

## **Attachment 4.10: Comprehensive System of Personnel Development**

The Designated State Agency, Nebraska Commission for the Blind and Visually Impaired (NCBVI) has established policies, procedures and activities to maintain a comprehensive system of personnel development. These mechanisms are designed to ensure an adequate supply of qualified rehabilitation professional and paraprofessional personnel for the Designated State Agency.

### State Personnel Standards for Counselors

Nebraska statute establishes a State Certification for Vocational Rehabilitation Counselors for the Blind. This law is the highest standard for the discipline of rehabilitation counseling for the blind in Nebraska.

Certified Vocational Rehabilitation Counselor for the Blind means 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 means 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 at the NCBVI Orientation Training Center; and (c) to have completed appropriate continued education training credits as approved by the NCBVI Executive Director.

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 their new position. This training provides an orientation to the agency's understanding of blindness and the strategy of service delivery that grows out of that understanding. The training includes reading and discussion of various articles and documents in the blindness field, and skills training in non-visual techniques and technologies through hands-on experiences. When possible, paraprofessional or support personnel receive four to six weeks of intensive pre-service training.

Following Center Training, newly hired rehabilitation personnel continue with two to three months involving 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 and plan for individualized training. The goals include activities to enhance abilities in blindness skills or to refresh philosophical concepts, as well as 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.

#### Extent to Which Counselors Meet the Standard

Our annual collection and analysis of data on qualified personnel needs and personnel development reveals the following data.

NCBVI staffing complement totals fifty-one FTEs, with forty-seven full-time staff persons and four permanent part-time. Fourteen are vocational rehabilitation counselors, including two field supervisors; fifteen are rehabilitation teachers; three are program specialists in technology; eight are vocational rehabilitation technicians. There are also eight administrative and support personnel. The Business Enterprise program consists of three positions.

All the NCBVI Vocational Rehabilitation Counselors meet the state standard by having achieved Certification as a Certified Vocational Rehabilitation Counselor for the Blind. Eight staff members hold graduate degrees of a masters or higher.

#### Staffing Levels and Projections

We project the number of applicants for vocational rehabilitation services and eligible individuals to be served by VR during FY 2009 to total 700. The ratio of applicants and eligible individuals served to all personnel will be 13.7 to 1. The current staffing level does enable NCBVI to provide core services to customers. When the numbers of referrals increase, we work to find ways to effectively streamline our processes to enable us to continue meeting customer needs.

#### Identified Factors that Inhibit Ability to Hire Qualified Staff

The State law establishing standards for Certified Vocational Rehabilitation Counselor

for the Blind enables NCBVI to hire and maintain qualified staff. This is especially important because there is no Master's degree program in Rehabilitation Counseling within Nebraska. We almost never have job applicants who have their CRC, and rarely have applicants with the MS in Rehabilitation Counseling specifically. There is no need for a personnel development data system, since 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)].

### Objectives & Activities for Achieving the Plan

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. In addition, 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.

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. We work to 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.

### Resource Plan

Funds from several segments of the NCBVI budget are committed to developing personnel, including funding the intensive Center training, as well as tuition and related expenses for expanding the capacities of NCBVI staff. The In-Service Training Grant will assist in accomplishing CSPD Objectives. It will be utilized to increase the skills and competencies of all staff, particularly in areas such as job development and job placement that directly relate to goals and priorities of the Workforce Investment Act and other issues related to delivery of vocational rehabilitation services in general, and for the blind, in particular.

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 will include:

- Relevant laws and regulations, including the Rehabilitation Act and the Workforce Investment Act
- methods to help clients achieve successful employment in high-quality positions with benefits and opportunities for advancement
- using data to measure success of concentrated efforts for achieving goals of high quality employment outcomes
- ways to work effectively with the increasing number of older individuals who are losing vision but still wanting to be a part of the workforce
- assistive technology, including low vision options
- maximizing effectiveness in the group training or counseling setting
- Social Security information, including PASS plan development
- supported employment
- workplace policies
- philosophical and positive understandings of blindness
- diversity awareness and sensitivity training
- multiple disabilities, including deaf-blindness
- relevant issues which may not be within the scope of services, e.g. transportation

The long-range plan for ongoing development of staff is based upon needs identified by the Comprehensive Statewide Needs Assessment conducted in 2007 by Mississippi State University. The plan is updated and kept current with ideas or issues identified from ongoing client satisfaction surveys, employees' requests for additional training on specific topics, analyses of agency performance on the RSA Standards and Indicators and internal data collection from the NCBVI data management system. It is also a result of priorities established by the Workforce Investment Act and the 1998 Amendments to the Rehabilitation Act.

### Evaluation

The evaluative segment of the plan is both quantitative and qualitative. We track the training sessions attended by all NCBVI staff members and the costs for such training (including registration, tuition, books/materials, lodging, transportation, and related costs). Individuals are asked for their assessment of the value of each event. They also provide reports and share resource materials with other NCBVI staff members, thus expanding the value of each training event to others not able to attend.

## 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 utilizes the Department of Administrative Services' Division of Personnel Affirmative Action resource bank, a database record of members of the four protected groups who are seeking employment or advancement within the State of Nebraska. We also 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.

## Coordination 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 coordinates a 'Transition Team' comprised of personnel from vocational rehabilitation for the blind and from the educational system, professionals from related entities, and blind consumers. The Team addresses topics of mutual concern for all ages (birth through graduation or 21). A recently developed work-product establishes Protocol for educators and NCBVI counselors, for providing high quality services to blind and visually impaired children and youth in Nebraska.

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. The Transition Team is in the process of planning a series of personnel training sessions relating to the Protocol. The training will be developed and provided by coordinated effort between NCBVI and personnel covered by IDEA.

Additional joint personnel development efforts are held when specific issues of mutual concern are identified. For example, Vision Teachers of the public school system provide presentations to NCBVI at Staff Meetings. NCBVI staff members provide presentations to training session of the school system, university and college classes, and other opportunities which arise.

## **Attachment 4.11(e)(2): Evaluation and Reports of Progress in Achieving Identified Goals & Priorities, and Innovation and Expansion Activities**

### Mission, Goals, and Priorities

The mission of Nebraska Commission for the Blind and Visually Impaired (NCBVI) is “Empowering Blind Individuals, Promoting Opportunities, and Building Belief in the Blind.” Our 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 employment (including supported employment). Our 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.

NCBVI goals are based on factors identified through analysis of the comprehensive statewide assessments, both the contracted research project and the ongoing public forums, as well as the federal standards and indicators.

1. Increase the number and percentage (to 68.9%) of clients achieving full-time (31+ hours per week) competitive employment outcomes.
2. Increase the ratio of average hourly earnings of clients who become employed compared to average earnings in the state, to at least .70.
3. Increase the rehabilitation rate for transition aged clients, from 29.20% to 35%.
4. Improve the quality assurance system.

To achieve the goals and priorities of achieving high-quality successful employment for clients, we are using many creative approaches. Each situation is individualized, thus the strategies and solutions for each client is unique. This approach is productive in itself. It also 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.

The overall priority of high-quality employment includes the “traditional” working age client, persons in transition from school to work, persons with multiple disabilities (e.g. Deaf Blind) or other special needs (e.g. Supported Employment candidates). Older applicants or persons who express interest in NCBVI’s Independent Living programs are encouraged to explore vocational rehabilitation in addition to IL services.

When competitive employment without ongoing support is not an option, particularly for individuals with developmental disabilities in addition to blindness, supported

employment is explored as an option that may be more conducive to that person. There are also some persons who could benefit from ongoing support, but who do not have developmental disabilities. For the most part, these individuals have traumatic brain injuries or mental health issues with the onset of disability occurring after age 21. NCBVI works to enhance the potential to achieve employment outcomes in many cases which often require maximizing resources and creativity.

Overall, each individual is encouraged to examine whether, if not for a visual impairment, 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 does lead to employment goals for individuals who otherwise would not have believed it possible.

Every year, NCBVI evaluates 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 we collaborate. Most importantly, service recipients are asked for their evaluation of services provided at several stages as detailed in Attachment 4.11(a). We gather identified needs of Nebraskans who are blind or have visual impairments on a statewide basis through our public forums and meetings, our surveys of clients after completion of Center training, after case closure, and changes at status 10, 18, and 20. We have ongoing communication with our consumer-controlled Governing Board of Commissioners and our accessible website. We also contracted for a comprehensive statewide needs assessment research project which was completed in 2007. We have been working with the results during FY08 to determine how best to address identified needs and modify procedures for the future.

During fiscal year 2009, NCBVI will begin the use of a comprehensive client information system. This will enable us to achieve our goal of improved quality assurance with a much more systematic assessment of progress of all aspects of service delivery. The system is being customized to our environment and fine-tuned to provide the data-analysis components which we will find most useful during future years. This process has taken much longer than anticipated, due mostly to factors beyond our control. We fully expect to 'go live' with the system on October 1, 2008.

#### Extent to Which Vocational Rehabilitation Program Goals are Achieved

The system of Standards and Indicators established by RSA is the benchmark we have used to measure the extent to which our program goals were achieved and as a result, the effectiveness of our program. The following are results of our status in meeting those parameters for quality vocational rehabilitation services to blind and visually impaired Nebraskans.

Standard 1.1: Change in number of Employment Outcome - Difference must be greater than previous year. In 2006 NCBVI had 153 closures with employment outcomes; 2007 data show 128 closures with employment outcomes. The difference is 25 less than the previous year. NCBVI did not pass this standard. The decrease was a result of concentration on high quality outcomes, resulting in fewer individual competitive closures. We are working to increase the number of employment outcomes during the coming year, in addition to emphasizing high quality employment outcomes.

Standard 1.2: Percentage of persons receiving services who become employed must be 68.9% or better. For 2007, 128 of 237 individuals served achieved employment outcomes, or 54.01%. This result was below the standard. We are working to assure that a higher percentage of people served do achieve quality employment outcomes. We will also examine the factors involved with the standard, to identify trends that might be impacting the outcomes as well as to strengthen our ability to help individuals achieve their employment goals.

Standard 1.3: Percent of Employment Outcomes that were Competitive Employment. The percentage must be 35.40% or better. In 2007, total Competitive Closures equaled 128, or 84.38%. NCBVI achieved nearly two and a half times the required level and also exceeded the percentage level from previous years, thus passing the standard. Continuing with this strong focus on competitive outcomes will help to assure that we pass the standard during the next year, so that the clients we serve will continue to obtain competitive jobs.

1.4: Significant Disabilities served from NCBVI was 100%. The level required is to serve at least 89% with significant disabilities. This standard was passed, as it has been every year since the standards and indicators were implemented. The nature of our clientele is that nearly all blind or visually impaired persons qualifying for vocational rehabilitation services do usually have significant disabilities.

1.5 Average Hourly Earnings: Ratio must be .59 or better. In 2007, the average hourly wage for NCBVI clients achieving competitive employment outcomes was \$12.19; the weighted average hourly wage in Nebraska was \$16.40. Wages earned by our clients in 2007 were \$.98 per hour higher than in 2006. The ratio of wages earned by NCBVI clients, compared to the average in the state, was .743. NCBVI did pass this standard, well above the required ratio. We will continue to work with clients and employers to assure that the outcomes achieved are high quality job placements, with good wages or salaries.

1.6 Self Support at Closure compared to Application: Percentage must be 30.4% or better. For 2007, of the 108 with Competitive Employment Outcomes, 38 had been primarily self-supporting at application; 86 were self-supporting at closure.



The difference between the percent self-supporting at closure and at application was 44.44%. This did pass the standard and was also higher than the previous year. We will continue to emphasize the importance of achieving job placements which help individuals to become self-supporting as a result of the newly achieved earnings.

2.1 Minority Ratio - all agencies must attain a ratio level of .80. The NCBVI ratio for 2007 was .925, above the required standard. NCBVI served more than 117 individuals from a minority background during 2007. We will continue to implement procedures to ensure that individuals with disabilities from minority backgrounds have equal access to VR services. Our statewide plan for outreach and tracking is specific to each geographic area, targets the minority populations present in each area, and indicates frequency and specific type of contact which will occur for each identified group, organization, or other community resource relevant to the target populations. Reports are reviewed by a NCBVI Deputy Director every six months. If any follow-up is needed, he takes the steps necessary to assure that the plan is implemented systematically. The process is repeated as necessary.

#### Additional Evaluation Processes

Ongoing communication between NCBVI client and NCBVI counselor provides an informal mechanism for evaluation. Counselors are trained in working with clients to be receptive to changes that need to be made in order to better meet the needs of individuals. Caseload reviews between Counselors, Supervisors, and Administrators (the Deputy Directors in charge of Vocational Rehabilitation and Independent Living services) provide a vehicle for additional evaluation and input regarding services delivered. Ideas from the discussions often impact the direct service offered, improving the likelihood of achieving goals and priorities, and accomplishing positive outcomes for clients.

NCBVI obtains data on level of satisfaction with services from individuals closed from Vocational Rehabilitation services through telephone interviews. We contract with an outside person who conducts the interviews at status 10, 18, 20, and four months after closure in statuses 26, 28, and 36. Calls are made to all clients at 18 and 28; randomly to the remaining clients.

A satisfaction survey is sent in Large Print format to all Independent Living clients, upon case closure. The surveys go to IL clients under age 55, as well as to clients of the Older Blind Program, over age 55. These are returned to us on a voluntary and anonymous basis, unless the respondent chooses to self-identify. Generally, responses are positive. When there are specific issues mentioned, the Deputy Director follows up to resolve the issues involved. In these cases, it is not unusual for the individual to list his/her own name or to identify the staff person involved. If no name is given, but negative comments are made, we discuss the issue with supervisors and remind

counseling staff of issues to which they need to be sensitive. This allows us to make changes if needed to facilitate better services in the future.

Another assessment procedure has been initiated in the past few years. NCBVI operates an Orientation and Training Center providing intensive training in the skills of blindness and attitude adjustment for building self-confidence. Many clients from across the State come to the Center for this training. Three months after students leave the Center, they receive a telephone call and are asked to answer questions related to Center training. This occurs whether or not the individual completes the training.

In some cases, a student may leave because of health or other personal reasons. The Deputy Director of Vocational Rehabilitation Services trains objective interviewers who conduct the telephone interviews. Results of each interview are provided to the Center Director who then changes the client name to a code number and forwards the results to Center Staff, the Executive Director of NCBVI, and to the Board of Commissioners.

These interviews have proven to be a very useful tool for assessing a major component of our overall service system. In addition to evaluating our Center program, comments sometimes relate to Field Services which individuals receive in preparation for attending the Center, or which occur during the months following training. The interviewee is assured that comments will be held in confidence. Much of the feedback is very positive regarding the productive impact felt as a result of attending the Nebraska Center for the Blind. The more negative comments have included the need for more one-on-one training or are specific to the student's personal expectations and needs. When trends are noticed or issues of concern are raised, we discuss the issue with the Center Director and find ways to revise our approach so that services continue to be improved.

During FY07, NCBVI contracted with Mississippi State University for a research study which assessed the comprehensive needs of blind and visually impaired consumers in Nebraska. The study surveyed NCBVI clients who were closed during FY06 in status 26 and status 28. It also surveyed all open clients in the Transition Age Group, from age 19 to 26. Age 19 is the legal age of adulthood in Nebraska; for research purposes, the study deals with adults only. Finally, a staff survey component obtained data about the needs identified by rehabilitation professionals employed by NCBVI. The study was completed at the end of FY 2007. During FY08, the findings have been analyzed and discussed. During FY09, we will incorporate the findings into the service plan to address themes identified. The issues were discussed in small groups and with all staff during a State Staff Meeting in April 2008. Ideas were generated for ways to enhance our services to achieve better and more individualized outcomes. The planning process will be continued in District and Management meetings. Each rehabilitation team will work to assure consideration of the issues raised in work that they do with each client and the Individualized Plan for Employment.

## Extent to Which Supported Employment Goals are Achieved

The primary goal for our Title VI-B Program is to develop supported employment situations for persons who experience the additional involvement of a developmental disability. A system is in place within the Nebraska Health and Human Services System to provide the expertise and resources, including ongoing support, to develop and sustain individualized services.

During FY07, the majority of VI-B funds were utilized for training of a client who is Deaf-Blind. We were able to send him to the Helen Keller National Center (HKNC) for intensive training. The training proved to be successful for him to acquire skills and techniques which could not have been provided in Nebraska. Due to other factors, primarily the failure of his family support system and health issues, the individual was not able to achieve his goals for supported employment.

Despite this experience, it has been successful to observe the benefits to be gained from utilizing HKNC as a resource for training. We are seeing 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 on going supports, it is crucial for such individuals to enhance their capabilities for productive lives.

## Innovation and Expansion

Each fiscal year, a percentage of Title I funds are used to develop and implement innovative approaches to expand and improve services, particularly to transition aged individuals who are blind, deaf-blind or have multiple disabilities. During FY 2007, Innovation and Expansion funds were allocated for a Mentoring Project. Clients of transition age were matched with adult blind mentors. Activities of the project enabled the youth to expand their horizons in many ways. The participants took part in confidence-building events and developed relationships with each other (mentees and mentors) which are expected to have a long-lasting impact on the young clients.

Qualitatively, it is clear that the youth became much more confident and focused upon a future of employment and self-sufficiency. In other words, their personal expectations were elevated significantly. They also developed many skills needed for future successes. The quantitative assessment is not yet available. Louisiana Tech University is documenting the results of the three year, three states project. After October 1, 2008, Louisiana Tech will conduct statistical analyses of the compiled data and will provide results of the project.

During the upcoming fiscal year, Innovation and Expansion funds will be used to further our ability to manage data systematically. We expect to go live with 'eForce,' our new

data management system, on October 1, 2008. We will hold training sessions for NCBVI personnel to operate the system, both inputting data and running reports. There will also be additional programming efforts needed. As with any data management system, facets needing to be fine tuned will become evident after we are using it. The programming and training costs will be funded with Innovation and Expansion funds.

We expect that ramping up such efforts will result in achieving our goals:

1. to increase the number and percentage of clients achieving full-time competitive employment outcomes;
2. to increase the ratio of average hourly earnings of clients who become employed compared to average earnings in the state; and
3. to increase the rehabilitation rate for transition aged clients.
4. Improve the quality assurance system.

Our work to implement the new data management system will address all four goals. 'eForce' will enable us to analyze the effectiveness of all parts of our 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.