

UTAH PYs 2024-2027 - VOCATIONAL REHABILITATION PROGRAM (COMBINED OR GENERAL)

## CONTENTS

Utah PYs 2024-2027 - Vocational Rehabilitation Program (Combined or General)

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Program-Specific Requirements for State Vocational Rehabilitation (Combined or General)

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- a. State Rehabilitation Council
- b. Comprehensive Statewide Needs Assessment (CSNA)
- c. Goals, Priorities, and Strategies
- d. Evaluation and Reports of Progress: VR and Supported Employment Goals
- e. Supported Employment Services, Distribution of Title VI Funds, and Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.
- f. Annual Estimates
- g. Order of Selection
- h. Waiver of Statewideness.
- i. Comprehensive System of Personnel Development.
- j. Coordination with Education Officials.
- k. Coordination with Employers
- l. Interagency Cooperation with Other Agencies

Assurances

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Vocational Rehabilitation (Combined or General) Certifications

---

Vocational Rehabilitation Program Performance Indicators

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GEPA 427 Form Instructions for Application Package - Vocational Rehabilitation

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GEPA 427 Form Instructions for Application Package - Supported Employment

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PROGRAM-SPECIFIC REQUIREMENTS FOR STATE VOCATIONAL REHABILITATION (COMBINED OR GENERAL)  
The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

A. STATE REHABILITATION COUNCIL.

1. ALL VR AGENCIES, EXCEPT FOR THOSE THAT HAVE AN INDEPENDENT CONSUMER-CONTROLLED COMMISSION, MUST HAVE A STATE REHABILITATION COUNCIL (COUNCIL OR SRC) THAT MEETS THE CRITERIA IN SECTION 105 OF THE REHABILITATION ACT. THE DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPLICABLE, HAS:

Select A or B:

*(A) is an independent State commission*

*(B) has established a State Rehabilitation Council*

*(B) has established a State Rehabilitation Council*

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

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	1	1/22
Parent Training and Information Center	1	3/22
Client Assistance Program	1	9/22
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	1	3/22
Community Rehabilitation Program Service Provider	1	11/23
Business, Industry, and Labor	2	11/23
Business, Industry, and Labor	1	3/23
Business, Industry, and Labor	1	11/23
Business, Industry, and Labor	0	Vacant
Disability Advocacy Groups	2	11/19
Current or Former Applicants for, or Recipients of, VR	1	2/20

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
services		
Section 121 Project Directors in the State (as applicable)	2	11/20
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	2	2/20
State Workforce Development Board	1	3/22
VR Agency Director (Ex Officio)	3	8/16
Rep. Deaf and Hard of Hearing Community	1	11/23
Former Recipient of VR Services	1	2/21
Former Recipient of VR Service	1	11/23
Higher Education Presentative	1	11/23
Rep. Service Provider	1	11/23
Rep. Assistive Technology for People with Disabilities	1	11/23

3. IF THE SRC IS NOT MEETING THE COMPOSITION REQUIREMENTS IN SECTION 105(B) OF THE REHABILITATION ACT AND/OR IS NOT MEETING QUARTERLY AS REQUIRED IN SECTION 105(F) OF THE REHABILITATION ACT, PROVIDE THE STEPS THAT THE VR AGENCY IS TAKING TO ENSURE IT MEETS THOSE REQUIREMENTS.

The Utah State Rehabilitation Council convenes six times annually, aligning with the quarterly meeting requirement. In addition to these regular meetings, the executive committee and the membership subcommittee hold supplementary sessions to guarantee adherence to council mandates, objectives, and priorities. These additional meetings serve to identify subjects for evaluation and discussion, facilitate membership outreach, and engage in strategic planning.

The Utah State Rehabilitation Council (SRC) and Utah State Office of rehabilitation collaborate to identify and recruit new members when there is a vacancy. Prospective members can attend meetings as guests to learn more about USOR and the SRC's roles. Currently, there's a vacancy in the Business, Industry, and Labor sector. Council members and USOR staff conducted outreach efforts, disseminating information through social media, the USOR Business Relations team and the Governor's Committee on Employment of People with Disabilities. Prospective applicants underwent interviews by the SRC Membership Committee. Their recommendation

will proceed to the full council for endorsement, followed by submission for appointment in accordance with SRC Bylaws. This will be completed prior to June 2024.

**4. IN ACCORDANCE WITH THE REQUIREMENTS IN SECTION 101(A)(21)(A)(II)(III) OF THE REHABILITATION ACT, INCLUDE A SUMMARY OF THE COUNCIL'S INPUT (INCLUDING HOW IT WAS OBTAINED) INTO THE STATE PLAN AND ANY STATE PLAN REVISIONS, INCLUDING RECOMMENDATIONS FROM THE COUNCIL'S ANNUAL REPORTS, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION AND OTHER COUNCIL REPORTS.**

The mission of the State Rehabilitation Council (SRC), in partnership with the Utah State Office of Rehabilitation and in collaboration with disability groups, is to ensure quality vocational rehabilitation services for eligible individuals as they make informed choices to achieve employment. The SRC provides input and feedback to USOR by conducting six meetings annually, committee activities, reports, the Comprehensive Statewide Needs Assessment interviews, planning goal setting activities and other structured activities designed to leverage the strategic composition of the SRC.

### **Order of Selection**

The Utah State Office of Rehabilitation leadership met with the State Rehabilitation Council executive committee on August 18, 2025, to discuss the need to implement an Order of Selection (OOS) due to resource limitations. Recognizing the significance of this issue and its impact on service delivery, the Council agreed that an additional meeting was necessary to engage in a more detailed discussion.

On September 3, 2025, the Council reconvened, and USOR provided a comprehensive presentation on the key components of the OOS. The presentation included information on priority categories, the criteria for identifying individuals with the most significant disabilities, the administration and implementation of OOS, and a fiscal forecast demonstrating the agency's financial position and the necessity of moving forward with OOS.

Following the presentation, the Council conducted a formal vote, during which all members affirmed the decision to pursue the OOS. This step ensures that vocational rehabilitation services can allocate resources in a manner that prioritizes individuals with the most significant disabilities while maintaining program sustainability.

In moving forward with implementation, the SRC recommended that USOR provide clear information to clients, stakeholders, and the public to ensure a thorough understanding of the process. The Council also suggested exploring alternative terminology for the "Wait List" to avoid confusion with the long-term support waitlists maintained by the designated ID/DD agency in Utah. Additionally, the SRC requested that USOR continue providing frequent updates on the process.

Following the SRC's vote of support, the Council received the draft state plan amendment and notices for public town halls scheduled for September 17 and 18, 2025. The state plan amendment and notices were posted on USOR's website and social media platforms, distributed through email list serves and posted in USOR offices. SRC members reviewed this information and disseminated it through their respective networks, with several members attending the public town hall meetings. Questions raised during these town halls addressed potential impacts

to existing clients, informational resources that would be available to the public post-implementation, the appeal process for clients regarding their priority classification, OOS implementation procedures, services for students, and counselor caseload capacity.

### **Comprehensive Statewide Needs Assessment (CSNA):**

- SRC Input: The council endorsed the recommendation for Utah State University to coordinate the Triennial Comprehensive Statewide Needs Assessment. The SRC engaged in an overview of the assessment and concurred with the designated focus areas. Additionally, the council agreed to select members to take part in key informant interviews and requested regular updates from the principal researcher. The SRC responded to the findings in the initial data results during an SRC meeting and then reviewed/responded to the draft report.

### **WIOA State Plan**

- SRC Input: Through the needs assessment review and council meetings, the SRC contributed valuable input and recommendations regarding goals and priority areas for the state plan. This encompassed a sustained emphasis on pre-employment transition services, including the optimal utilization of the 15% reserve funding, bolstering support for students with disabilities, and addressing the needs of potentially underserved student demographics. Recommendations were also made to improve service accessibility for individuals residing in rural areas; along with ongoing enhancements to the quality for CRP services. Furthermore, council members participated in the review and feedback process for the 2024 VR Portion of the WIOA State Plan. They were furnished with the complete draft plan and engaged in a dedicated meeting to examine the plan, discuss goals and priorities, and provide collective input. Council members were also invited to attend virtual WIOA town hall meetings.

### **Pre-ETS CAP**

- SRC Input: The Council USOR's Corrective Action Plan to address the underspent Pre-Employment Transition Services reserve. The SRC voted in support of the plan and recommended USOR also focus on close collaboration with local educational agencies and enhancing communication and engagement with parents.

### **Client Satisfaction Surveys**

- SRC Input: The council collaborated with USOR to review the client satisfaction survey process. They offered feedback on the questions and their wording to enhance readability. Additionally, the council supported the recommendation to share survey results feedback with local district directors. They also contributed input on suggested revisions to the confidential statement within the survey. In addition, in review of the survey results, the Council requested information on why clients might exit the program prior to employment.

### **SRC Goals**

- SRC Input: The council recommended a review of the goals and objectives of the SRC, aligning with its mission. This initiative will be spearheaded by the SRC Executive Committee.

## **SRC Meetings and Bylaws:**

- SRC Input: The council proposed reducing the number of annual meetings from 10 to 6. They emphasized that this adjustment would ensure compliance with federal regulations while enabling substantive discussions during meetings. The council unanimously voted to support this amendment to the meeting schedule and update the bylaws accordingly.

## **Community Rehabilitation Program (CRP) Dashboard**

- SRC Input: Following an overview of a performance dashboard of job development and placement services provided by CRPs, the SRC recommended that this information be made available to the clients and the public.

## **VR Counselor Recruitment and Retention:**

- SRC Input: In response to a previous presentation on national VR trends related to staff retention and raising awareness about VR services, the SRC requested an update on USOR's actions to address these concerns.

## **Informed Choice:**

- SRC Input: The SRC requested an overview of Informed Choice, especially in its relevance to requesting a counselor change or selecting a service provider. Provide the VR agency's response to the Council's input and recommendations, including an explanation for the rejection of any input and recommendations.

List each recommendation/input followed by the VR agency response

The following is a summary of USOR's response and actions taken:

## **Order of Selection (OOS):**

- USOR Response: The SRC voted unanimously to support the Utah State Office of Rehabilitation (USOR) in moving forward with the implementation of an Order of Selection. In response, USOR accepted the Council's recommendations and affirmed that, following implementation, it would provide clear information and resources to clients, applicants, and stakeholders to ensure understanding of the OOS and establish clear expectations. The agency also committed to exploring alternative terminology for the waitlist to reduce confusion with another agency's waitlist while maintaining transparency for VR clients.

## **Comprehensive Statewide Needs Assessment (CSNA):**

- USOR Response: USOR values the effort SRC members dedicated to reviewing the draft CSNA. The insights, feedback from interviews, and recommendations shared by the SRC were carefully considered and integrated into the final report.

## **WIOA State Plan**

- USOR Response: USOR accepted the council's input and recommendations for the State Plan, incorporating VR goals and priorities. The goals are tailored to emphasize Pre-Employment Transition Services, address underserved populations, leverage technology for enhanced services, and elevate the quality of CRP services.

## **Pre-ETS CAP**

- USOR Response: The agency agreed and accepted the council's input. Collaboration with LEAs and parent engagement was included within the State Plan and CAP remediation activities.

### **Client Satisfaction Surveys**

- USOR Response: USOR has accepted the feedback from the council and collaborated with them to enhance the readability of the survey questions and revise the confidential statement. USOR also agreed to compile and provide additional information on the reasons clients report exiting the program prior to obtaining an employment outcome.

### **SRC Goals**

- USOR Response: USOR supported the recommendation and will work with the council to update their goal and objective statements.

### **SRC Meetings and Bylaws:**

- USOR Response: USOR has supported the council's recommended adjustment to the meeting schedule and the update to the bylaws.

### **Community Rehabilitation Program (CRP) Dashboard**

- USOR Response: USOR agreed with the recommendation from the SRC and published the annual report on the USOR website.

### **VR Counselor Recruitment and Retention:**

- USOR Response: USOR agreed with the request. USOR responded by providing the council with an overview of its public awareness initiatives and sharing outreach materials. Furthermore, USOR committed to keeping the council informed about its efforts to recruit and retain staff, which includes providing information on strategic hiring initiatives and implementing a 10% wage increase for VR counselors, alongside a legislative-approved cost-of-living increase

### **Informed Choice:**

- USOR Response: USOR provided an overview of the process, including the involvement of a supervisor and/or district director when valid reasons exist to transfer a client's case to another counselor. Additionally, USOR furnished details about their Informed Choice policies and the information they offer to clients to aid them in selecting service providers. Furthermore, USOR collaborated with their Client Assistance Program representatives to provide an up-to-date overview of their roles and services.

#### **B. COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT (CSNA).**

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

##### **1. THE VR SERVICES NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, INCLUDING:**

**A. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES AND THEIR NEED FOR SUPPORTED EMPLOYMENT;**  
 USOR, in cooperation with the State Rehabilitation Council (SRC), conducts a comprehensive statewide assessment of the rehabilitation needs of individuals with disabilities in the state of Utah. The assessment identifies needs and assesses the current VR system's capacity to meet service needs. The most recent triennial Comprehensive State Needs Assessment (CSNA) was developed and completed in the Spring of 2023.

USOR and SRC worked in collaboration to analyze the results of the CSNA, review the findings and recommendations, and develop goals and strategies to inform on the state plans, and improve areas of service capacity gaps and unserved/underserved populations.

In Utah, the prevalence of disability is lower than the national average, at 9.1% compared to 12.7%, with around 289,000 Utahns having a disability as per the ACS-2019. While state-level data is useful, regional disparities in factors like disability prevalence, poverty, and racial diversity, among others, exist. Thus, considering regional variations is crucial. The CSNA identified not just areas for improvement but also the organization's strengths. Notably, Utah ranks third nationally for employment among those with disabilities, boasting a 47.5% employment rate in this demographic. The CSNA findings consistently showed that while stakeholders acknowledged strengths of USOR, they also identified areas for growth to better serve Utahns with disabilities.

The pandemic caused a disruption in rehabilitation services, resulting in a 4.8% drop in applications and a 10.7% decrease in the number of individuals served from 2018-2021. These decreases were consistent across racial and ethnic groups, with non-white disability populations seeing the most significant increase in USOR service eligibility. While there was a decline in the number of people with disabilities exiting the USOR program with employment from PY 2018 to 2021, the quality of employment outcomes improved.

Focus group participants consistently expressed a favorable opinion of USOR, especially valuing the accessibility and openness of its leadership. Several recurrent themes emerged: the need to improve consumer access to services, enhance outreach efforts, increase pay for personnel and contractors, and advance the use of technology—specifically, there was a clear desire for digital signature capabilities. Concerning Pre-ETS, USOR counselors highlighted several challenges: a scarcity of resources, collaboration bottlenecks with schools, the need for specialized training for transition youth, and gaps in outreach to particular youth groups, such as those in juvenile justice or foster care systems, and those without 504 plans or IEPs.

Agency turnover, particularly within special education, contracted providers, and USOR, was cited as a substantial disruption. Suggestions point toward an emphasis on system-wide collaboration over individual relationships to ensure continuity. Partnering agencies expressed a consistent desire for better and more frequent communication from USOR.

#### Challenges Faced by Those with Most Significant Disabilities:

In regards to the needs of individuals with the most significant disabilities, including their needs for supported employment services, the CSNA found USOR's performance stands out positively when compared to vocational rehabilitation agencies in other states in terms of employment rates, quality indicators, and service timing. However, an area for enhancement is the employment rate for those with the most significant disabilities, where Utah ranked 3rd out of 5 states in 2021 and last in 2020. Identified challenges and recommendations include:

- Community Rehabilitation Program (CRP) providers identified those with the most significant disabilities as having the more difficulties in finding and maintaining employment. It is noted this is often compounded by having parents or caregivers who do not see any possibility for employment.
- Individuals with the most significant disabilities living in rural areas faced challenges in accessing USOR services and employment due to limited transportation, difficulties accessing technology, job opportunity scarcity and pervasive poverty. Recommended solutions include strengthening the presence of USOR in rural areas and better outreach

and awareness for its services.

- USOR staff pointed out that the main barriers lay in access, collaboration, and knowledge level among providers, in rural areas when serving individuals with most significant disabilities. These challenges were attributed to service provider turnover and hiring difficulties, affecting collaboration and service provision, particularly for supported and customized employment.
- A notable issue with Supported Employment Services is the reduction in funding for the Division of Services for People with Disabilities (DSPD) for extended support services.
- The consensus among focus group members is that Community Rehabilitation Providers (CRPs) need more training on both supported and customized employment services. Training for VR counselors, specifically in understanding customized employment, was also identified.
- In addition, other needs to support individuals with most significant disabilities include: providing job accommodations, communication and social skills training, developing effective business relations partnerships, benefits planning, financial literacy and self-advocacy training.

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

USOR has completed a thorough analysis on the demographic make-up of individuals seeking services compared to Utahns with disabilities overall. The CSNA results reveal USOR serves a diverse population, largely representative of those with disabilities in Utah. The results revealed that USOR assists diverse clients, closely mirroring the demographic composition of Utah's population. Historically, past CSNAs pointed to a slight underrepresentation of the Asian community within USOR client bases.

Consequently, the current CSNA placed a greater focus on catering to the needs of Utahns with disabilities identifying as Asian. Through focus groups and surveys, it was discerned that while many of the target populations we sought information from suggested that there are systemic and cultural reasons that some from this population may not seek out or want to receive USOR services even if qualifying for them. Survey data suggests that the Asian population is not among the most unserved or underserved racial-ethnic groups in Utah. Instead, USOR counselors and staff observed that the American Indian community grapples with the most pronounced challenges in accessing and benefiting from USOR services. However, on a broader scale, race and ethnicity were deemed less consequential in influencing employment challenges than the nature and type of disability.

Furthermore, the CSNA underscored several vital areas of potential improvement. Recognizing the significant fraction of Utah's population fluent in Spanish but not English, the CSNA also noted a need for USOR to enhance the provision of outreach, information resources and forms in Spanish. Additionally, given the unique challenges posed by Utah's refugee population, the CSNA recommended specialized training tailored to help serve refugees and address their specific needs.

The CSNA also examined unserved and underserved communities. The CSNA high-lighted homeless population with disabilities as underserved and facing the most significant barriers. These include challenges related to employment, accessing USOR services, and deriving benefits from the same. Adults with criminal backgrounds were identified as the next group facing the highest employment challenges, followed closely by individuals with limited English proficiency.

However, perceptions of which groups are most underserved varied across the state.

Cultural barriers play a critical role in outreach effectiveness. Interviewees pinpointed specific marginalized groups, such as Asians, Polynesians, and the Slavic community, as having pronounced stigmas associated with disability and a cultural inclination to address needs internally, within the family or community framework. Additionally, there's a noteworthy gap in counselor knowledge about these specific underserved groups, further exacerbating the challenges of effective outreach.

In the context of Pre-ETS (Pre-Employment Transition Services), several primary challenges and barriers were outlined. These encompassed resource limitations, collaboration challenges with schools, and the need for specialized training geared towards working with transition youth. CSNA particularly emphasized the need for outreach to underserved transition populations, which includes youth in the juvenile justice system, homeless youth, those in foster care, youth with disabilities with only a 504 plan, and those without either a 504 plan or an IEP.

**C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE WORKFORCE DEVELOPMENT SYSTEM; AND**  
The CSNA delved into the collaboration between USOR and other components of the state workforce development system in serving individuals with disabilities. Most respondents perceived these partnerships as beneficial, with a majority deeming the services moderately to very effective. When asked about potential improvements to the Department of Workforce Services one-stop centers (AJCs), a clear emphasis emerged on two primary areas: collaboration and accessibility. The most frequent feedback highlighted the need for enhanced inter-agency collaboration. Some praised existing collaborative efforts but also noted conflicting goals between agencies. A robust referral system, prioritizing a personal approach, was recommended. The next prevalent feedback centered on program accessibility, with concerns about the complex service access process, an over-reliance on automated phone systems, and a hard-to-navigate website. Respondents also underscored the importance of disability awareness training to improve the understanding of the unique needs of clients with disabilities

In regards to another core WIOA partner, Adult Education, the CSNA assessed the frequency of collaboration between direct service providers and adult education entities. The prevailing perception of the efficacy of adult education services was positive. However, only a minor proportion found them slightly or not at all effective. While specific recommendations for enhancing adult education services were gathered, the report urges caution in interpreting these suggestions, given that many respondents had minimal or no interactions with such services.

**D. YOUTH WITH DISABILITIES, INCLUDING STUDENTS WITH DISABILITIES AND THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER IDEA.**

The CSNA assessment thoroughly examined the needs and challenges faced by youth and students. Students with disabilities generally have access to the broad range of transition and pre-employment transition services. The number of youth and students served did plateau during the pandemic, but has started to rebound. However, there is a clearly identified need to increase the number of youth and students served, including the provision of Pre-ETS. In addition to the CSNA, this is reflected in USOR data reports. While students with individual disabilities, learning disabilities, autism and other health impairments have the strongest access

to Transition and Pre-ETS services, there is an opportunity to increase service provision to students with sensory impairments. Another shortfall identified is the limited outreach efforts geared towards underserved populations. This underserved group encompasses youth entangled in the juvenile justice system, homeless youth, those navigating the complexities of foster care, and students without the support of a 504 plan or an IEP. Furthermore, the introduction of more temporary and work-based learning opportunities for the youth and students stands out as an area for enhancement.

Another area of note was the varying degrees of collaboration between educational institutions and the CSNA. While some schools are proactive and welcoming towards collaborative efforts, others demonstrate noticeable reluctance, resulting in inconsistent cooperation levels.

The feedback from focus groups across different target populations highlighted a persistent challenge: the high turnover rates among agencies associated with special education, USOR, and contracted providers. This turnover disrupts consistent service delivery and hinders long-term collaborations. To mitigate these challenges, CSNA proposes a more systems-oriented approach rather than relying on personal relationships. This would involve amplifying efforts in information sharing, offering on-demand training sessions, and devising strategies to bolster inter-agency communication, ensuring smoother collaboration.

In regards to Pre-ETS, the CSNA underscores the importance of proactive and strategic long-term planning. This planning should holistically consider the roles and capacities of USOR in assisting students with disabilities. In terms of inter-institutional relationships, the assessment suggests a deeper emphasis on building and sustaining ties with school counselors and 504 coordinators within the LEAs. Moreover, the assessment emphasizes the potential of the USOR website as a key tool for outreach and recommends its enhancement, focusing on better searchability and making it more user-friendly for potential beneficiaries.

**2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.** The CSNA has pinpointed significant areas of development for USOR in its collaboration with Community Rehabilitation Program (CRP) providers in Utah. These areas include fostering a culture within CRPs that aligns with and respects the perspectives of USOR, expanding CRP options in rural regions, and enhancing communication between CRPs and USOR staff. There's also an emphasis on bolstering CRPs' capacities to cultivate business partnerships and offering additional training in areas like Supported Employment, Pre-ETS, and Customized Employment. Furthermore, the CSNA recommends enriching CRPs' comprehension of USOR's policies and expectations and providing them with training to refine the gradual phase-out of job supports. Conversely, CRPs have voiced their needs, including the ability to digital signatures with USOR, improving the compensation structure of temporary work experiences and worked-based learning experiences, clearer comprehension of their needs and services by VR counselors, timelier responses from these counselors, consistency in service hours authorized by USOR, and an increase in ACRE trained personnel.

#### **c. GOALS, PRIORITIES, AND STRATEGIES**

Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals

and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of Section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under Section 107 of the Rehabilitation Act. VR agencies must—

**1. DESCRIBE HOW THE SRC AND THE VR AGENCY JOINTLY DEVELOPED AND AGREED TO THE GOALS AND PRIORITIES AND ANY REVISIONS; AND**

The Utah State Office of Rehabilitation, in partnership with the State Rehabilitation Council, has formulated goals and priorities aimed at enhancing the delivery of high quality vocational rehabilitation services. The development of these objectives involved a thorough examination of information derived from the Comprehensive Statewide Needs Assessment, client satisfaction survey outcomes, stakeholder input, corrective action plans, and internal data analysis. The State Rehabilitation Council played a crucial role by offering valuable feedback, input, and voting in favor of advancing the proposed goals and strategies.

**2. IDENTIFY MEASURABLE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS AND THE BASIS FOR SELECTING THE GOALS AND PRIORITIES (E.G., CSNA, PERFORMANCE ACCOUNTABILITY MEASURES, SRC RECOMMENDATIONS, MONITORING, OTHER INFORMATION). AS REQUIRED IN SECTION 101(A)(15)(D), (18), AND (23), DESCRIBE UNDER EACH GOAL OR PRIORITY, THE STRATEGIES OR METHODS USED TO ACHIEVE THE GOAL OR PRIORITY, INCLUDING AS APPLICABLE, DESCRIPTION OF STRATEGIES OR METHODS THAT—**

**A. SUPPORT INNOVATION AND EXPANSION ACTIVITIES;**

**B. OVERCOME BARRIERS TO ACCESSING VR AND SUPPORTED EMPLOYMENT SERVICES;**

**C. IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POST-SECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES); AND**

**D. IMPROVE THE PERFORMANCE OF THE VR AND SUPPORTED EMPLOYMENT PROGRAMS IN ASSISTING INDIVIDUALS WITH DISABILITIES TO ACHIEVE QUALITY EMPLOYMENT OUTCOMES.**

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

The Utah State Office of Rehabilitation (USOR) and the State Rehabilitation Council (SRC) collaborated on defining the goals, priorities, strategies and measures for the VR program. The SRC, along with its executive committee, convenes regularly throughout the year to offer insights to the VR agency regarding emerging needs. This input plays a significant role in shaping the agency's objectives and priorities.

The review and refinement of the VR program's priorities, strategies and measures occurred after a thorough examination of the Comprehensive Statewide Needs Assessment, including its key findings and recommendations, by both the SRC and USOR. Joint discussions on goal setting took place during council meetings. The primary focus was on identifying, suggesting modifications to, and reaching agreement on the goals, priorities, and strategies outlined in the state plan. This collaborative process unfolded between September 2023 and January 2024.

- **Goal 1:** Ensure sufficient and reasonable resources are available to support the State Rehabilitation Council and Statewide Independent Living Council in carrying out essential and mandated tasks.
  - **Strategy 1:** USOR will reserve funds and resources to support the SRC in fulfilling their activities, such as gathering customer satisfaction feedback, contributing to the statewide needs assessment and publishing the Annual Report. Ongoing coordination with USOR will emphasize identifying crucial resources to meet these responsibilities in line with the strategic plan goal.

- o **Strategy 2:** USOR will allocate funding to empower the Utah Statewide Independent Living Council (SILC) to carry out their mandated activities outlined in the Statewide Plan for Independent Living. The earmarked funds for SILC are determined through a collaborative planning process, during which the SILC identifies the resources needed to fulfill their responsibilities and achieve their goals.
- o **Basis and Measures:** Adherence to regulatory requirements, fulfillment of SRC objectives, and implementation of the USILC plan will be evaluated. Success will be determined through compliance assessments and the review of achievements aligned with the objectives set by each council.
- **Goal 2:** Ensure the provision of quality Pre-Employment Transition Services that meet the needs of students with disabilities.
  - o **Strategy 1:** USOR will extend and enhance quality assurance activities to verify students are benefiting and gaining skills from services provided.
  - o **Strategy 2:** USOR will allocate additional resources to increase the provision of Pre-ETS contract monitoring and technical assistance, including on-site visits, to ensure that the provided Pre-ETS services align with the needs of the students.
  - o **Basis and Measures:** Ensuring the provision of high-quality Pre-ETS services remains an ongoing focus for the SRC, in accordance with the internal compliance standards established by USOR. Success in this area will be measured through diligent monitoring of the achievement of goals and objectives outlined in the providers' contracts.
- **Goal 3:** Enhance awareness and facilitate improved access to services for minority and underserved groups.
  - o **Strategy 1:** Broaden outreach efforts and strengthen collaborations with community partners and agencies that engage with individuals involved in the justice system; including youth in custody.
  - o **Strategy 2:** Increase the provision of USOR forms, documents, and informational resources available in Spanish.
  - o **Strategy 3:** Provide ongoing training and information to VR staff to ensure they possess the skills, knowledge, and competencies necessary to serve diverse populations.
  - o **Strategy 4:** Develop region specific outreach, engagement and support initiatives to assist individuals with disabilities experiencing homelessness.
  - o **Basis and Measures:** The CSNA-derived recommendations form the foundation for the objective and strategy aimed at enhancing access to services for minority and underserved groups. USOR will gauge success by examining demographic trends among 9-11 data and evaluating feedback from clients, staff, and stakeholders.
- **Goal 4:** Optimize and modernize VR processes to enhance accessibility and sustained engagement in services.
  - o **Strategy 1:** Improve the referral and application process by streamlining data

collection and implementing an online referral.

- o **Strategy 2:** Expand use of technology to communicate with clients, obtain required documents and signatures.
- o **Strategy 3:** Identify data entry and paperwork burdens for clients and VR staff and implement process improvement initiatives.
- o **Basis and Measures:** The CSNA, along with input from staff and stakeholders, pinpointed crucial areas for enhancing client access to services. USOR is dedicated to improving the client experience and will measure success by tracking progress toward and completion of the specified strategies.

- **Goal 5:** Fully Spend 15% Funding Reserve for Pre-Employment Transition Services.
  - o **Strategy 1:** Allocate additional USOR staff resources to provide and coordinate Pre-ETS to students.
  - o **Strategy 2:** Evaluate and, if deemed appropriate, incorporate the costs for additional authorized Pre-Employment Transition Services (Pre-ETS) activities beyond the mandated five.
  - o **Strategy 3:** Improve opportunities for fee-for-service arrangements for providers offering Pre-Employment Transition Services (Pre-ETS)
  - o **Basis and Measures:** In compliance with regulations and its corrective action plan, prioritizing the utilization of the Pre-ETS reserve is imperative for USOR. Success will be monitored and measured through a thorough review of expenditures and fully spending the reserve funding.
- **Goal 6:** Increase the number of students with disabilities participating in work-based learning experiences.
  - o **Strategy 1:** Expand utilization of USOR Business Relations Team to assist in identifying and coordinating work-based learning experiences.
  - o **Strategy 2:** Expand contracts for Pre-Employment Transition Services (Pre-ETS) with a focus on providing work-based learning experiences.
  - o **Strategy 3:** Review policies and rates for the provision of work-based learning experiences and implement identified areas for improvement.
  - o **Basis and Measures:** As indicated by performance dashboards and the CSNA, USOR must increase the provision of work-based learning experiences. Success will be measured by monitoring the number of eligible and potentially eligible students who participate in these services.
- **Goal 7:** Improve access and awareness for Transition and Pre-Employment Transition Services.
  - o **Strategy 1:** Identify and implement strategies resilient to turnover to foster local-level collaboration and facilitate access to information.
  - o **Strategy 2:** Revise outreach, information and referral materials to improve engagement with education and parents.
  - o **Strategy 3:** Enhance outreach and develop new referral pathways to increase

engagement with students on 504 plans, youth in foster care, youth in custody and youth living in rural communities.

- o **Basis and Measures:** Highlighted in the CSNA and acknowledged by stakeholders, enhancing awareness and linking students to services emerged as an identified area for improvement. This initiative aligns with overarching goals pertaining to the delivery of Transition and Pre-ETS services. Success will be attained by increasing the number of students served.
- **Goal 8:** Improve client achievement of high-quality employment outcomes, considering factors such as wages, hours worked, benefits and occupations that require credentials.
  - o **Strategy 1:** Provide additional training and resources to VR staff for effectively utilizing labor market information with clients to identify high-demand careers.
  - o **Strategy 2:** Expand VR staff and client access to vocational assessment and career exploration resources.
  - o **Strategy 3:** Enhance and increase services to employers to support hiring and retention of individuals with disabilities; including developing new employer partnerships.
  - o **Basis and measures:** A review of performance dashboards and secondary data from the CSNA has identified opportunities for USOR to improve the quality of its employment outcomes. Success will be measured through common performance indicators and a thorough examination of client employment information at exit.
- **Goal 9:** Increase co-enrollment with Adult Education and Workforce Development programs to support client success
  - o **Strategy 1:** Enhance local level partnership collaborations to streamline co-enrollment processes and coordinate service delivery efficiently.
  - o **Strategy 2:** Provide WIOA partners with training, resources and support to improve disability awareness and understanding for VR services.
  - o **Basis and measures:** Insights from the CSNA and performance dashboards guided the identification of this goal. Success will be measured by the increased co-enrollment of Adult, Youth, Dislocated Worker, Wagner-Peyser, and Adult Education programs.

**d. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS**

For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

**1. PROGRESS IN ACHIEVING THE GOALS AND PRIORITIES IDENTIFIED FOR THE VR AND SUPPORTED EMPLOYMENT PROGRAMS;**

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

**Goal:** Increase awareness, information availability, and access to Transition and Pre-Employment Transition Services.

- **Progress:** USOR has successfully expanded its student outreach, witnessing a growth from 4492 eligible and potentially eligible students in FY20 to 6,083 in FY22. This achievement was made possible through strengthened collaborations with Local Education Agencies, the facilitation of an Annual Transition Institute for education and VR staff, the creation of innovative digital and print materials focusing on Pre-ETS services and the formulation of targeted local-level outreach plans in conjunction with VR district offices.

**Goal:** Expand availability of Pre-Employment Transition Services.

- **Progress:** The Utah State Office of Rehabilitation has expanded the network of contracted service providers for Pre-Employment Transition Services (Pre-ETS) from 8 to 18, thereby enhancing the statewide reach of these services, with a particular focus on rural areas. Furthermore, the number of Pre-ETS instructors has been increased from 11 to 16. Each Vocational Rehabilitation (VR) District office now ensures the presence of at least one instructor, and additional instructors have been strategically allocated to regions characterized by extensive geographic coverage and significant student populations.

**Goal:** Improve the quality of services provided by Community Rehabilitation Providers (CRPs).

- **Progress:** The Utah State Office of Rehabilitation (USOR) established and maintained collaborative contracts with Utah State University, focusing on training and technical assistance in Customized Employment and Work Supports. This partnership also gave rise to a Community of Practice for Community Rehabilitation Providers (CRPs), facilitating ongoing education sessions and the sharing of best practices. To address concerns and training needs, USOR initiated monthly CRP meetings. Simultaneously, the agency revamped provider agreements, bolstered provider monitoring, and implemented a provider performance dashboard. Over the past four years, these efforts have yielded positive outcomes, evidenced by an improved success rate in provider placements and a reduction in the average days to placement. Furthermore, the placements from CRPs increasingly align with criteria for positions offering high wages, hours, and benefits. Key measure for success are detailed below:

- Successful SJBT Placements: Increased from 200 to 374
- Successful SE Placements: Increased from 92 to 239
- Days to Placement: Decreased from 142 days to 111 days
- High Quality Indicator Achieved for Hours: Increased from 30 to 76
- High Quality Indicator Achieved for Hourly Wages over \$14 (or \$10 for SE): Increased from 14 to 120
- High Quality Indicator Achieved for Jobs with Benefits: Increase from 20 to 60
- High Quality Indicator Achieved for Rural Area Placement: Increased from 19 to 27
- High Quality Indicator Achieved for Placement in Less than 60 days: Increased from 27 to 116

**Goal:** Improve access to Vocational Rehabilitation services for minority populations.

- **Progress:** Counselors and staff consistently engage in ongoing training to enhance their

cultural competence. Notably, outreach efforts to the Asian American population have been expanded in various regions. Vocational Rehabilitation district offices have actively collaborated with local community partners and Asian American associations to offer insights into Vocational Rehabilitation services and cultivate referral networks. Despite these initiatives, USOR did not observe a notable rise in the percentage of individuals from minority populations accessing services. This remains a focal point for ongoing improvement efforts.

**Goal:** Improve client understanding of benefits and work incentives.

- **Progress:** The Utah State Office of Rehabilitation (USOR) updated informational brochures designed to offer clients an overview of Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI) benefits, including details on work incentive options and earning thresholds. These brochures were disseminated directly to clients and made accessible on the USOR website. To enhance staff expertise, USOR conducted both virtual and in-office training sessions for Vocational Rehabilitation (VR) staff on benefits counseling. This training aimed to equip staff with a comprehensive understanding of the fundamental principles, enabling them to effectively communicate and clarify rights and options to clients. Additionally, USOR broadened its scope to include information and training on ABLE savings accounts, addressing the specific needs of potentially eligible clients.

**Goal:** Expanding Services to Employers.

- **Progress:** In the past four years, the Utah State Office of Rehabilitation (USOR) has undertaken substantial improvements to its services for employers. Notable program enhancements involved the consolidation of all Choose to Work Employment Specialists under the Utah State Office of Rehabilitation Business Relations Team. This initiative included intensive training for specialists in disability awareness, accommodations, and employment placement strategies. The team was seamlessly integrated into a specialized employer services tracking system. Consequently, the Utah State Office of Rehabilitation Business Relations team achieved a remarkable increase of over 115% in the number of employers served. Additionally, USOR utilized technology to augment its capabilities, extending support to Utah employers through expanded training and technical assistance initiatives.

**Goal:** Increase Vocational Rehabilitation Counselor and client access to Career Assessment Resources.

- **Progress:** The Utah State Office of Rehabilitation (USOR) ensured that Vocational Rehabilitation (VR) counselors received ongoing training with continued access to the Career Index Plus Training curriculum. Both current and new staff can review training sessions as needed. This material is also incorporated into the VR Training Academy for new staff onboarding. As an additional resource, staff were provided access to the Virtual Job Shadow platform, specifically designed to assist students and youth in exploring career opportunities. Ongoing efforts include the development of fee-for-service opportunities for vocational assessment and exploration pathways.

**Goal:** Improve Vocational Rehabilitation Counselor and client access to financial literacy and life skills training.

- **Progress:** The Utah State Office of Rehabilitation (USOR) developed a financial literacy curriculum that clients can access through CRP providers. Vocational Rehabilitation

refers clients and youth with disabilities to the training and authorizing payment for the financial literacy curriculum that includes modules for engaging in banking services, budgeting, residential finance needs, and managing credit. Currently, over 25 CRPs statewide have undergone training and are authorized to deliver this valuable service to clients.

**Goal:** Increase Vocational Rehabilitation performance on WIOA performance accountability measures.

- **Progress:** Over the past four years, the Utah State Office of Rehabilitation (USOR) has conducted training sessions and offered guidance to its staff on common performance measures. The primary objective of these sessions was to enhance staff knowledge and comprehension of performance measures, equipping them to assist clients in achieving quality outcomes in various areas. Additionally, the training aimed to instruct staff on effective coordination with clients, partners, and vendors to obtain necessary documentation for reporting purposes. USOR implemented internal controls to validate accuracy of educational goals and skill gains. They also introduced counselor dashboards to aid field staff in tracking their progress. Furthermore, the office revised Training Services policies, providing additional training to enhance staff understanding of career pathways, apprenticeships, and other post-secondary training opportunities. Consequently, USOR demonstrated year-to-year increases in measurable skill gains, credential attainment, median wages, and employment rates during the 4th quarter after client exit.

2. PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR, REFLECTING ACTUAL AND NEGOTIATED LEVELS OF PERFORMANCE. EXPLAIN ANY DISCREPANCIES IN THE ACTUAL AND NEGOTIATED LEVELS; AND

Indicators	PY22 Negotiated Level	PY22 Actual Level
Employment (Second Quarter After Exit)	51.0%	53.7%
Employment (Fourth Quarter After Exit)	49.3%	52.7%
Median Earnings (Second Quarter After Exit)	\$3,996	\$4,726
Credential Attainment Rate	30.4%	37.5%
Measurable Skill Gain	53.9%	55.2%

USOR successfully met or exceeded its negotiated performance levels for PY22.

3. THE USE OF FUNDS RESERVED FOR INNOVATION AND EXPANSION ACTIVITIES (SECTIONS 101(A)(18) AND 101(A)(23) OF THE REHABILITATION ACT) (E.G., SRC, SILC).

The Utah State Office of Rehabilitation has undertaken various innovation and expansion projects and activities. These encompass a range of strategic initiatives aligned with the Rehabilitation Act's requirements, demonstrating the organization's commitment to enhancing rehabilitation services:

- Establishment of a Pre-ETS program evaluation model with Utah State University to assess students gaining measurable skills following the participation in Pre-ETS services. **Funding for this activity is not charged to the 15% Pre-ETS Reserve**
- Development and implementation of new contracts to provide training and technical assistance to Community Rehabilitation Program (CRP) providers to ensure the provision of high-quality job development, placement and coaching services, along with increasing the number of Customized Employment (CE) providers. In the past four years, the number of CE-approved providers has surged from 7 to 27, marking a remarkable 280% increase.
- Providing funding support operation of the Utah State Independent Living Council.
- Providing administrative support and funding for operation of the State Rehabilitation Council (SRC) were also provided by the Utah State Office of Rehabilitation.

**E. SUPPORTED EMPLOYMENT SERVICES, DISTRIBUTION OF TITLE VI FUNDS, AND ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.**

**1. ACCEPTANCE OF TITLE VI FUNDS:**

(A) VR agency requests to receive title VI funds.

2. IF THE VR AGENCY HAS ELECTED TO RECEIVE TITLE VI FUNDS, SECTION 606(B)(3) OF THE REHABILITATION ACT REQUIRES VR AGENCIES TO INCLUDE SPECIFIC GOALS AND PRIORITIES WITH RESPECT TO THE DISTRIBUTION OF TITLE VI FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES. DESCRIBE THE USE OF TITLE VI FUNDS AND HOW THEY WILL BE USED IN MEETING THE GOALS AND PRIORITIES OF THE SUPPORTED EMPLOYMENT PROGRAM.

The Utah State Office of Rehabilitation provides Supported Employment (SE) services to clients with the most significant disabilities, including youth aged 14 to 24. These SE services are funded through a combination of Title I and Title VI funds. The USOR has defined key goals and priorities guiding the utilization of Title IV funds and the delivery of Supported Employment services.

**Goal 1:** Increase the number of competitive, integrated employment outcomes for individuals receiving supported employment services.

- **Strategy 1:** Expand the number of qualified and trained providers of Customized Employment Services.
- **Strategy 2:** Enhance the support and training of Community Rehabilitation Program providers to increase the quality and quantity of supported employment services; including targeted training on job accommodations and job coach fading.
- **Strategy 3:** Implement supported education resources to help individuals with significant disabilities increase participation in training programs and obtain long-term employment outcomes.
- **Strategy 4:** Identify tactics to assist clients achieve independence on the worksite.

**Goal 2:** Increase the number of youth with most significant disabilities receiving supported employment services

- **Strategy 1:** Enhance ongoing School-to-Work initiatives to assist students with disabilities begin SE/CE prior to exiting the secondary education system.
- **Strategy 2:** Enhance outreach and training to educator partners on supported and customized employment models to help facilitate discussion of CIE during Individual

Education Program planning meetings.

- **Strategy 3:** Enhance outreach to youth with substance use and mental health disabilities who could benefit from supported employment and individual placement and support services.

3. SUPPORTED EMPLOYMENT SERVICES MAY BE PROVIDED WITH TITLE 1 OR TITLE VI FUNDS FOLLOWING PLACEMENT OF INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES IN EMPLOYMENT. IN ACCORDANCE WITH SECTION 101(A)(22) AND SECTION 606(B)(3) OF THE REHABILITATION ACT, DESCRIBE THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES; AND THE TIMING OF TRANSITION TO EXTENDED SERVICES.

**Quality:** USOR maintains high quality in supported employment services by establishing and applying Supported Employment (SE) program standards for USOR SE vendors. These standards prescribe minimum customer outcomes and identify program procedures that must be followed for a provider to receive funds. A newly implemented quality assurance checklist for provider reviews every two years requires certifications, continuing education requirements, consumer satisfaction, review of complaints and concerns, and an action plan for continuing services for USOR.

USOR created specific policy based on the provision of supported employment services. The main service provided under SE is job coaching. USOR requires all employment specialists to be trained and have certifications prior to providing services to SE clients. Employment specialists from providers who do not meet the minimum qualifications cannot work with VR clients. The monitoring of SE service providers is conducted by the SE Coordinator and the Employment Support Services Program Specialist. This monitoring is conducted by assessing the application of USOR program standards and outcomes. It includes a review of any complaints received and the results of surveys completed by counselors using the program for clients. The coordinator and program specialist also review current providers, create updates, standardized expectations, revise provider agreements, and provide technical assistance. A list of USOR approved CRPs is posted on the website and updated frequently by the ESSS.

USOR also partners with extended support agencies to train and set expectations for employment specialists in customized employment, discovery, and Individualized Placement and Support (IPS). These services have been proven to meet the needs of persons with most significant disabilities (MSDs) who may need additional services and long-term support in order to be successfully employed.

**Scope:** Prior to placement, general VR Title I funds are used to assist individuals seeking supported employment services. After placement, SE services are provided with Title VI, Part B funds on a fee-for-service basis (based on achievement of milestones) by SE service providers, including functional assessment of clients to perform in supported employment (supplemental to the assessment conducted by the counselor for purposes of establishing eligibility with Title I funds); life-skills training, job development, job analysis and client job matching; training by an employment specialist in job skills and behavioral expectations at the job site; training and support away from the job to ensure work performance; family support; and support to the employer to ensure client job retention. The same scope of services is provided by the extended service agency. Target populations in supported employment include persons with the most significant disabilities who qualify for extended services from the Division of Services for Persons with Disabilities (DSPD) or the Office of Substance Use and Mental Health (OSUMH), or individuals who have extended services available from other sources, including private, Social Security and natural supports.

Extent: SE services are provided to eligible individuals according to their needs. Services are

provided for a period not to exceed 24 months unless under special circumstances a longer period to achieve job stabilization has been jointly agreed to by the individual and the VR counselor and established in the Individualized Plan for Employment (IPE). VR Services may be provided to students with disabilities in the school system as a part of a team with the school, extended services agency, VR, family etc. Once the student is placed on a competitive, integrated job, SE services may be utilized to assist the student maintain employment

**Timing:** The transition of services from VR to the extended support service agency depends on the customer's needs and level of support. VR can provide ongoing supported employment services on the job and employment specialist job coaching for up to 24 months or until the customer reaches an 80/20 level of intervention support. The 80/20 level of support is defined as needing less than 20% intervention by the employment specialist to successfully complete job tasks. For example, if a client is working 20 hours each week, the employment specialist would be intervening with job support for four hours or less each week.

The VR counselor is required to maintain communication with the Supported Employment (SE) team at least every 30 days. The SE team includes the VR counselor, customer, family members, extended services agency representative (i.e., support coordinator, mental-health worker, etc.), teacher (if a student), and employment specialist or employer. The team will coordinate services to ensure the client has the support needed to be successful on the job. Once the client reaches an 80/20 level of support or 24 months (whichever comes first) and the team agrees, services and funding will be transferred to the identified extended services agency for long-term SE.

For youth and students with disabilities who qualify and need supported employment services, the transition to the extended services agency will occur at the 80/20 level of support or 24 months. Youth SE who have received ongoing support for a full 24 months and are not able to transition to an extended services provider may receive extended services from USOR for a period of up to 48 months, until they reach age 25, or before if an extended services provider is found.

4. SECTIONS 101(A)(22) AND 606(B)(4) OF THE REHABILITATION ACT REQUIRE THE VR AGENCY TO DESCRIBE EFFORTS TO IDENTIFY AND ARRANGE, INCLUDING ENTERING INTO COOPERATIVE AGREEMENTS, WITH OTHER STATE AGENCIES AND OTHER APPROPRIATE ENTITIES IN ORDER TO PROVIDE SUPPORTED EMPLOYMENT SERVICES. THE DESCRIPTION MUST INCLUDE EXTENDED SERVICES, AS APPLICABLE, TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THE PROVISION OF EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES IN ACCORDANCE WITH 34 C.F.R.

§ 363.4(A) AND 34 C.F.R. § 361.5(c)(19)(v).

The Utah State Office of Rehabilitation (USOR) reserves Supported Employment (SE) funds for clients who have been determined most significantly disabled and who have secured an extended support agency for long-term SE support. USOR also uses SE funding for clients who have identified natural supports in the work environment. USOR has partnered with the Division of Services for People with Disabilities (DSPD) and the Division of Substance Abuse and Mental Health (DSAMH) to provide and transfer funding and support for mutual clients. Though these are the primary agencies that USOR partners with for SE, there are other individual supports that may qualify as an extended support agency as provided for in policy.

USOR and DSPD, in partnership with the Utah Legislature, seek annual ongoing funding for the Support Work Independence (SWI) program. This program provides state funded supported employment supports for individuals who have accessed the vocational rehabilitation program and are on the waiting list for DSPD waiver services. When the client is working successfully and is ready to transfer to DSPD for long-term support, state funds are utilized for SE while the individual remains on the waiting list for other waiver supports.

USOR partners with DSAMH with the Individual Placement Services (IPS) model to support local mental health agencies with training and technical assistance to provide supported employment services. USOR and DSAMH are partnering to provide supported employment and extended support to individuals with severe and persistent mental illness (SPMI). Through the support and direction of DSAMH, the local mental health agencies partner with USOR to provide the necessary treatment and employment support necessary for individual success. Supported employment is growing for mental health agencies; therefore, many projects are in progress across the state. USOR is providing guidance on policy, milestone payments and facility requirements in order to partner with each project and local mental-health agency.

USOR continues to set aside 50% of SE funds to be used for youth with most significant disabilities ages 14-24 who are in need of supported employment services. In order to qualify for use of these funds, the individual must be classified as someone with a most significant disability, require ongoing and extended services to maintain employment, and be between the ages of 14-24. USOR supports these individuals to seek and secure access to an extended services provider (DSPD, DSAMH, natural support, etc.). USOR's information management system is programmed to expend youth SE funds and adult SE funds based on the individual's age, employment status, and service provided. This allows USOR to capture and accurately report expenditures for adult SE and youth SE services

USOR continues to partner with DSPD, USBE, WDD and USU on the school-to-work project. USOR is partnering with Local Mental Health Authorities and DSAMH to provide and expand supported employment services for youth and adults with severe and persistent mental illness, specifically with the IPS model. Through Customized Employment and Supported Employment, USOR is also providing services and support for individuals with most significant disabilities who are eligible VR clients, utilizing 14C certificates, earning subminimum wages to help them move to competitive, integrated employment. USOR also continues to develop and provide training for internal staff and external service providers through the Supported Employment Coordinator position and a collaborative partnership with DSPD and DSAMH.

#### **F. ANNUAL ESTIMATES**

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 C.F.R. § 361.29(b), annual estimates must include the following projections:

##### **1. ESTIMATES FOR NEXT FEDERAL FISCAL YEAR—**

###### **A. VR PROGRAM; AND**

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Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

#### **FFY26**

<b>Priority Category</b>	<b>No. of Individuals</b>	<b>No. of Eligible Individuals</b>	<b>Costs of Services using</b>	<b>No. of Eligible Individuals Not</b>
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	Eligible for Services	Expected to Receive Services under VR Program	Title I Funds	Receiving Services (if applicable)
1 (MSD)	7,054	7,054	\$14,052,414	N/A
2 (SD)	11,683	6,983	\$9,514,198	4,700
3 (D)	2,776	1,732	\$2,417,179	1,044

B. SUPPORTED EMPLOYMENT PROGRAM.

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Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

[PLEASE REVIEW AND EDIT THE TABLE, AS APPLICABLE. IN THE TABLE, PLEASE INDICATE THE PRIORITY CATEGORIES, NUMBER OF INDIVIDUALS ELIGIBLE FOR SERVICES, NUMBER OF ELIGIBLE INDIVIDUALS EXPECTED TO RECEIVE SERVICES UNDER VR PROGRAM, ESTIMATED COSTS OF SERVICES USING TITLE I AND TITLE VI FUNDS, NUMBER OF PROJECTED NUMBERS OF ELIGIBLE INDIVIDUALS THAT WILL NOT RECEIVE SERVICES, DUE TO THE OOS, FOR TITLE VI, SUPPORTED EMPLOYMENT PROGRAM.]

**FFY26**

Priority Category	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
1 (MSD)	465	465	\$926,335 (\$300,000 from Title I)	N/A

**G. ORDER OF SELECTION**

- PURSUANT TO SECTION 101(A)(5) OF THE REHABILITATION ACT, THIS DESCRIPTION MUST BE AMENDED WHEN THE VR AGENCY DETERMINES, BASED ON THE ANNUAL ESTIMATES DESCRIBED IN DESCRIPTION (F), THAT VR SERVICES CANNOT BE PROVIDED TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR AND ARE DETERMINED ELIGIBLE FOR SERVICES.

The Utah State Office of Rehabilitation is implementing an order of selection with one or more priority categories closed

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

A. THE JUSTIFICATION FOR THE ORDER

The Utah State Office of Rehabilitation (USOR), in consultation with the Utah State Rehabilitation Council (SRC) has determined that it does not have sufficient resources to serve all eligible individuals. Multiple factors have contributed to this resource shortage, necessitating the implementation of an Order of Selection.

Over the past four years, the Utah State Office of Rehabilitation (USOR) has seen significant growth in both demand for services and the resources required to meet that demand. Since FFY21, the number of annual applicants has risen sharply, from 5,663 to 8,809 in FFY24, representing an increase of more than 55%. The total number of clients served has also grown steadily, reaching nearly 18,500 in FFY24, while the number of individuals actively engaged in an Individualized Plan for Employment (IPE) rose by 14%, from 12,380 to 14,150. This surge in participation has been accompanied by a marked increase in program costs. Client service expenditures have grown by more than 66% over the same period, climbing from \$12.2 million in FFY21 to \$20.3 million in FFY24.

This growth is attributed to several factors, including federal requirements to serve youth and students, increased program awareness following post-pandemic outreach, economic conditions, and expanded support for individuals with the most significant disabilities, particularly those requiring long-term supported employment services.

Rising expenditures are driven by:

- Inflation and the higher cost of long-term services such as training, post-secondary education, supported employment job coaching, and assistive technology.
- Vendor rate increases for goods and services.
- A greater number of program participants requiring assessments.
- Staff salary increases to maintain competitive pay.

Staffing capacity is another factor contributing to the need for an Order of Selection. The rising demand for services has increased the average caseload size for VR counselors to 115 clients, with some caseloads exceeding 160 clients in areas where clients are assigned based on their place of residence. USOR does not have the financial resources to address the additional personnel demands, and these capacity limitations are hindering staff's ability to provide timely and high-quality services.

With the continued growth in individuals seeking and receiving services, along with a significant rise in costs, USOR has maintained and expanded a variety of cost containment strategies, including:

- Maintaining a Financial Needs Assessment to ensure individuals with available resources contribute toward the cost of non-exempt services.
- Conducting regular reviews to identify and utilize comparable benefits and services to avoid duplication of funding.
- Collaborating with the Department of Workforce Services' Workforce Development programs to leverage training funds and job placement services.
- Applying internal controls, including supervisor review thresholds, to ensure goods and services are necessary, appropriate, and reasonably priced.
- Maintaining supervisory review of all client service authorizations to ensure compliance

with programmatic and fiscal requirements.

- Collocating standalone VR offices into American Job Centers, when appropriate, to reduce facility costs.
- Increasing use of internal staff to provide direct job placement and pre-employment transition services, rather than purchasing these services.
- Eliminating non-essential positions, such as medical consultants.
- Slowing the rate vacant positions are filled to control personnel costs.
- Removing master's degree and certification requirements for vocational rehabilitation counselors to reduce tuition and certification reimbursements expenses previously required under the Comprehensive System of Personnel Development plan.
- Providing staff training on using existing information for assessments to prevent duplication and reduce unnecessary expenditures.
- Implementing real-time dashboards for review, training, and updates of authorizations to ensure obligations align with actual expenditures.
- Revising policies to promote cost-effective funding use and ensure quality outcomes, including in areas such as private training providers and community rehabilitation program services.
- Adjusting, consolidating, or reducing service contracts where applicable to increase savings
- Reducing non-essential travel (in-state and out-of-state) and expanding the use of virtual training options and platforms.

Combined with the increase in clients and rising expenditures mentioned above, the following shifts in funding compound the need to go on an OOS:

- \$3,479,185 of FFY25 VR federal funding relinquished due to non-federal share constraints
- Reduction in reimbursements from the Social Security Administration (SSA) due to recent changes in SSA procedures. These changes are more restrictive and have led to a higher rejection rate of reimbursement claims. The challenges stem from new requirements related to the timing of submissions, additional supplemental documentation requirements, and restrictions on resubmissions, all of which contribute to a reduction in program income.
- Utah is unable to obtain additional non-federal share to match any increases in Federal Awards.

Vocational Rehabilitation funding is awarded annually for one year. However, if certain conditions are met, VR funds not expended in the first year can be carried forward and spent in the second year. As a result of the factors described above, VR funding is being depleted earlier in the award period, causing the unspent first year funding that has previously been carried forward and utilized to cover expenditures in the second year to shrink. Absent an OOS, we anticipate that available funding in FFY26 will not be sufficient to cover FFY26 obligations as illustrated below.

	<b>FFY26 (estimated)</b>	<b>FFY27 (estimated)</b>
Prior Year Funding	\$25,496,140	\$6,926,935
12-Month Funding	53,300,469	53,300,469
Available Funding	<b>78,796,609</b>	<b>60,227,404</b>
Less: Expenditures	(71,869,674)	(80,994,979)

<b>Surplus (Deficit)</b>	<b>\$6,926,935*</b>	<b>(\$20,767,575)</b>
*We anticipate that unliquidated obligations at September 30, 2026 will exceed the available remaining funds		

Because prior year funding is no longer sufficient to address the gap between available funding and expenditures, it is crucial to bring annual expenditures into alignment with annual (12-month) funding.

	<b>FFY23</b>	<b>FFY24</b>	<b>FFY25 (estimated)</b>	<b>FFY26 (estimated)</b>	<b>FFY27 (estimated)</b>
Federal Award*	\$39,831,760	\$39,831,760	\$41,239,169	\$41,239,169	\$41,239,169
Non-Federal Share	11,017,095	11,161,292 <sup>‡</sup>	11,161,300	11,161,300	11,161,300
Program Income	2,217,439	1,641,120	975,000 <sup>§</sup>	900,000 <sup>§</sup>	900,000 <sup>§</sup>
<b>Total 12-Month Funding</b>	<b>53,066,294</b>	<b>52,634,172</b>	<b>53,375,469</b>	<b>53,300,469</b>	<b>53,300,469</b>
Less: Expenditures	(47,447,735)	(55,909,606)	(64,189,024)	(71,869,674)	(80,994,979)
<b>Funding Gap</b>	<b>\$5,618,559</b>	<b>(\$3,275,434)</b>	<b>(\$10,813,555)</b>	<b>(\$18,569,205)</b>	<b>(\$27,694,510)</b>

\*Excludes prior year funding

<sup>‡</sup>Amount that is anticipated to be reported on the final FFY24 report

<sup>§</sup>As of the end of August 2025, actual program income received during FFY25 is down 40.6% compared to the same point in time in FFY24. Program income in subsequent years is expected to be lower than FFY25 actuals.

Based on the justification above, USOR needs to implement an Order of Selection (OOS). The OOS ensures that current USOR clients with Individualized Plans for Employment (IPEs) can continue receiving services without interruption, while managing a wait list for new applicants who are determined eligible and assigned to a closed disability priority category. USOR plans to close Priority Categories 2 and 3, and keep Priority Category 1, individuals with the most significant disabilities, open.

USOR engaged in multiple public consultation efforts leading up to the implementation of the OOS. Examples include:

- August 18, 2025 – Met with the State Rehabilitation Council Executive Committee to discuss the need for an OOS and obtained their support.
- August 21, 2025 – Presentation on the OOS to the State Workforce Development Board, and received a vote of support to continue.
- September 3, 2025 – Consultation with the State Rehabilitation Council on the need for an OOS, as well as related rules, policies, and procedures. The SRC voted to support USOR's plan to implement an Order of Selection.
- September 4, 2025 - USOR staff were informed of the agency's intent to implement an Order of Selection through a virtual meeting, which included an overview by leadership and a Q&A session.
- September 9, 2025 – The state plan amendment was posted for public comment
- September 17–18, 2025 – USOR conducted public town hall meetings providing an overview of the state plan amendment, the justification for the OOS, priority

classifications, and related processes. USOR leadership collected input and answered questions.

- November 17, 2025 - USOR implemented the Order of Selection

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

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

Priority Category 1: An individual with the Most Significant Disability (MSD) as defined below.

Priority Category 2: An individual with a Significant Disability (SD) as defined below.

Priority Category 3: An individual with a Disability (D) as defined below.

***Description of priority categories:***

- **Priority Category 1:** An *individual with the most significant disability* means a severe physical or mental impairment causes serious limitations in two or more functional capacities. Functional capacities include mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills. In addition, the individual must require multiple VR services over an extended period of time in order to engage in employment.
- **Priority Category 2:** An *individual with a significant disability* means a severe physical or mental impairment causes serious limitations in at least one functional capacity. The individual requires multiple VR services over an extended period of time
- **Priority Category 3:** An *individual with a disability* means an individual who has a physical or mental impairment that constitutes or results in a substantial impediment to employment and who can benefit in terms of an employment outcome from the provision of vocational rehabilitation services.

USOR serves eligible individuals with the most significant disabilities (Priority Category 1) first. Eligible individuals with significant disabilities (Priority Category 2) are served once Priority Category 1 is open and no individuals remain on the waiting list. Eligible individuals with disabilities (Priority Category 3) are served once Priority Category 2 is open and no individuals remain on the waiting list. In all cases, individuals are released from the statewide waiting list in order of priority category, from most significant to least significant, and within each category by application date, from oldest to newest.

**C. THE VR AGENCY'S GOALS FOR SERVING INDIVIDUALS IN EACH PRIORITY CATEGORY, INCLUDING HOW THE AGENCY WILL ASSIST ELIGIBLE INDIVIDUALS ASSIGNED TO CLOSED PRIORITY CATEGORIES WITH INFORMATION AND REFERRAL, THE METHOD IN WHICH THE VR AGENCY WILL MANAGE WAITING LISTS, AND THE PROJECTED TIMELINES FOR OPENING PRIORITY CATEGORIES. NOTE: PRIORITY CATEGORIES ARE CONSIDERED OPEN WHEN ALL INDIVIDUALS IN THE PRIORITY CATEGORY MAY BE SERVED.**

## Projected Service Goals for FY26 and Continuity of Services

- USOR will continue to provide services to individuals who, as of the effective date of the Order of Selection (OOS), are already receiving services under an approved Individualized Plan for Employment (IPE). Over the next year, USOR estimates it will serve 7,054 individuals in Priority Category 1, 6,983 in Category 2, and 1,776 in Category 3.
- USOR intends to continue to provide services to newly eligible individuals classified in Priority Category 1 (MSD), while individuals classified in Priority Category 2 (SD) and Category 3 (D) will go on a wait list.
- USOR will continue providing pre-employment transition services (Pre-ETS) to students with disabilities who first access services as potentially eligible, as well as to those who have individualized plans for employment established prior to implementation of the Order of Selection or who are in Category 1 (MSD)

If expenditures rise above the projected growth, USOR will need to consider closing the MSD category. If actual expenditures increase at a lower rate, individuals can begin to be released from the waitlist. The USOR budget status is reviewed monthly by USOR senior leadership and the DWS finance team.

Priority Category	Estimated Number of Clients to be Served	Estimated Cost	Estimated Clients on a Wait List
1 (MSD)	7,054	\$14,052,414	0
2 (SD)	6,983	\$9,514,198	4,700
3 (D)	1,732	\$2,417,179	1,044
Total	15,769	\$25,983,792	5,744

## Applications, Eligibility and Priority Classification

When OOS is in effect, USOR will continue to accept applications and make eligibility determinations. At the time of eligibility clients will also be placed into a priority category. USOR will provide all eligible individuals placed on the OOS waiting list with Information and Referral (I&R) services. These services include information about, and referrals to, other federal or state programs, including components of the statewide workforce development system, that are best suited to address the specific employment needs of an individual with a disability. The I&R process will be carried out in compliance with 34 C.F.R. § 361.37 to ensure individuals are directed to appropriate resources that may assist them in preparing for, securing, retaining, or regaining employment.

## Notification Requirements

USOR will notify each individual determined eligible, in writing, of the following:

- The individual's assignment to a priority category classification;
- The individual's right to request reclassification if there is a change in circumstances or if a misclassification has occurred;

- The individual's right to appeal the category assignment; and
- The availability of assistance from the Client Assistance Program (CAP).

## **Contact and Monitoring**

Individuals placed on the OOS waiting list (Delayed Status) will be contacted at least once within the first 90 days of being placed in delayed status and every 120 days thereafter. Client records will document the nature and scope of any information and referral services provided.

## **Priority Order**

USOR will manage the statewide waiting list as follows:

- **Priority Category 1:** Individuals with the most significant disabilities will be served first.
- **Priority Category 2:** Individuals with significant disabilities will be served once Priority Category 1 is open and no individuals remain on the waiting list.
- **Priority Category 3:** Individuals with disabilities will be served once Priority Category 2 is open and no individuals remain on the waiting list.

Regardless of category closure, individuals will be released from the waiting list first by priority category (most significant to least significant), and then by application date (oldest to newest).

## **Placing Clients on the Waitlist**

- Clients will be placed on the waitlist within their priority category based on application date.
- Clients on the wait list will be managed and tracked through the AWARE case management system and dashboard reports.

## **Removing Clients from the Waitlist**

- USOR will evaluate financial resources and staffing capacity at least monthly to determine when categories can be reopened.
- One priority category will be reopened at a time. The entire waiting list for that category must be cleared before the next category is opened.
- Clients will be removed from the waiting list in order of application date.
- District offices will be notified when clients are moved from the wait list to eligible status.
- Counselors will notify clients by letter of their activation from the waiting list and request a meeting to start the process of developing an IPE within 90 days from wait list removal.

## **Projected Timeline**

At the earliest, USOR estimates it may have the resources and capacity to open Priority Category 2 and begin moving clients off of the waitlist by October 2026. USOR will continue to monitor the fiscal outlook on a monthly basis and evaluate the capacity to serve clients, as well as program cost-management efforts. In making these evaluations, USOR will review:

- Projected and actual expenditures;

- Projected and actual numbers of clients in each priority category;
- The number of individuals on the waiting list for services;
- The number of potentially eligible students with disabilities receiving Pre-ETS;
- Pre-ETS expenditures; and
- Staff capacity and caseloads.

When resources allow, USOR will first reopen Priority Category 2 (Significant Disability). If funding continues to support expanded services, USOR will then reopen Priority Category 3 (Disability).

**3. HAS THE VR AGENCY ELECTED TO SERVE ELIGIBLE INDIVIDUALS OUTSIDE OF THE ORDER OF SELECTION WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT?**

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

**H. WAIVER OF STATEWIDENESS.**

The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with Section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 C.F.R. § 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 C.F.R. § 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."

Not applicable. The Utah State Office of Rehabilitation is not requesting a Waiver for Statewideness.

**I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT.**

In accordance with the requirements in Section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the State VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

**1. ANALYSIS OF CURRENT PERSONNEL AND PROJECTED PERSONNEL NEEDS INCLUDING—**

- A. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND**
- B. THE NUMBER AND TYPE OF PERSONNEL THAT ARE EMPLOYED BY THE VR AGENCY IN THE PROVISION OF VOCATIONAL REHABILITATION SERVICES, INCLUDING RATIOS OF QUALIFIED VOCATIONAL REHABILITATION COUNSELORS TO CLIENTS;**
- C. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES IN 5 YEARS BASED ON PROJECTIONS OF THE NUMBER OF INDIVIDUALS TO BE SERVED, INCLUDING INDIVIDUALS WITH SIGNIFICANT DISABILITIES, THE NUMBER OF PERSONNEL EXPECTED TO RETIRE OR LEAVE THE FIELD, AND OTHER RELEVANT FACTORS.**

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Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can

copy and paste the table into the narrative field, and start over if needed.

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
VR Counselors	101	103	105
VR Supervisors	25	26	26
District Directors	9	10	10
Office Specialists	43	45	45
Rehab Techs	14	14	15
Pre-ETS Instructors	16	18	24
Business Relations Specialists	3	3	3
Employment Specialists	9	10	10
Work Incentives Counselors	8	8	9
Assistive Tech Specialists	8	8	8
Field Service Directors	3	3	3
Program Coordinators	3	4	4
Program Specialists	4	4	4
VR Staff Trainers	3	3	3
Business Analysts	3	3	3
Asst. Directors	2	2	2
State VR Director	1	1	1

**D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:**

Of the 265 positions within the Vocational Rehabilitation Program, 129 are rehabilitation counselors and counseling supervisors who provide the direct core, non-delegable Vocational Rehabilitation services to clients. During FFY 23, USOR served 16,827 individuals (applicant to eligible) with a counselor to client ratio of 1:130.

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

The University of Utah's Kem C. Gardner Policy Institute projects an annual population growth of 1.7% in Utah through 2028. In addition, 2023 Annual Disability Statistics Compendium projects a similar growth trend, but also notes a lower disability prevalence in the state. In analysis of this information, along with referral trends, outreach initiatives, and the connection of potentially eligible students to the Vocational Rehabilitation program, the Utah State Office of

Rehabilitation anticipates serving 14,650 eligible individuals over the course of PY-2028.

**2. DATA AND INFORMATION ON PERSONNEL PREPARATION AND DEVELOPMENT, RECRUITMENT AND RETENTION, AND STAFF DEVELOPMENT, INCLUDING THE FOLLOWING:**

**A. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM; THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND THE NUMBER OF STUDENTS WHO GRADUATED DURING THE PRIOR YEAR FROM EACH OF THOSE INSTITUTIONS WITH CERTIFICATION OR LICENSURE, OR WITH THE CREDENTIALS FOR CERTIFICATION OR LICENSURE, BROKEN DOWN BY THE PERSONNEL CATEGORY FOR WHICH THEY HAVE RECEIVED, OR HAVE THE CREDENTIALS TO RECEIVE, CERTIFICATION OR LICENSURE.**

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
Utah State University	Masters of Rehabilitation Counseling	53	18

**B. THE VR AGENCY'S PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL, WHICH ADDRESSES THE CURRENT AND PROJECTED NEEDS FOR QUALIFIED PERSONNEL; AND THE COORDINATION AND FACILITATION OF EFFORTS BETWEEN THE VR AGENCY AND INSTITUTIONS OF HIGHER EDUCATION AND PROFESSIONAL ASSOCIATIONS TO RECRUIT, PREPARE, AND RETAIN PERSONNEL WHO ARE QUALIFIED, INCLUDING PERSONNEL FROM MINORITY BACKGROUNDS AND PERSONNEL WHO ARE INDIVIDUALS WITH DISABILITIES.**

The Utah State Office of Rehabilitation (USOR) actively engages in recruitment efforts to strengthen the rehabilitation profession within the state. USOR hiring officials regularly attend college and provider job fairs to promote the profession and attract applicants with relevant qualifications. The organization has fostered relationships with out-of-state colleges, including successful outreach to the Pontifical Catholic University of Puerto Rico. From this partnership, USOR successfully recruited four Spanish-speaking VR counselors to relocate to Utah.

Throughout the year, USOR targets Vocational Rehabilitation counselor positions by participating in career fairs and presenting to Utah State University Rehabilitation Counselor Education (RCE) students. Additionally, USOR provides internship opportunities for rehabilitation students, with several later joining as full-time counselors. To broaden its reach, USOR collaborates with the Department of Human Resource Management (DHRM) to amplify recruitment announcements across the nation, using platforms like LinkedIn and engaging with other social service professionals, including WIOA partners. USOR collaborates with DHRM to provide an alternative state application pathway that promotes the employment of individuals with disabilities. Additionally, the Work Ability Internship program, offered by USOR, has demonstrated success in creating a pathway to state employment for individuals with disabilities.

Active involvement in the state chapter of the National Rehabilitation Association (NRA) allows USOR to leverage this association for recruitment and professional development. The

organization backs the Utah Rehabilitation Association (URA) conferences and co-sponsors monthly 'brown bag training seminars' for staff. These endeavors aim to attract, train, and retain qualified personnel, especially those from minority backgrounds or with disabilities.

USOR offers flexible schedules, an incentive program that gives administrative leave for above average performance and generous educational assistance. USOR provides staff with a 10% Administrative Salary Increase (ASI) for credential attainment. USOR supports employees by providing reimbursement for costs related to obtaining and maintaining certification and licensure. In addition, USOR focuses on internal promotion and career mobility opportunities to support the long-term career development of staff.

**C. DESCRIPTION OF STAFF DEVELOPMENT POLICIES, PROCEDURES, AND ACTIVITIES THAT ENSURE ALL PERSONNEL EMPLOYED BY THE VR AGENCY RECEIVE APPROPRIATE AND ADEQUATE TRAINING AND CONTINUING EDUCATION FOR PROFESSIONALS AND PARAPROFESSIONALS:**

- I. PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND**
- II. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO VR AGENCY PROFESSIONALS AND PARAPROFESSIONALS AND FOR PROVIDING TRAINING REGARDING THE AMENDMENTS TO THE REHABILITATION ACT MADE BY THE WORKFORCE INNOVATION AND OPPORTUNITY ACT.**

The Utah State Office of Rehabilitation (USOR) provides for attendance at workshops, conferences, formal course work at institutions of higher education, as well as agency developed and conducted training sessions.

All new counselors participate in a training academy that provides in-person training, instruction and guidance on Vocational Rehabilitation policy, procedures and case management. New counselors also have an opportunity to learn about various support programs, community partners and resources. While working in their offices, new staff receive training, clinical supervision, administrative supervision, counseling skills instruction, and professional development from office leadership, counseling supervisor and district director. New counselors also receive support through peer mentorship, case conceptualizations and staffing meetings.

New and existing staff receive regular training in the areas of counseling, informed choice, medical, psychological and vocational assessment, assistive technology, culturally sensitive practices, job placement and development, ethics, labor market, technology, as well as other topics relevant to Rehabilitation counselors. Topics and content areas for training are identified through client record review findings, staff surveys, consumer satisfaction survey responses, program updates, local and national trends, system changes and leadership recommendations.

USOR provides monthly in-service training via the video conferencing system to offices throughout the state, as well as by virtual training content. USOR has consistently exceeded the required training hours required to maintain national certification and has also provided counselors with the training hours required to maintain state licensure this past year.

During FY 22 and FY 23, USOR offered training covering intersectional identities for individuals with disabilities, aligning with the principles outlined in the CRCC code of ethics, particularly section D on Multicultural Considerations. Topics included understanding ethical responsibilities in rehabilitation counseling, addressing systemic bias in chronic pain and substance abuse treatment, and exploring intersectionality, disability, and victimization.

Furthermore, USOR provides for attendance at workshops, conferences, webinars, formal course

work at institutions of higher education, as well as agency developed and conducted training sessions. USOR provides monthly in-service training via high definition video conferencing to offices throughout Utah, as well as by web-streaming training content. USOR has consistently exceeded the required training hours required to maintain national certification and has also provided counselors with the training hours required to maintain state licensure this past year. Available training incorporates the dissemination of knowledge gained through research in rehabilitation.

USOR leadership, program specialists and other staff attend local and national conferences and receive training where research relevant to their areas of specialization is disseminated. The information obtained is used for the development of staff training, along with application for enhancement of policies, practices and programs. USOR also surveys staff on the training they attended in order to obtain feedback on making improvements and identifying additional training needs. In addition, USOR encourages staff to be aware of current research, information and practices in the field of rehabilitation and disability. USOR regularly shares and incorporates into trainings information provided by professional associations, government programs and university resource centers, such as the National Rehabilitation Association, Helen Keller National Center for deafblind youth and adult, Utah State University's Department of Special Education & Rehabilitation Counseling, National Institute on Disability and Rehabilitation Research, Mathematica, University of Utah's Policy Institute, George Washington University Center for Rehabilitation Counseling Research and Education, and ADA National Network.

**3. DESCRIPTION OF VR AGENCY POLICIES AND PROCEDURES FOR THE ESTABLISHMENT AND MAINTENANCE OF PERSONNEL STANDARDS CONSISTENT WITH SECTION 101(A)(7)(B) TO ENSURE THAT VR AGENCY PROFESSIONAL AND PARAPROFESSIONAL PERSONNEL ARE ADEQUATELY TRAINED AND PREPARED, INCLUDING—**

**A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND**

**B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(i) 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.**

The Utah State Office of Rehabilitation (USOR) has established hiring preferences, policies and procedures for the establishment and maintenance of personnel standards to ensure that the USOR professional and paraprofessional personnel are prepared and trained. USOR has a Comprehensive System of Personnel Development (CSPD) policy that ensures professionals providing services meet the requirement of master's level education, rehabilitation counselor certification and state licensure. This policy applies to all rehabilitation counselors, counseling supervisors, district directors and field service directors.

The Utah State Office of Rehabilitation CSPD standard requires employees meet one of the following criteria:

- Hold a Utah State Licensure in Vocational Rehabilitation Counseling
- Meet the criteria to obtain a Utah State Licensure in Vocational Rehabilitation

Counseling which includes holding a Master's degree in Rehabilitation Counseling or related field as outlined in the Utah State licensing regulations; obtaining 4000 hours of supervised experience under a Licensed Vocational Rehabilitation Counselor; and having taken and passed the CRC exam (national certification exam). Employees who hold a Master's degree in an approved counseling field will be considered to have met the CSPD if they have completed the required 4000 hours of supervised work under the supervision of an LVRC and have completed

and passed the CRC national exam. CSPD status is tracked for counselors, supervising counselors, and district directors. In addition, the CSPD database contains information on various area directors, administrators and program specialists.

CSPD plans also require new counselors to meet the standard within five years of their hire date. Counselors who do not meet CSPD upon hire and require additional graduate level education are expected to enroll in at least one graduate level class and apply for a graduate program during their probationary period (first 12 months of hire).

USOR makes every effort to recruit and hire individuals who meet the USOR's CSPD standard and supports the training of existing employees who do not meet the CSPD standard. USOR offers ongoing educational assistance for those needing additional education to meet the standard. USOR offers a pay increase for counselors who obtain national certification (CRC).

All new counselors receive a notification indicating their current CSPD standing and the requirement they must meet within their first year of hire and subsequent five years to meet the standard. Supervisors track the progress of the employee and include the requirement to meet CSPD in the counselor's performance plan and evaluation.

Each new counselor hired must complete a Utah State Office of Rehabilitation Qualification of Personnel Standard form. For staff who meet the standard at the time of hire and those who will meet the standard within five years of hire with additional work experience and national certification, those hired with a Master's degree in an approved counseling field, no additional documentation is required except verification of passing the CRC exam and verification of state licensure. For counselors who need additional education to meet the standard, sections will be added to their performance plans under the heading of Professional Development. The Professional Development section must include a plan describing how the counselor will meet the standard, by obtaining the required Master's degree and National Certification, within five years of the date of hire. These plans are submitted to the USOR training coordinator with the Utah State Office of Rehabilitation Qualification of Personnel Standard form within 30 days of hire. Progress sufficient to meet the CSPD plan requirements will be monitored in each subsequent year. If an employee has not satisfactorily completed all activities outlined for the year of review, they will receive an unsatisfactory rating in the Professional Development section and be placed on corrective action. This plan will include goals and deadlines for remediating their lack of progress toward their CSPD Plans. If the corrective action is not successful, disciplinary action will result, which may include termination based upon non-compliance with the Department of Workforce Service's policy.

USOR assists with funding for graduate level education for those hired without a Master's degree in a counseling field. A graduate degree specific to rehabilitation counseling is required and considered to be directly related to the job requirements of a vocational rehabilitation counselor. The CACREP accredited program chosen must be eligible to grant an RSA scholarship to offset the costs of tuition, fees, and books. All employees attending these programs must apply for the RSA scholarship. In the rare instance where an approved graduate program has exhausted available scholarship monies for a given semester, employees will be eligible to request full reimbursement from the department.

All requests for USOR educational benefits will be considered contingent upon available funding, and employees will be notified of approval prior to enrollment for each semester. All related educational expenses and time required to complete any graduate program will be the responsibility of the employee.

While it is the intention of USOR to establish and maintain funding necessary to allow all employees to meet the CSPD requirements, exceptional and unforeseen circumstances may arise that prohibit such funding. Should funding become unavailable, the employee will be allowed an adjusted time frame to accomplish the standard when such funding becomes available.

Upon completion of a Master's degree, counselors will be promoted to the position of Rehabilitation Counselor II and will receive a 10% increase. Counseling staff who obtain the CRC certification will receive a 5% increase. Counselors must continue to maintain CRC certification or they will lose the salary increase. In addition, once a counselor obtains their CRC designation and has completed the required number of hours, they must meet the eligibility criteria to become an LVRC. To assist counselors in maintaining licensure and certification, USOR provides training for continuing education credits. The department also provides reimbursement for CRC and LVRC application and renewal.

USOR instituted a hiring preference to encourage hiring staff that already meet the CSPD standard:

- Individuals who hold the Utah State Licensure for Vocational Rehabilitation Counselors.
- Individuals who meet the USOR CSPD standard but have not yet obtained state licensure.
- Individuals enrolled in a CORE/CACREP accredited program to obtain a Master's degree in Rehabilitation Counseling.
- Individuals who hold a Master's degree in an approved counseling field as outlined in the state licensing law.
- Individuals who hold a Bachelor's degree in a related social service field such as counseling, psychology, social work, etc. and who have two or more years of employment or vocational counseling experience.
- Individuals who hold a Bachelor's degree in a related social service field with less than two years of counseling experience are hired as a rehabilitation counselor trainee.

Progress of USOR staff is collected and monitored through the data system. Staff employed as rehabilitation counselors, counseling supervisors, district directors and field service directors must meet the CSPD standards and are tracked through this system.

In addition, USOR has established policies, procedures, and activities to ensure that all personnel employed by the designated state unit receive appropriate and adequate training and staff development for professionals and paraprofessionals within the DSU. Training and professional development targets necessary rehabilitation skills particularly with respect to assessment, vocational counseling, job placement, rehabilitation technology, disability and utilization of labor market information. USOR maintains procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated state unit professionals and paraprofessionals within the DSU.

**4. METHOD(S) THE VR AGENCY USES TO ENSURE THAT PERSONNEL ARE ABLE TO COMMUNICATE IN APPROPRIATE MODES OF COMMUNICATION WITH OR IN THE NATIVE LANGUAGE OF APPLICANTS OR ELIGIBLE INDIVIDUALS WHO HAVE LIMITED ENGLISH SPEAKING ABILITY.**

The Utah State Office of Rehabilitation is dedicated to delivering high-quality services to all individuals seeking vocational rehabilitation services. As such, USOR endeavors to address the

communication needs of all clients, in line with the Equality Opportunity standards of the Department of Workforce Services. Upon application, USOR gathers information regarding preferred language and utilizes accessible resources to offer services and information in the individual's preferred language.

USOR works to ensure the availability of personnel who are able to communicate in the native language of applicants or eligible individuals who have limited English-speaking ability or in appropriate modes of communication with applicants or eligible individuals. The Utah State Office of Rehabilitation makes coordinated efforts to hire Vocational Rehabilitation Counselors who have bilingual skills to meet the needs of eligible individuals with limited English speaking abilities. USOR utilizes state contracts language interpreting. This includes On-Demand Phone and Video Language translation services, such as Language Link and Language Line. USOR also has applications and forms available in Spanish. In addition, USOR utilizes state contract services for additional language translation needs.

Beyond linguistic diversity, USOR also acknowledges the unique communication needs of the deaf and hard of hearing community. To this end, USOR has strategically designated specific caseloads across the state to be managed by professionals who are fluent in American Sign Language (ASL).

The Utah State Office of Rehabilitation provides interpreting services through qualified staff members, through telephone, video relay services, real-time captioning, and through outside staff services purchased per state contract. The Utah State Office of Rehabilitation also routinely provides materials in alternative formats, to meet the needs of individuals. This includes electronic, large print and braille.

**5. AS APPROPRIATE, DESCRIBE THE PROCEDURES AND ACTIVITIES TO COORDINATE THE DESIGNATED STATE UNIT'S COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT WITH PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT.**

The Utah State Office of Rehabilitation (USOR) has put in place procedures and initiatives to align with the comprehensive system of personnel development outlined in the Individuals with Disabilities Education Act (IDEA). A cornerstone of this alignment is the state interagency agreement between the USOR and the Utah State Board of Education (USBE). This agreement ensures a systematic transition for Utah's youth with disabilities.

One primary objective of this partnership is to elevate awareness and understanding of Pre-employment Transition Services (Pre-ETS) available to eligible and potentially eligible students. The agreement provides clarity on how USOR and USBE work synergistically, detailing collaborative efforts in cross-training, offering technical assistance and fostering partnerships at the local level. Furthermore, to support best practices and enhance staff capabilities, USOR and USBE jointly host an annual transition institute conference. This event serves as a platform for USOR staff and local education agency personnel to receive training and share effective strategies, ensuring a seamless and efficient transition for the youth they serve.

**J. COORDINATION WITH EDUCATION OFFICIALS.**

In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act—

**1. DESCRIBE PLANS, POLICIES, AND PROCEDURES FOR COORDINATION BETWEEN THE DESIGNATED STATE AGENCY AND EDUCATION OFFICIALS RESPONSIBLE FOR THE PUBLIC EDUCATION OF STUDENTS WITH DISABILITIES, THAT ARE DESIGNED TO**

FACILITATE THE TRANSITION OF THE STUDENTS WITH DISABILITIES FROM THE RECEIPT OF EDUCATIONAL SERVICES IN SCHOOL TO THE RECEIPT OF VOCATIONAL REHABILITATION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES.

The Utah State Office of Rehabilitation (USOR) has robust plans, policies, and procedures in place to strengthen coordination with education officials overseeing the public education of students with disabilities. These mechanisms aim to ease the transition of students with disabilities into employment and independent living, with a focus on providing Pre-Employment Transition Services (Pre-ETS) for students with disabilities aged 14 through 21.

Annually, USOR collaborates with the Utah State Board of Education (USBE) through a cross-training conference. This gathering provides an avenue for teams from both sides to strategize and refine their collaboration efforts, particularly concerning Transition and Pre-ETS. A pivotal part of this strategy involves synchronizing the student's Individualized Education Program (IEP) with their Individualized Plan for Employment (IPE), ensuring seamless progression from school to post-school endeavors.

To support this process, USOR maintains policy and procedures to ensure that eligible students with disabilities develop an IPE prior to exiting high school. Both USOR and USBE have affirmed their commitment through a signed Interagency Agreement. This agreement delineates the blueprint for state and local level coordination, guaranteeing a smooth transition for Utah's students with disabilities as they navigate from academic settings to the workforce.

Both USOR and USBE attend the annual National Transition Institute sponsored by the National Technical Assistance Center on Transition to develop state goals and strategies to improve student transition from school to employment. In addition, as specified in the DWS and USBE interagency agreement, USOR will share information regarding policies, procedures, guidelines, programs and services for the purpose of improving the access to, and availability of Transition and Pre-ETS services. The interagency agreement also specifies that USBE will assist USOR in the facilitation of provision of transition services.

To ensure procedural integrity, USOR's Client Services specifies that student's IPEs will be developed and signed prior to graduation from high school or post high. USOR's Client Service Policy Manual Chapter 10 (Individual Plan for Employment) states that IPEs will be developed as soon as possible, but within 90 days unless an exception is granted. Furthermore, USOR, in partnership with USBE and the Local Education Agencies (LEAs), aligns IEPs with IPEs. This coordination ensures timely IPE development and signing, all within the prescribed 90 days and prior to the student's exit from the school system.

**2. DESCRIBE THE CURRENT STATUS AND SCOPE OF THE FORMAL INTERAGENCY AGREEMENT BETWEEN THE VR AGENCY AND THE STATE EDUCATIONAL AGENCY. CONSISTENT WITH THE REQUIREMENTS OF THE FORMAL INTERAGENCY AGREEMENT PURSUANT TO 34 C.F.R. § 361.22(b), PROVIDE, AT A MINIMUM, THE FOLLOWING INFORMATION ABOUT THE AGREEMENT:**

- A. CONSULTATION AND TECHNICAL ASSISTANCE, WHICH MAY BE PROVIDED USING ALTERNATIVE MEANS FOR MEETING PARTICIPATION (SUCH AS VIDEO CONFERENCES AND CONFERENCE CALLS), TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES AND OTHER VOCATIONAL REHABILITATION SERVICES;**
- B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY PERSONNEL FOR STUDENTS WITH DISABILITIES THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS (IEPs) UNDER SECTION 614(d) OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT;**
- C. THE ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES;**
- D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES. OUTREACH TO THESE STUDENTS SHOULD OCCUR AS EARLY AS POSSIBLE**

DURING THE TRANSITION PLANNING PROCESS AND MUST INCLUDE, AT A MINIMUM, A DESCRIPTION OF THE PURPOSE OF THE VOCATIONAL REHABILITATION PROGRAM, ELIGIBILITY REQUIREMENTS, APPLICATION PROCEDURES, AND SCOPE OF SERVICES THAT MAY BE PROVIDED TO ELIGIBLE INDIVIDUALS;

**E. COORDINATION NECESSARY TO SATISFY DOCUMENTATION REQUIREMENTS SET FORTH IN 34 C.F.R. PART 397 REGARDING**

STUDENTS AND YOUTH WITH DISABILITIES WHO ARE SEEKING SUBMINIMUM WAGE EMPLOYMENT; AND

**F. ASSURANCE THAT, IN ACCORDANCE WITH 34 C.F.R. § 397.31, NEITHER THE SEA NOR THE LOCAL EDUCATIONAL AGENCY WILL ENTER INTO A CONTRACT OR OTHER ARRANGEMENT WITH AN ENTITY, AS DEFINED IN 34 C.F.R. § 397.5(d), FOR THE PURPOSE OF OPERATING A PROGRAM UNDER WHICH YOUTH WITH A DISABILITY IS ENGAGED IN WORK COMPENSATED AT A SUBMINIMUM WAGE.**

**A.** The Department of Workforce Services Utah State Office of Rehabilitation (USOR) maintains a state-level interagency agreement with Utah State Board of Education (USBE) which governs collaboration with school districts and public charter schools who serve secondary education students. The interagency agreement includes provisions for consultation, technical assistance, professional development, Vocational Rehabilitation referrals and eligibility, and individualized goals of the local teams. USOR has assigned transition counselors to each local school district and charter school. The counselors meet with special educators and administrators, provide outreach to students and parents, provide Vocational Rehabilitation Welcome Sessions to students, provide Job Readiness Workshops to students, attend IEP meetings, as well as cover all referrals and questions from that school.

The interagency agreement with USBE also provides guidance and clarification of expectations as set forth by the Workforce Innovation and Opportunity Act (WIOA), defines terms, and delineates financial responsibilities. It describes consultation and technical assistance available to assist USBE and local districts in planning for the transition of students with disabilities from school to post school activities, including vocational rehabilitation services and Pre-Employment Transition Services to eligible and potentially eligible students with disabilities. Recognizing the diverse geographical landscape and potential logistical challenges, USOR and the LEAs have integrated alternative communication tools, like video conferencing and conference calls. This ensures continuous and effective collaboration regardless of any physical distance or logistical barriers.

**B.** The interagency agreement between the Department of Workforce Services Utah State Office of Rehabilitation (USOR) and the Utah State Board of Education (USBE) provides for joint transition planning coordination for students with disabilities that facilitates the development and completion of their individualized education programs (IEPs) under Section 614(d) of the Individuals with Disabilities Education Act (IDEA), and specifies the roles and responsibilities of each agency.

The agreement includes directives for establishing state lead agencies and delineating qualified personnel responsible for overseeing transition services. It includes provisions for determining state lead agencies and qualified personnel responsible for transition services and describes procedures developed for outreach to students with disabilities during the transition planning process and identification of students with disabilities who need transition services. To ensure a comprehensive understanding and shared goals, representatives from both entities are embedded within the other's key advisory groups. Specifically, a representative from the Utah State Board of Education Special Education is an integral member of the State Rehabilitation Council (SRC). Conversely, a representative from USOR plays an active role in the Utah Special Education Advisory Panel (USEAP). These cross-representations facilitate continuous dialogue, consultation, and assistance between the two bodies.

Every year, USOR and the USBE collaborate to formulate statewide objectives aimed at enhancing transition services. This collaborative effort is enriched by their participation in the

Capacity Building Institute, an initiative sponsored by the National Technical Assistance Center on Transition (NTACT). Furthermore, representatives from USOR and USBE play active roles in the Statewide Transition Council (STC). Alongside other state agencies and stakeholders, this council's overarching mission is to elevate post-secondary outcomes for students with disabilities in Utah. Through interagency collaboration and shared expertise, the council works diligently to ensure a seamless and productive transition for these students.

**C.** The interagency agreement between the Department of Workforce Services Utah State Office of Rehabilitation (USOR) and the Utah State Board of Education (USBE) clearly delineates the roles and responsibilities for each entity, ensuring clarity and direction in their collaborative efforts.

USBE agrees to ensure that all children ages 3 through 21 with disabilities are provided free and appropriate public education (FAPE) under IDEA. USBE has responsibility for educating transition youth between age 14 and school exit through graduation, reaching maximum age, or no longer IDEA-eligible. Under IDEA, USBE will provide education and activities focused on improving the academic and functional achievement of the student, to facilitate movement from the school to post school activities, including postsecondary education, vocational training, counseling and guidance, integrated employment (including supported employment), adult services, independent living or community participation. USBE is also responsible for funding transportation and developmental, corrective, and other supportive services including speech-language pathology and audiology services, psychological services, physical and occupational therapy, recreation (including therapeutic recreation), social work services, counseling services (including rehabilitation counseling), orientation and mobility services and medical services (for diagnostic or evaluation purposes only) as may be required to assist a student with a disability to benefit from special education, and includes the early identification and assessment of disabling conditions in students.

USOR is responsible for providing vocational rehabilitation services to eligible individuals with a disability, including students and youth with disabilities, to prepare for, secure, retain or regain an employment outcome that is consistent with his or her strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice. In addition, USOR is responsible for providing transition services to eligible students and youth with disabilities as they transition from school to adult life. USOR will coordinate with USBE to provide Pre-Employment Transition Services (Pre-ETS) to students who are eligible and potentially eligible for services. USOR coordinates with USBE at the state and local level to ensure that transition services, to include Pre-ETS, provided by each entity are complementary and non-duplicative. USOR and USBE agree to collaborate on financial responsibility of services, within the guidelines of the Rehabilitation Act and IDEA. Both agencies will respect the resources set forth by the policies and procedures that guide each agency's services. When a student with a disability is both in school and has an IPE with Vocational Rehabilitation, the cost of services necessary for both education and for the student to become employed, will be negotiated between the LEA representative and the Vocational Rehabilitation counselor, pending any necessary approval through LEA administration and USOR chain of command. At any time during the transition process, comparable benefits or additional agency representatives will be included in the IEP and IPE transition team as an additional resource for financial responsibility. Agreements on shared cost of required services for the student/client, will be in writing in the IEP and IPE, to ensure collaboration and understanding of agency involvement. USOR and USBE are separately responsible for recruiting, hiring, training and retaining qualified personnel responsible for transition services and the coordination of transition services. USOR's staffing policy and

practices comply with CSPD standards and state licensing requirements for Vocational Rehabilitation counselors. USBE maintains a separate staffing policy that adheres to state educator and para-educator licensing and credential requirements.

**D.** The Utah State Office of Rehabilitation (USOR) actively engages with a broad range of educational and community partners to ensure that students with disabilities are promptly identified and provided the necessary transition services.

Key school personnel, including special education teachers, administrators, 504 coordinators, school counselors, and nurses, collaborate closely with USOR. Additionally, community non-profit organizations, such as the Utah Parent Center, also play a vital role in this outreach process. These collective efforts aim to pinpoint students requiring Transition and Pre-Employment Transition Services (Pre-ETS). Informational sessions, bolstered by both digital and printed resources, provide clarity on the services offered, emphasizing the eligibility criteria, application procedures, and the range of services available. Notably, outreach materials underscore the opportunity for students with disabilities as young as 14-years-old to access these services.

To support and enhance outreach endeavors, USOR has a notable presence on various advisory and operational councils. This includes local school district transition councils, the statewide transition council, and the Utah Futures Advisory Committee. These platforms foster a cohesive collaboration between the Department of Workforce Services Workforce Development Division and Utah State Office of Rehabilitation, Utah State Board of Education, Governor's Office of Economic Opportunity and higher education.

Further strengthening this collaborative structure, USOR has designated roles such as a transition coordinator and two Pre-ETS program specialists. Their primary responsibility is to augment the quality of transition services provided by USOR.

In addition, by working collaboratively with the Utah State Board of Education and the Local Education Agencies, USOR ensures that students, both eligible and potentially eligible for Vocational Rehabilitation services, have information and access to services. In addition to Vocational Rehabilitation counselors, USOR has Pre-ETS instructor positions in each of the Vocational Rehabilitation district offices to provide Pre-ETS services and outreach and coordination activities to students.

The outreach and identification procedure for students with disabilities is multi-faceted and inclusive. By casting a wide net through varied platforms and methods, USOR ensures that every student who could benefit from transition services is not only identified but also equipped with comprehensive knowledge about the opportunities available to them.

**E.** To fulfill the documentation mandates outlined in 34 C.F.R. § 397, both the Utah State Office of Rehabilitation (USOR) and the Utah State Board of Education (USBE) have a coordination process, which is defined in the statewide interagency agreement.

Furthermore, USOR has set forth specific policies and procedures concerning Section 511—Limitations of Subminimum Wage. These guidelines encompass the provision of Vocational Rehabilitation services, Pre-Employment Transition Services, as well as career counseling, information and referral services to youth contemplating subminimum wage employment.

To reinforce this effort, USOR and USBE actively collaborate with the Local Education Agencies (LEA). This collaboration ensures that youth receive the requisite career counseling,

information, and referral services. Information related to these services is communicated to parents, guardians, teachers, and students during IEP meetings, fostering a comprehensive postsecondary transition planning process. In addition, USOR has introduced disability career navigators to support these activities. These navigators are tasked with providing education and outreach services to youth with disabilities and their parents, particularly those considering the prospects of subminimum wage employment.

Lastly, USOR maintains a centralized database to track and maintain records, making it easier to verify and demonstrate compliance regarding its statutory responsibilities.

**F.** According to the statewide interagency collaborative agreement, the State Education Authority and the Local Education Agency affirm not to enter into contracts or partnerships with entities possessing a special wage certificate under section 14(c) of the Fair Labor Standards Act, which could lead to employing a youth with a disability at subminimum wage levels. Furthermore, the Utah State Office of Rehabilitation commits to adhering to all regulatory mandates as outlined in the Workforce Innovation and Opportunity Act, specifically Section 511 - Limitation on the Use of Subminimum Wage.

#### **k. COORDINATION WITH EMPLOYERS**

In accordance with the requirements in Section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

The Utah State Office of Rehabilitation (USOR) is actively engaged in several initiatives aimed at forging partnerships with employers to uncover competitive, integrated employment opportunities and foster career exploration that facilitates the provision of Vocational Rehabilitation services. These initiatives are primarily spearheaded by the Business Relations team, the Choose to Work (CTW) Program, and the Governor's Committee on Employment of People with Disabilities (GCEPD). Through these coordinated efforts, USOR enhances the connection between employers and individuals with disabilities. The approach involves outreach endeavors, disability awareness training, consultation services, job fairs, workshops, business networking activities, and job posting networks. Key activities, services, and initiatives are outlined as follows:

- **Customized Services:** The USOR Business Relations Team actively engages in outreach activities, meeting with individual businesses to furnish information and resources regarding hiring practices, disability awareness, recruitment strategies, retention programs, consulting, technical assistance, tax credits, incentives, the Americans with Disabilities Act (ADA), reasonable accommodations, employment laws and other pertinent subjects related to disabilities and assistive technology.
- **Workshops, Job Fairs, and Trainings:** USOR conducts semi-annual employer workshops focused on hiring and retaining individuals with disabilities and career preparation. These workshops provide business partners an opportunity to gain insights into disability-related topics, accommodations, and other employment-related issues. USOR offers job fairs designed to connect businesses with job-ready individuals with disabilities and provide career exploration opportunities. They also offer avenues for internships and mentorship experiences. Additionally, the USOR collaborates with the

GCEPD to support the Utah affiliate of Disability:IN, a business-to-business mentoring model aimed at promoting disability-inclusive workforce practices.

- **PWDNET:** Through the one-stop center's (AJC's) online job board, employers have the option to use the keyword "PWDNET" in their recruitment, facilitating the search for job opportunities by job seekers with disabilities, Vocational Rehabilitation counselors, and employment specialists. The business relations team manages an email listserv of job postings shared by business partners and recruitment entities targeting individuals with disabilities.
- **Choose to Work (CTW):** The core services of the Choose to Work program involve job development and job placement for individuals with disabilities. CTW employment specialists collaborate with the business relations team to organize employer workshops aimed at increasing awareness about hiring and retaining individuals with disabilities. These specialists actively participate in local chambers of commerce and sit on local and community boards to facilitate Vocational Rehabilitation services leading to employment outcomes. They also work closely with workforce development specialists, other one-stop center (AJC) partners and affiliates to identify integrated employment opportunities for job seekers with disabilities.
- **Business Customized Training (BCT):** The business relations team also helps to support Business Customized Training (BCT) with specific business partners. BCT entails negotiating a tailored training program and training duration in partnership with USOR, a Community Rehabilitation Program (CRP) of the business's choice and the business partner. The designated CRP conducts training on-site at the business partner's location, preparing clients for potential employment opportunities with the partner business.
- **Talent Acquisition Portal (TAP):** USOR utilizes the Talent Acquisition Portal (TAP), a platform developed by the Council of State Administrators of Vocational Rehabilitation (CSAVR) and the National Employment Team (NET) in partnership with disABLEDperson, Inc. TAP serves as a connection point for a national talent pool of Vocational Rehabilitation clients seeking employment and a job posting system for employers interested in hiring individuals with disabilities.

USOR offers a diverse range of transition and Pre-Employment Transition Services (Pre-ETS) aimed at connecting transition-aged youth, including students with disabilities, with employers. To facilitate these transition services, USOR leverages the business relations team, Choose to Work and Pre-Employment Transition Services team.

The various USOR teams collaborate closely with the Governor's Committee for Employment of People with Disabilities to organize Disability Mentoring Day events for eligible and potentially eligible students with disabilities. These events are hosted by interested businesses, offering insights into their organizations and addressing concerns raised by students with disabilities. During these events, students have the opportunity to tour the company premises and gain a firsthand understanding of the job opportunities available within the business. Local high school students, accompanied by their teachers, advocates, or parents, are invited to attend these informative gatherings.

Furthermore, the VR district office staff, which includes Pre-ETS instructors, VR counselors and supervisors, partners with Local Educational Agencies (LEAs) to develop events and activities with employers tailored for students. These activities encompass business tours, employer

panels, mock interviews, career days and workshops.

USOR is committed to expanding work-based learning and job exploration opportunities for students and youth with disabilities. USOR has established contracts with providers to support the provision of Pre-ETS, with a strong emphasis on collaboration with employers to deliver work-based learning experiences for eligible and potentially eligible students. These services are provided in both individual and group settings, fostering partnerships with employers to enrich the learning experience.

Additionally, USOR incorporates a career exploration track within its Work Ability Job Fairs. This unique offering enables LEAs to bring students to engage with hiring specialists and explore potential employment opportunities. The business relations team and Vocational Rehabilitation counselors equip school transition specialists and teachers with information packets to prepare students for these events. These packets cover essential topics such as dressing for success, interviewing skills, resume building and appropriate etiquette when interacting with business partners. Students can also participate in workshops covering subjects such as "Working in Government Professions, State and Federal Hiring Initiatives," "Employer Panel," "How to Dress on a Dime and Interview Success" and "Social Security and Working."

#### **L. INTERAGENCY COOPERATION WITH OTHER AGENCIES**

In accordance with the requirements in Section 101(a)(11)(C) and (K), describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

**1. STATE PROGRAMS (DESIGNATE LEAD AGENCY(IES) AND IMPLEMENTING ENTITY(IES)) CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;**

The Utah State Office of Rehabilitation (USOR) has a collaborative relationship with the Utah Assistive Technology Program (UATP), which is a state program carried out under section 4 of the Assistive Technology Act of 1998. UATP provides assistive technology devices and services to Utahns with disabilities, in addition to providing training to individuals with disabilities, families and professional service providers. Through USOR's Utah Center for Assistive Technology office, UATP operates a program that provides refurbished mobility devices and equipment to low-income individuals with disabilities. In addition, specific to the provision of assistive technology services, Utah System of Higher Education (USHE) serves as a statewide resource for information and technical services for people with disabilities for assistance with acquiring and using assistive technology devices. Another assistive technology resource within USHE is the Utah assistive technology team which provides assistance to adults and youth with disabilities by providing introductory training and support on computer technology that can enhance education and employment. This includes free consultations, workshops, and information and referral services and augmentative communication device loaner programs for students with disabilities in public schools.

**2. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;**  
The Utah State Office of Rehabilitation (USOR) actively partners with AgrAbility of Utah, a program under the umbrella of the United States Department of Agriculture. AgrAbility's primary objective is to assist farmers, ranchers, and their families in navigating the challenges posed by age, illness, injury, or other disabilities, ensuring they can continue their agricultural endeavors. Specialists from AgrAbility assess individual cases, offering pragmatic solutions

tailored to each unique situation. This can range from restructuring work tasks and adapting agricultural operations to tapping into community and state resources. With their expertise, they design customized plans addressing the specific needs of farmers and ranchers.

USOR works hand-in-hand with AgrAbility, lending its expertise to shape these recommendations. The focus is on enabling individuals with disabilities to pursue agricultural employment safely and effectively. Many of these tailored recommendations encompass the introduction of assistive technologies or other necessary accommodations, ensuring individuals remain active and productive in the agricultural sector.

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

The Utah State Office of Rehabilitation (USOR) actively collaborates with various agencies dedicated to assisting out-of-school youth. Among its key partners are the Division of Services for People with Disabilities, the Division of Substance Use and Mental Health, Community Rehabilitation Programs, the Division of Juvenile Justice and Youth Services and regional mental health agencies. To streamline these collaborations, USOR has designated liaisons across the state. These liaisons play a pivotal role in interagency referrals, conducting outreach, disseminating information and coordinating services tailored to the specific needs of out-of-school youth. Additionally, USOR partners with the Title I WIOA Youth program, further enhancing the referral process and ensuring comprehensive support for these youth.

**4. STATE USE CONTRACTING PROGRAMS;**

The State Use Program serves to create employment opportunities and to enhance independence of people with disabilities by having departments of state government purchase commodities and services from qualified Community Rehabilitation Programs (CRPs). Utah state law sets aside funding for contracts to be awarded to CRPs. The USOR assistant director serves as a member of the Purchasing from People with Disabilities Advisory Board, which implements the State Use Program.

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

The Utah State Office of Rehabilitation (USOR) continues to collaborate with the Departments of Health and Human Services related to provision of services for individuals eligible for home and community-based waiver programs. USOR, the Division of Services for People with Disabilities and the Utah State Board of Education will coordinate efforts to provide information and referral resources to Utahns with disabilities interested in entering or reentering the workforce. The three aforementioned agencies will negotiate and allocate resources as necessary to support a comprehensive system of work support resources that will increase employment outcomes for individuals with disabilities in Utah.

**6. STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES;**  
The Utah State Office of Rehabilitation (USOR) maintains a long standing cooperative agreement with the Division of Services for People with Disabilities (DSPD), the state agency responsible for providing services for individuals with developmental disabilities. USOR and DSPD are partners in the Employment First legislative initiative in Utah (UT HB 240) which establishes competitive, integrated employment as the preferred option for Utahns with disabilities. USOR and DSPD are in the process of developing an improved data sharing agreement to enhance collaboration and coordinate services for shared clients.

USOR and DSPD collaborate to provide extended services to clients participating in supported employment services, including customized employment services. DSPD receives its extended

support funding through Medicaid Waivers and the Utah State Legislature. This funding is ongoing and available to provide long term services for individuals who have utilized Vocational Rehabilitation supports, are eligible for DSPD Services, and need long term supported employment services. USOR and DSPD coordinate to ensure successful transitions of mutual clients from ongoing services to extended services. DSPD currently has a waitlist for services and will provide services to those with the most critical needs first when funding is available. DSPD has a yearly allocation in their budget to provide extended services to clients who are on their waitlist.

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

The Utah State Office of Rehabilitation (USOR) and the Department of Human Services, Division of Substance Use and Mental Health (DSUMH) have a longstanding partnership and collaborative relationship to provide supported employment opportunities for individuals with primary diagnoses of severe and persistent mental illness. USOR coordinates and collaborates with the DSAMH to implement the Individual Placement and Supports (IPS). IPS is a Supported Employment model that is designed to meet the needs of individuals with severe and persistent mental illness. To implement the IPS model, local mental health agencies receive employment support training from DSAMH and register as Community Rehabilitation Program providers with USOR.

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

The Department of Workforce Services Utah State Office of Rehabilitation (USOR) has developed and maintains cooperative agreements where necessary with federal and state agencies not carrying out activities through the statewide workforce investment system. The department maintains cooperative agreements with the Utah State Board of Education (USBE) and the Utah Department of Health and Human Services (DHHS). As required by Utah state legislation, USOR has coordinated plans with the Division of Services for People with Disabilities (DSPD) and the Division of Substance Use and Mental Health (DSUMH) within DHHS to carry out services related to employment for persons with significant disabilities. Additional agreements exist relevant to the Employment First initiatives in Utah. The department also maintains cooperative agreements with the USBE, the Utah Department of Corrections, The Navajo Nation Tribal Vocational Rehabilitation Program and the Veterans Administration (VA).

#### **9. OTHER PRIVATE NONPROFIT ORGANIZATIONS.**

The Utah State Office of Rehabilitation (USOR) holds the authority to engage in contracts with organizations to deliver Vocational Rehabilitation services to individuals with disabilities in compliance with Part A of Title VI of the Rehabilitation Act. Within the framework of the Combined State Plan, USOR has established fee-for-service provider agreements with both private and non-profit entities offering Vocational Rehabilitation services throughout Utah. Furthermore, the office maintains vendor relationships with agencies involved in Supported Job Based Training (SJBT), Supported Employment (SE) and Customized Employment (CE) services. These partnerships involve fee-for-service agreements and participation in job coach training activities. USOR remains committed to identifying and, where applicable, expanding the availability of Community Rehabilitation Programs (CRPs) offering supported employment and extended services to individuals with the most significant disabilities, in line with state plan requirements. To ensure the efficacy of these agreements and the quality of services, USOR employs an employment support services specialist. This specialist is responsible for overseeing provider agreements, ensuring that providers meet the necessary training qualifications, and monitoring the performance of these providers.

## ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner, that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

**The VR agency must select the “Edit” button to review and agree to the VR State plan Assurances.**

<p>The State Plan must include</p>
<p>1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.</p>
<p>2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.</p>
<p>3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:</p>
<p>3.a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.</p>
<p>3.b. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.</p>
<p>3.c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.</p>
<p>3.d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).</p>
<p>3.e. as applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.</p>
<p>3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.</p>
<p>3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.</p>
<p>3.h. the requirements for cooperation, collaboration, and coordination, as required by</p>

The State Plan must include
sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.
3.i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.
3.j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
3.k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.
3.l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).
3.m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:
4.a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.
4.b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act.
4.c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.
4.d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.
4.e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act
4.g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.
4.h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act.

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

The State Plan must include
7. Provision of Supported Employment Services:
7.a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.
7.b. The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.

Do you attest that these assurances will be met? [THIS WILL BE UPDATED IN THE PORTAL.]

YES

**VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS**  
States must provide written and signed certifications that:

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY TITLE IV OF WIOA<sup>[1]</sup>, AND ITS STATE PLAN SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT;

<sup>[1]</sup> Public Law 113-128.

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE  
The Utah State Office of Rehabilitation

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

<sup>[2]</sup> All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

<sup>[3]</sup> No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

<sup>[4]</sup> Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

ENTER THE NAME OF DESIGNATED STATE AGENCY  
The Utah Department of Workforce Services

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY, OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT, AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN<sup>[5]</sup>, THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS<sup>[6]</sup>, 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;

<sup>[5]</sup> No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

<sup>[6]</sup> Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

4. THE DESIGNATED STATE UNIT OR, IF NOT APPLICABLE, THE DESIGNATED STATE AGENCY HAS THE AUTHORITY UNDER STATE LAW TO PERFORM THE FUNCTIONS OF THE STATE REGARDING THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE VR PROGRAM IN ACCORDANCE WITH 34 CFR 361.13(b) AND (c);

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Sarah Brenna

8. THE (ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND THE SUPPLEMENT FOR SUPPORTED EMPLOYMENT SERVICES;

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

Division Director

9. THE AGENCY THAT SUBMITS THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT HAS ADOPTED OR OTHERWISE FORMALLY APPROVED THE PLAN AND ITS SUPPLEMENT.

FOOTNOTES

<sup>[1]</sup> Public Law 113-128.

<sup>[2]</sup> All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

<sup>[3]</sup> No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

<sup>[4]</sup> Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

<sup>[5]</sup> No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

<sup>[6]</sup> Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

CERTIFICATION SIGNATURE

To review and complete the Certification section of the VR portion of the State plan, please select the "Edit" button. [THIS WILL BE UPDATED IN THE PORTAL.]

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Signatory information	Enter Signatory information in this column
Name of Signatory	Sarah Brenna
Title of Signatory	Division Director
Date Signed	10/03/2025

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

**Effectiveness in Serving Employers**

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter)	53.0%	54.0%	54.0%	55.0%

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
After Exit)				
Employment (Fourth Quarter After Exit)	51.1%	53.0%	52.1%	54.0%
Median Earnings (Second Quarter After Exit)	\$4,648	\$4,805	\$4,805	\$4,900
Credential Attainment Rate	34.6%	38.0%	35.1%	39.0%
Measurable Skill Gains	54.2%	55.5%	55.2%	56.0%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

**GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - VOCATIONAL REHABILITATION EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES**

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

**Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a)** applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

**GEPA Section 427 Form Instructions for State Applicants**

**State applicants must respond to the following four questions:**

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to [GEPA 427 - Form Instructions for Application Package](#)

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

***Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.***

*GEPA 427 - Form Instructions for Application Package*

***State applicants must respond to four questions.***

***The first of four questions is:***

*Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.*

The Utah State Office of Rehabilitation is dedicated to supporting individuals with disabilities in their journey toward employment and increased independence. Our mission is to assist them in preparing for and securing meaningful employment opportunities. We envision a community where everyone receives top-quality services and where both clients and staff are empowered through collaborative teamwork, leading to fulfilling employment, independence, and self-fulfillment. Our commitment to respect, kindness, dignity, diversity, trust, and integrity forms the foundation of our work.

In alignment with the designated state agency, the Department of Workforce Services, USOR adheres to standards of equal opportunity and maintains policies that prohibit discrimination based on race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including

limited English proficiency), age, disability, political affiliation, or belief. We have established procedures for individuals to seek assistance if they believe they are being unfairly denied access.

Additionally, USOR actively solicits feedback from clients to assess their experiences and satisfaction with our vocational rehabilitation services. This feedback is gathered through monthly client satisfaction surveys and a comprehensive statewide needs assessment conducted triannually. By analyzing this assessment, USOR can identify and address the needs and barriers faced by underserved and unserved individuals, ensuring that our services are accessible and responsive to all.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

***Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.***

**GEPA 427 - Form Instructions for Application Package**

***State applicants must respond to four questions.***

***The second of four questions is:***

*Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?*

Based on USOR's latest comprehensive assessment of rehabilitation needs, individuals residing in rural communities encounter obstacles due to the scarcity of service providers, particularly concerning community rehabilitation program services and temporary work-based learning opportunities. Furthermore, non-English speakers face an additional barrier, prompting a recommendation for USOR to enhance the availability of forms in Spanish. Additionally, various populations, such as refugees, individuals experiencing homelessness, and those with criminal backgrounds, require specific support to overcome their respective barriers.

Regarding students and youth, the assessment underscores the necessity for increased outreach to specific groups, including youth involved in the juvenile justice system, homeless youth, and those in foster care

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

***Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.***

**GEPA 427 - Form Instructions for Application Package**

***State applicants must respond to four questions.***

**The third of four questions is:**

*Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?*

USOR is actively prioritizing outreach efforts and leveraging technology to enhance services in rural communities. Furthermore, USOR is reevaluating fee-for-service options to bolster and expand provider capacity in rural regions across the state. Addressing language barriers remains a key focus, with ongoing efforts to update and broaden the availability of forms and correspondence in Spanish.

To effectively reach underserved populations, USOR is implementing various localized outreach initiatives. Additionally, to enhance overall client accessibility and streamline service connectivity, USOR is in the process of developing an applicant/client online portal, aimed at improving the application and communication channels. Further elaboration on these activities is provided in the Goals, Priorities, and Strategies sections.

**4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?**

**Section 427 of the General Education Provisions Act (GEPA)** (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

*GEPA 427 - Form Instructions for Application Package*

**State applicants must respond to four questions.**

**The final of four questions is:**

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

In accordance with state plan requirements, USOR aims to make significant strides in overcoming these barriers within the next two years. By the conclusion of FY-24, USOR plans to augment the availability of Spanish forms and letters while also assessing and updating (where necessary) fees for services in rural areas. The target for the initial implementation of the client portal is set for FY-25, with further technology and communication enhancements slated for the same fiscal year.

The outreach and engagement efforts targeting underserved populations will span a two-year period, with progress updates incorporated into the state plan update. USOR will closely monitor and track its progress through comprehensive data collection and information gathering.

**GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - SUPPORTED EMPLOYMENT  
EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES**

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

**Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a)** applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that

provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

### **GEPA Section 427 Form Instructions for State Applicants**

**State applicants must respond to the following four questions:**

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to [GEPA 427 - Form Instructions for Application Package](#)

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

***Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.***

*GEPA 427 - Form Instructions for Application Package*

***State applicants must respond to four questions.***

***The first of four questions is:***

*Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.*

The Utah State Office of Rehabilitation is dedicated to supporting individuals with disabilities in their journey toward employment and increased independence. Our mission is to assist them in preparing for and securing meaningful employment opportunities. We envision a community where everyone receives top-quality services and where both clients and staff are empowered through collaborative teamwork, leading to fulfilling employment, independence, and self-fulfillment. Our commitment to respect, kindness, dignity, diversity, trust, and integrity forms the foundation of our work.

In alignment with the designated state agency, the Department of Workforce Services, USOR adheres to standards of equal opportunity and maintains policies that prohibit discrimination based on race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation, or belief. We have established procedures for individuals to seek assistance if they believe they are being unfairly denied access.

Additionally, USOR actively solicits feedback from clients to assess their experiences and satisfaction with our vocational rehabilitation services, which includes Supported Employment and Customized Employment. In addition to client satisfaction surveys and the comprehensive statewide needs assessment, USOR closely monitors supported employment providers performance, and provides training and technical assistance to enhance quality and support accessibility. USOR publishes the CRP Performance Report which details provider performance and can be utilized to assist in making an informed choice in providers.

**2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?**

***Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.***

[GEPA 427 - Form Instructions for Application Package](#)

***State applicants must respond to four questions.***

***The second of four questions is:***

*Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?*

USOR is dedicated to addressing the barrier of Community Rehabilitation Program (CRP) provider capacity and skill; and limited provider options in rural areas, as it can hinder the access and engagement of clients in need of supported employment and customized employment services. Furthermore, individuals with the most significant disabilities, who may require supported employment services, face additional challenges related to transportation, technology access and utilization, financial literacy, awareness of available services, educational support, and extended service needs. There is also a need to increase awareness for supported

employment services among MSD youth with substance use and mental health disabilities.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

**Section 427 of the General Education Provisions Act (GEPA)** (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

*GEPA 427 - Form Instructions for Application Package*

**State applicants must respond to four questions.**

**The third of four questions is:**

*Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?*

USOR remains committed to collaborating with Utah State University to provide comprehensive training, support, and technical assistance aimed at enhancing both the quantity and quality of Community Rehabilitation Program (CRP) providers. This includes a focus on expanding the number of providers offering customized employment services. USOR is actively leveraging technology to broaden access to supported employment services, with a particular emphasis on exploring virtual job coaching options to overcome access barriers. Additionally, efforts are underway to increase the availability of providers offering financial literacy and life skills support for supported employment (SE) clients.

Furthermore, in alignment with Section (e) outlining goals and strategies for Supported Employment Services, USOR is diligently working towards establishing a supported education pathway. This initiative aims to facilitate increased access to educational programs for individuals with the most significant disabilities, while also enhancing provider training, support, and comprehension regarding job accommodations and job coach fading.

Moreover, USOR is dedicated to improving outreach and awareness initiatives targeting youth with substance use and mental health disabilities who could benefit from supported employment and individual placement and support (IPS) services.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

**Section 427 of the General Education Provisions Act (GEPA)** (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

*GEPA 427 - Form Instructions for Application Package*

**State applicants must respond to four questions.**

**The final of four questions is:**

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

USOR is committed to achieving significant progress towards its goals within the next two years. To this end, USOR aims to achieve year-to-year increases in the number of Supported Employment (SE) and Customized Employment (CE) providers for FY24 and FY25. Furthermore, USOR aims to roll out supported education support services by the conclusion of FY-24, and to provide additional training for providers in job accommodation and job coach fading techniques throughout FY-25.

Moreover, USOR plans to advance its efforts in leveraging technology and exploring virtual job coaching applications in FY-25. Additionally, USOR is collaborating with the Department of Health and Human Services to enhance access to extended support services for supported employment clients. Concurrently, efforts are underway to improve service awareness for youth with substance use and mental health disorders over the next two years.