

Program-Specific Requirements for Vocational Rehabilitation (Nebraska Commission for the Blind and Visually Impaired [NCBVI])

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

* Sec. 102(b)(D)(iii) of WIOA

a. Input of State Rehabilitation Council (NCBVI)

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

- 1. Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions; (NCBVI)***

The Nebraska Commission for the Blind and Visually Impaired (NCBVI) is a consumer-controlled agency. Since it is governed by a Board of consumers, there is no State Rehabilitation Council.

- 2. The Designated State unit's response to the Council's input and recommendations; and (NCBVI)***

Not applicable

- 3. The designated State unit's explanations for rejecting any of the Council's input or recommendations. (NCBVI)***

Not applicable

b. Request for Waiver of Statewideness (NCBVI)

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

- 1. A local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request; (NCBVI)**

All services provided by NCBVI are statewide. There is no request for a waiver.

- 2. The designated State unit will approve each proposed service before it is put into effect; and (NCBVI)**

Not applicable

- 3. All State plan requirements will apply (NCBVI)**

Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Not applicable

c. Cooperative Agreements with Agencies not carrying out Activities under the Statewide Workforce Development System. (NCBVI)

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 with respect to:

- 1. Federal, State, and local agencies and programs; (NCBVI)**

Nebraska Commission for the Blind and Visually Impaired (NCBVI) works across the state of Nebraska to establish interagency cooperation with, and utilization of the services of all relevant entities, including entities which are not within the Workforce Development System. NCBVI administrative personnel communicate and cooperate with representatives of the statewide or corporate level of such entities. Counseling and other staff of our District and area rehabilitation offices do so in their areas. There are no State Use Contracting programs in Nebraska.

In each office, NCBVI staff members identify and network with a wide range of professionals in both the public and the private sectors. Doing so serves multiple purposes. NCBVI's VR professionals become well-versed in the resources and opportunities available to blind consumers across Nebraska. They are able to make NCBVI services known to those same entities, to educate them about the tremendous

resource available to them from blind and visually impaired community members. In some cases, NCBVI Counselors participate with local Chambers of Commerce, Lions Clubs, Rotary Clubs, Commissions or Area Agencies on Aging, Community Networking Councils, and related organizations.

The United States Rural Development Agency (RDA) administers programs related to self-employment, business opportunities, housing, and other community economic development activities. NCBVI collaborates by providing information to counseling staff about the RDA programs which might benefit their clients. NCBVI VR Counselors also provide information to RDA representatives about efforts to assist blind and visually impaired Nebraskans to access funds available for developing self-employment and business opportunities.

NCBVI works to assure that all the programs of the RDA in Nebraska are made available to clients. We also are available to provide training about NCBVI services, and about blindness, to RDA personnel. With this training they are able to provide reciprocal referrals to persons participating in their programs who might be eligible for services from NCBVI. NCBVI offices are located in six locations; NCBVI staff work in all communities across the State of Nebraska. Agency staff members go to where the referrals and clients live, to provide the rehabilitation services specific to each individual. In each area and statewide, they work with local, state, and regional resources available. These include, but are not limited to small business, women's and minority business initiatives, community commercial, recreational and educational programs, religious entities (churches, synagogues, mosques), and private or public organizations are available and relevant to helping blind Nebraskans achieve their employment goals.

2. State programs carried out under section 4 of the Assistive Technology Act of 1998; (NCBVI)

NCBVI provides Assistive technology services throughout the state of Nebraska to blind and visually impaired consumers. Under the leadership of the NCBVI Technology Program Manager, the Commission's three technology specialists provide assessment, consultative support, and training on mainstream and access technology products. The specialists participate in trainings and research to discover technology solutions and provide consumers the ability to weigh the pros and cons of specific technologies to support their informed choice. Furthermore, NCBVI collaborates with Assistive Technology Partnership throughout the state in field offices and is active on the ATP Advisory Board.

3. Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture; (NCBVI)

The United States Rural Development Agency (RDA) administers programs related to self-employment, business opportunities, housing, and other community economic development activities. NCBVI collaborates by providing information to counseling staff about the RDA programs which might benefit their clients. NCBVI VR Counselors also

provide information to RDA representatives about efforts to assist blind and visually impaired Nebraskans to access funds available for developing self-employment and business opportunities.

4. *Noneducational agencies serving out-of-school youth; and (NCBVI)*

NCBVI programs partner with non-educational agencies serving out-of-school youth through many of the programs listed above.

5. *State use contracting programs. (NCBVI)*

NCBVI will contract with the National Federation of the Blind for a State-wide Mentoring program which should start in April 2018.

d. *Coordination with Education Officials (NCBVI)*

Describe:

1. *DSU's plans (NCBVI)*

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

Consistent with requirements of the Workforce Investment and Opportunities Act, NCBVI coordinates with entities within the WIOA system, including teachers of the visually impaired and education officials, to facilitate the transition of students with disabilities from school to the vocational rehabilitation service system. We have developed a number of strategies to address the seamless transition from school to work for blind students. The most formal is a Cooperative Agreement, signed and updated periodically.

2. *Information on the formal interagency agreement with the State educational agency with respect to: (NCBVI)*

A. *Consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services; (NCBVI)*

The agreement delineates the responsibilities of NCBVI, the Nebraska Department of Education (NDE) Special Populations Division, the Nebraska Center for the Education of Children who are Blind or Visually Impaired (NCECBVI), and school districts and Educational Service Units across Nebraska.

B. Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs; (NCBVI)

Specifically, included in the agreement are provisions for consultations and technical assistance, transition planning, coordinating the IEP and the IPE for roles and responsibilities amongst key individuals, and financial responsibilities, and procedures for outreach. The purpose is to coordinate and promote the cooperation of the programs and services available to students who are blind, deaf-blind and visually impaired during the transition process.

C. Roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services; (NCBVI)

NDE is responsible for assuring that a free, appropriate public education, in accordance with federal and state laws, rules and regulations, to children with disabilities from date of diagnosis to age 21 or graduation. Local school districts and Educational Service Units operate under the structure of NDE and are responsible to fund the education of children with disabilities who are in that particular district. This may include direct provision of educational services in the district itself or at NCECBVI. Ongoing communication amongst NCBVI, educators, parents, and students, are an important strength to the overall transition efforts in Nebraska. NCBVI counselors and administrators will continue a process of educating educators and service providers about the services we provide to children who are blind. Students of NCECBVI and those attending school in their local school districts also have the opportunity to participate in specialized NCBVI programs for children and youth. We invite educators to also attend and observe our programs for students. NCBVI youth programs are offered each year. In all NCBVI Transition Programs our participants are exposed to successful adult blind role models. The impact of the events is clear in terms of self-confidence, blindness skills, and elevated expectations. We can see qualitatively that many if not most adults who have attended such programs in previous years, are active, competent members of the workforce and their communities. NCBVI recently acquired a data management system which will enable us to track results quantitatively as well. Project Independence (PI) is a five day summer program for pre-transition age students. PI provides counseling on attitudes about blindness, self-esteem building, recreational and social experiences. It enables students to develop and to utilize relevant skills in conjunction with the discussions and activities. The opportunity to be with other blind and visually impaired children is a vital factor to the success of the program participants. Winnerfest retreats are offered twice per school year, from Thursday evening through Saturday noon. Transition aged students from across the state participate in the opportunity for fellowship with blind and visually impaired peers. The curriculum focuses on personal achievement, goal setting, and communication skills. Through videos, role play activities and group discussion, young people explore a variety of topics relative to their everyday lives and to their career aspirations. Participants have the opportunity to learn from and with each other about how to be

competent and successful in all aspects of their lives. WAGES (Work and Gain Experience in the Summer) is a summer employment program for students as they approach high school graduation. WAGES provides students with work experience, peer interaction, and the opportunity to enhance pre–employment and independent living skills. Participants are trained in job–readiness skills, perform actual jobs with businesses in the community, and practice the behaviors needed to maintain employment. WAGES also enhances entities within the workforce system, particularly those participating employers who learn the value of employees who are blind or visually impaired. In FFY 2018, fifteen percent (15%) of VR funds and fifty percent (50%) of supported employment funds are committed to the provision of pre–employment transition services to blind and visually impaired students in transition between 14 and up to but not including 22 years of age. A Transition Service Specialist was hired in September 2015 to strengthen the partnership with educational institutions statewide with the objective of making a smooth transition from school to adult life and the world of work possible for more blind and visually impaired students and youth. NCBVI staff members work with local Workforce Investment Boards and Youth Councils to inform them of the program and to develop the job opportunities for the young blind participants.

D. Procedures for outreach to and identification of students with disabilities who need transition services. (NCBVI)

The Transition Service Specialist continues to work on a statewide basis to enhance communication between NCBVI, educators at all levels, and families with children identified as having a visual disability. These efforts include meetings with local Educational Service Units and school districts, together with the NCBVI Technology Program Manager and Specialists, and local VR Staff to further reach out and identify students with visual disabilities who need transition services. He also meets regularly with NCBVI Supervisors to assure that the outreach efforts are consistent in all NCBVI field offices. In addition, NCBVI has an MOU with NCECBVI in which all the Vision teachers in Nebraska will get information from our agency regarding Pre-ETS; including referral procedures.

e. Cooperative Agreements with Private Nonprofit Organizations (NCBVI)

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

Most private non–profit vocational rehabilitation service providers in Nebraska do not specifically serve persons who are blind or visually impaired; however, Nebraska Commission for the Blind and Visually Impaired (NCBVI) works cooperatively with community rehabilitation programs when the needs and interests of mutual clients dictate. The Vision Resource Coalition, a collaborative project initiated in 2013, developed public informational materials regarding a wide range of services and resources available to blind and visually impaired consumers. Coalition partners include

NCBVI, Radio Talking Book of Nebraska (RTBN), Nebraska Library Commission and Talking Book and Braille Services, Lions Clubs, Nebraska Academy of Eye Physicians and Surgeons, and others. The Coalition conducts an annual Resource Fair featuring programs, services, and resources of interest to blind and visually impaired consumers across the state of Nebraska. Coalition and NCBVI materials are also shared at annual state conventions of the Nebraska Academy of Eye Surgeons, Ophthalmologists, and Optometrists. NCBVI also partners with the Nebraska Foundation for Visually Impaired Children in the provision of assistive technology for blind and visually impaired children under 14 years of age on an ongoing basis.

f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services (NCBVI)

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

Nebraska Commission for the Blind and Visually Impaired (NCBVI) enters into cooperative agreements with other state agencies and providers of supported employment when specific clients are identified as candidates for those services. The agreements are based on a model utilized for the purpose of providing supported employment, including the assurance of long term services. NCBVI's Deputy Director of Services has lead responsibility for Supported Employment. She is the point of contact for the Nebraska Department of Health and Human Services-Division of Developmental Disabilities (NDHHS-DDD). NCBVI Field Supervisors and Vocational Rehabilitation Counselors typically identify providers of supported employment services and make the necessary contractual arrangements. Each blind and visually impaired individual with a developmental disability has a case service coordinator employed by the NDHHS-DDD. The case service coordinator is responsible for leading a multi-disciplinary team in the development of an Individualized Service Plan (ISP) for mutual clients served by NCBVI and NDHHS-DDD. When supported employment services are involved, NCBVI provides incentive payments at specific intervals (start of job search, start of employment, stabilization, maintenance, and start of long-term support.). This arrangement is in accordance with the "milestones" model used by Nebraska VR General to serve clients shared with NDHHS-DDD. NCBVI is currently contracting for supported employment services on behalf of blind persons provided by the Autism Center of Nebraska. NCBVI collaborated with the Department of Education, Special Education and Vocational Rehabilitation (Nebraska VR Services) in the development of policies and procedures more clearly delineating the responsibilities of the different agencies and institutions involved and the scope and nature of services available to younger persons with disabilities in transition from school. The Collaborative Agreement between NCBVI, Department of Education – Special Populations, and the Nebraska Center for the Education of Children who are Blind or Visually Impaired, applies to

persons who are likely to require supported employment or extended services in the future, as well as those students without this need.

g. Coordination with Employers (NCBVI)

(Formerly known as Attachment 4.8(b)(5)). Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR services; and (NCBVI)

The business community is a key customer for vocational rehabilitation. NCBVI professionals in all six offices have active approaches to reaching out to employers in their areas of coverage. NCBVI professionals are engaged with the American Job Centers (AJC) and the WIOA state and local boards. In the metropolitan area of Omaha, NCBVI co-locates 1 part-time VR Counselor at the local AJC.

VR Counselors and Supervisors are members of employer groups, or business networking organizations, as available in each area. These include local Chambers of Commerce, and other entities established for businesses to connect in a meaningful way.

Employers and Human Resource personnel of companies are invited to tour the Nebraska Center for the Blind. This gives them a chance to learn about the potential capability of blind persons as potential employees and to dispel misconceptions held by many people about blindness.

VR professionals, including Counselors and Technology Specialists in particular are available to spend time at companies to assess the positions or openings, to identify if any accommodations might be needed and to provide information about the various technologies and adaptations that can facilitate employing blind and visually impaired persons in most every occupation.

Information is also provided about the resources available – some directly from NCBVI, such as paying for technology, or from external sources, such as tax supports or benefits to the employer as a result of hiring a person with a disability.

2. *Transition services, including pre-employment transition services, for students and youth with disabilities. (NCBVI)*

Transition services, including pre-employment transition services for students and youth with disabilities are key to life-long successful employment of persons with disabilities. NCBVI has a strong emphasis on building the skills and abilities of blind and visually impaired youth, so that they will be successful. The Work And Gain Experience in the Summer (WAGES) program is an example already in place, others will likely be developed pursuant to pre-employment transition services requirements in WIOA. WAGES first focuses on identifying employers who will hire young clients for a nearly full-time job during the summer. Employers involved are encouraged to consider the youth as any employee, with high expectations for performance. NCBVI provides wages to the clients and consultation and technology to the employers. This and other such programs are effective in the career success of the young clients; they are also instrumental in enabling employers to have direct experience with the benefits of hiring people who are blind. This promotes more opportunities for VR clients of all ages to achieve full-time integrated employment.

h. *Interagency Cooperation (NCBVI)*

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

1. *The State Medicaid plan under title XIX of the Social Security Act; (NCBVI)*

NCBVI is very much focused upon clients achieving competitive integrated employment, to the greatest extent practicable. The agency will explore potentials for cooperation and collaboration with the State Medicaid plan under title XIX of the Social Security Act.

2. *The State agency responsible for providing services for individuals with developmental disabilities; and (NCBVI)*

NCBVI collaborates with the Nebraska Department of Health and Human Services—Division of Developmental Disabilities services (NDHHS—DDD) to identify potential clients, coordinate service plans and share funding for those individuals in the System who are described as blind and visually impaired.

3. *The State agency responsible for providing mental health services. (NCBVI)*

Representatives of NCBVI and the Department of Health and Human Services-Division of Behavioral Health (NDHHS-DBH) have met to discuss how our two agencies can work together to promote competitive integrated employment opportunities on behalf of blind and visually impaired people with behavioral health conditions. Services include A method for providing supported employment services similar to the milestone approach used by Nebraska VR General. Other mental health services are provided statewide by

various entities. NCBVI personnel in each office cooperate with those providers to ensure that mutual clients, or persons who may need both VR and mental health services, will be adequately and appropriately served.

i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development (NCBVI)

(Formerly known as Attachment 4.10)). Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

1. Data System on Personnel and Personnel Development (NCBVI)

A. Qualified Personnel Needs. (NCBVI)

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

i. The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category; (NCBVI)

NCBVI staffing complement totals forty-seven point eighty eight (47.88) FTEs; forty-five (45) full-time staff persons and four (4) permanent part-time staff persons. NCBVI personnel include ten (10) vocational rehabilitation (VR) counselors; three Field supervisors and one Center supervisor; thirteen (13) rehabilitation teachers (orientation counselors); six (6) program specialists (three in technology, one in older blind services, one in transition services, and one is in Nebraska Business Enterprises); two (2) Program Managers (one in Technology and one in Nebraska Business Enterprises); and eight (8) vocational rehabilitation technicians. There are also seven (7) administrative/business personnel including one (1) executive director, one (1) deputy director, one (1) business manager, three (3) Administrative Assistants, and one (1) Staff Assistant (Nebraska Business Enterprises). The Nebraska Business Enterprises (NBE) program consists of a Team including one (1) Program Manager, one (1) Program Specialist, one (1) Staff Assistant, and part of the time of the VR Deputy Director and two people in the Business Office. All NCBVI Vocational Rehabilitation Counselors meet the state standard by having achieved the status of Certified Vocational Rehabilitation Counselor for the Blind (CVRCB). Forteen (14) staff members hold graduate degrees of a Masters or higher, including one J.D. These positions are all included in the total agency staffing, mentioned above.

ii. The number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and (NCBVI)

We project the total number of persons receiving vocational rehabilitation services (all statuses, from applicant through full services) during FY 2018 to total 560. The ratio of applicants and eligible individuals served to Vocational Rehabilitation Counselors will be 56 to 1. The current staffing level enable NCBVI to provide core services to customers. Generally, the number of individuals served each year does not change a great deal.

iii. projections of the number of personnel, broken down by personnel category, who will be needed by the State 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. (NCBVI)

When numbers of referrals increase, we work to find ways to effectively streamline our processes to enable us to continue meeting customer needs. Budgetary considerations and state regulations which limit personnel per agency prevent us from changing our staffing to any great extent. We do, of course, monitor services to assure that all core services are provided and that all active Individualized Plans for Employment are carried out in full. Policy and procedures are in place to implement Order of Selection should it ever be imminent. As stated, though, to date we are able to manage the number of personnel who will be needed by the Commission to provide vocational rehabilitation services to all eligible individuals. During the next five years, we project that the number of individuals served including those with significant disabilities, will neither increase nor decrease significantly from the current level. Over the past year, one (1) Executive Director, one (1) Deputy Director, one (1) Orientation Counselor, and two (2) Vocational Rehabilitation Technicians (support staff) retired. Other vacancies projected during the next five years, based on potential retirement age and age of the individual, include: one (1) Business Manager, one (1) Vocational Rehabilitation Counselor, one (1) Program Specialist, one (1) Technology Specialist, two (2) Orientation Counselors, and one (1) vocational rehabilitation technician (support staff). The plan is to consider the needs of the agency as people retire. When any vacancy occurs, we assess client needs statewide, to determine whether to change the staffing patterns. We may decide to move any vacant position to a different location in the State or to put the resources toward a different position.

Row	Job Title	Total positions	Current	vacancies	Projected vacancies over the next 5 years
1	Vocational Rehabilitation Counselors	10	0	1	2
2	Vocational Rehabilitation Technicians	8	2	2	3
3	Orientation Counselors (Rehab Teachers)	thirteen	1	3	4
4	Program Managers (Technology, Nebraska Business Enterprises)	2	0	0	5
5	Program Specialists (Technology, Transition, OIB, Nebraska Business Enterprises)	6	0	1	6
6	Vocational Rehabilitation Supervisors	4	1	0	7
7	Deputy Director	1	0	0	8
8	Business, Personnel, Other	4	0	1	8
9	Executive Director	1	0	0	

B. Personnel Development (NCBVI)

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program; (NCBVI)

There are no institutions of higher education in Nebraska that are preparing vocational rehabilitation professionals. The State law mandating standards for Certified Vocational Rehabilitation Counselor for the Blind (CVRCB) enables NCBVI to hire, train and maintain qualified staff. This is especially important because there are no post-secondary degree programs in Rehabilitation Counseling within Nebraska. It is extremely rare that our job candidates have a CRC, and rarely do applicants have a Master's or Bachelor's Degree in Rehabilitation Counseling specifically. There are no institutions of higher education in Nebraska receiving funds under Title III of the Rehabilitation Act, to prepare vocational rehabilitation professionals in the disciplines designated in the Act [29 USC 771(b)(1)(B)].

ii. The number of students enrolled at each of those institutions, broken down by type of program; and (NCBVI)

- Institutions 0
- Students enrolled 0
- Employees sponsored by agency and/or RSA 0
- Graduates sponsored by agency and/or RSA Graduates from the previous year 0

iii. The number of students who graduated during the prior year from each of these 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. (NCBVI)

As stated above, there are no institutions of higher education in Nebraska receiving funds under Title III of the Rehabilitation Act, to prepare vocational rehabilitation professionals in the disciplines designated in the Act [29 USC 771(b)(1)(B)]. Nor are there any colleges or universities offering academic programs in vocational rehabilitation at the Baccalaureate or Graduate degree levels. Therefore, there is no coordination or facilitation of recruitment, preparation or retention efforts between NCBVI and colleges or universities within Nebraska. There are, however, some such graduate programs in the Midwest. NCBVI has contacted the university placement offices of nine institutions. All have indicated that they will post any job openings that we transmit to them.

2. Plan for Recruitment, Preparation and Retention of Qualified Personnel (NCBVI)

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit 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.

Currently, there is vacancy for an Orientation Counselor and no vacancies for pre-existing vocational rehabilitation personnel at NCBVI. When vacancies occur within our VR positions, NCBVI recruits through local and statewide newspapers, State of Nebraska Personnel services, consumer organizations of blind persons, University graduate programs beyond our immediate geographic area, and related list-serves. As stated above, there are no institutions of higher education in Nebraska receiving funds under Title III of the Rehabilitation Act, to prepare vocational rehabilitation professionals in the disciplines designated in the Act [29 USC 771(b)(1)(B)]. Nor are there any colleges or universities offering academic programs in vocational rehabilitation at the Baccalaureate or Graduate degree levels. Therefore, there is no coordination or facilitation of recruitment, preparation or retention efforts between the Commission and colleges or universities within Nebraska. There are, however, some such graduate programs in the Midwest. NCBVI has contacted the university placement offices of nine institutions. All have indicated that they will post any job openings that we transmit to them. During 2014, we began to do this on a routine basis. The goal is to recruit recent graduates to apply for open positions with NCBVI in the future. Non-Discriminatory Plan NCBVI always strives to be non-discriminatory in hiring, retention, and promotion of staff from minority backgrounds and with disabilities. To recruit qualified personnel including those from minority backgrounds and those with disabilities, NCBVI follows federal Affirmative Action guidelines. We recruit via national consumer groups of blind individuals. To prepare and retain all personnel, including those from minority backgrounds and those with disabilities, the initial training and the ongoing training plan are individualized according to each person's specific training needs and also encompasses training issues that will maximize the agency's effectiveness and efficiency.

3. *Personnel Standards (NCBVI)*

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit 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 (NCBVI)

Nebraska statute requires a State Certification for Vocational Rehabilitation Counselors for the Blind. This law is the highest standard in Nebraska for the discipline of rehabilitation counseling for the blind. All NCBVI Vocational Rehabilitation Counselors meet the state standard by having achieved the status of Certified Vocational Rehabilitation Counselor for the Blind. Fourteen staff members also hold degrees of a

Masters or higher. Certified Vocational Rehabilitation Counselor for the Blind (CVRCB) is defined as a person who is certified to practice vocational rehabilitation counseling for blind persons and holds a certificate issued by NCBVI. Vocational rehabilitation counseling for the blind is defined as the process implemented by a person who operates a comprehensive and coordinated program designed to assist blind persons to gain or maintain remunerative employment, to enlarge economic opportunities for blind persons, to increase the available occupational range and diversity for blind persons, and to stimulate other efforts that aid blind persons in becoming self-supporting. The qualifications to be a certified vocational rehabilitation counselor for the blind in Nebraska are: (a) to have a bachelor's degree from an appropriate educational program approved by the NCBVI Executive Director; (b) to have completed six hundred (600) hours of immersion training under sleep shades (for persons with any functional vision) at the Nebraska Center for the Blind (operated by NCBVI); and (c) to have completed appropriate continued education training credits as approved by the NCBVI Executive Director. The plan for training newly hired personnel who do not meet the established standards is as follows. New hires for VR Counselor positions must have the bachelor's degree (a) before hire. Training in the immersion setting (b), begins on the first day of the second week of employment. It continues for 600 hours of their employment, that is roughly four (4) months of work time. The time period allowed is sometimes extended if there are interruptions to the training, such as leave needed for illness, vacation, or sometimes meetings that must be attended, etc. The continuing education credits (c) are accrued over time and are reviewed every three years to qualify for certification renewal. Intensive systematic immersion training of six hundred (600) hours is provided by NCBVI for all newly hired counselors, followed by three months of training specific to the individual's new position. This training provides an orientation to the agency understanding of blindness and the strategy of service delivery that grows out of that understanding. The training includes reading and discussion of many articles and documents in the blindness field, and skills training in non-visual techniques and technologies through hands-on experiences. To a lesser degree, paraprofessional or support personnel also receive intensive pre-service training in the office where they will be working at the start of their employment.

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. (NCBVI)

Following Center Training, newly hired rehabilitation personnel continue with two to three months of on-the-job training activities for specific job duties including agency policies and procedures, accessing local resources, sensitivity training, social security, vocational counseling techniques, consumer group information, etc. The topics covered include a wide range of policies and procedures, counseling techniques, teaching modalities, etc. Each Certified Vocational Rehabilitation Counselor for the Blind shall, in the period since his or her certificate was issued or last renewed, complete continuing competency requirements as set forth by NCBVI under the Executive Director's approval. Annually, each employee and supervisor review performance and plan for

individualized training. The goals include activities to enhance abilities in blindness skills, to refresh and deepen understanding of philosophical concepts, to expand professional knowledge within the field of rehabilitation counseling for the blind, and opportunities for training specific to rehabilitation counseling for specific positions. Discussions of philosophical issues are held in local offices and by the Administrative Team in Central office. Employees are also encouraged to spend time with other staff to learn new practices and to stimulate ongoing improvement.

4. Staff Development. (NCBVI)

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. System of staff development (NCBVI)

a system of staff development for professionals and paraprofessionals within the designated State unit, 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

Supervisors have provided data regarding their subordinates' education, including degrees held. As mentioned above, the CVRCB Certification requirement is a Bachelor's degree approved by the Executive Director, and 600 hours of intensive training at the NCBVI Nebraska Center for the Blind. We encourage VR Counselors to pursue additional academic work. NCBVI has six offices across the State of Nebraska. Some of these locales are many hours away from colleges or universities with graduate programs relevant to this endeavor. Distance learning is an option for some parts of a degree program, but may not fulfill all requirements for such a program. Many activities are conducted in the team setting. This enables mentoring of staff less experienced by those with more expertise in a particular area. Individual staff members may also schedule time with others to expand their own knowledge, skills and experience in areas needing to be strengthened. One example that is proving to be highly productive is training in Motivational Interviewing (MI). The Nebraska Center for the Blind and each district have each scheduled sessions with MI trainers, to develop, expand, and fine tune the MI skills of NCBVI Counselors. These skills helped counselors build more positive working relationships with clients towards the achievement of individualized service goals and objectives. NCBVI coordinates efforts with institutions of higher education, organized consumer groups and professional associations to recruit, prepare, and retain qualified personnel, including personnel from minority backgrounds, and personnel who are individuals with disabilities. Continuing efforts ensure that all personnel are adequately trained and prepared to meet standards that are based on the highest requirements in the State and to become certified in accordance with State Law. NCBVI also works to ensure the availability of personnel internally (or from external resources) who are, to the maximum extent feasible, trained to communicate in the native language or mode of communication of an applicant or eligible individual. Ongoing staff development activities will ensure that all NCBVI personnel receive appropriate and adequate training. Funds from several segments of the NCBVI budget are committed to developing personnel, including funding training from the Nebraska Center for the Blind, as well as tuition and related expenses for expanding the capacities of NCBVI staff. Ongoing training is made available to all staff on relevant and timely topics. Retaining qualified personnel is particularly important because of the investment we make with the intensive Center Training as well as our willingness to

reimburse tuition for course work. Topics of focused training sessions may include, but are not limited to:

Laws and regulations, including the Rehabilitation Act, Randolph–Sheppard, the Workforce Innovation and Opportunity Act, Americans with Disabilities Act, Individuals with Disabilities Education Act, and others,

methods to help clients of all ages achieve successful employment in high–quality positions with benefits and opportunities for advancement,

using data to measure the success of concentrated efforts for achieving goals of high quality employment outcomes,

providing effective services to transition–aged persons who are blind or visually impaired, including approaches to outreach and service delivery;

ways to work effectively with the increasing number of older individuals who are losing vision but still want or need to be a part of the workforce,

serving persons with multiple disabilities, especially deaf–blindness,

assistive technology, including non–visual and low vision options,

maximizing effectiveness in the group training or counseling setting,

Social Security information, including benefits counseling and PASS plan development,

supported employment,

workplace policies,

positive philosophical understandings of blindness,

diversity awareness and sensitivity training, especially to working with people from poverty, and

additional relevant issues, e.g. transportation, crisis management, etc.

The long–range plan for ongoing development of staff is based upon needs identified by our annual processes for comprehensive statewide needs assessment. The plan is updated and kept current with ideas or issues identified from ongoing client satisfaction surveys, employee requests for additional training on specific topics, and internal data collection from the NCBVI data management system.

B. Acquisition and dissemination of significant knowledge (NCBVI)

Procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

Significant knowledge from research and other sources is disseminated to staff members; thus ensuring access to new knowledge and learning in the field of vocational rehabilitation. The system of staff development provides for on-going renewal and enhancing of the individual and the agency's organizational knowledge and expertise.

5. *Personnel to Address Individual Communication Needs (NCBVI)*

Describe how the designated State unit has personnel or obtains the services of other individuals who 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.

NCBVI has several employees across the State of Nebraska with bilingual skills in English and Spanish. Independent contracts are established as needed to obtain services from individuals who are able to communicate in the native language of applicants or clients who have limited English speaking ability or in appropriate modes of communication. Contracts have included, but are not limited to American Sign Language, including Tactile Signing for Deaf–Blind individuals, Spanish, French, Turkish, Arabic, Vietnamese, Burmese, Kareni, Swahili and others according to the needs of applicants and eligible individuals.

6. *Coordination of Personnel Development under the Individuals with Disabilities Education Act (NCBVI)*

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.

NCBVI coordinates with the Comprehensive System of Personnel Development under the Individuals with Disabilities Education Act (IDEA) in several ways. NCBVI and a team of educators and other stakeholders established a Protocol for educators and NCBVI counselors, for providing high quality services to blind and visually impaired children and youth in Nebraska. The handbook is titled *Opening Doors: A Transition Guide*. This tool serves as a vehicle for educating parents and families, service providers, educators, and others about the best way for children from birth through transition age, to obtain the education and rehabilitation services that will move them into adulthood successfully. NCBVI provides information to educators and to VR personnel about training opportunities relevant to personnel development in the fields of both education and vocational rehabilitation. A series of personnel training sessions relating to the handbook were held in a coordinated effort between NCBVI and personnel covered by IDEA. In FFY 2014 and 2015, NCBVI Counselors continued to provide the tool, and instructions as needed, statewide to educators, parents, and other persons involved with educating blind and visually impaired school students within Nebraska. Additional joint personnel development efforts will be held when specific issues of mutual concern are identified. For example, teachers of blind children from the public school system provide presentations to NCBVI at Staff Meetings. At the NCBVI Annual State Staff Meeting in 2013, a speaker from Nebraska Department of Education/Special Populations gave a presentation on the IEP process and the role of VR Counselors in that process, working with educators, families and students. NCBVI staff members provide presentations at training sessions of the school system, university and college classes, and other opportunities which arise. We will continue to

explore ways to assure success in education and quality employment. One avenue will be collaborating with the WinAHEAD organization (Western Iowa and Nebraska Association on Higher Education and Disabilities). On an ongoing basis, the primary emphasis will be individual communication between NCBVI counselors and parents, teachers and others in the education system.

j. Statewide Assessment (NCBVI)

(Formerly known as Attachment 4.11(a)).

1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those: (NCBVI)

A. With the most significant disabilities, including their need for supported employment services; (NCBVI)

Nebraska Commission for the Blind and Visually Impaired (NCBVI) is the Designated State Agency responsible under State law for operating the vocational rehabilitation program for the blind in Nebraska. A governing board, the majority of whom are persons who are blind or visually impaired, appointed by the Governor of the State of Nebraska serves to assure the agency is consumer-controlled. NCBVI undertakes to review and analyze the effectiveness of services and consumer satisfaction with services provided by the Commission, vocational rehabilitation services provided by other state, public and private entities, and employment outcomes achieved by eligible individuals receiving vocational rehabilitation services from NCBVI, to assure high quality, career track employment outcomes, with health and other employment benefits, wages comparable to state wages for non-disabled persons, and equity for persons of minority status. Formal Comprehensive Statewide Needs Assessment (CSNA) During FFY 2013, NCBVI established a contract with the National Research and Training Center on Blindness and Low Vision (NRTC), Mississippi State University Research Unit for a formal Comprehensive Statewide Needs Assessment to cover the period of 2011 through 2013. The assessment included surveys of blind clients closed either in status 26 or 28, members of NCBVI staff, and employers who have had experience with NCBVI staff and clients. Semi-structured interviews were conducted with other key informants. In addition, existing data from various sources was analyzed, such as the RSA-911 data for NCBVI, American Community Survey data, and Bureau of Labor Statistics labor and economic forecasts. Data gathering began in March 2013 and continued through August 2013. Analysis was conducted primarily during the final quarter of Fiscal year 2013. The full report was provided to NCBVI early in fiscal year 2014. The next Statewide Assessment will cover the period of FY 2015 through FY 2017. This time we contracted with Gemini Research from Louisiana to conduct the needs assessment; which will address needs on serving students under the Pre-Employment Transition Services. We will be getting a report by August 2018 and have an strategy on how to implement their recommendations by September 30 2018.

Serving consumers with the most significant and multiple disabilities is a need that grows in complexity and numbers. The agency will work to increase staff members' expertise in a variety of disabilities, including deaf–blindness, brain injury, and others. In addition, it is important to partner with other entities specializing in serving persons with specific disabilities other than blindness. There is a need to increase competitive employment outcomes for clients with multiple disabilities. Caseloads were reviewed to identify clients with multiple disabilities and strategies were developed to more effectively provide the services needed by those individuals.

B. Who are minorities: (NCBVI)

The population of Nebraska is not tremendously diverse in terms of race and ethnicity, but diversity has been increasing. The agency works to assure that contacts are made to minority populations in every area of the State. The CSNA results show that there is a need to analyze the work being done. It is important to make meaningful contacts with diverse populations, to effectively reach persons who might be eligible for agency services. Materials are being revised to have different languages available, including print, online, and video productions for public use. A translation tool was added in 2014 to the agency website, allowing the user to read all content in a wide range of language options. There is a need to increase the proportions of people served from minority populations who achieve competitive employment outcomes. The efforts to date have focused on increasing outreach to all Nebraskans. This effort will continue, along with examination of barriers that inhibit successful outcomes. Efforts statewide assure that regardless of race or ethnicity, quality services are provided at referral, application, and throughout the VR process.

C. Who have been unserved or underserved by the VR program: (NCBVI)

Several data sources indicated that services to consumers with multiple disabilities need improvement. According to the RSA–911 analyses, consumers with multiple disabilities were competitively employed at a significantly lower rate after receiving services than other consumers. In the consumer survey, respondents who had multiple disabilities reported a greater need for services in many areas compared to those with blindness or visual impairment only. In terms of services for which a need remained after the completion of their rehabilitation program, respondents with multiple disabilities had similar or higher remaining needs in all areas. They reported a higher remaining need (compared to those without multiple disabilities) in 47.4% (n=9) of the services asked about. Almost all staff (94.7%) indicated that improving services to consumers with multiple disabilities was a moderate or critical need. This item had the fewest number of people who did not consider it a need (only one staff person rated this as limited or no need). Four of the eight key informants identified persons with multiple disabilities as a group that was unserved or underserved by NCBVI. One key informant mentioned that counselors tended to not have knowledge about other disabilities, and there was a need for them to have this knowledge in order to serve this group appropriately. In terms of suggestions by participants about how to better serve this population and meet their needs, four key informants indicated that it is important for

NCBVI to partner with other agencies or organizations that have some expertise with the additional disabilities of this group. Three staff members mentioned that additional training or professional development about other disabilities was needed, and two staff members suggested partnering with other professionals or organizations that have expertise with other disabilities.

D. Who have been served through other components of the statewide workforce development system; and (NCBVI)

Assistance related to employment is another identified need. The needs can be broken into three major areas: career exploration and guidance, searching for and obtaining employment, and working with employers on accommodations and other on-the-job requirements. More specifically, the needs include help with finding a job, finding job leads or contacting employers, working with employers on job accommodations, completing applications, exploring career options, and developing clients' skills for seeking and obtaining competitive employment. The world of work and life in general require increasing needs for technology related skills and equipment. The highest focus of need from consumer surveys was in this area. Training in access technology is an area of high need, according to the assessment. This is consistent with our ongoing needs assessment with consumers statewide, described below, which we conduct every year. Employers surveyed also indicated that assistance with technology will help them to hire and retain employees with vision impairments. The Technology Team, led by a Program Manager, works to enhance their own expertise, to train other staff, to provide opportunities for training consumers, and to identify additional opportunities available from external resources. Another area identified is the importance of partnering with other organizations, agencies, groups, etc. In particular, other components of the statewide workforce development system are key entities with whom to partner. Much is done and will continue to be done throughout the state. Staff members in each geographic area are encouraged to engage in networking opportunities with businesses in their locale. We engage with the Local Workforce Boards in all parts of the State. This helps to assure that we do have knowledge of and interaction with other components of the workforce system statewide. When staff members learn of new entities, or ones that have not worked with NCBVI in the past, the information is shared with other staff and consumers who need it. This agency is strongest when collaborating with and learning from people and groups that may have resources beyond its own. With the exception of Omaha and Lincoln metropolitan areas, most of the state is rural. There are small and medium sized towns sprinkled across the state. Still it is critical that we work to ensure our ability to achieve competitive employment outcomes for clients living in rural Nebraska. NCBVI data show that the rates of acceptance for services and competitive employment are actually slightly better for rural-based clients than for urban. However, there may be a perception amongst individuals who feel isolated and unable to connect with employment, leading to a sense that this is an unmet need. It is also not unusual for VR Counselors in the rural areas to be frustrated by limited employment opportunities for their clients. The fact that this need emerged as critical in the survey reinforces the need to strengthen networking efforts, outreach to potential clients and employers, and

building skills among agency staff to make sure that all areas of the state are served fully, including rural, urban, and metropolitan.

E. Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services. (NCBVI)

NCBVI is committed to the provision of rehabilitation services to blind and visually impaired children and youth and their families as early as possible in the child's development. Special programs such as Project Independence for children between the ages of six and twelve stress the importance of self-confidence and independence using the alternative skills of blindness. Programs for blind and visually impaired teens such as WAGES (Work and Gain Experience in the Summer) and Winnerfest provide valuable work experiences and opportunities for developing interpersonal skills needed for success in later life. Other programs such as technology fairs and the College Workshop also help blind and visually impaired students make the transition to life after high school. In the coming year, NCBVI will increase efforts promoting more job opportunities for blind and visually impaired youth in their home communities throughout the school year. In September 2015, NCBVI hired a Transition Services Specialist to strengthen the relationship between NCBVI and schools statewide on behalf of blind and visually impaired students. Fifteen percent (15%) of funds allocated to NCBVI for vocational rehabilitation services are dedicated to providing pre-employment transition services to blind and visually impaired students between the ages of 14 and up to but not including 22; 50 percent (50%) of funds for supported employment services are committed to providing pre-employment transition services to blind and visually impaired students in the same age group. Increasing the number of blind and visually impaired youth in transition achieving their individual employment goals is a major objective for NCBVI in FY 2018. Transition-aged clients are encouraged to elevate their expectations for personal achievement. This can translate to higher education, often delaying their ultimate employment. It may take more years to reach that goal, but when they do, it will be in a career that will pay well, have benefits, and the chance for promotions. All 28 closures, including Transition clients who were closed unsuccessful from active services, are studied for more effective intervention methodologies. We will determine if there are differences between those who choose to continue their education and those who do not. We also will explore any commonalities among cases closed unsuccessfully. There may be strategies which can be used to improve the employment outcomes and the resulting rehab rate.

2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and (NCBVI)

For the effort to establish, develop or improve community rehabilitation programs (CRPs), NCBVI collaborates with a wide range of community partners statewide, working together to develop and improve services. Job coaching to Supported/customized Employment clients is provided through contracts with community rehabilitation programs. Agency staff members also work with CRPs and independent living centers to assure that services are coordinated and meeting the needs of Nebraskans with disabilities, especially those who are blind or visually impaired along with multiple disabilities. NCBVI partners with community rehabilitation

programs (Martin Luther Homes, Quality Living) and other entities. In addition to services specific to individuals, collaboration on other projects occurs as the need and opportunity arise. The activities enable NCBVI to inform many persons about the services available to individuals who are blind, thus expanding opportunities to those who are, or who may become, eligible for services of the Vocational Rehabilitation or the Supported Employment program. The agency website is updated continuously and provides information to the public about available services and resources, avenues to apply for services, and ask questions, and so forth. Work is being done to enhance a social media presence with information and updates about NCBVI events, activities, and services. The agency collaborates with the Nebraska Department of Health and Human Services–Division of Developmental Disabilities services (NDHHS–DDD) to identify potential clients, coordinate service plans and share funding for those individuals in the System who are described as blind and visually impaired. Efforts have been initiated to establish a similar relationship with the Department of Health and Human Services–Division of Behavioral Health (NDHHS–DBH) on behalf of blind and visually impaired clients with behavioral health issues. For the most part, job coaching to SE clients is provided through contracts with community rehabilitation programs. DDD provides ongoing funding for the job supports. Contracts with CRPs and coordination for services all serve to expand, develop and improve such programs across the State of Nebraska. Part of the Comprehensive Statewide Needs Assessment gathered information regarding this question, from the staff survey and the key informant interviews. One item on the staff survey addressed this, and staff did not consider establishing or developing CRPs within the state to be an important need. This was the lowest rated item for staff in terms of need, with 64.7% indicating there was limited or no need to do this. Four of the key informants indicated they did not know or preferred not to provide an answer about this need. One informant did not see a need to establish CRPs, while another commented on the fact that there are no other organizations in the state which can provide blindness rehabilitation services. Only one key informant felt there is a need to establish additional CRPs, although this was from the perspective of providing a source of employment for consumers rather than from the perspective of providing rehabilitation services to consumers. Overall, the results would indicate that most do not consider the establishment or development of CRPs to be an important need for blind consumers in Nebraska. The only information that supports a need is that two key informants thought that there is a need for other service options (beyond NCBVI providing all services). The fact that NCBVI currently partners with community programs to identify and to address consumer needs may be the reason that developing further such programs is not seen as a high–level need.

3. 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 the Individuals with Disabilities Education Act. (NCBVI)

With the increased emphasis on pre–employment youth, students and programming to enhance their skills in the areas of job readiness, community based integration skills and exploration of potential pathways in both college and/or job settings, NCBVI has

adopted several new strategies designed to assess both the needs of our staff and clients with regard to the transition process. NCBVI has engaged in a survey and programmatic initiative with Dr. Gary Meers, to implement his internationally recognized transition model in ways suited to NCBVI and WIOA. This process involves the assessment of various stakeholders to gauge their present level of transition knowledge and then create new curriculums or methods that staff and students can use together to increase internships or employment opportunities, especially in after-school, non-traditional settings, rural areas and with multiply-disabled youth, all of which are strengths of the model. In addition, NCBVI attends Stakeholder meetings at NCECBVI, the statewide program for blind and visually impaired youth, meetings of the transition practitioners committees, and various district meetings of teachers of the visually impaired, in an effort to assess the needs of students and teachers and to offer our expertise in meeting these needs. One unique aspect of this effort is a strategic plan to connect schools districts and every education service unit in Nebraska to cement the notion that NCBVI provides the rehabilitation services for youth with visual impairments and blindness. These connections will help to assess the extent that youth may not yet know of vocational rehabilitation services for the blind in Nebraska. These efforts will enhance discovery and anecdotal assessed needs for increased programming for blind and visually impaired youth in school systems who now offer career academies. Programs and districts, such as the one in Lincoln Public Schools, are now shifting to new pathways of learning, which are career-based opportunities for students as opposed to the traditional classroom learning model. Initial Meetings have been held and proposals are being drafted to submit to Lincoln Public Schools to support staffing at these career academies so the needs of youth can be addressed, to enable them to perform in these new and exciting aspects of education in our state.

k. Annual Estimates (NCBVI)

(Formerly known as Attachment 4.11(b)). Describe:

1. The number of individuals in the State who are eligible for services; (NCBVI)

NCBVI projects the total number of persons served by vocational rehabilitation (all statuses, from applicant through full services) during FY 2018 and FY 2019 to total 560. The ratio of applicants and eligible individuals served to VR counselors will be 56 to 1. The current staffing level enable NCBVI to provide core services to customers. Generally, the number of individuals served each year does not change a great deal. When numbers of referrals increase, the agency identifies ways to effectively streamline processes to enable the staff to continue meeting customer needs. Budgetary considerations and state regulations that limit personnel per agency prevent us from changing our staffing to any great extent. Services are monitored to assure that all core services are provided and that all active Individualized Plans for Employment are carried out in full. Policy and procedures are in place to implement Order of Selection should it ever be imminent. As stated, though, to date there are adequate personnel to provide vocational rehabilitation services to all eligible individuals.

2. *The number of eligible individuals who will receive services under: (NCBVI)*

A. The VR Program; (NCBVI)

560

B. The Supported Employment Program; and (NCBVI)

75

C. Each priority category, if under an order of selection; (NCBVI)

Not applicable

3. *The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and (NCBVI)*

Not applicable

4. *The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category. (NCBVI)*

Not applicable

I. **State Goals and Priorities (NCBVI)**

The designated State unit must:

1. *Identify if the goals and priorities were jointly developed (NCBVI)*

Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

Nebraska Commission for the Blind and Visually Impaired (NCBVI) is an independent, consumer–controlled Commission. As such, it does not have a State Rehabilitation Council. A Board of Commissioners governs NCBVI, the majority of whom must be blind consumers. Up until three years ago, all Commissioners appointed by the Governor of the State of Nebraska have been individuals who are blind or visually impaired. One Commissioner is the parent of a blind young adult. The Board of Commissioners works together with the agency Executive Director to develop and agree to annual goals and priorities.

2. *Identify the goals and priorities in carrying out the VR and Supported Employment programs. (NCBVI)*

The mission of NCBVI is “Empowering Blind Individuals, Promoting Opportunities, and Building Belief in the Blind.” The agency’s primary priority is to enable persons who are blind and visually impaired, including those who also have multiple disabilities, to achieve their individual goals for competitive integrated employment (including supported employment). The secondary priority is to enable persons who are blind and visually impaired, including those who also have multiple disabilities, to achieve their individual goals to live independently, and to be full participants in their communities. With both priorities, agency personnel work with clients to elevate their personal goals beyond what they might have expected a blind person to be able to achieve. As people learn to understand blindness and learn to utilize the alternative skills of blindness, they develop self-confidence and determination to establish personal goals that embody elevated expectations for themselves and for their future. 1. Increase the number and percentage of clients achieving competitive integrated employment outcomes. 2. Increase the rehabilitation rate for transition aged clients achieving competitive integrated employment outcomes. 3. Improve the quality assurance system.

3. *Ensure that the goals and priorities are based on an analysis of the following areas: (NCBVI)*

A. The most recent comprehensive statewide assessment, including any updates; (NCBVI)

NCBVI goals are based on factors identified through analysis of the comprehensive statewide assessments, both the contracted research project and the ongoing public forums, and results of federal RSA Monitoring and oversight.

The State's performance under the performance accountability measures of section 116 of WIOA; and (NCBVI)

NCBVI performance will be based on the performance accountability measures of section 116 of WIOA. Of the three options for reporting on the effectiveness in serving employers performance measure, NCBVI will use 1) retention with the same employer – this approach captures the percentage of participants who exit and are employed with the same employer in the second and fourth quarters after exit (states must use wage records to identify whether a participant’s employer wage record indicates the same establishment identifier, such as a federal employer identification number or state tax ID), and 2) repeat business customers (percentage of repeat employers using services within the previous three years; this approach tracks the percentage of employers who receive services that use core services more than once).

B. Other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and finding and recommendations from monitoring activities conducted under section 107. (NCBVI)

NCBVI goals are based on factors identified through analysis of the comprehensive statewide assessments, both the contracted research project and the ongoing public forums, and results of federal RSA Monitoring and oversight. The operation and effectiveness of the VR–B program is reviewed by the NCBVI Board of Commissioners at quarterly meetings, reviews of reports to federal and state entities, and follow–up from previous RSA Monitoring activities and reports.

m. Order of Selection (NCBVI)

Describe:

1. *Whether the designated State unit will implement and order of selection. If so, describe: (NCBVI)*

A. The order to be followed in selecting eligible individuals to be provided VR services. (NCBVI)

NCBVI is not under an Order of Selection. Policy and procedures are in place to implement Order of Selection should it ever be imminent. It is not expected that an Order of Selection will be required during FFY 2018.

B. The justification for the order. (NCBVI)

Not applicable

C. The service and outcome goals. (NCBVI)

Not applicable

D. The time within which these goals may be achieved for individuals in each priority category within the order. (NCBVI)

Not applicable

E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and (NCBVI)

Not applicable

2. *If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment. (NCBVI)*

Not applicable

n. Goals and Plans for Distribution of title VI Funds. (NCBVI)

1. *Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services. (NCBVI)*

The primary goal for the Supported Employment (SE) program of NCBVI is to develop appropriate individualized SE placements for blind and visually impaired persons with developmental disabilities. It is also the goal of NCBVI's SE program to develop appropriate individualized SE placements for blind and visually impaired persons with significant secondary disabilities including brain injury, mental illness, hearing impairment, or other multiple disabilities occurring after consumers have reached the age of 21.

2. *Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including: (NCBVI)*

A. The provision of extended services for a period not to exceed 4 years; and (NCBVI)

Each blind and visually impaired individual with a developmental disability has a case service coordinator employed by the Nebraska Department of Health and Human Services, Division of Developmental Disabilities (NDHH–DDD). The case service coordinator is responsible for developing an Individualized Service Plan (ISP) for mutual clients served by NCBVI and DDD. When supported employment services are involved, NCBVI provides incentive payments at specific intervals (start of job search, start of employment, stabilization, maintenance, and start of long-term support.). This arrangement is in accordance with the “milestones” model used by Nebraska VR General to serve clients shared with NDHHS–DDD. NCBVI representatives met with a meeting of supervisors of local field office coordinated by NDHHS–DDD in November 2012 to explain how the milestone model applies to clients served by NCBVI as well as Nebraska VR General. Since then, NCBVI administrators, supervisors, and counselors continue to meet and build closer working relationships with NDHHS–DDD at the state and local levels. NCBVI has also reached out to Nebraska Department of Health and Human Services-Division of Behavioral Health (NDHHS-DBH) and to the Autism Center of Nebraska to create a mechanism for providing supported employment services to blind and visually impaired clients with mental health conditions and autism. Continued training regarding Supported Employment services is provided to NCBVI counselors, statewide. The total funds projected for FY 2018 is expected to be \$30,000. At least 50% will be allocated to blind and visually impaired students in the pre-employment transition services categories.

B. How the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities. (NCBVI)

Concerted efforts will assure efficiency so that the limited funding will be as effective as possible. As appropriate, additional funding will be available from Title I funds. SE services were provided to 63 clients in FY 2017; it is feasible that the number served in 2018 will be 75. Overall, NCBVI Management staff work to implement creative strategies to most effectively utilize Supported employment funds to maximize the benefit for those individuals in the program's target population. Project SEARCH is a joint effort between NCBVI, Nebraska VR General, school districts, hospitals, and other businesses in several communities. Project SEARCH is not specifically supported employment, but it is designed to benefit people with developmental disabilities in transition. Additional Project SEARCH programs were added during the past year. These partnerships between NCBVI, VR, schools and businesses are expanding. New projects include a major hotel and hospitals. Outreach to transition aged persons with multiple disabilities will enable us to identify youth who are appropriate for this opportunity and to provide the vocational preparation and experience that will serve them well into adulthood.

o. State's Strategies (NCBVI)

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

1. *The methods to be used to expand and improve services to individuals with disabilities. (NCBVI)*

Nebraska Commission for the Blind and Visually Impaired (NCBVI) works to increase the number and percentage of clients achieving competitive integrated employment outcomes; increase the rehabilitation rate for transition aged clients achieving competitive integrated employment outcomes; and to improve the quality assurance system. NCBVI utilizes strategies identified in the text above and in WIOA to achieve these goals and priorities, to support innovation and expansion activities, and to overcome barriers to accessing NCBVI's vocational rehabilitation and supported employment programs. There are six physical offices throughout the State of Nebraska, to reach blind and visually impaired persons in their home communities. Vocational Rehabilitation staff travel their catchment areas to meet with referrals and clients, to educate the general public, including employers, and to reach out to individuals who may need our services.

2. *How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis. (NCBVI)*

NCBVI provides assistive technology services throughout the state of Nebraska to blind and visually impaired consumers. NCBVI's team of three technology specialists, under

the lead of a Technology Program Manager, provides assessment, consultative support, and training on mainstream and access technology products. The specialists participate in trainings and research to discover technology solutions and provide consumers the ability to weigh the pros and cons of specific technologies to support their informed choice. Technology training is provided in the NCBVI Center for the Blind. We also contract with third parties to make software accessible and with others to provide training when additional consultation is needed. NCBVI collaborates with the Assistive Technology Partnership (ATP) throughout the state in field offices.

3. *The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program. (NCBVI)*

Through the leadership of the NCBVI Deputy Director of Services and three district Supervisors, Counselors in each District and Office work to identify and serve blind and visually impaired individuals who are of minority backgrounds, have the most significant disabilities, and those who have been unserved or underserved by NCBVI. Direct contact is made with organizations and populations in each area of the state, to assure that the availability of services is made known to all who might be eligible.

4. *The methods to be used to 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, postsecondary education, employment, and pre-employment transition services). (NCBVI)*

There is an increasing emphasis upon providing effective services to the transition population, particularly pre-employment transition eligible persons. From the RSA perspective, as well as this agency, it is crucial to increase successful outcomes for clients who begin rehabilitation services from the age of 14 through age 24. NCBVI closely reviews all transition cases closed without achieving employment outcomes. Through this process, approaches and services are analyzed, to determine how successes for transition clients can be increased. At the same time, case reviews are conducted on all transition cases closed that did achieve employment outcomes. The level and types of services provided and the success achieved are examined based upon benchmarks established by RSA and WIOA common measures.

5. *If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State. (NCBVI)*

Workshops are provided in various locations around Nebraska to spotlight the capabilities of blind individuals. The agency partners with other agencies, consumer organizations, communities, and groups; including Disability Rights Nebraska, Nebraska Assistive Technology Partnership (ATP), the Statewide Independent Living Council, Workforce Development Councils, educational entities, hospitals,

multi-cultural centers, community rehabilitation programs (Martin Luther Homes, Quality Living), and a wide range of other entities.

6. *Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA. (NCBVI)*

Data collected for performance accountability measures under §116 of WIOA have not yet been analyzed. The system of Standards and Indicators established by RSA had been the primary benchmark used to measure the extent to which program goals were achieved and as a result, the effectiveness of the overall program. NCBVI successfully achieved performance levels required by the US Department of Education/Rehabilitation Services Administration (RSA) official Standards and Indicators.

7. *Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities. (NCBVI)*

Various activities enable NCBVI to inform other components of the statewide workforce development system about the services available to individuals who are blind, thus expanding opportunities to those who are, or who may become, eligible for services of the Vocational Rehabilitation or the Supported Employment program. At the Statewide level, NCBVI is actively engaged with the WIOA Core Partners efforts; in local workforce areas, NCBVI staff collaborates with other components of the workforce system to assure there is knowledge of and access to providing services to persons who are blind or visually impaired. The agency website is updated continuously and provides information to the public about available services and resources, avenues to apply for services, and ask questions, and so forth. In 2018, employment conferences for clients will continue as long as available funds and resources allow. The conferences are an effective approach to expand and improve efforts to secure high quality employment outcomes for job ready consumers and to enable pre-employment services clients to gain skills and resources for achieving employment. Included in the conferences are motivational speakers, sessions on resume writing, interviewing and related skills, technology demonstrations, mock interviews with local business people, and a job fair with local businesses present. Employers have an opportunity to meet blind job candidates in a setting conducive to exploring the options for both blind consumers and for business representatives. Clients learn and practice many skills necessary to succeed in the world of work. Instructional videos developed and produced by NCBVI are now being used by clients, for self-study on blindness skills, between appointments with Rehabilitation Counselors and teachers.

8. *How the agency's strategies will be used to: (NCBVI)*

A. *Achieve goals and priorities by the State, consistent with the comprehensive needs assessment; (NCBVI)*

Over the past several years, staff training included intervention strategies promoting greater effectiveness working with people with Traumatic Brain Injury, Deaf–Blindness, autism, and other significant disabilities. These activities will enable more blind consumers to obtain employment and to be full participants in their families and communities. Every year, NCBVI conducts comprehensive, statewide assessments on an ongoing basis. Throughout each year, NCBVI holds public forums to elicit opinions and comments from consumers regarding the services currently being provided and the needs of consumers that are not being addressed. In some cases, the forums are conducted jointly with other providers (e.g. the general vocational rehabilitation agency, centers for independent living, education, health and human services, etc.). Other forums are conducted as a part of our presentations to statewide meetings of consumer or peer support groups of the blind: National Federation of the Blind of Nebraska, American Council of the Blind of Nebraska, Nebraska Association of the Blind, and others. The NCBVI Board of Commissioners also holds quarterly public meetings during which they encourage consumers and interested persons to make comments and suggestions. In addition to the ongoing work to hear from the public about services and needs, we have the results of the formal Comprehensive Statewide Needs Assessment, completed in FFY 2014. The results are consistent with our less formal, ongoing assessments, validating the information that is received from both approaches. Consumers are informed that the current NCBVI State Plan is posted on the website and is otherwise available to anyone requesting a copy in any format. The forums serve as focus groups to solicit consumer input. The event locations and logistics are scheduled to best elicit input from and ideas about the needs of persons with the most significant disabilities, disabled individuals of minority or ethnic background, areas that may be underserved, and those who may be served by other entities such as the Nebraska Workforce System or other partner entities. The following strategies work toward achieving the third goal (Improve the quality assurance system): each fiscal year, a percentage of Title I funds are used to develop and implement innovative approaches to expand and improve services. Since 2009, Innovation and Expansion funds were used to maintain the data management system, eForce, to manage data systematically. Beginning in November 2016, training in the operation of a new, more sophisticated data management system, AWARE, was provided to NCBVI personnel with the system going live on July 1, 2017.

B. Support innovation and expansion activities; and (NCBVI)

A combination of Title I Innovation and Expansion and Social Security reimbursement funds will be used to cover the subscription fee for the operation and maintenance of AWARE, the data management system used by NCBVI. Work with the data management system will address all goals. Data management will enable NCBVI to analyze the effectiveness of all parts of the system. These can then be used the data based results to add value to overall efforts of the agency, achieve established goals, and to identify future needs and challenges.

C. Overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program. (NCBVI)

Partnering with other organizations throughout Nebraska and the nation is crucial to assuring equitable access to and participation of individuals who are blind and visually impaired in the State VR and SE services programs. Resources external to NCBVI can help to address areas and issues of potential barriers. Partnering with other agencies, components of the statewide workforce system, consumer organizations and experts expands the capacities of NCBVI and of those other entities. It is a viable way to better serve hard to reach consumers and to improve services with limited funding. Particularly in rural areas, collaboration improves outreach and services to those living in less-populated communities.

p. Evaluation and Reports of Progress: VR and Supported Employment Goals (NCBVI)

Describe:

- 1. *An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must: (NCBVI)***

A. Identify the strategies that contributed to the achievement of the goals. (NCBVI)

Mission

The mission of NCBVI is “Empowering Blind Individuals, Promoting Opportunities, and Building Belief in the Blind.” NCBVI’s primary priority is to enable persons who are blind and visually impaired, including those with multiple disabilities (i.e., hearing impairment, brain injury, mental illness) to achieve their individual goals for competitive integrated employment (including supported employment). A secondary priority is to enable persons who are blind and visually impaired, including those who also have multiple disabilities, to achieve their individual goals to live independently and to be full participants in their home communities. Particular emphasis is given to the provision of pre-employment transition services to blind students ages 14 years and up to but not including age 22.

Goals

NCBVI’s goals are based on factors identified through analysis of comprehensive statewide assessments, the contracted research projects, and ongoing public forums. 2016 State Plan program goals for NCBVI are extensions of the goals identified on the 2014 State Plan:

- (1) Increase the number and percentage of clients achieving full-time (31+ hours per week) competitive employment outcomes.

Forty-six (46) VR clients were closed in Status 26 during FY 2017 indicating that employment goals were achieved, compared to sixty-seven (67) in FY 2016. In FY 2017, 58.7% of cases closed in Status 26 achieved full-time employment, compared to 58.27% achieving full-time employment in FY 2016. Our goal specifically focused on employment with more than 31 hours per week. The goal of increasing the percentage of status 26 closures achieving full-time employment in FY 2017 was not met; neither was the goal of increasing the number of status 26 closures achieving full-time employment in FY 2017.

- (2) Increase the ratio of average hourly earnings of clients who become employed compared to average earnings in the state.

The average hourly wage of cases closed in status 26 during FY 2017 was \$15.72. Using the Department of Labor (DOL) estimates for the average overall hourly wage for Nebraska in the third quarter of 2017 (\$21.89), the ratio of average hourly wage of cases closed in status 26 with DOL estimates is .72. The average hourly wage of cases closed in status 26 during FY 2016 was \$14.69. Using DOL estimates for the average hourly wage for Nebraska in the third quarter of 2016 (\$20.93), the ratio of average hourly wage of cases closed in status 26 with DOL estimates of the average overall hourly wage in Nebraska is .70. Goal number 2 was met.

- (3) Increase the rehabilitation rate for transition aged clients in FY2015 over the previous fiscal year.

The rehabilitation rate for transition-aged clients in FY 2015 was 45.45%; in FY 2014, it was 28.57%. Goal 3 was met. The rehabilitation rate for youth in transition in FY 2017 and 2016 respectfully was 30.4 % and 55.2%. NCBVI is committed to the provision of rehabilitation services to blind and visually impaired children and youth and their families as early as possible in the child's development. Special programs such as Project Independence for children between the ages of five and fourteen stress the importance of self-confidence and independence using the alternative skills of blindness. Programs for blind and visually impaired teens such as WAGES (Work and Gain Experience in the Summer) and Winnerfest provide valuable work experiences and opportunities for developing interpersonal skills needed for success in later life. Other programs such as technology fairs and the College Workshop also help blind and visually impaired students make the transition to life after high school. In the coming year, NCBVI will increase efforts promoting more job opportunities for blind and visually impaired youth in their home communities throughout the school year.

In September 2015, NCBVI hired a Transition Services Specialist to strengthen the relationship between NCBVI and schools statewide on behalf of blind and visually impaired students. Fifteen percent (15%) of funds allocated to NCBVI for vocational rehabilitation services are dedicated to providing pre-employment transition services to blind and visually impaired youth between the ages of 14 and up to but not including 22; 50 percent (50%) of funds for supported employment services are committed to providing pre-employment transition services to blind and visually impaired youth in the same age group. Increasing the number of blind and visually impaired youth in transition achieving their individual employment goals is a major objective for NCBVI in FY 2016. Transition-aged clients are encouraged to elevate their expectations for personal achievement. This can translate to higher education, often delaying their ultimate employment. It may take more years to reach that goal, but when they do, it will be in a career that will pay well, have benefits, and the chance for promotions.

We are in the process of examining all 28 closures, including those for Transition clients. We will determine if there is any difference between those who choose to continue their education and those who do not. We also will explore any commonalities among cases closed unsuccessfully. There may be strategies which can be used to improve the employment outcomes and the resulting rehab rate.

(4) Improve the quality assurance system.

On July 1, 2017, NCBVI launched AWARE, a client database management system, to replace eForce, the previous system. AWARE will be more comprehensive and effective on all levels of the process, such as establishing electronic reminders of service deadlines; ways for staff to communicate with each other about client needs and case service activities; mechanisms for administrators to review work that is done, accomplishments made, and to assess gaps in either the data management system itself or the agency's service delivery system. As there is more time using the new system, the NCBVI will be better able to track effectiveness of programs and in other ways, assure that high quality services are provided to accomplish successful outcomes for clients.

To achieve the goals and priorities of achieving high-quality successful employment for clients, NCBVI is using many approaches. Each situation is individualized, thus the strategies and solutions for each client is unique. This approach is productive in many ways. It helps each individual client to clarify personal goals and then to achieve those goals. It helps to model for the individual that throughout life, one can accomplish new things by thinking creatively and having the confidence to try new approaches. It also helps rehabilitation staff by reinforcing creative, individualized thinking, which in turn stimulates creative thinking for the next client who walks in the door.

Clients are encouraged to examine whether, if not for blindness, he or she would still be in the workforce. If so, counselors help individuals to understand blindness and to raise personal expectations and aspirations. This process often leads to employment goals for individuals who otherwise would not have believed that they could be successful in the job market as a blind or visually impaired person.

NCBVI has developed workshops for clients that give a jump-start toward competitive employment. They also serve to educate business people about the features and benefits involved with hiring blind job candidates, the capabilities of blind individuals, and technology related to blind persons in the workplace. These events have been highly effective in the short term and are expected to garner additional benefits over time.

During FY 2015, NCBVI entered into a contract with Abilities Fund, a private non-profit organization specializing in training for people with disabilities in preparation for self-employment. Unfortunately, this partnership terminated in

June 2017 because of health problems; however, it is expected that the experience NCBVI counselors gained from their work with Abilities Fund will continue to expand self-employment options for more blind and visually impaired consumers. The upturn in the national economy over the past couple of years has created a more favorable labor market; however, there are still pressures which make getting a job more difficult for individuals who are blind or visually impaired. It is hoped that the overall economic situation in Nebraska and across the country will continue to improve during 2018.

B. Describe the factors that impeded the achievement of the goals and priorities. (NCBVI)

Evaluation of Program Effectiveness.

Every year, NCBVI evaluates the effectiveness of its vocational rehabilitation program in several different ways; using data and input from Rehabilitation Services Administration (RSA), employers, consumers and the general public, staff members, the Client Assistance Program, and private or other public entities with whom the agency collaborates. Most important, service recipients are asked for their evaluation of services provided at several stages of their program.

The needs of Nebraskans who are blind or have visual impairments are identified on a statewide basis through public forums and meetings, surveys of clients after completion of Center training, after case closure, and changes at statuses 18 and 20. There is ongoing communication with the NCBVI Governing Board of Commissioners (four of five of whom are blind) and the agency's accessible website. Work continues with the resultant feedback, to best address identified needs and to modify procedures for the future. The public forums held throughout the year continue to confirm and reinforce findings of that formalized needs assessment.

Statewide Needs Assessment.

In 2013, NCBVI initiated a contract for a statewide needs assessment with the National Research and Training Center on Blindness and Low Vision (NRTC), Mississippi State University Research Unit. The assessment includes surveys of blind clients who were closed either in status 26 or 28, members of NCBVI staff, and employers who have had experience with NCBVI staff and clients. Semi-structured interviews were conducted with other key informants. In addition, existing data from various sources were analyzed, such as the RSA-911 data for NCBVI, American Community Survey data, and Bureau of Labor Statistics labor and economic forecasts. Some of the more important research findings of the statewide needs assessment issued in FY 2014 were as follows:

Services to Consumers with Multiple Disabilities.

Several data sources indicated that services to consumers with multiple disabilities need improvement. According to the RSA–911 analyses, consumers with multiple disabilities were competitively employed at a significantly lower rate after receiving services than other consumers. In the consumer survey, respondents who had multiple disabilities reported a greater need for services in many areas compared to those with blindness or visual impairment only. In terms of services for which a need remained after the completion of their rehabilitation program, respondents with multiple disabilities had similar or higher remaining needs in all areas. They reported a higher remaining need (compared to those without multiple disabilities) in 47.4% (n=9) of the services asked about. Almost all staff (94.7%) indicated that improving services to consumers with multiple disabilities was a moderate or critical need. This item had the fewest number of people who did not consider it a need (only one staff person rated this as limited or no need). Four of the eight key informants identified persons with multiple disabilities as a group that was unserved or underserved by NCBVI. One key informant mentioned that counselors tended to not have knowledge about other disabilities, and there was a need for them to have this knowledge in order to serve this group appropriately.

In terms of suggestions by participants about how to better serve this population and meet their needs, four key informants indicated that it is important for NCBVI to partner with other agencies or organizations that have some expertise with the additional disabilities of this group. Three staff members mentioned that additional training or professional development about other disabilities was needed, and two staff members suggested partnering with other professionals or organizations that have expertise with other disabilities.

Services to minorities.

Several data sources also indicated that services to minorities could be improved. In RSA–911 analyses, there were significant differences by race/ethnicity in both acceptance rates and competitive employment. Whites were significantly more likely than other races/ethnicities to be accepted to receive services and also to be closed with competitive employment.

Specifically, Whites were competitively employed at a rate of nearly double the rate for African Americans (51.2% and 25.9%, respectively). Competitive employment rates were also lower for Hispanics (33.3%) and for American Indians (10%). The majority (57.9%) of staff respondents indicated that services to consumers with diverse racial or ethnic backgrounds was a critical (31.6%) or moderate (26.3%) need for improvement.

Across multiple data sources, there were indications that improvement of services to non–English speaking individuals is needed. Those of Hispanic origin were under–represented in percentages who received services by NCBVI compared to the percentages of their population in the state. Key informants and staff respondents indicated that there are various barriers associated with serving non–English speaking consumers. These issues included cultural barriers, language or communication issues,

and outreach concerns. Improving the availability of materials for non-English speaking consumers was indicated as either a critical or moderate need by 73.7% of staff respondents. Staff and key informants suggested that the use of local translators can create a perceived threat to confidentiality among non-English speaking consumers, especially in small communities. One recommendation provided was to contract with non-local translators by phone when possible. Another respondent suggested that specific steps need to be taken beyond what is outlined in the Minority Outreach Plan. Suggested actions to potentially improve services include making all materials and outreach brochures available in Spanish and reaching out to communities to learn about cultural issues that may discourage individuals from contacting the Commission.

Employment-related Assistance.

Employment-related assistance was another area of need identified by several data sources. This was one of the most common rehabilitation needs identified by key informants, for all people who are blind or visually impaired and for those with the most significant disabilities. Consumers indicated a remaining need, after receipt of services, for many employment-related services. The services included assistance with finding a job (39.3% reported still needing help in this area), finding job leads or contacting employers (38.5%), assistance working with employer to provide accommodations (34.8%), filling out a job application (33.3%), exploring career options (26.7%), support from counselor to raise career expectations (24%), improving interview skills (21.4%), and guidance in developing a resume (11.8%). More than one quarter of the consumer respondents (28.2%) indicated that they did not achieve their employment goal. However, it is relevant to note that when reporting on barriers experienced to employment, the top five barriers identified are not things that can be directly influenced by the agency.

Several items on the staff survey addressed employment-related services. The two items that were identified as having the greatest needs were Improving placement services by developing and strengthening relationships with employers and community organizations and improving services that enable consumers to learn more about career options (both identified by 84.2% of staff as a moderate or critical need). Also considered a moderate or critical need by most staff were improving job placement services to help clients find or maintain employment (78.9%) and improving training for consumers on job seeking skills (68.4%). Some suggestions related to improving services in these areas were: doing more on-the-job training, use of professionals to help with career exploration, use of career assessments, providing more opportunities for bringing employers and job-ready consumers together, all staff being involved in networking with employers, and having one staff person in each district specialize in placement activities.

Assistive technology.

Training in assistive technology, including computer assistive technology, was the highest area of need reported by consumers in their survey. After completing their

rehabilitation programs, a number of consumers reported a remaining need for training in this area. Of the people who reported that they initially needed the service, 20.8% (n=11) for assistive technology and 14.8% (n=8) for computer assistive technology reported still needing the service after completion of their programs. Four of the seven consumers who indicated a remaining need after services (to the open-ended question) indicated a need in this area. In addition, 33.3% of employers who completed the survey indicated that providing assistance with assistive technology would help them in hiring or retaining people who are blind or visually impaired, and two key informants identified assistive technology as an important rehabilitation need.

Most staff also considered items associated with improving assistive technology to be important needs. Improving the assistive technology training to consumers was rated the second highest in terms of critical need (36.8% of staff rated as critical and 42.1% rated it as a moderate need). A large majority of staff (84.2%) also believed that offering more in-service training for staff who provide assistive technology to consumers and providing more assistive technology support to employers were moderate or critical needs. Staff provided several suggestions for improving services related to assistive technology. Several recommended additional, ongoing training in use of assistive technology for all staff (not just the tech staff). Two suggested group training classes for consumers. One suggested that better teamwork was needed between VR/OC counselors and technology staff.

Partnering with Other Organizations across multiple data sources, many respondents suggested that several needs could be addressed by partnering with other agencies and organizations. According to respondents, collaboration with resources external to NCBVI has the potential to address several issues, particularly those related to expertise and funding constraints. Staff members and key informants suggested partnering with other agencies, consumer groups, and experts to improve service to those with multiple disabilities by providing staff training, learning from successful organizations, and sharing costs and caseloads. Specifically, some individuals suggested partnering with experts in mental health, memory loss, and brain injury associations.

Respondents suggested that partnering with organizations would also improve services to other special populations such as the older blind, transition age youth, non-English speaking consumers, and those living in rural areas. For example, key informants suggested that NCBVI could better serve older blind consumers, by reaching out to senior centers, community centers, the Department of Aging, and state independent living centers. Respondents also suggested that partnerships should be established with schools and educators beginning as early as pre-school, with direct communication with TVIs, which would develop better relationships to later serve transition-age youth.

In addition to these partnerships, some respondents noted the benefits of strengthening partnerships with community organizations, non-employment related agencies (such as housing, transportation, and Medicaid), advocacy groups, the Nebraska Partner

Council, and low vision clinics. Most respondents suggested that partnering with other organizations is a viable way to better serve hard to reach consumers and to improve services with limited funding. Some respondents suggested that partnering with agencies in rural areas, or hiring paraprofessionals, would improve outreach and services to those living in those communities. Collaboration with other agencies was also suggested as one way to improve services to non-English speaking consumers by learning how cultural and language barriers are being addressed by other community agencies. While most respondents were in favor of improving and developing partnerships, one individual cautioned that “sometimes too many agencies working together can create delays and miscommunication.”

Services for Consumers in Rural Areas.

A large majority of staff indicated that enhancing services in rural areas was either a moderate (47.4%) or critical (42.1%) need, making it the most critical area for improvement of all items on the staff survey. In addition, one key informant stated that reaching consumers in rural areas is a problem. However, analyses with RSA-911 data did not indicate a significant difference in acceptance rates or competitive employment rates based on rurality. Though not significantly different, highest acceptance and competitive employment rates were among those living in rural areas (86.8% and 50% respectively), while those living in urban areas had the lowest acceptance and competitive employment rates (75.2% and 45.3% respectively). To evaluate whether people living in rural areas might be underserved (under-represented), percentages of consumers served in rural, urban, and metro areas were compared to percentages for the entire population of the state, and no differences were found.

Despite lack of evidence from secondary data sources (RSA-911 and state population data), staff and one key informant perceived services to consumers in rural areas to be an important area needing improvement. A variety of suggestions for improving services to consumers in rural areas included increasing outreach efforts in these areas, increasing presence by providing more counselors and visits to clients in those areas, promoting self-employment, and partnering with other agencies or contracting with professionals within rural communities.

NCBVI has studied and assessed these research findings in conjunction with other methods for gathering data in the establishment of priorities for improving VR services to blind and visually impaired individuals and in the consideration of future practice and policy.

As noted above, NCBVI will be switching to a new, more comprehensive client data management system. This will enable us to achieve our goal to improved quality assurance with a systematic assessment of progress of all aspects of service delivery. The system will be customized to our environment and fine-tuned to provide the data-analysis components which we will find most useful in the future.

Work to implement a new database management system will address all four goals and enable NCBVI to analyze the effectiveness of all parts of the client services system. We can then use the data based results to add value to our overall efforts, achieve established goals, and to identify future needs and challenges.

2. *An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must: (NCBVI)*

A. Identify the strategies that contributed to the achievement of the goals. (NCBVI)

The primary goal for the SE Program is to develop supported employment opportunities for persons who experience a significant secondary disability (i.e., developmental disability, acquired brain injury, mental illness, or other significant disability limiting a person's ability to maintain competitive employment without ongoing support).

An agreement with the Nebraska Health and Human Services System provides the expertise and resources, including ongoing support, to develop and sustain individualized services. Each individual with a developmental disability has a case manager service coordinator, employed by the Nebraska Health and Human Services, Division of Developmental Disabilities (NHHS–DDD). The case service coordinator is responsible for developing an Individual Service Plan (ISP) for each client. When supported employment services are involved, NCBVI provides incentive payments at specific intervals (start of job search, start of employment, stabilization, maintenance, and start of long-term support.). This arrangement is in accordance with the “milestones” model used by Nebraska VR General to serve mutual clients interested in supported employment services shared with NDHHS–DDD.

Blind and visually impaired individuals with mental health issues, acquired brain injury, or other significant disabilities with onset of disability occurring after the age of 21 may also be candidates for SE services , and NCBVI is exploring ways to expand SE opportunities with these individuals through partnerships with relevant state agencies and non–profit SE service providers.

NCBVI works to enhance the potential to achieve employment outcomes in cases that often require maximizing resources and creativity. SE funds are utilized for training of clients who are Deaf–Blind or have other multiple disabilities. As appropriate, some clients are referred to the Helen Keller National Center (HKNC) for intensive training, not available in Nebraska. In recent years, there have been more Deaf–Blind individuals who have personal goals to become employed, who qualify for Supported Employment and for whom Supported Employment is indicated. In addition to the actual job coaching and ongoing supports, it is crucial for such individuals to enhance their capabilities for productive lives.

B. Describe the factors that impeded the achievement of the goals and priorities. (NCBVI)

As outreach efforts are made to behavioral health agencies, resistance has been encountered to working with NCBVI. We believe that this is due in part to a general lack of understanding about NCBVI being the entity responsible for funding Supported

Employment services for the blind. That is, that NCBVI is the same as Nebraska VR General in this regard. We believe that ignorance and lack of information about blindness also contributes to the hesitation experienced by other human service professionals unfamiliar with blind people. Personnel from the Nebraska Mental Health Association met with Lincoln district counselors and toured the Nebraska Center for the Blind in 2016, and it is hoped that this will lead to more interaction between our two agencies. To that end, efforts to educate behavioral health and other human service professionals will continue.

3. The VR program's performance on the performance accountability indicators under section 116 of WIOA. (NCBVI)

Analyses of performance accountability indicators under section 116 of WIOA have not been completed. To date, the RSA Standards and Indicators have served as the performance measure by which the VR programs are judged. The most current reporting of achievement on Standards and Indicators gives the following results. Standard 1.1 Change in number of employment outcomes – must be greater than or equal to zero. NCBVI: Plus 68. Passed. Standard 1.2 Percent employed – must be greater than or equal to 68.9%. NCBVI: 58.66%. Not passed. Standard 1.3 Employed competitively – % must be greater than or equal to 35.40%. NCBVI: 98.10%. Passed. Standard 1.4 Significant Disabilities achieving competitive employment outcomes – must be greater than or equal to 89%. NCBVI: 100%. Passed. Standard 1.5 Average hourly earnings – ratio must be greater than or equal to .59. NCBVI: 0.819. Passed. Standard 1.6 Self Support – % must be greater than or equal to 30.40%. NCBVI 33.01%. Passed Primary Indicators 1.3 through 1.5 – must pass 2 out of 3. Passed all three. Number of indicators 1.1 through 1.5 – must pass 4 of the 6. Passed five of the six. Standard 2.1 Minority ratio – must be greater than or equal to .80, except for low incidence populations where number served are less than N=100. Not applicable

4. How the funds reserved for innovation and expansion (I&E) activities were utilized. (NCBVI)

In FY 2017, NCBVI utilized I&E funds to install AWARE, a data management system produced by Alliance Enterprises, to replace eForce, the old, outmoded system.

q. Quality, Scope, and Extent of Supported Employment Services. (NCBVI)

Include the following:

1. 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. (NCBVI)

Supported Employment (SE) is an employment option available to individuals with the most significant disabilities receiving services from NCBVI. An individual with the most significant disability is defined in rule (Title 192 Nebraska Administrative Code, Chapter

1) as an individual with a severe visual impairment or combination of visual, physical, or mental impairments which profoundly limits one or more functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome; and an individual whose vocational rehabilitation can be expected to require extensive or intensive SE services.

NCBVI provides financial support of SE services using Title IV Subtitle G funds only if the placement is expected to meet the following conditions:

- The placement is community-based.
- The consumer is integrated into the workforce with other non-disabled individuals.
- The consumer earns minimum wage or better.
- The need for ongoing support is expected to continue indefinitely.

NCBVI works in partnership with the Department of Health and Human Services—Division of Developmental Disabilities (NDHHS—DDD) in the provision of SE services to blind and visually impaired individuals with developmental disabilities. Each individual with a developmental disability has a case service coordinator, employed by NDHHS—DDD. The case service coordinator is responsible for developing an Individualized Service Plan (ISP) for each client. When supported employment services are involved, NCBVI provides incentive payments at specific intervals (start of job search, start of employment, stabilization, maintenance, and start of long-term support.). This arrangement is in accordance with the “milestones” model used by Nebraska VR General to serve mutual SE clients shared with NDHHS—DDD.

NCBVI collaborated with the Department of Education, Special Education and Vocational Rehabilitation in the development of policies and procedures more clearly delineating the responsibilities of the different agencies and institutions involved and the scope and nature of services available to younger persons with disabilities in transition from school. The Collaborative Agreement between NCBVI, Department of Education/Special Populations, and the Nebraska Center for the Education of Children who are Blind or Visually Impaired, applies to persons who are likely to require supported employment in the future, as well as those students without this need. Particular emphasis is placed on the provision of pre-employment transition services for blind and visually impaired students in need of SE services between the ages of 14 and up to but not including the age of 22.

Collaborative working relationships with state agencies and service providers are currently being explored to extend SE service opportunities to blind and visually impaired consumers with acquired brain injury, mental health conditions, autism, or other significant secondary disabilities. These agencies or service providers include The Nebraska Department of Behavioral Health, the Nebraska Mental Health Association, and Autism Center of Nebraska.

A small number of blind and visually impaired consumers with significant, non-developmental secondary disabilities occurring after age 21 might benefit from SE services. Generally, however, if the individual has a secondary disability other than a

significant behavioral health condition or autism, there may not be a source of ongoing financial support for SE services extending beyond the time allowed for NCBVI support. In such cases, the Deputy Director of Services and the immediate supervisor of field services works with the NCBVI Counselor involved to identify possible resources for the ongoing support, such as developing a PASS (Plan to Achieve Self Sufficiency) or personal resources. The Deputy Director also provides statewide training and information to NCBVI personnel regarding the SE program.

NCBVI has service contracts with a number of providers in the Nebraska Developmental Disabilities system and with private providers of job coaching and related services. Contracts are developed on behalf of individuals with the most significant disabilities with both private and public providers who are actively seeking suitable work placements for them in integrated settings. The total amount of Title IV Subtitle G funds that we project to expend in FY 2016 is \$30,000. We expect to provide SE services to approximately 75 clients in FY 2018.

2. The timing of transition to extended services. (NCBVI)

NCBVI Supported Employment clients are transitioned to extended services provided by other public agencies, non-profit organizations, employers, natural supports or other entities after no longer than 24 months, or 48 months for blind or visually impaired youth after placement in Supported Employment, unless a longer period is set forth in the IPE. The transition to extended services is based upon a) substantial progress made toward hours per week goal in the IPE, b) the client is stabilized on the job, and c) that extended services will be available and provided without a break in services.

Certifications (NCBVI)

Name of designated State agency or designated State unit, as appropriate

- **Nebraska Commission for the Blind and Visually Impaired**

Name of designated State agency

- **Nebraska Commission for the Blind and Visually Impaired**

Full Name of Authorized Representative

- **Carlos Servan**

Title of Authorized Representative

- **Executive Director**

States must provide written and signed certifications that:

1. The **designated State agency or designated State unit (as appropriate) listed above** is authorized to submit the VR services portion of the Unified or Combined State Plan under title 1 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA*, and its supplement under title VI of the Rehabilitation Act.** **Yes**
2. 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 listed above** agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under section 111 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; **Yes**
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 agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan*, the Rehabilitation Act, and all applicable regulations, 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; **Yes**
4. The designated State agency and/or the designated State unit 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; **Yes**
5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. **Yes**

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. **Yes**
7. The **Authorized Representative listed above** 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;. **Yes**
8. The **Authorized Representative listed above** has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services. **Yes**
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. **Yes**

Footnotes (NCBVI)

Certification 1 Footnotes

* Public Law 113-128.

** Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

Certification 2 Footnotes

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

** No funds under title 1 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.

*** 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 3485; and the State VR Services Program regulations.

Certification 3 Footnotes

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

** Applicable regulations, in part, include the citations in *** under Certification 2 footnotes

Additional Comments on the Certifications from the State (NCBVI)

None

Certification Regarding Lobbying — Vocational Rehabilitation (NCBVI)

Certification for Contracts, Grants, Loans, and Cooperative Agreements – The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance (NCBVI)

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization

- **Nebraska Commission for the Blind and Visually Impaired**

Full Name of Authorized Representative

- **Carlos Servan**

Title of Authorized Representative

- **Executive Director**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>). If applicable, please print, sign, and email to MAT_OCTAE@ed.gov

Certification Regarding Lobbying — Supported Employment (NCBVI)

Certification for Contracts, Grants, Loans, and Cooperative Agreements – The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance (NCBVI)

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization

- **Nebraska Commission for the Blind and Visually Impaired**

Full Name of Authorized Representative

- **Carlos Servan**

Title of Authorized Representative

- **Executive Director**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>).

Assurances (NCBVI)

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 of the Rehabilitation Services Administration (RSA), 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 State Plan must provide assurances that:

1. Public Comment on Policies and Procedures: (NCBVI)

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: (NCBVI)

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 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: (NCBVI)

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

- a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act. (NCBVI)
- b. the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. (NCBVI)

The designated State agency or designated State unit, as applicable: **(A) is an independent State commission**

- 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. (NCBVI)
- 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). (NCBVI)
- e. 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. (NCBVI)

The designated State agency allows for the local administration of VR funds **No**

- f. the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. (NCBVI)

The designated State agency allows for the shared funding and administration of joint programs **No**

- g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. (NCBVI)

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan **No**

- h. the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act. (NCBVI)
- i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act. (NCBVI)
- j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act. (NCBVI)
- 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. (NCBVI)
- 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. (NCBVI)
- m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act. (NCBVI)

4. Administration of the Provision of VR Services: (NCBVI)

The designated State agency, or designated State unit, as appropriate, assures that it will:

- a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act. (NCBVI)**
- 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. (NCBVI)**
- 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 in accordance with section 101(a)(5) of the Rehabilitation Act? (NCBVI)**

Agency will provide the full range of services described above

Yes

- d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act. (NCBVI)**
- e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act. (NCBVI)**
- 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. (NCBVI)**
- 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. (NCBVI)**
- 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 section 101(a)(14) of the Rehabilitation Act. (NCBVI)**
- 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 (NCBVI)**
- j. with respect to students with disabilities, the State,**
 - i. has developed and will implement,**
 - a. strategies to address the needs identified in the assessments; and**
 - 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

- ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).

5. Program Administration for the Supported Employment Title VI Supplement: (NCBVI)

- 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. (NCBVI)
- 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. (NCBVI)
- c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act. (NCBVI)

6. Financial Administration of the Supported Employment Program: (NCBVI)

- 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)(G) and (H) of the Rehabilitation Act. (NCBVI)
- b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act. (NCBVI)

7. Provision of Supported Employment Services: (NCBVI)

- a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act. (NCBVI)**
- b. The designated State agency assures that:**
 - i. 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**
 - ii. 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)(6)(C) and (E) of the Rehabilitation Act.**

Additional Comments on the Assurances from the State (NCBVI)

None