

IVRS State Plan Public Comment

March 28, 2018

IVRS made revisions in the State Plan per public comment received. Areas receiving feedback and reflected in the submitted plan include:

Prior comments provided by Page Easton of the Iowa Client Assistance Program were accepted and infused into the posted IVRS State Plan.

Comments received from Rosemary Thierer

- i. Comprehensive System of Personnel Development: Data System on Personnel and Personnel Development, Page 30, Data updated to reflect the number of students enrolled at the University of Iowa and Drake University Graduate programs in Rehabilitation Counseling and the number of graduates from their programs in 2017.

Statewide Assessment: Clarified hiring date of IVRS Training Specialist position to January 2017. Pages 33 and 43. On Page 43, expanded the comment regarding the collaboration occurring with the Iowa Department of Aging and our initiative working with individuals who have a disability and are 55 years or older. "When a disability has been experienced which creates a gap in work history and the individual is older, there are increased ways for discrimination to occur. Older workers have much to offer, but do need additional supports and training to prepare them for a return to work. This initiative allows for these supports. This is a unique Iowa collaborative effort to meet an identified need in our population."

- l. State Goals and Priorities, Deleted sentence on page 61 regarding some cities having higher minimum wages than other Iowa cities.

Comments received from Jane Hudson, J.D., Executive Director Disability Rights Iowa

Comment/Question/Change 1. Pg. 3. Sixth Paragraph - Comment While ICIE membership does include stakeholders from a variety of backgrounds, its membership heavily features providers and provider staff, many of whom have a vested financial interest in the continued use of 14c certificates. This, combined with the funding ICIE receives via the Iowa Association of Community Providers creates a significant conflict of interest. How can ICIE be counted upon to advocate for community options when so many of its funders have a voiced a clear interest in preserving shelter work?

IVRS RESPONSE: *IVRS has a specific contract with identified measurable expectations for the role ICIE plays in facilitating coalition group discussion addressing employment strengths and gaps in service delivery. ICIE has been a key leader in Iowa Employment First efforts supporting the vision that all individuals can work in competitive community integrated employment, provided the right services and right supports are available. Currently, ICIE has established two separate and distinct contracts with both IVRS and IACP. IVRS is monitoring the delivery of our expected services through our contract. IVRS is aware of the role ICIE is performing with IACP which also has a focus on efforts supporting competitive, community integrated employment opportunities.*

Comment/Question/Change 2. Pg. 3. Seventh Paragraph - Question In contracting with ICIE, did IVRS pursue any Requests for Proposals prior to identifying ICIE as the ideal partner to implement consumer surveys and trainings? If no RFP was created, how did IVRS determine ICIE was the ideal choice considering its entanglement with the interests of providers?

IVRS RESPONSE: *IVRS did solicit bids through Bids Opportunities through the state website.*

See Comment/Question/Change 3. Pg. 4. Third Paragraph - Question We fully acknowledge VR's right as the Designated State Agency to contract with other organizations to fulfil its obligations under WIOA. However, WIOA specifically disallows providers from offering the required training and information and referral requirement as necessitated by 34 CFR 397.40 (e): "(e)Provision of services. Nothing in this section will be construed as requiring a designated State unit to provide the services required by this section directly. A designated State unit may contract with other entities, i.e., other public and private service providers, as appropriate, to fulfill the requirements of this section. The contractor providing the services on behalf of the designated State unit may not be an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act (29 U.S.C. 214(c)) as defined in 397.5(d)." As ICIE is in part funded directly from the Iowa Association of Community Providers, doesn't this relationships trigger the exact conflicts of interest that rule was specifically created to address? Did the Rehabilitation Services Administration waive the WIOA requirement? If so, please provide the exact waiver language from RSA. b. Request for Waiver of Statewideness (pages 7 - 9)

IVRS RESPONSE: *There was no waiver requested. ICIE is not an entity that holds a special wage certificate under section 14(c) of the Fair Labor Standards Act. ICIE has been and continues to be a strong promoter of Employment First efforts leading to competitive, community integrated services.*

See Comment/Question/Change 4. Pg. 8. First Paragraph. – Question Regarding Project Search Where are the ten other Project Search's partners located? What businesses are associated with these projects?

IVRS Response:



Project Search
Programs 2018.docx

See Comment/Question/Change 5. Pg. 8. First Paragraph. – Terminology change Pre-vocational Services as defined by CMS guidance¹ has repeatedly clarified that PreVocational Services are not employment in and of themselves, but are instead a means of amassing the necessary skills to pursue community based, integrated employment "where the individual can develop general, non-job-task-specific strengths and skills that contribute to employability in paid employment in integrated community settings." Speaking of sheltered pre-vocational services as a form of employment is antithetical to the purpose of the service, and deeply out of step with CMS guidance. Pre-vocation by virtue of its segregated setting and frequent use of sub-minimum wage certification makes labeling it employment of any kind deeply inappropriate, and it further encourages the harmful, imprecise utilization of pre-voc common throughout the state. Recommendation: Replace all use of the inaccurate term "Facility Based Employment" with "Prevocational Services" c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System (pages 9 - 12)

IVRS Response: *IVRS has not supported pre-vocational or facility based employment occurring in segregated settings since 2001. We do not see mention of support for pre-vocational services in our State Plan and that is terminology used through the Department of Human Services Medicaid/Medicare service delivery system. IVRS does have a MOA with the Department of Human Services regarding how we coordinate employment services for common customers. Wording was changed removing facility based employment terminology in this section.*

See Comment/Question/Change 6 Page 11 Point Three – Suggested Additions “3. Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture;” NA lowan’s with disabilities can often struggle to begin farming as a profession, or continue to farm following a significant injury. The hurdles that exist for this unique population are extensive, and require a greater degree of specialization and attention from IVRS to address. Considering these barriers, it seems a lost opportunity to not collaborate with the USDA, and identify ways these two organizations can work to empower farmers with disabilities in rural communities. Wherever through specialized funding or technical expertise surrounding agriculture, the USDA could be a valuable partner that appears to thus far been unutilized. In this suggest, DRI would suggest laying out a preliminary plan on how to approach the USDA, and begin to explore shared goals and first steps at collaboration.

IVRS Response: *Accepted. We will include this as a plan of action to coordinate resources and information through the USDA.*

See Comment/Question/Change 7. Pg. 11. Point 2 - Question 1 CMCS Informational Bulletin Updates to the §1915 (c) Waiver Instructions and Technical Guide regarding employment and employment related services 9/16/2011 The broad mandate of the Rehabilitation Act to remove barriers to employment makes it incumbent on states to remove financial barriers. Frequently, the assistive technology VR clients need to seek and maintain employment are software programs that run on computers or tablets such as iPads. Without these computers, clients cannot use the software they need. Within federal VR regulations, an assistive technology device is defined as “any item, piece of equipment, or product system, whether acquired commercially off the shelf, modified, or customized, that is used to increase, maintain, or improve the functional capabilities of an individual with a disability.”² If a computer is needed to address a disability specific employment barrier, how does IVRS justify excluding it from the intentionally broad umbrella of AT as a matter of policy, and insisting on an exception of policy to secure financial assistance? d. Coordination with Education Officials (pages 12 - 18)

IVRS Response: *IVRS has a Policy Manual with principles outlined for purchasing computers.*

See Comment/Question/Change 8. Pg. 12. Second Paragraph Under 1. DSU’s Plan - Questions By what metric can IVRS be confident that “Each student with a disability is aware of the PreETS services available to them”? Can IVRS produce quantitative assessments that support this degree of awareness of VR services by youth in transition?

IVRS Response: *This section was re-written reflecting the intent of coordination efforts with our education partners. Tracking within the IVRS case management system and tracking through the Department of Education data system is still a work in progress, but an effort is occurring to produce cleaner data to identify who actually is receiving these services.*

See Comment/Question/Change 9. Pg. 13. - Questions Should IVRS become aware of a school district or school still actively contracting with providers for the purposes of pre-employment services done at a sub-minimum wage level, what are the actions taken by IVRS? Is the Department of Labor and Education notified of this WIOA violation?

IVRS Response: IVRS is attempting to educate our education partners on the parameters of WIOA, which includes the topic of contracting for sub-minimum wage positions. If a district still contracts for this service, IVRS would notify representatives at the Iowa Department of Education. IVRS has participated in a number of joint trainings with Iowa Department of Education officials including the DE attorney regarding this topic.

See Comment/Question/Change 10. Pg. 14 2nd Paragraph – Questions and Recommendation If IVRS readily acknowledges that the “Collaborative Outcomes for Employing Students” resulted in poor outcomes and a significant amount of students designated as status 30’s, why is IVRS so readily implementing the protocol statewide? Will its failure to improve meaningful employment outcomes be examined before statewide implementation and solutions identified beyond simple calls for greater collaboration? Recommendation: For the purposes of readability, define any referenced VR’s statuses. f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services (pages 19 - 20) 2 (34 CFR 361.5(b) (6))

IVRS Response: IVRS is in discussions with the Department of Education regarding review of this data. Status 30 is an IVRS term meaning an eligible job candidate’s file was closed prior to the implementation of an Employment Plan. There are many possible explanations and causes including a poor referral, a lack of interest, a change in family or individual support plans, a comparable benefit or service meeting an existing need, a change in medical status, unclear expectations, all of which are reviewed and tracked at the time of closure. Quality assurance programming is being reviewed in efforts to identify changes in service delivery, which impact this data.

See Comment/Question/Change 11. Page 19 5th Paragraph – Terminology Change Change “IVRS counselors and job candidates” to “Job Candidates, with the assistance of IVRS’ councilors”. Whenever possible, reiterate that the consumer and NOT the IVRS counselor determines job goals, and all services are first and foremost consumer directed. g. Coordination with Employers (pages 20 - 25)

IVRS Response: Agreed and accepted. Section was re-written to reflect the change.

See Comment/Question/Change 12. Page 20 6th Paragraph - Questions Beyond the anecdotal, does IVRS have a clear pre and post training assessment of the prevalence of “great customized outcomes” for consumers? If not, how does IVRS gauge its training effectiveness? How many of these self-described “great outcomes” were in line with the consumers original work goals? Recommendation: IVRS needs to track what the original employment goals of an individual were and analyze how the customized employment outcomes met these goals.

IVRS Response: This section was re-written to reflect the intent of the statement regarding successful customized outcomes.

See Comment/Question/Change 13. Page 22 2nd Paragraph - Questions How does IVRS ensure these Kwik-Trip Placements are in line with the original consumer goals? Are consumers goals ever changed immediately following an opening of a Kwik-Trip position or has IVRS simply been very fortunate in

having an overabundance of consumers with the employment goal of “Retail Helper”?

Recommendation: As stated above, IVRS needs to track and analyze whether employment goals are matching employment outcomes, for example, with respect to the Kwik-Trip “Retail Helper position.”

IVRS Response: Informed choice is something IVRS takes seriously and is part of our federal regulation. To successfully close a case, a discussion should occur between the VR staff person and the job candidate, and there must be agreement to their successful completion of their employment plan. These placements may directly relate to the desired employment goal of the job candidate or could be a stepping stone in the progressive employment journey and lead to other employment interests and goals. IVRS partners with our job candidates in coordinating service delivery, and the job candidate accepts or rejects service options per their choice.

In June of 2017 IVRS offered two dates of a mandatory Informed Choice Training for all staff . This training was recorded and remains accessible for senior staff and new staff to view. The training consisted of; a definition of informed choice, understanding of how informed choice is implemented in the entire IVRS process, and examples of how to provide and document informed choice/job candidate choice.

See Comment/Question/Change 14. Page 25 1st Paragraph- Question and Recommendation The Plan states that “Data reported after the first year of this grant shows that the number of services provided by IN Staff to students with disabilities totaled 2,388.” However, there is no breakdown of the services actually provided on an individual or systemic basis nor the outcomes resulting from the services provided. This data is needed to analyze what services are actually effective and should be continued. Recommendation: IVRS will collect and analyze data on individual and systemic services provided by IN Staff to determine what services are effective and should be continued. i. Comprehensive System of Personnel Development: Data System on Personnel and Personnel Development (pages 29 - 37)

IVRS Response: IVRS monitors and tracks data specific to each of our contracted services. The Intermediary Network is focused on providing core required services reflective of job exploration counseling, work-based learning experiences, counseling on opportunities for post-secondary education, workplace readiness training and self-advocacy. In addition, data is collected for internships, job shadows, student and teacher externships, and employment.

See Comment/Question/Change 15 Page 32: Suggested Additional Staff Development Add: “IVRS counselors will be expected to participate in at least one concentrated training on Disability Culture as presented by a person with a disability, along with a structured dialog with former consumers on the topic of how to better address and communicate with consumers from a place of equity and respect.”

IVRS Response: Each of our area office supervisors have been tasked to explore opportunities existing locally to work with culturally diverse populations prevalent in their area. Topics and discussion points would vary pending local regional needs. IVRS staff are provided with training opportunities to become familiar with a variety of medical conditions and rehabilitation training focusing on professional development. The topic of cultural diversity and improved strategies to engage all of our job candidates, including those of diverse backgrounds, remains a priority and we are attempting to implement practices to meet individual region needs per feedback received at the local levels.

See Comment/Question/Change 16 p. 36 Fourth Paragraph. The State Plan indicates that “IVRS actually served 51% of the students who were potentially eligible or eligible to receive services in the State of Iowa.” Thus, only half of the students who are receiving special education or related services or who have accommodations under a 504 plan are actually receiving services from IVRS. Question: What specific activities does IVRS plan to take in the next year and in the next 5 years to increase these percentages? j. Statewide Assessment (pages 37 - 56)

IVRS Response: IVRS will review existing third party contracts with a continued consideration for those that add benefit. Many of these current contracts are specifically focused on our transition population and are relatively new in terms of recent implementation. We agree with the importance of reviewing data and effectiveness of these efforts. IVRS staff are still becoming aware of strategies and priorities related to this topic area and we believe further efficiencies will come with time as staff improve their knowledge, comfort level and awareness of local transition needs. IVRS also believes efficiencies will improve through collaborative partnering with our education officials as they become more familiar with WIOA regulations.

See Comment/Question/Change 17 Page 37, Second Full Paragraph – Questions and Recommendation
On page 37, IVRS establishes “the intent of the survey was to determine satisfaction with services from IVRS, areas of concern, (and) identify Best Practices within systems.” Considering the intent of the survey, it is surprising only four percent of those surveyed were clients. Four percent is not an appropriate degree of representation of the consumer perspective. Recommendation: Use validated and reliable national survey tools in addition to the tool developed by to survey consumer satisfaction with IVRS services.

IVRS Response: IVRS is always aware of the need to be receptive to customer feedback. Opportunities for job candidate satisfaction feedback is solicited at several times during the rehabilitation process (Intake, plan development and annual review) as well as with every case at closure of status 26 or 28 (successful /unsuccessful). The satisfaction rate, return rate and recommendations for improvement in services are reviewed by the State Rehabilitation Council. This was a priority action occurring during the initial stages of this state plan, as the agency worked with an external consultant reviewing the job candidate satisfaction process.

See Comment/Question/Change 18 Page 39-42, Survey - Comment In featuring heavily provider/disability professional responses to consumer-based questions, and focusing much of the survey on gauging the ease of consumer handoff, the survey greatly minimizes the importance of the consumer experience. A survey to assess consumer service quality that fails to give weight first and foremost to consumer feedback invariably creates wildly incomplete and potentially misleading conclusions. Additionally, any policy changes or reforms that take place due to the survey will cater to provider and professional interests.

IVRS Response: One of the purposes of this survey was to solicit feedback from a variety of stakeholders including service professionals and partners. IVRS solicits feedback from job candidates who utilize services at routine intervals during service delivery and after case closure.

See Comment/Question/Change 19 Page 46, Fourth Full Paragraph. Question and Comment. IVRS states that “there continues to be a need in the State of Iowa for improved access to highly skilled benefit planners and as IVRS does not have the capacity to meet statewide needs.” As IVRS knows, the Social

Security Administration funds comprehensive and intensive benefits planning services for SSDI and SSI beneficiaries who are about to return to work. However, IVRS has not contributed any funding to supplement this effort. Recommendation: IVRS should supplement Social Security's Workforce Incentive and Planning Assistance (WIPA) program with state funding to provide technical assistance to VR counselors who do not have sufficient expertise to provide benefits planning services to VR clients.

IVRS Response: IVRS has made a commitment to expanding benefit planning capacity through training of a VR benefits planning cadre. IVRS dollars must be utilized for the direct benefit of VR eligible job candidates and dollars are not allocable or allowable unless it can be tracked to specific VR service recipients. We are open to consider opportunities to engage in training opportunities related to technical assistance for improved service delivery related to this topic.

See Comment/Question/Change 20 Page 46, Suggested additional Underserved population In Iowa, obviously the agricultural sector is a prevalent and essential part of our State's economy and daily life. Unfortunately, IVRS services are not catered to the unique needs of farmers who acquire disabilities, as well as those with disabilities and mental illness who wish to pursue farming as a profession. At nearly every stage of VR services, considerable gaps exist that would make full utilization of VR services difficult to impossible for members of this unique population. Whether its profound knowledge gaps concerning the unique needs and challenges of those operating a family farm, the incompatibility with many VR policies with the financial management needs of many farming families, or policy confusion specific to consumers with an interest in farming, these barriers have helped to create an underserved population. IVRS consumers who wish to enter into the Agricultural Sector, or take their spot within a family farming business are simply overlooked when practices and policies are being formed, and IVRS must not allow these clear gaps in service to continue. Farmers play a central role in Iowa's future, and IVRS consumers have every right to explore farming as a career track without sacrificing expedient, quality VR services. For these reasons, we recommend that IVRS develop a plan to be described in this section of the State Plan to explore the ways that IVRS is can fully serve the farming population, and begin to modify policies as needed to address these shortcomings.

IVRS Response: Agreed and added a section. Discussions have been occurring with Easter Seal of Iowa and it is not believed that existing policies need to be immediately changed; instead, it appears to be a lack of understanding of how policies are implemented by IVRS staff as well as partner staff. Training will occur on this topic in efforts to get at more consistent implementation of service delivery.

See Comment/Question/Change 21 Page 49, Fourth Paragraph – Suggested Language The wording seems to imply that an intake is predicated at the instigation of the counselor or teacher, and not also something that can be instigated by the student and parent. We suggest DRI include additional language such as "Students and Parents can request a VR intake at any point of the Pre-ETE process, and the request is not dependent on a teacher or VR referral"

IVRS Response: Accepted and changed.

See Comment/Question/Change 22 Page 50, 3 nd Full Paragraph – Language Change "IVRS staff are encouraged...." While no doubt IVRS staff benefits from encouragement now and again, requiring this staff engagement is a far more meaningful and appropriate approach to ensuring the kinds of collaborative relationships WIOA is designed to create. Therefore, we recommend that the language be revised as follows: "IVRS staff will be required to reach out to school councilors, school nurses and other

LEA staff in order to reach students with disabilities who have barriers to employment and who are not on an IEP or 504 Plan.”

IVRS Response: This should be occurring through annual meetings with the school district staff in building the transition plan. IVRS staff are held accountable to be visible in their school assignments and are performing outreach activities with school personnel as capacity and program need allows. Wording was re-written.

See Comment/Question/Change 23 Page 53, 2nd Paragraph - Question “A major barrier has been the inconsistent communication and understanding of roles and responsibilities between education partners, community providers and IVRS staff in the role of transition. Training, regular “check-ins,” ongoing communication and follow-up continue to be the primary considerations to resolve this.” How will IVRS assess if these suggested solutions did in fact address the significant communication barriers that exist between partners?

IVRS Response: Efforts are on-going to provide trainings and communication with community rehabilitation providers, education, workforce and human service partners and internal staff. Progress is tracked through evaluating the training opportunities and subsequent review/analysis of employment outcome data. We will continue efforts to solicit feedback as well as through our needs assessment process to obtain perspectives on areas where communication is effective or not effective.

See Comment/Question/Change 24 Page 54, 1st Paragraph - Additional Suggested Language. Suggested Language following second Paragraph: IVRS recognizes there exists a continued overreliance by providers on Pre-Employment Services as a long term placement, rather than a time limited service designed to move a consumer closer to community employment. IVRS recognizes that all people with disabilities can find meaningful work in the community beyond the simulated work of a workshop setting, and we will continue to lend our efforts in educating providers on the importance of integrated, community based goals for consumers as is required by Federal regulation.

IVRS Response: Accepted and changed, with the emphasis not on Pre-Employment Services, but the understanding this was meant to be extended services in segregated settings at sub-minimum wage.

See Comment/Question/Change 25 Page 54, 1st Paragraph - Question and Recommendation “developed education packets and three webinar options for individuals earning subminimum wage” Considering that many if not most of consumers of Pre-vocational services have significant ID, TBI, or Mental Illness, how is IVRS ensuring the information provided is effectively received? Does post training analysis depend predominantly on provider feedback over consumer feedback? Contracting with outside organizations to provide training and I/R does not remove VR’s responsibility to ensure its responsibilities are met as the Designated State Entity. Recommendation: We recommend that IVRS collect data and conduct an outcome analysis to determine whether this training is actually resulting in individuals moving from pre-vocational services to employment. I. State Goals and Priorities (pages 58 - 66)

IVRS Response: This is a new process recently implemented during the past year. IVRS is tracking referrals from community rehabilitation providers who are leaving prevocational and extended employment settings to explore work opportunities through IVRS. We also track all referrals and

numbers of categories so we should be able to see if any progress has occurred based upon data of individuals in our caseload.

See Comment/Question/Change 26 Pg. 60. Final Paragraph – Suggested Word Replacement “An analysis of IVRS data show that employment rates dropped from 59.66 in FFY14 to 57.35 in FFY15 to 52.61 in FFY16” Context suggests that the word “unemployment” should be used instead of “employment” rates.

IVRS Response: The terminology should be rehabilitation rate and was changed. This was a standard and indicator form the Rehabilitation Services Administration and was one of our previous federal measures. This was identified as a concern from our State Rehabilitation Council and further review is occurring.

See Comment/Question/Change 27 Pg. 62. First Bullet - Additional Suggested Wording. “IVRS counselors while capable of providing information and assistance surrounding the accommodation process under the Americans with Disabilities Act, will make referrals to the appropriate resources should consumers encounter ADA related obstacles that require advocacy. . Recommendation: Consumers often face barriers within the interactive process, which necessitates legal expertise or direct advocacy with employers so that individuals can obtain the accommodations to which they are entitled. For this reason, IVRS brochures should include in IVRS informational documents the names and contact information of organizations that can assist IVRS clients with ADA issues, including such organizations as the the Iowa Civil Rights Commission, Disability Rights Iowa, and the Client Assistance Program.

IVRS Response: Accepted. This will be integrated as opportunities arise to print new brochures for our job candidates.

See Comment/Question/Change 28 Pg. 65. End of first paragraph. Suggested Additional Wording. IVRS continues to support individuals to achieve competitive integrated employment through a variety of strategies that meet the needs and individual goals of each job candidates. These may include... Following the listed services, DRI suggests, “All of these supports are explored per the client’s direction and in service to the consumer goals as laid out within their IPE. While IVRS services and supports are a collaboration between consumer, counselor and support staff, it is the consumer that can best direct us to meet their unique employment service needs.” m. Order of Selection (pages 66 - 69)

IVRS Response: Accepted and section added.

See Comment/Question/Change 29 Pg. 66. First paragraph. Question “It is estimated that 729 of these individuals will exit with employment after receiving services” Of these consumers exiting with employment, how many exit with employment in areas outside of their initial job goal as specified in their initial IPE’s? Does IVRS track how often consumers drastically change work goals, and for what reasons?

IVRS Response: There are many reasons an employment goal is changed from the original goal and when a change occurs, it is at the desire of the job candidate, who approves and signs their employment plan. We can obtain data of plan changes from the original goal, but we have not been able to make meaningful decisions from the data because of all the variables.

See Comment/Question/Change 30 Pg. 68. Third full paragraph down. Questions The State Plan states on page 61, “Competitive integrated employment is the ultimate goal for all Iowans.” However, page 68

of the State Plan indicates that IVRS makes use of Trial Work to determine if an individual is to be considered “too disabled to work”. These two provisions are contradictory. There should never be a “too disabled to work” category which results in a denial of IVRS services. The Plan should describe the administrative and legal process in which an individual can challenge the lack of IVRS services resulting from this label. The Plan should also indicate that advocacy services are available through the Client Assistance Program and Disability Rights Iowa to challenge IVRS’ “too disabled to work” designation. o. State Strategies (pages 71 - 80)

IVRS Response: Agreed and changed since Trial Work has not been in practice at IVRS for over a year.

See Comment/Question/Change 31 Pg. 74 Addition to Third Paragraph down. – suggested language Following, “In addition, IVRS expectations require that this role involve a continual exploration of new and innovative technologies that become available to help in service to customers.” DRI recommends: “IVRS, in collaboration with stakeholders and members of the SRC, will formally examine in 2018 the application of AT services to ensure that IVRS’ current policy and Iowa Code language is tailored to best comply with federal law regarding the scope of AT services.”

IVRS Response: Agreed and section revised.

See Comment/Question/Change 32 Pg. 75 Addition to Third Paragraph down – Suggested underserved population DRI suggests adding rural VR consumers seeking agricultural employment as an underserved population, with full language reflecting issues raised in Comment 20.

IVRS Response: Agreed and section added.

See Comment/Question/Change 33 Pg. 79 - Fourth Paragraph – Questions and Recommendation The Plan states that “IVRS maintains a collaborative relationship with the Iowa Client Assistance Program and Disability Rights Iowa for working through identified barriers for access and participation in needed programming for individuals with disabilities.” Questions: Does IVRS provide written notice to individuals whose services are denied or reduced by IVRS, the reasons for such denials or reductions in services and information about how to contact the CAP and DRI for advocacy services to challenge such reductions or denials? Is IVRS tracking the numbers of individuals to whom it has sent written notice of service reductions or denials. If not, IVRS should track this data to understand any patterns of reductions or denials that may be reviewed by IVRS management. Does Vocational Rehabilitation have a written policy as to when Counselors should make outside referrals to assist with ADA issues? p. Evaluation and Reports of Progress: VR and Supported Employment Goals (pages 80 -89)

IVRS Response: IVRS provides written notice to individuals who apply for services and are determined ineligible for services. Communication includes appeal rights and contact information; both of which remain available at numerous times in the VR service delivery process including information on their Rights and Responsibilities and any employment plan reviews. IVRS staff seek external resources if support is needed to assist with employment related issues including ADA concerns. IVRS is revising the development of our internal case management system to track exception request decisions. IVRS utilizes the Iowa Client Assistance Program for advocacy services for our job candidates, families and partners. Their contact information is listed on each employment plan, intake information, and discussed throughout the job candidate’s involvement with IVRS programming.

See Comment/Question/Change 34 Pg. 88 Questions “IVRS has the intent to be an active partner and leader in employment services for individuals with disabilities and is excited regarding the work occurring across our state systems to align employment services to maximize state resources for the benefits of our job candidates.” As a leader in the employment service field, does IVRS have access to quantitative evidence that Consumers who utilize Pre-Vocational Services are more likely to achieve integrated, community based employment outcomes than those who proceed directly to supported employment?

IVRS Response: IVRS is tracking the number of individuals referred from community rehabilitation providers as well as other referral sources. This data is analyzed in various ways to inform strategic goals reflecting agency performance. IVRS has not participated in a quantitative evidence project, but is an active participant in federal projects like the Office of Disability and Employment Policy’s Employment First effort. Iowa has been recognized as a collaborative partner state in this effort. IVRS is also a leader in Iowa’s Employment First team, which for the past five years have focused on staff capacity and provider transformation efforts to support competitive, community integrated employment outcomes. This has been a multi-state, public/private effort at disseminating information and strategies to support employment in community integrated settings. There have been limited national studies done to quantify the numeric and financial support for individuals to access community integrated employment, but those studies do identify financial value supporting employment efforts. IVRS has been involved in a DHS, Center for Disabilities and Development cost analysis, as well as distribution of a paper recently published through the Iowa Department of Human Rights titled, “The Great Debate, the Shift from Sheltered Workshops to Competitive Integrated Employment”.