DEPARTMENT ON DISABILITY SERVICES

PUBLIC NOTICE FOR COMMENTS ON MODIFICATIONS TO THE DISTRICT OF COLUMBIA'S WORKFORCE INNOVATION AND OPPORTUNITY ACT UNIFIED STATE PLAN FOR PY 2024-2027

In accordance with the requirements in 34 C.F.R. § 361.135(c), and in its capacity as the Designated State Agency (DSA), the District of Columbia Department on Disability Services (DDS) is seeking public comments on proposed modifications to the Program Specific Requirements for Vocational Rehabilitation, Section L, State Goals and Priorities, as set forth in the District of Columbia's Workforce Innovation and Opportunity Act Unified State Plan for PY 2024-2027.

DDS, by and through its Rehabilitation Services Administration (DCRSA) provides vocational rehabilitation services, independent living services, and supported employment services to eligible District of Columbia residents with disabilities to prepare for, secure, retain, regain or advance in employment consistent with the person's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice in accordance with the Department on Disability Services Establishment Act of 2006, effective March 14, 2007 (D.C. Law 16-264; D.C. Official Code § 7-761.01 et seq. (2018 Repl.)), the Rehabilitation Services Program Establishment Act of 2004, effective April 12, 2005 (D.C. Law 15-332; D.C. Official Code § 32-331 et seq. (2019 Repl.)), and federal law. At a meeting with the State Rehabilitation Council (SRC) on January 9, 2025, the DSA Director presented the results of the 2023 Comprehensive Statewide Needs Assessment (CSNA), which had been completed in September 2024. The full report was provided to all SRC members and is available on the agency's website. In addition, on January 24, 2025, the DSA Director provided an overview of the findings and recommendations from the CSNA at the agency's regularly scheduled Community Forum. The goals and priorities for the Vocational Rehabilitation and Supported Employment program as set forth in the proposed modifications are based on information obtained in the 2023 CSNA and in response to both national and state issues, as mandated by Section 105 of the Rehabilitation Act of 1973, as amended. The goals and priorities were developed, reviewed, and approved by DCRSA and the SRC, and have been shared with DCRSA staff, providers and community stakeholders to seek their input.

Comments on these proposed modifications to the goals and priorities for the Vocational Rehabilitation program in the Unified State Plan for PY 2024-2027 must be submitted, in writing, to Andrew P. Reese, Director, D.C. Department on Disability Services, 250 E Street SW, 6th Floor, Washington, D.C. 20024, or by email to DDS.publiccomments@dc.gov, within thirty (30) days from the date of publication of this notice in the *D.C. Register*. Please reference "Modifications to WIOA Unified State Plan for PY 2024-2027" in your submission. A copy of the proposed modifications to the Unified State Plan can be found on the DDS website at www.dds.dc.gov.

L. STATE GOALS AND PRIORITIES

1. 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

The SRC has six scheduled meetings each program year. These sessions are public forums structured to gather information about the employment of persons with disabilities and how the Designated State Agency (DSA) is utilizing funds to accomplish its goals and objectives. The DSA provides information about services offered. Every effort is made to provide a variety of avenues for public input whenever issues, concerns, or policy changes are considered. DCRSA has an active policy committee that reviews and comments on proposed regulatory, policy and procedure changes, and reaches out to the SRC for feedback when needed. Effective December 2024, a fully constituted SRC was appointed by the Mayor. All members were sworn in and officers elected at the regularly scheduled SRC meeting on January 9, 2025. At this meeting, the DSA Director provided a presentation on the results of the 2023 Comprehensive Statewide Needs Assessment (CSNA), which had been completed in September 2024. The full report was provided to all SRC members and is available on the agency's website. In addition, on January 24, 2025, the DSA Director provided an overview of the findings and recommendations from the CSNA at the agency's regularly scheduled Community Forum.

The goals and priorities for the Vocational Rehabilitation and Supported Employment program set out below are based on information obtained in the 2023 CSNA and in response to both National and State issues, as mandated by Section 105 of the Rehabilitation Act of 1973, as amended. The focus of the goals and activities includes, but are not limited to, consumer satisfaction, statewide needs assessment, state plan and amendments, policy, extent/scope/effectiveness of services, interagency agreements, and District of Columbia employment programs. These goals were developed, reviewed, and approved by DCRSA and the SRC. These goals and priorities were then also shared with DCRSA staff, providers and community stakeholders to seek their input.

Goal 1: Increase the number of DC residents with disabilities who achieve quality employment outcomes in competitive integrated settings.

Objective 1.1: Increase outreach efforts, with a particular focus on ensuring accessibility of services for people identified as underserved or unserved in the 2023 Comprehensive Statewide Needs Assessments.

Strategies: DCRSA will:

- 1. Maintain an increased presence of bilingual Spanish speaking staff, consistent with 34 CFR 361.18 to support expansion of employment and career-exploration services to the District's Latino population who represent underserved and unserved residents of the District.
- 2. Maintain a sustainable presence of VR Specialists at all three American Job Center Locations, five days a week throughout the District with the addition of the employment coordinators stationed at the AJCs in Wards 7 and 8.
- 3. Ensure that intake appointments are offered at either DCRSA's office, one of the AJC locations or a community-based location.
- 4. Identify additional outreach sites in order to expand DCRSA's presence across all wards of the District.
- 5. Identify outreach sites in community-based organizations that serve immigrants from Asia/Pacific Islands, Ethiopia, Eritrea and Latin America, and people with physical and sensory disabilities.

- 1. DCRSA will maintain sufficient staff fluent in Spanish to assign a Spanish speaking VR Specialist to all limited English proficient or non-English proficient (LEP/NEP) Spanish speaking clients, consistent with the caseload standards included in the Comprehensive System of Personnel Development (CSPD).
- 2. VR services will be provided five (5) days per week at all American Job Centers.
- 3. When scheduling intake appointments, DCRSA staff will offer an appointment at a location in the community most accessible to a client's home.
- 4. DCRSA will expand its outreach and engagement to at least three (3) additional agencies based in Wards 7 and 8 and will establish an agreement to provide services at each location at least one (1) day per month.
- 5. DCRSA will re-establish its (MOA) with the National Rehabilitation Hospital.
- 6. DCRSA will expand its outreach and engagement to at least two (2) community-based agencies serving Ethiopian and Eritrean immigrants, two (2) serving immigrants from Latin America and will establish an agreement to provide services at each location at least one (1) day per month.
- 7. DCRSA will sponsor educational and informational activities in underserved and unserved communities.
- 8. DCRSA will develop and maintain flyers, brochures, and other printed materials in diverse languages.
- 9. DCRSA will expand its outreach and engagement to medical facilities that specialize with people with physical and sensory disabilities and will establish an agreement to provide services at least (1) day per month.

Objective 1.2: Increase the effectiveness of outreach efforts through ongoing evaluation of utilization of outreach sites to ensure that DCRSA staff are placed in the community where the need for VR services is highest.

Strategies: DCRSA will:

- 1. Assign VR supervisory staff to each quadrant of Washington, DC to be responsible for managing the relationship between DCRSA and the community-based agencies where outreach services are offered.
- 2. Track the number of referrals received and clients seen at each outreach site monthly.
- 3. Work with staff at the site to determine what marketing can be done to improve outreach or consider reducing or eliminating VR services in sites that appear to be underutilized.

Performance by June 30, 2024, and ongoing through June 30, 2028:

- 1. VR Supervisory Staff will conduct an annual review of all DCRSA Community Sites to evaluate the utilization of the site.
- 2. DCRSA will increase outreach sites in the community to at least 50% of the level that existed prior to COVID public health crisis (37 in 2018) by June 2026; to at least 75% of this level by June 2027 and to at least 100% by June 2028.

Objective 1.3: Increase the number of people who complete training programs that prepare them for jobs in high demand fields, increasing the number of employment placements in these fields. **Strategies:** DCRSA will:

1. Coordinate with the Workforce Investment Council (DCWIC) staff and the Department of Employment Services (DOES) staff responsible for approving and contracting with eligible training providers, to identify qualified providers in the identified growth industries in the District, including retail, transportation, hospitality, health care, IT, construction, and security.

- 2. Provide training to VR Specialists to ensure that they can use labor market information in assisting people to develop employment goals that are consistent with the person's strengths, needs, resources, abilities, capabilities, and prepares the person for work that is available in high demand fields in the District economy.
- 3. Track the number of people completing training programs in high demand fields.
- 4. Analyze employment rates for those completing training in high demand fields by training provider and by employment field.
- 5. Evaluate provider performance annually, including completion rates, employment rates and consumer satisfaction; and make this information publicly available.

- 1. DCRSA will obtain baseline data regarding performance outcomes for all current hospitality, health care, IT, construction, and security training providers with which it has agreements.
- 2. There will be an increase in the number of people served by DCRSA who complete training programs in identified high demand industries.
- 1. There will be an increase in job placements in high demand industries.

Objective 1.4: Increase the number of people with intellectual disabilities (ID) and serious mental illness (SMI) or substance use disorder (SUD) who obtain and maintain employment through better coordination of supported employment services with the Developmental Disabilities Administration (DDA) and the Department of Behavioral Health (DBH).

Strategies: DCRSA will:

- 1. Arrange with DBH to provide training for all VR Specialists regarding mental health and substance use treatment services available in the District.
- 2. Assign three VR counselors to work with people referred from DDA and three VR counselors to work with people referred from DBH.
- 3. Arrange with DBH to provide training for all VR Specialists regarding mental health and substance use treatment services available in the District.

Performance by June 30, 2026, and ongoing through June 30, 2028:

- 1. There will be at least 25 successful closures of people referred for supported employment services by DCDDA.
- 2. There will be at least 50 successful closures for people with serious mental illness (SMI) or substance use disorder (SUD) referred by DBH to DCRSA for supported employment services.
- 3. There will be no gaps in the provision of supported employment services when transitioning people from VR supported employment services to extended supported employment services through either DCDDA or DBH.
- 4. All people in transition will receive 90 days of extended services through DCDDA or DBH before their case is closed successfully by DCRSA.

Objective 15: Increase the range of employment outcomes.

Strategies: DCRSA will:

- 1. Provide person-centered training for VR Specialists and training on provision of comprehensive, holistic assessment for use in eligibility determination and for the comprehensive assessment used to inform the development of the IPE.
- 2. Conduct eCASAS assessment at the time of a person's application and provide referrals for appropriate literacy and adult education services.
- 3. Establish a working group within DCRSA (including line staff and managers), in coordination with the DDS Quality Assurance and Performance Management Administration (QAPMA) Performance Unit, focused on improving processes such as eligibility, referral, client participation, engagement, retention and overall service delivery quality.

- 4. Expand the provision of job readiness training for DCRSA job seekers, by both DCRSA Business Relations and Employment Coordinator staff and through contracts with provider agencies.
- 5. Provide training for VR counselors to strengthen assessment and counseling skills utilized during IPE development process, to ensure that counselors are fully taking into account the person's strengths, resources, priorities, concerns, abilities, capabilities, career interest and informed choice in supporting the person to establish an employment goal.
- 6. Provide training on customized employment and employer engagement for RSA and provider agency staff.

- 1. Review, update and publish benefits counseling procedures to ensure streamlined access to service.
- 2. Increase the number of people who complete the eCASAS assessment ten percent (10%) above the current number.
- 3. Increase the number of people who receive job readiness training by ten percent (10%) above the current number.
- 4. All VR staff will use person-centered planning tools to develop employment goals that better reflect the strengths, interests, abilities, capabilities, and resources of people served by DCRSA.
- 5. Maintain the increased level (i.e., 10% above the current number) of people who receive job readiness training.
- 6. Ensure that all VR clients receiving SSI/SSDI benefits are offered to attend DCRSA's benefits counseling and orientation sessions immediately after eligibility is determined
- 7. Provide training on customized employment by June 30, 2026, and offer at least annually thereafter.

Goal 2: Improve DCRSA service delivery through more efficient operations and a more effective, skilled workforce.

Objective 2.1: Continue to provide regular training for DCRSA staff.

Strategies: DCRSA will:

- 1. Provide regular, mandatory training for DCRSA vocational rehabilitation staff based on policies, procedures, protocols, best practices, and trends identified by the agency, and make trainings available electronically.
- 2. Improve the DCRSA onboarding process to efficiently and effectively educate new staff about job requirements at DCRSA.
- 3. Implement a mentoring program for new staff to shadow and receive guidance from experienced colleagues.
- 4. Coordinate with DDS Office of Human Capital to hire a full-time CRC qualified vocational rehabilitation trainer, who will be responsible for overseeing onboarding, new staff training and ongoing staff development.
- 5. Provide support to VR Specialists to sit for the CRC (Certified Rehabilitation Counselor) examination.

Performance by June 30, 2026, and ongoing through June 30, 2028:

1. Results from the quality case review system and other Quality Assurance Reviews (conducted after the introduction of any new policy or procedure) will show at least

90% compliance with new policies and procedures, or the agency will provide updated training to improve outcomes.

2. Program Year (PY) 2025-2028, DCRSA will track WIOA performance measures to establish a baseline of performance. By June 30, 2028, DCRSA will meet established WIOA performance standards identified in the Unified State Workforce Development Plan.

Objective 2.2: Retain, train, and recruit experienced and qualified VR staff and service providers to improve services to the low incidence populations, including people who are blind, deafblind, have autism, or other autism spectrum disorders.

Strategies: DCRSA will:

- 1. Provide continuous training to staff on customized employment policies, procedures, protocols, and best practices.
- 2. Provide continuous training to service providers on customized employment policies, procedures, protocols, and best practices.
- 3. Develop and implement outreach plans to recruit providers who can provide services to low incidence populations.
- 4. Develop and implement an outreach plan on DCRSA services to the low incidence population.
- 5. Establish a working group within DCRSA focused on improving processes such as eligibility, referral, client participation, engagement, retention and overall service delivery quality

Performance by June 30, 2026, and ongoing through June 30, 2028:

- 1. 100% of DCRSA workforce will receive professional development opportunities.
- 2. VR Specialists' performance will be 90% compliant in case reviews and as required by standards established in policies and regulations.
- 3. Establish and maintain a communication network with service providers in the District.
- 4. DCRSA will complete the development and use of the vendor report card system to include the workgroups with the SRC and the provider community.
- 5. DCRSA will recruit CBE providers for services to include the blind and deaf, especially job placement and supported employment.
- 6. DCRSA will invite providers to be part of trainings provided to staff and relevant to the provider community.
- 7. Establish contracts that support consumers achieving the milestones contained in the common performance measures in WIOA to include payment for consumers that retain employment during the second and fourth quarter after exit from the VR Program.

Objective 2.3: Revise VR policies and procedures to ensure that current policies are consistent with the requirements of the Workforce Innovation and Opportunity Act (WIOA). **Strategies:** DCRSA will:

- 1. Consult with the State Rehabilitation Council (SRC) regarding the review of all current policies and procedures and revise as necessary.
- 2. Hold required public hearings and provide appropriate public notice to obtain community input on all policy, procedure or regulatory changes.

Performance by through June 30, 2028:

1. DCRSA will have up-to-date policies and procedures, consistent with federal and District regulations, which reflect best practices and are developed with input from the SRC and the community.

Goal 3: Expand and improve the quality of transition services through improved coordination with the state education agency and all local education agencies and implementation of Pre-Employment Transition Services (Pre-ETS) to students with disabilities.

Objective 3.1: DCRSA will establish and maintain Memoranda of Agreement (MOA) with the Office of the State Superintendent of Education (OSSE) and all local education agencies, including DCPS and all public charter schools regarding provision of services to all students with disabilities, including those who are potentially eligible for VR services. Strategies: DCRSA will:

1. Work with OSSE and LEAs to clarify updates and processes for referrals to DCRSA. Provide training to school staff regarding when referral for VR services is appropriate and transition planning should begin.

Performance by June 30, 2026:

- 1. MOAs with 18 public charter schools will be in place.
- 2. MOA with DCPS will be established and reviewed annually.
- 3. MOA with OSSE will be reviewed annually and updated as necessary.

Performance by June 30, 2026, and ongoing through June 30, 2028:

- 1. When appropriate, all students between the ages of 14 and 22 attending a DC Public School, Public Charter School or non-public placement will be referred for participation in pre-employment transition services, with the consent of the adult student or parent of students under the age of 18.
- 2. DCRSA will determine eligibility for VR services within 60 days of receiving the application and complete the IPE within 90 days of determining eligibility.
- 3. VR Specialists will visit the schools regularly, on at least a monthly basis, or more frequently for schools that have higher referral numbers.

Objective 3.2: Provide opportunities for work experience for students with disabilities resulting in postsecondary education or competitive integrated employment outcomes. **Strategies:** DCRSA will:

- 1. DCRSA will provide at least 140 paid work-based learning experiences annually for DC Public School students who are enrolled in CTE and/or transition courses aligned to goals for competitive integrated employment and/or postsecondary education.
- 2. Each summer, at least 25 eligible students will participate in a pre-ETS employment summer work-based learning experience (e.g., JumpStart).
- 3. DCRSA employment coordinator will work with employers to provide paid work-based learning experiences for at least 65 students who attend DC public charter schools.
- 4. DCRSA will work with LEAs and employer partners to ensure at least 25 students who participated in a DCRSA funded work-based learning experience will achieve competitive integrated employment or post-secondary education or training following the conclusion of a work-based learning experience or secondary education.
- 5. Coordinate with schools to offer benefits counseling for eligible or potentially eligible students, through pre-employment transition services, as appropriate or requested throughout the academic year.
- 6. DCRSA will continue to work with DOES to coordinate and provide necessary supports to identified students who are eligible or potentially eligible for VR services, to be successful in their MBSYEP summer work placements.
- 7. DCRSA will ensure that all students on a certificate pathway have at least one (1) opportunity for a paid work-based learning experience prior to exiting high school.

- 8. Prior to exiting high school, all students on a certificate pathway, who are referred to DCRSA for either pre-employment transition services or VR services will have the opportunity to work with DCRSA on resume development, that may include prior employment or work-based learning experiences, obtaining official school records, and/or references from previous supervisors, if available.
- 9. Provide communication to transition youth using social media platforms that are familiar to the population.
- 10. DCRSA employment coordinator will work with employers to provide paid work-based learning experiences for at least 25 students who are enrolled in non-public schools.

- 1. DCRSA will provide at least 140 paid work-based learning experiences annually for DC Public School students who are enrolled in CTE and/or transition courses aligned to goals for competitive integrated employment and/or postsecondary education.
- 2. At least 25 eligible students will participate in a supported employment summer work-based learning experience (e.g., JumpStart).
- 3. DCRSA will coordinate with its Pre-ETS providers to establish paid work-based learning experiences for at least 65 students who attend DC public charter schools.
- 4. DCRSA will work with LEAs and employer partners to ensure at least 25 students who participated in DCRSA funded work-based learning experience will achieve competitive integrated employment or post-secondary education or training following the conclusion of a work-based learning experience or secondary education.
- 5. Coordinate with schools to offer benefits counseling for eligible students, through pre- employment transition services, as appropriate or requested throughout the academic year.
- 7. DCRSA will ensure that all students on a certificate pathway have at least one (1) opportunity for a paid work-based learning experience prior to exiting high school.
- 8. Prior to exiting high school, all students on a certificate pathway who are referred to DCRSA for either pre-employment transition services or VR services will have the opportunity to work with DCRSA on resume development, that may include prior employment or work-based learning experiences, obtaining official school records, and/or references from previous supervisors, if available.

Objective 3.3: Provide Pre-ETS services to students with disabilities that lead to post-secondary success, including post-secondary education, job training or competitive integrated employment. **Strategies:** DCRSA will:

- 1. Have its VR Specialists and Transition Specialists provide monthly job readiness training sessions in DC local education agencies for students with disabilities who are potentially eligible for vocational rehabilitation services.
- 2. As needed, DCRSA will issue a solicitation seeking qualified providers to provide pre- employment transition or VR services to students with disabilities, as authorized in their individual plans for employment (IPEs).
- 3. DCRSA will work with DCPS and Public Charter Schools to track students who have 504 plans and identify other students with disabilities who may be potentially eligible for VR services.
- 4. DCRSA will coordinate with its Pre-ETS providers to host community-based transition fairs where DCPS and Public Charter school students with disabilities can explore career pathways, post-secondary education opportunities, and participate in workplace readiness activities that led to post-secondary education or competitive integrated employment.

- 5. DCRSA will coordinate with DCPS and Public Charter Schools to host school-based transition fairs to increase the number of students accessing Pre-ETS services that lead to post-secondary education and competitive integrated employment.
- 6. DCRSA Transition Program Manager will participate in and attend OSSE's quarterly Career Technical Education (CTE) Special Populations Advisory Committee to provide input on and evaluate strategies to strengthen the provision of CTE for students with disabilities.

- 1. At least 75% of students with IEPs or 504 plans will receive at least one Pre-ETS service during the 2025-2026 school year.
- 2. DCRSA VR Specialists and Transition Specialists will work with DCPS, Public Charter Schools and non-public schools to coordinate at least 15 school-based transition fairs annually.
- 3. DCRSA will coordinate with its Pre-ETS providers to host at least two (2) community-based transition fairs annually.
- 4. DCRSA will work with OSSE CTE Special Population Committee to identify strategies that lead to increased CTE enrollment and participation rates among students with disabilities.

Goal 4: Improve coordination with other workforce development agencies providing services at the American Job Centers.

Objective 4.1: Improve coordination of services at American Job Centers **Strategies:** DCRSA will:

- 1. Work with DOES, the WIC and the One Stop Operator to provide cross-training for staff in American Job Centers; and request cross-training from the One Stop Operator and DOES for all VR staff located at AJCs.
- 2. In coordination with the Office of Disability Rights, provide an evaluation of accessibility of all AJCs to the one-stop operator and provide technical assistance to support them in making necessary changes to ensure that all AJCs are accessible for people with disabilities, including people with physical and sensory impairments.

Performance by June 30, 2026, and ongoing through June 30, 2028:

1. American Job Centers will be accessible and provide all required core services. **Objective 4.3:** Improve Coordination of Services to Businesses:

- **Strategies:** DCRSA will:
 - 1. Coordinate with the Business Services Group at the Department of Employment Services to ensure that business outreach by government agencies occurs in a more coordinated manner.
 - 2. Establish relationship with the Department of Small and Local Business Development (DSLBD), and with small, local businesses in DC, to inform them about supports available for employees with disabilities.
 - 3. Provide business roundtables regularly throughout the year to provide education to businesses about employing people with disabilities.
 - 4. Work with business partners to conduct business roundtables and to develop education materials for businesses.

Performance by June 30, 2026, and ongoing through June 30, 2028:

- 1. DCRSA will have at least two (2) business roundtables throughout each year.
- 2. DCRSA will increase the number of small businesses with which it has relationships by ten percent (10%) yearly.