for individuals with SMI.
- 1.3.4 Ensure non-duplication in the coordination of services and resources to support provision of IPS services and common clients.
- 1.3.5 Provide basic guidance for ongoing coordination between VRBS, BHDD-Prevention, and BHDD-Treatment as it relates to implementation, expansion, sustainability, and fidelity of IPS in Montana

Section 2. General Duties and Responsibilities:

2.1 **VRBS** operates under the Rehabilitation Act of 1973 (the Act) as amended by the 2014 Workforce Innovation and Opportunity Act (WIOA) and its joint implementing regulations and is responsible for the provision of vocational rehabilitation services within the framework of the Act and the WIOA joint implementing regulations. VRBS presumes all people with disabilities, including those with the most significant disabilities, can work in competitive integrated settings with advancement opportunities and believes collaborating with partners makes us stronger and more effective.

2.1.a VRBS agrees to:

- Support 100% the cost of the IPS trainer for the first year (10/1/2023-9/30/2024) of the MOU.
- Explore annually Disability Innovation Funds (“DIF”) grant for additional IPS funding.
- Develop an IPS fee schedule and execute contracts with existing MHBG-funded IPS programs (Yellowstone Boys and Girls Ranch, Inc. and Mountain Home Montana) as well as newly implemented IPS programs in Montana.
- Train one Vocational Rehabilitation Counselor per VRBS office on the IPS model, contracts, processes and procedures by December 31, 2024.
- Create a VRBS IPS Leadership team.
- Meet quarterly to review this document and report on progress on the following dates:
 - November 24, 2023
 - February 23, 2024
 - May 24, 2024
 - August 23, 2024
- Participate in fidelity reviews.
- Collect data on number served and employment outcomes of those served by VRBS through an IPS program.

2.1.b VRBS contacts:

- Chanda Hermanson, DETD Administrator, 406-444-4179, Chanda.Hermanson@mt.gov
- Brook Hodge, Bureau Chief of Field Services, 406-214-4848, bhodge@mt.gov

- Lacey Conzelman, Program Supervisor, 406-655-7673, Lacey.Conzelman@mt.gov

2.2 BHDD-Prevention provides services through Block Grants, Formula Grants, Discretionary Grants, and Emergency Grants. These are Federal Grants to provide Substance Use Treatment & Prevention, Peer Support Services, Individuals Experiencing Homelessness, and Recovery Support Services. The Prevention Bureau works with a diverse group of stakeholders to help support the mission of DPHHS: improving and protecting the health, well-being, and self-reliance of all Montanans.

2.2.a BHDD-Prevention agrees to:

- Continue supporting, with available block grant funding, the existing IPS programs through the transition to VRBS and Medicaid funding.
- As existing programs enhance their funding abilities through other means (VRBS & Medicaid & other grant opportunities), issue Request For Proposal (RFP) for unused block grant funds to create further IPS program implementation in Montana.
- Support 100% the cost of the IPS trainer starting FFY24 (10/1/2024-9/30/2025) and moving forward.
- Collect and process monthly invoices from MHBG-funded IPS Programs within 30 days of receipt.
- Collect and analyze quarterly data and outcomes for MHBG-funded IPS Programs.
- Use outcome data to improve best-practices for MHBG-funded IPS Programs.
- Utilize MHBG to garner one or two additional IPS Supported Employment sites in Montana.
- Conduct an annual site review at each of the MHBG-funded IPS Programs.
- Assist MHBG-funded IPS Programs to monitor their budget to successfully complete the fiscal year reasonably within their allocated funding/budget.
- Participate in fidelity reviews.

2.2.b BHDD-Prevention contacts:

- Rebecca De Camara, BHDD Administrator, rdecamara@mt.gov, 406-444-6951
- Jami Hansen, Prevention Bureau Chief, Jami.Hansen@mt.gov, 406-444-3055

2.3 BHDD-Treatment is responsible for the certification of Mental Health Professional Person, State Approval for Substance Use Disorder (SUD) providers, and development of Medicaid Manual for both SUD and Adult Mental Health Services. BHDD-Treatment ensures services are meeting federal and state standards efficiently and effectively. The BHDD-Treatment works with Office of Inspector General (OIG) to provide routine monitoring of programs. BHDD-Treatment also reviews and analyzes Medicaid billing practices with Surveillance Utilization Review Section ("SURS") and Fraud unit to review costs to ensure practices are being followed by reviewing records from SUD programs that have been licensed by OIG and are state approved. Additionally, BHDD-Treatment provides oversight for the Severe and Disabling Mental Illness (SDMI) Home and Community Based Services (HCBS) 1915 waiver and State funding for crisis diversion.

2.3.a BHDD-Treatment agrees to:

- Meet with existing MHBG-funded IPS programs (Yellowstone Boys and Girls Ranch, Inc. and Mountain Home Montana) to provide education regarding Medicaid billable services specific to the program.
- Meet with newly implemented IPS programs within 30 days of implementation to provide education regarding Medicaid billable services specific to the program.

2.3.b BHDD-Treatment contacts:

- Rebecca De Camara, BHDD Administrator, rdecamara@mt.gov, 406-444-6951
- Isaac Coy, Treatment Bureau Chief, icoy@mt.gov, 406-444-7922

2.4 VRBS, BHDD-Prevention, and BHDD-Treatment mutually agree to:

- Outreach to a minimum of four CMHCs per year to expand IPS programs in Montana and assist with IPS implementation for new programs who want to participate.
- Meet with IPS providers monthly.
- Join the International Learning Community for IPS and create a specialized and Montana-specific steering committee through Behavioral Health Advisory Committee (BHAC).
- Attend the IPS International Learning Community Conference as permitted by respective Administrator.
- Meet quarterly to review this document and report on progress on the following dates:
 - November 24, 2023
 - February 23, 2024
 - May 24, 2024
 - August 23, 2024
- Prioritize IPS meeting attendance by attending all scheduled meetings or appointing a designee to attend or communicate in advance the inability to attend and commit to reading meeting minutes/notes.
- Communicate to external stakeholders via attendance at Local Advisory Council and Behavioral Health Alliance of Montana (BHAM) meetings as invited and written information provided via BHDD's weekly newsletter and periodic VRBS' Friends of Rehab newsletter.
- Jointly create a clear funding guidance tool for distribution to existing MHBG-funded IPS Programs and newly implemented programs.
- Jointly create statewide IPS fidelity procedures and internal controls.

Section 3. Expected Outcomes:

- 3.1 Add a minimum of two new IPS sites achieving fidelity.
- 3.2 Ensure one full-time or two part-time trainer positions staffed and sustainably funded.
- 3.3 Create clear funding tools for IPS Programs to navigate billing.
- 3.4 Collect and analyze baseline data of successful competitive integrated employment outcomes to monitor progress in throughout the duration of this MOU.
- 3.5 Develop and implement internal IPS fidelity procedures and internal controls to monitor high quality service delivery and provide technical assistance to programs not meeting fidelity.
- 3.6 Solidify collaboration among VRBS, BHDD-Prevention and BHDD-Treatment.

Section 4. Resolution of Conflict:

4.1 In the event that VRBS, BHDD-Prevention, and/or BHDD-Treatment find themselves in a conflict, the programs agree to meet to discuss the issues and navigate conflict resolution using the programs' respective leadership.

Section 5. Term and Effective Date:

5.1 This MOU is effective on the date signed, October 1, 2023 and shall terminate automatically, without notice to the other party, on September 30, 2025.

5.2 Any party may terminate this MOU with 30 days written notice to the other party.

Section 6. Modification:

6.1 This document contains the entire agreement between the parties and any statements, promises, or inducements made by either party, or agents of either party, which are not contained in this MOU shall not be valid or binding. The MOU shall not be enlarged, modified, or altered except upon written agreement signed by all parties to the agreement.

VRBS will continue to work towards developing memorandums of understanding with other programs within the Department of Public Health and Human Services (DPHHS), who manage other Medicaid waivers, such as the Big Sky Waiver and Physical Disability (PD) waiver, to outline the roles and responsibilities of all parties regarding the delivery of VRBS services and long-term supported employment services for individuals with the most significant disabilities who have been determined to be eligible for Medicaid waivers.

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

VRBS has had a long and productive relationship with Montana's Developmental Disabilities Program (DDP). The program continues to sign off for extended long-term support services for many individuals with significant disabilities who have Medicaid cost plans to fund long-term supported employment services. Cross-training and technical assistance between VRBS and DDP to make available the required supported employment services continues to be ongoing.

Over the last few years, VRBS leadership has maintained a close working relationship with DDP leadership through monthly meetings. During those meetings, both agencies worked extensively to create a current, updated memorandum of understanding (MOU). Due to significant turnover and staffing difficulties within DPHHS Legal, this MOU has not yet been approved, despite our best efforts, and signed by the appropriate parties. However, VRBS and DDP are committed to fully executing this MOU in 2024.

The current draft of the MOU, which has not been updated since spring 2023 and now needs additional revisions, reads as follows:

Section 1. Parties and Purpose of Agreement:

1.1 The Memorandum of Understanding ("MOU") is entered between the Department of Public Health and Human Services, Disability Employment and Transitions Division (DET), Vocational Rehabilitation and Blind Services ("VRBS") and Department of Public Health and Human Services, Behavioral Health and Developmental Disabilities Division (BHDD), Developmental Disabilities Program ("DDP").

1.2 The purpose of this MOU is to establish procedures to assure continued coordination between DDP and VRBS. This agreement is implemented in response to the vision of collaboration and innovation articulated in the 2014 Workforce Innovation and Opportunity Act (WIOA). DDP and VRBS enter into this agreement for the purpose of increasing competitive integrated employment outcomes, including supported and customized employment, for people with disabilities, including those with the most significant disabilities served by both DDP and VRBS. This agreement strives to clarify and facilitate the coordination of services and resources to support competitive integrated employment outcomes in a seamless and non-duplicative manner. The

increased focus on competitive integrated employment outlined in this document is not intended to disallow other levels of employment related entitlements provided to eligible individuals through DDP.

Section 2. General Duties and Responsibilities:

2.1 **VRBS** operates under the Rehabilitation Act of 1973 (the Act) as amended by the 2014 Workforce Innovation and Opportunity Act (WIOA) and its joint implementing regulations and is responsible for the provision of vocational rehabilitation services within the framework of the Act and the WIOA joint implementing regulations. VRBS presumes all people with disabilities, including those with the most significant disabilities, can work in competitive integrated settings with advancement opportunities and believes collaborating with partners makes us stronger and more effective.

- VRBS agrees to:
 - Consider recommendations of the DDP case manager, contracted case manager, and/or PSP team regarding the needs of individuals that they refer.
 - Presume every eligible individual referred to VRBS by DDP will benefit from VRBS in terms of achieving a competitive integrated employment outcome.
 - Coordinate with the PSP team and long-term service providers regarding mutual client Individualized Plan for Employment (IPE).
 - Provide existing documentation and referral recommendations to DDP to assist in the DDP eligibility process with appropriate signed release of information.
 - Collaborate through regularly scheduled meetings between VRBS and DDP leadership:
 - to ensure maximization of shared provider network to ensure seamless supports for individuals jointly served by communicating regarding provider changes and issues.
 - to promote and support Employment First initiatives and the Customized Employment model to increase competitive integrated employment outcomes for mutual clients.

2.2 **DDP** works with people who are eligible for the State of Montana Developmental Disabilities Program and administers the 0208 DDP Waiver through contracted service providers to provide Home and Community Based Services (HCBS) across Montana.

- DDP agrees to:
 - Promote competitive integrated employment as a valuable and viable option to all individuals
 - Refer individuals to VRBS that want to pursue, competitive integrated employment.
 - Provide existing documentation and referral recommendations to VRBS to assist in the VRBS eligibility process.
 - Support the competitive integrated employment goal in the PSP by having Supported Employment written into the cost plan for long-term follow-along services.
 - Collaborate through regularly scheduled meetings between VRBS and DDP leadership:
 - to ensure maximization of shared provider network to ensure seamless supports for individuals jointly served by communicating regarding provider changes and issues.

- to promote and support Employment First initiatives and the Customized Employment model to increase competitive integrated employment outcomes for mutual clients.

Section 3. Term and Effective Date

3.1 This MOU is effective on the date signed, February 1, 2023, and shall terminate automatically, without notice to the other party, on January 31, 2025.

Section 4. Modification

4.1 This document contains the entire agreement between the parties and any statements, promises, or inducements made by either party, or agents of either party, which are not contained in this MOU shall not be valid or binding. The MOU shall not be enlarged, modified, or altered except upon written agreement signed by both parties to the agreement.

DDP and VRBS have a joint procedure that outlines the steps to efficiently and effectively refer a client to the Developmental Disabilities Program (DDP) from Vocational Rehabilitation and Blind Services (VRBS) as well as the steps to correctly refer a client to VRBS from DDP. This procedure also outlines proper procedure for securing long-term funding for supported employment, steps for procuring signed Cooperative Agreements, and assigns responsibility to specific employees throughout both programs to ensure the process is completed as outlined. DDP and VRBS administration and management as well as mutual contracted providers worked collaboratively to develop this procedure and agree upon the common rules.

Additionally, DDP and VRBS are working on a project to transition several clients currently receiving supported employment services through Montana's Extended Employment program (EE) to receiving supported employment services funded through their Medicaid funded cost plans to make room in EE for VRBS clients without Medicaid funded cost plans who are stable in competitive integrated employment and ready to exit VRBS.

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

For at last five years, VRBS leadership met regularly with Montana's Mental Health Block Grant (Prevention Bureau) leadership in an attempt to formalize collaborative processes between VRBS and Mental Health Block Grant to improve existing IPS programs and implement new IPS programs across the state. While working together to advance our initiatives in this realm, VRBS and Mental Health Block Grant often included individuals from IPS Works into discussions. It was the IPS Works staff who encouraged Montana to apply for the ODEP's ASPIRE project. As explained in section I (5), Montana was one of seven states selected into the ASPIRE project and through that project VRBS and Mental Health Block Grant were able to deepen their collaboration through developing systems of braided funding for IPS.

See section I (5) above for the full, collaboratively developed MOU between VRBS, Mental Health Block Grant (Prevention Bureau), and Medicaid (Treatment Bureau) executed on October 31, 2023.

Lastly, Montana's VRBS Director, Chanda Hermanson, is an ex-officio member of the Behavioral Health Advisory Council (BHAC).

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

- VRBS works closely with the Social Security sponsored Work Incentives Planning and Assistance (WIPA) project at Montana State University-Billings to assist consumers to understand the impact of working on their benefits, including Medicaid. This past year VRBS began contracting with the WIPA project to create a Community Work Incentives Coordinator to work specifically with VRBS clients.

- VRBS presently has cooperative agreements with all of the five Section 121 projects (Flathead Reservation, Fort Belknap Reservation, Fort Peck Reservation, Rocky Boy's Reservation, and the Blackfeet Reservation) located in Montana. The purpose of these agreements is to establish procedures to assure continued coordination between the 121 projects and VRBS. These agreements are implemented for the sole purpose of enhancing, to the greatest extent possible, the delivery of rehabilitation services to persons with disabilities living in the state of Montana and residing on or near the five reservations that currently have a tribal vocational rehabilitation project.
- VRBS has contracted with San Diego State University Interwork Institute to develop and maintain a VRBS Staff training series, which is a series of electronic training modules that are being used to onboard new staff and provide continuing education to current staff.
- The local VRBS offices and the local Small Business Development Centers (SBDC) all have well established and productive working relationships with each other. SBDCs share information on classes and upcoming offerings to the VRBS offices and VRBS regularly refers clients interested in self-employment to participate in various SBDC trainings and services. VRBS will explore enhancing our current relationship with SBDCs by exploring a contract to provide technical assistance to our participants who are pursuing self-employment.
- VRBS is a member of Montana's Work-Based Learning Collaborative which is a group of statewide partners who work together to expand student opportunities, support educators, and support Montana businesses in work-based learning activities.
- VRBS has contracted with Montana's Department of Military Affairs to provide a unique STEM Careers Summer Camp for high school students with disabilities through their STARBASE program. At the STARBASE camp students participate in challenging "hands-on, minds-on" STEM activities. They interact with military personnel to explore careers and observe STEM applications in the world of work.
- VRBS is partnering with Montana's Child Protection Services agency to increase opportunities for older youth in foster care to obtain skills necessary for economic stability as adults. VRBS wants to ensure all youth in foster care who are eligible for Pre-ETS have the opportunity to participate and have the opportunity to apply for VR services should they choose.
- VRBS has MOUs with various public transportation programs in counties across the state. The MOUs commit to procedures to assist VRBS's clients to obtain documentation necessary to receive transportation services at reduced fares.
- VRBS works with the Social Security Administration to collaborate on employment incentives and supports and to maximize Social Security Administration/Vocational Rehabilitation (SSA/VR) reimbursement activity through the Ticket to Work Program.
- VRBS routinely collaborates with other organizations to provide training opportunities for VRBS' staff. The following is a list of collaborating organizations: University of Montana-Rural Institute on Disabilities, Montana State University Billings-Montana Center for Inclusive Education, Centers of Independent Living, Office of Public Assistance, Department of Labor and Industry, Cornell-Yang Tan Institute, San Diego State University-Interwork Institute, The Harkin Institute, Office of Public Instruction, Child and Family Services, Children's Mental Health Bureau, Disability Rights Montana, MonTECH, Disability Determination Services, Developmental Disabilities Program, Montana Association for Rehabilitation, MYTransions Project, and the Veteran's Administration.

9. OTHER PRIVATE NONPROFIT ORGANIZATIONS.

VRBS works with the Montana Association for the Blind and a partnership with their Summer Orientation Program. This partnership increases education and outreach for all of our Blind and Low Vision (BLV) programs with a focus on our Older Individuals who are Blind program.

VRBS has a partnership with Northwest Association for Blind Athletes to help provide access to exercise, sports, and outdoor activities for blind and low vision individuals.

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.

The State Plan must include
3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
3.h. the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.
3.i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.
3.j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
3.k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.
3.l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).
3.m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:
4.a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.
4.b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act.
4.c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.
4.d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.
4.e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act
4.g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.

The State Plan must include
4.h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act.
4.i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs.
4.j. With respect to students with disabilities, the State,
4.j.i. has developed and will implement,
4.j.i.A. strategies to address the needs identified in the assessments; and
4.j.i.B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113).
4.j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5. Program Administration for the Supported Employment Title VI Supplement to the State plan:
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
6. Financial Administration of the Supported Employment Program (Title VI):
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(H) and (I) of the Rehabilitation Act.
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant

The State Plan must include
disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.
7. Provision of Supported Employment Services:
7.a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.
7.b. The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.

Do you attest that these assurances will be met?

Yes

VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

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

State of Montana, Department of Public Health and Human Services, Disability Employment and Transitions Division, Vocational Rehabilitation and Blind Services.

2. IN THE EVENT THE DESIGNATED STATE AGENCY IS NOT PRIMARILY CONCERNED WITH VOCATIONAL AND OTHER REHABILITATION OF INDIVIDUALS WITH DISABILITIES, THE DESIGNATED STATE AGENCY MUST INCLUDE A DESIGNATED STATE UNIT FOR THE VR PROGRAM (SECTION 101(A)(2)(B)(II) OF THE REHABILITATION ACT). AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (DESIGNATED STATE AGENCY OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT)[2] AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[3], THE REHABILITATION ACT, 34 CFR 361.13(B) AND (C), AND ALL APPLICABLE REGULATIONS[4], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE TO STATES UNDER SECTION 111(A) OF THE REHABILITATION ACT ARE USED SOLELY FOR THE PROVISION OF VR SERVICES AND THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

[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

State of Montana, Department of Public Health and Human 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

Chanda Hermanson

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

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	Anna Gibbs acting for Chanda Hermanson
Title of Signatory	Disability Employment and Transitions Division Administrator
Date Signed	07-18-2025

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)	55.2%	55.2%	55.7%	55.7%
Employment (Fourth Quarter After Exit)	45.5%	45.5%	45.7%	45.7%
Median Earnings (Second Quarter After Exit)	\$3550	\$3550	\$3560	\$3600
Credential Attainment Rate	28.6%	30.0%	29.3%	31.0%
Measurable Skill Gains	49.4%	56.3%	50.0%	57.0%
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.

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.

VRBS ensures equal access and participation to all persons regardless of their gender, race, color, national origin, age, or disability in its education programs, services, and/or activities. VRBS will enforce all federal and state laws/regulations designed to ensure equitable access to all program beneficiaries and to overcome barriers to equitable participation.

VRBS's commitment to equitable access is reflected in the program's Core Values:

- We value informed choice; our staff guide, and the people we serve decide.
- We presume all people with disabilities, including those with the most significant disabilities, can work in competitive integrated settings with advancement opportunities.
- We believe work provides a sense of purpose.
- Our services promote the civil rights of each participant.
- We respect and value diversity.
- We value our ethical foundations of autonomy, beneficence, fidelity, justice, non-maleficence, and veracity.
- We promote healthy interdependence, independent living, and community integration.
- Collaborating with partners makes us stronger and more effective.
- We continually innovate and provide state of the art services.

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?

Gender, Race, Color, and Disability

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.

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?

Steps taken to ensure equitable access and to eliminate access barriers based on gender, race, national origin, color, disability, and age include but are not limited to:

- Providing accessible materials
- Providing materials to blind persons or other persons with print disabilities in a timely manner, including specialized formats such as Braille, Audio, enlarged print, and Electronic Text
- Providing professional development opportunities with the goal of empowering staff in culturally responsive practices
- Offering interpretation services for language and communication needs, including translation, transliteration, and cued speech
- Utilizing a broad range of assistive technology which includes a variety of tools that range from no- to low- to high-tech options;
- Providing reasonable accommodations based on disability
- Utilizing technologies to convey content of program and curricular materials
- Providing professional development activities in accordance with the Americans with Disabilities Act (ADA), the Rehabilitation Act of 1973 Section 504, and the Individuals with Disabilities Education Act (IDEA) to staff and contractors
- Providing individualized resources designed to support diverse students to be college, career, and community ready, including integrated employment experiences, access to STEM-related curricula, and enrollment in Career and Technical Centers
- Hiring, recruiting, and involving individuals from diverse social and ethnic minority groups to the greatest extent possible

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.

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

This State Plan cycle.



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

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- We value informed choice; our staff guide, and the people we serve decide.
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- We believe work provides a sense of purpose.
- Our services promote the civil rights of each participant.
- We respect and value diversity.
- We value our ethical foundations of autonomy, beneficence, fidelity, justice, non-maleficence, and veracity.
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GEPA 427 - Form Instructions for Application Package

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GEPA 427 - Form Instructions for Application Package

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- Utilizing a broad range of assistive technology which includes a variety of tools that range from no- to low- to high-tech options;
- Providing reasonable accommodations based on disability
- Utilizing technologies to convey content of program and curricular materials
- Providing professional development activities in accordance with the Americans with Disabilities Act (ADA), the Rehabilitation Act of 1973 Section 504, and the Individuals with Disabilities Education Act (IDEA) to staff and contractors
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This State Plan cycle.