

**VOCATIONAL REHABILITATION**

**Idaho Division of Vocational Rehabilitation**

**Idaho WIOA Combined State Plan (modification) for PY2026 and PY2027**

**Program-Specific Requirements for State Vocational Rehabilitation Services Program**

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.** 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.

In accordance with Assurance 3(b), 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.

<b>Council Representative</b>	<b>Current Term Number/Vacant</b>	<b>Beginning Date of Term Mo./Yr.</b>
Statewide Independent Living Council (SILC)	1	08/24
Parent Training and Information Center	1	12/25
Client Assistance Program	1	12/22
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	1	04/25
Community Rehabilitation Program Service Provider	1	06/24
Business, Industry, and Labor	2	12/25
Business, Industry, and Labor	2	12/23
Business, Industry, and Labor	1	12/23
Business, Industry, and Labor	1 Vacant	12/23
Disability Groups (4 total)	3 -1st, 1 -2nd	8/22, 10/25, 6/24, 4,25
Disability Advocacy Groups	1	12/22
Current or Former Applicants for, or Recipients of, VR services	2	10/25 & 8/24
Section 121 Project Directors in the State (as applicable)	1	10/24
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	2	10/23

<b>Council Representative</b>	<b>Current Term Number/Vacant</b>	<b>Beginning Date of Term Mo./Yr.</b>
State Workforce Development Board	1	04/25
VR Agency Director (Ex Officio)	1	6/24

*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 Council has voted and approved a position to fill the vacancy for the business and industry representative. The recommendation has been provided to the State Board of Education for review and approval prior to final approval to fill this vacancy. All other requirements are being met by the SRC.

*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.*

*[text box]*

The State Rehabilitation Council provides input and feedback to the Idaho Division of Vocational Rehabilitation through various methods including the SRC quarterly meetings, Annual Report development, committee work, participation in the Strategic Planning and Goal Setting activities, and other structured activities designed to leverage the strategic composition of the SRC.

*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]*

**CSNA:**

SRC Input: The SRC reviewed and made recommendations for the surveys used in the current CSNA. They participated in focus groups and supported the dissemination of the surveys. The SRC responded to the findings in the initial data results during an SRC meeting and then reviewed/ responded to the draft report. The SRC were presented with survey drafts to support the development of the 2026 CSNA at the January 2026 SRC meeting for review and approval.

Division Response: The Division appreciates the time SRC members took to review the draft CSNA surveys and time that will be invested to complete the 2026 CSNA.

**State Plan:**

SRC Input: SRC members reviewed and provided input into the VR Portion of the State Plan. This was done by reviewing Agency data and information at SRC meetings and by reviewing sections of the 2-year State Plan draft updates. Additionally, the Division with guidance on the specific areas required for the SRC to review and comment. A designated SRC member collects and summarizes the responses for the

IDVR staff.

Division Response: The Division appreciates the time and input of the SRC and utilizes their feedback to inform the state plan.

**SRC Annual Report:**

SRC Input: The SRC has worked each year with the Division to produce a combined annual report. This process begins with a designated subcommittee that reviews the prior year's report and provides input on what type of changes should be implemented for the upcoming year. The entire SRC then reviews the proposed report in the October quarterly SRC meeting or at an ad hoc meeting as needed and provides additional feedback. Traditionally, the SRC Chair develops opening remarks for the report by providing an overview of the SRC's work for the year.

Division Response: The Division appreciates the SRC's ongoing support to develop the Combined Annual Report. The Division responded to the SRC's requests to the Combined Annual Report, including the addition of success stories that represent across the state's geography.

**By-laws Changes**

SRC Input: In fulfilling the federal requirement to review the council by-laws every three years, the SRC reviewed the by-laws in 2025 and made without any proposed changes brought forward for consideration during the review process. The next review of by-laws will occur in 2027.

Division Response: The Division agrees with the SRC's review of bylaws and findings of no changes identified.

**Fair Hearing Officers:**

SRC Input: The Code of Federal Regulations 361.57 (f) ii, specifies that the SRC responsibility includes involvement in the process for selection of fair hearing officers. In 2022, the Idaho State Legislature passed HB629, which created the Office of Administrative Hearing to have consistency among state agencies on how fair hearings are conducted. The SRC motioned and passed to select the Office of Administrative Hearing for the agency's fair hearing process.

Division Response: The Division appreciates the Council's support to follow Idaho State laws and rules regarding the selection of hearing officers.

**New Members:**

SRC Input: The SRC motioned and passed the recommendations for membership throughout 2024 with board appointments of two members in July 2024, two reappointments in August 2024, and three new members and one reappointment in October 2024. In 2025, the SRC motioned and passed the recommendations for membership for 3 new board members in April 2025 and 2 new board members in July 2025. Additionally, in December 2025 the SRC motioned and passed the recommendation to fulfil a current position that was vacated for business and industry representatives.

Division Response: The Division continues to meet the federal composition requirements of the council and consistently meets on a quarterly basis.

**NCRSC:**

SRC Input: SRC members attended the NCRSC and CSAVR meetings in Bethesda in 2024. SRC members elected not to travel in 2025 due to budget constraints of the VR program to support the reduction in Agency travel costs. The attending members reminded the SRC of their essential roles and responsibilities of as council members

Division Response: The Division is pleased to have the support of the SRC and for them to continue to understand their roles and responsibilities as members of the council.

**Participant Satisfaction Surveys (PSS):**

SRC Input: The SRC membership indicated that in addition to the qualitative comments that a deeper dive by breaking down the responses based upon whether they received a CRP service or not.

Division Response: The Division accepted this recommendation and is now including a deeper breakdown of the data in the quarterly PSS quarterly report to the SRC.

**Policy Review:**

SRC Input: The Division has not implemented new policies in 2025 due to working with RSA under a Corrective Action Plan that encompasses updating the Agency's Field Services Policy Manual to align with federal requirements. The Division continues to work with RSA for policy review and approval. Once policies are approved under the Corrective Action Plan with RSA, the Division will present the updated and approved policies to the SRC. Any additional policies outside of the Corrective Action Plan will be provided to the SRC for input and feedback on new or revised agency policies.

Division Response: The Division appreciates the SRC's feedback on the updates made as a part of IDVR's Corrective Action Plan to ensure IDVR policy alignment with federal requirements.

**Order of Selection:**

April 23, 2024, The Division met with the State Rehabilitation Council to discuss the need to establish and implement an Order of Selection based on a fiscal projection illustrating that the Division will not be able to serve all eligible individuals in the coming FFY. The Division has provided updates to the SRC following this meeting related to entering Order of Selection (OOS) in September 2024 and ongoing projections and waitlist management since entering OOS.

SRC Input: The Council recommended entering Order of Selection in review of the provided financial analysis.

Division Input: The Division appreciates the SRC's feedback related to their review of the Division's financial review and analysis of the need to implement Order of Selection and the Division's ongoing Order of Selection waitlist management.

**(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*
  - (B) *Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program;*
  - (C) *Individuals with disabilities served through other components of the workforce development system; and*
  - (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.*
- (2) *Identify the need to establish, develop, or improve community rehabilitation programs within the State.*

The Comprehensive Statewide Needs Assessment (CSNA) was completed previously in 2023, with no updates. The next CSNA will be completed in 2026.

**(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*

Review and modification of the goals and priorities for the Division was achieved following a joint review of the Comprehensive Statewide Needs Assessment (including major findings and recommendations) by the SRC and IDVR Strategic Leadership, and a joint in-person goal setting and risk assessment session. This full meeting of the SRC included IDVR Strategic Leadership and all field management, with a focus on identification, suggested modification, and agreement on the goals, priorities, and strategies for the state plan. This process was completed in January 2024. Due to IDVR entering Order of Selection, with all categories closed effective September 2024, the Division did not undertake additional goal setting in this 2-year plan cycle. All goals listed below remain active and are being implemented within the parameters of the Order of Selection and the Division’s Corrective Action Plan with Rehabilitation Services Administration (RSA).

- (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, postsecondary 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]*

These are the goals, priorities, and strategies proposed by The Division and agreed to by Idaho's State Rehabilitation Council to be accomplished PYs 2026-2027. The Division uses RSA Primary Performance Indicators, Other Measures that Matter, and other internally developed measures to determine progress toward goals. The goals articulated below address the following:

- 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.

**Goal 1: Maximize the career potential of Idahoans with disabilities engaged with the Division.**

**Priority 1 – Improve the quality of VR outcomes for IDVR participants. (A, B, C, D).**

- 1. Strategy: Improve access to and utilization of relevant local area LMI and Career Pathways to inform participant career choice and promote successful outcomes.
- 2. Strategy: Ensure participants have better job-ready/hire-ready skills through staff training and accessing WIOA partner workshops, tools, and resources.
- 3. Strategy: Increase access to relevant educational opportunities (vocational/technical/2-year/4-year/apprenticeships and other pathways to quality employment).
- 4. Strategy: Expand the provision of relevant Assistive Technology (AT) services and devices to IDVR participants through collaboration with Idaho Assistive Technology Project.
- 5. Strategy: Leverage technology to streamline processes, reducing staff burden and allowing enhanced engagement with IDVR participants.

Goal 1 Priority 1 Measures:

- a. Measure: Increased utilization of AT services by IDVR participants.
- b. Measures: Meet or exceed negotiated targets on Primary Performance Indicators 1-5 established by the US Department of Education, Rehabilitation Services Administration
- c. Measure: OMTM #5: Percent of Participants Enrolled in Education/Training Program Leading to a Recognized Credential/Employment

**Priority 2: Strategically expand outreach. (B. Overcome barriers)**

1. Strategy: Increase customized outreach through community organizations, WIOA partners, and professionals)

Goal 1 Priority 2 Measures:

- a. Measure: Referrals (applications) by targeted referral source

**Priority 3: Improve Community Rehabilitation Program (CRP) Service provision quality and quantity (including Supported Employment) for Idahoans with the Most Significant Disabilities. (A, B, D).**

1. Strategy: Complete rate methodology/recalibration. This is a part of a greater Innovation and Expansion strategy the Division is engaged in. The new rates proposed are designed to be rates that support quality Community Rehabilitation Program Services and may include the need to support a limited period of subsidized training for Idaho's CRPs, or other mechanisms of compensation for strategic initiatives above and beyond typical expenses for CRP services. The Division anticipates it may utilize Innovation and Expansion funds for CRP improvement within this 2-year state plan cycle.
2. Strategy: Implement newly revised CRP Monitoring Protocol designed to promote two-way data-driven continuous improvement conversations/increase feedback, relevance, and understanding between IDVR and Idaho's CRPs.

Goal 1 Priority 3 Measures:

- a. Measure: Primary Performance Measure: Supported Employment program performance as measured by median wages, 2<sup>nd</sup> and 4<sup>th</sup> quarter employment rate after exit.

**Priority 4: Improve participant engagement throughout the VR process. (A, B, C, D)**

1. Strategy: Leverage technology to improve initial and sustained participant engagement

Goal 1 Priority 4 Measures:

- a. Measure: Other Measures That Matter: #4: VR Service Provision (This profile will show the number of VR program participants who received at least one VR service divided by the total number of VR program participants).
- b. Rehabilitation rate/employment rate.
- c. Applicant and participant attrition rates.

**Priority 5: Hire and retain qualified employees to deliver quality vocational rehabilitation services. (C, D)**

1. Strategy: Continued efforts to expand FTE, maximize compensation, and other innovative approaches to increase employee satisfaction and retention.
2. Strategy: Leverage technology to streamline processes, reduce staff burden and allow for enhanced engagement with IDVR participants.

Goal 1 Priority 5 Measures:

- a. Measure: Overall staff turnover rate.
- b. Measure: Qualified Rehabilitation Professional turnover rate.

Goal 2: Expand utilization and improve quality of Pre-Employment Transition Services (Pre-ETS) and similar services for youth.

**Priority 1: Increase utilization of Pre-ETS services and similar services to youth and students (C, Expand Pre-ETS)**

1. Strategy: Increase outreach with schools, community organizations, and professionals that serve student, youth, and families (e.g. State Department of Education, Idaho Parents Unlimited, Idaho Council on Developmental Disabilities, school nurses, pediatric professionals, and others with connection to in-and-out of school youth).
2. Strategy 2: Increase outreach through WIOA umbrella partners that serve students and youth (i.e. Title-I WIOA Youth, and Title-II adult education and literacy for youth under 24).

Goal 2 Priority 1 Measures:

- a. Measure: Number of students who are receiving potentially eligible services.
- b. Measure: Number of Pre-ETS services (across categories).
- c. Measure: Percent of potentially eligible students who apply for VR program.
- d. Measure: Number of youths receiving IDVR services.

**Priority 2: Improve the quality of Pre-employment Transition Services (Pre-ETS) and similar services to youth. (C, Improve Pre-ETS)**

1. Strategy: Work with schools, businesses, students/youth, and families to understand and improve Work Based Learning Experiences (WBLEs) for students and youth.
2. Strategy: Continue efforts to establish a comprehensive and complimentary Pre-ETS evaluation and monitoring strategy.

Goal 2 Priority 2 Measures:

- a. Measure: Tool established and disseminated for regional Pre-ETS supervisor reviews and complimentary annual Pre-ETS case file review.
- b. Measure: WBLE Specific service evaluations/business evaluations.

Goal 3: Improve outreach and engagement through individualized services to Idaho businesses.

**Priority 1: Work with the business community to improve understanding and utilization of IDVR business services. (B, C, D)**

1. Strategy: Identify business groups (i.e., Chamber, Workforce Development groups, Society for Human Resource Management (SHRM) that could benefit from networking with IDVR.
2. Strategy: Identify opportunities to provide education and training on the scope and availability of IDVR business services to provide customized business solutions.
3. Strategy: Expand business spotlights to each IDVR Center.
4. Strategy: Continue to improve IDVR website business page for useability and improved business content.

Goal 3 Priority 1 Measures:

- a. Measure: Number of identified business groups engaged with IDVR
- b. Measure: Statewide spotlights presence for each IDVR Center.
- c. Measure: Increased utilization of IDVR business services.

**Priority 2: Evaluation of new Business Relations Team to determine effectiveness and promote the continuous improvement of business outreach activities. (A, B, C, D)**

1. Strategy: Continue efforts to align IDVR BOOST team activities with the workforce development system, including at the local level as indicated by the CSNA.

Goal 3 Priority 2 Measures:

- a. Measure: Increased utilization of IDVR business services.

**Priority 3: Improved utilization of business engagement partnerships with the local workforce system. (B, C, D)**

1. Strategy: Continue efforts to align IDVR activities with the workforce development system, including aligned business engagement strategy at the state and local level.

Goal 3 Priority 3 Measures:

- b. Measure: Increased utilization of IDVR business services.
- c. Measure: 2nd and 4th quarter retention with same employer.

**(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]*

The goals and priorities for the Division are reviewed annually and revised as necessary based on input from a variety of sources including the SRC, combined plan partners, the State Independent Living Council (SILC), the Client Advocacy Program (CAP), Tribal VR representatives, findings and recommendations from monitoring activities conducted under Section 107, and the IDVR management team, including management at the regional level. Additionally, the goals and priorities are informed by the Comprehensive Statewide Needs Assessment (CSNA) which is conducted every three years.

**Goal 1: Maximize the career potential of Idahoans with disabilities engaged with the Division.**

**Priority 1 – Improve the quality of VR outcomes for IDVR participants. (A, B, C, D).**

1. Strategy: Improve access to and utilization of relevant local area LMI and Career Pathways to inform participant career choice and promote successful outcomes.

The Division has worked to increase Counselor access to relevant local area LMI data with the introduction of regular collaboration with the economists at the Idaho Department of Labor and the business services team to provide more data and insights to support better understanding of the employment landscapes in communities across Idaho. The business services team then provides the relevant data to the Counselors along with real time information on employment opportunities to support the development of vocational goals based on actionable local data. IDVR will continue the business services team provision of this information to the counselors and identify additional ways to implement the knowledge transfer of LMI from the business services team to the VR Counselors.

2. Strategy: Ensure participants have better job-ready/hire-ready skills through staff training and accessing WIOA partner workshops, tools, and resources.

The Division has continued to require engagement in the job ready process with participants prior to engaging in job search activities to ensure that participants have the support needed to address the skills needed for job searching. IDVR has also seen an increase in PY2023 and PY2024 in co-enrollment to 7.19% and 6.57% respectively versus prior co-enrollment of 5.1% in PY2021 and 6.34% in PY2022. The Division will continue to utilize the job ready process and determine additional training needs to support VR Counselors to prepare participants to be job ready.

3. Strategy: Increase access to relevant educational opportunities (vocational/technical/2-year/4-year/apprenticeships and other pathways to quality employment).

The Division has continued to provide training on the completion of quality comprehensive assessments to support the development of appropriate vocational goals and services to support individuals to engage in appropriate career training that would support their achievement of a successful employment outcome. Through these efforts to ensure that quality counseling and guidance leads to appropriate goals and services, the Division has realized an increase in training services year after year as below. The Division will continue to work with VR Counselors to ensure that they have the training and resources needed to support

participants to engage in career pathways that may require training and upskilling.

PY2021: 25.41%  
PY2022: 26.48%  
PY2023: 27.77%  
PY2024: 32.23%

4. Strategy: Expand the provision of relevant Assistive Technology (AT) services and devices to IDVR participants through collaboration with Idaho Assistive Technology Project.

The Division has continued to develop support for Counselors to understand the ability for our partners to provide services that support participants that may benefit from assistive technology to be successful in employment. Additionally, IDVR has had increased collaboration with the Idaho Assistive Technology Project over the last two program years as they have been a core partner in effort with IDVR's Pre-ETS team. Additionally, the agency has representation on the SRC that provides oversight as part of their role to the Idaho Assistive Technology Project, and they work collaboratively with Agency leadership regarding ability to collaborate and support VR participants to be assessed and access necessary assistive technology. From PY 2021 to PY 2024 the Division had an increase in authorized services with IATP from \$845 to \$2730. The Division will work with IATP to develop an MOU to support ongoing referrals for assessment and access to assistive technology.

5. Strategy: Leverage technology to streamline processes, reducing staff burden and allowing enhanced engagement with IDVR participants.

The Division has begun to leverage additional Power BI data visualization software dashboards to give staff access to up-to-date information on participant case progression and case expenditures and to reduce the time needed to look up this information in our case management system. This information is tailored to specific agency roles and responsibilities and helps to identify which participants should be prioritized for engagement. IDVR's case approval process was previously handled through a cumbersome email process, but IDVR is now using updated processes in our case management system to streamline the approval process for eligibilities, plans, authorizations, and payments. The CMS automatically creates "Activity Due" reminders for staff within the CMS to remind them of approvals that need to be completed. These approval processes are also tracked in Power BI. The Division will continue to evaluate process improvements and technology that can be leveraged to support streamlining of work processes in the next two-year State Plan cycle.

**Priority 2: Strategically expand outreach. (B. Overcome barriers)**

2. Strategy: Increase customized outreach through community organizations, WIOA partners, and professionals.

Prior to the Division entering Order of Selection in September 2024, the Division was actively

engaged in increasing outreach through collaboration with community and WIOA partners for greater statewide reach. Due to the Division entering Order of Selection in September 2024, the Division has not actively engaged in outreach activities due to the utilization of a waitlist and all categories being closed. The Division anticipates engaging in outreach activities again in the next two years of this State Plan cycle, as the Division can open disability priority categories and serve more participants at a regular cadence off of the waitlist.

**Priority 3: Improve Community Rehabilitation Program (CRP) Service provision quality and quantity (including Supported Employment) for Idahoans with the Most Significant Disabilities. (A, B, D).**

1. Strategy: Complete rate methodology/recalibration. This is a part of a greater Innovation and Expansion strategy the Division is engaged in. The new rates proposed are designed to be rates that support quality Community Rehabilitation Program Services and may include the need to support a limited period of subsidized training for Idaho's CRPs, or other mechanisms of compensation for strategic initiatives above and beyond typical expenses for CRP services. The Division anticipates it may utilize Innovation and Expansion funds for CRP improvement within this 2-year state plan cycle.

The Division has engaged in a review of the rate study that was completed and has engaged with Rehabilitation Services Administration (RSA) to work towards implementing updated methodology and payment structure in alignment with the Division's Corrective Action Plan with RSA and the rate study that was completed. The Division continues to engage with RSA in this process and expects to implement updated rate structure and fees for CRP services in this 20-year state plan cycle. The Division has also engaged with a workgroup to assess mechanisms for compensation for enhanced outcomes for VR participants served by CRPs. This workgroup has paused their work until the updated rate structure is implemented but will resume meeting within this two-year state plan cycle to continue this work to create incentive payments linked to the Division's primary performance indicators and participant outcomes.

2. Strategy: Implement newly revised CRP Monitoring Protocol designed to promote two-way data-driven continuous improvement conversations/increase feedback, relevance, and understanding between IDVR and Idaho's CRPs.

The Division has outlined additional revisions to the CRP Monitoring Protocol as part of updates to the CRP Manual as part of the Division's Corrective Action Plan with RSA. The Division anticipates obtaining approval of the updated CRP manual and implementing additional updates to this monitoring protocol within this two-year state plan cycle.

**Priority 4: Improve participants' engagement throughout the VR process. (A, B, C, D)**

2. Strategy: Leverage technology to improve initial and sustained participant engagement

The Division began using SARA (Semi-Autonomous Rehabilitation Assistant) as a primary means of communicating with participants outside of face-to-face contact in the last two years

of this state plan cycle. The SARA platform allows our staff and participants to communicate through text, email, and video. Additionally, all text and email communications with participants through SARA are documented in our case management system.

The Division has already seen increased engagement with participants as SARA has given staff the flexibility to communicate with participants in their preferred manner. The Division plans to add additional prompts and automated messages that can be sent to participants based upon changes within their case status within this 2-year plan cycle to increase the benefits and utilization of this technology.

**Priority 5: Hire and retain qualified employees to deliver quality vocational rehabilitation services. (C, D)**

1. Strategy: Continued efforts to expand FTE, maximize compensation, and other innovative approaches to increase employee satisfaction and retention.

The Division engaged in a robust Employee Engagement Plan in the last 2 years of the State plan cycle which focused on increasing employee satisfaction and retention through creating increased flexibilities, addressing trust in leadership, management support, and increased communication. Through this work, the Division has seen positive responses to the increase in communication and flexibility offered to team members. The Division has engaged in an updated employee engagement plan for the current state plan year and intends to develop an additional plan in the second year of this state plan cycle to continue these efforts.

2. Strategy: Leverage technology to streamline processes, reduce staff burden and allow for enhanced engagement with IDVR participants.

In addition to the SARA communication processes mentioned above, the Division is leveraging Power BI data visualization software to give staff access to up-to-date information on participant case progression and case expenditures. This information is tailored to specific agency roles and responsibilities and helps to identify which participants should be prioritized for engagement. IDVR's case approval process was previously handled through a cumbersome email process, however the Division is now using updated processes in the AWARE Case Management System to streamline the approval process for eligibilities, plans, authorizations, and payments. These approval processes are also tracked in Power BI. The Division will continue to evaluate options to leverage technology and AI to streamline processes in this two-year state plan cycle.

**Goal 2: Expand utilization and improve quality of Pre-Employment Transition Services (Pre-ETS) and similar services for youth.**

**Priority 1: Increase utilization of Pre-ETS services and similar services to youth and students (C, Expand Pre-ETS)**

1. Strategy: Increase outreach with schools, community organizations, and professionals that serve students, youth, and families (e.g. State Department of Education, Idaho Parents Unlimited, Idaho Council on Developmental Disabilities, school nurses, pediatric professionals, and others with connection to in-and-out of school youth).

The Division completed an analysis of the needs for collaboration and service delivery to students and youth. Through this analysis, a need was identified to restructure Agency Pre-ETS positions to increase capacity was identified to meet the requirements of WIOA to make services available to eligible or potentially youth and students statewide. The Division engaged with Department of Human Resources (DHR) to develop new job descriptions to support the identified need and completed a restructuring of the Pre-ETS team as of October 27<sup>th</sup>, 2025, to include specialized roles and increased availability for outreach in the community and educational institutions. The restructuring completed utilized the existing FTPs previously allocated to the Pre-ETS program.

Due to the restructuring of roles, the Division has increased the number of Pre-ETS Team Members who are responsible for providing direct services and coordination efforts in the community and with partners to increase access to Pre-ETS services for potentially eligible and eligible students to meet the requirements for the provision of services to students and youth.

The Division has increased partnerships and outreach with Health and Welfare, Centers for Independent Living, Idaho Parents Unlimited, and Idaho Department of Career Technical Education during the first two years of this state plan cycle. The Division has presented information about the VR program at the State CTE conference to increase awareness of the Division's mission, populations served, and services provided. Due to the increase in education with partners about the Division's services to students and youth the Division has received an increase in new referral sources from CTE teachers. The Division has also continued outreach with special education administrators and 504 coordinators for school districts in Idaho. The Division is a required partner of the State Department of Education through the Pathways to Partnership grant awarded through the Rehabilitation Services Administration (RSA). Through this grant, the Division has engaged in additional coordination efforts between local education agencies, centers for independent living, businesses, and community stakeholders. Business Services Team Members and Pre-ETS Team Members are engaged in collaborative efforts with these partners to increase outreach and Pre-Employment Transition Services provided to new and existing students. The Division will continue to be engaged in partner council meetings that encourage increased referrals in the upcoming two years of this plan cycle.

2. Strategy 2: Increase outreach through WIOA umbrella partners that serve students and youth (i.e. Title-I WIOA Youth, and Title-II adult education and literacy for youth under 24).

The Division engaged in a new partnership with the Idaho Department of Labor to provide increased access to paid work-based learning experiences (WBLE). The Division has also increased referrals for students receiving pre-case services to WIOA partners as students exit

their educational goals and no longer remain eligible for pre-employment transition services to assure access to workforce services, as eligible individuals without a plan for employment are currently being placed on the Division's waitlist for services.

The Division strengthened referral pathways by clarifying points of contact, sharing outreach materials, and encouraging warm handoffs between WIOA partners and vocational rehabilitation staff. These efforts are intended to improve early identification of eligible students and youth with disabilities and increase timely access to Pre-ETS services. Additionally, the Division ensures the Pathways to Partnership grant's Regional Secondary Transition Coordinators are invited to local One-Stop meetings to provide information and updates on the grant's work. Through the work of the grant, local interagency leadership teams (LILT) were created at six pilot local education agencies around the state. These teams meet regularly to promote a shared understanding and develop resources and information to increase partner referrals and opportunities for students. WIOA partners are invited to participate as a part of the LILTs. The Division anticipates increasing collaboration in this state plan cycle with additional LILTs implemented. The Division will continue to work with partners during the upcoming two years of this state plan cycle.

**Priority 2: Improve the quality of Pre-employment Transition Services (Pre-ETS) and similar services to youth. (C, Improve Pre-ETS)**

3. Strategy: Work with schools, businesses, students/youth, and families to understand and improve Work Based Learning Experiences (WBLEs) for students and youth.

The Division continued prioritization for students to engage in a variety of work-based learning experiences and early engagement in these services. The Division increased its focus on connecting to employers through partnerships with business service team to create opportunities for a variety of these experiences both in the community and in the school setting. Additionally, the Division has begun to coordinate and deliver group events to meet both needs of students and employers, and to provide the students with hands-on work-based learning experience. Through the Pathways to Partnership grant, professional development opportunities have been provided, collaboratively by the Division and partners, to understand the purpose and types of work-based learning experiences. Team members have provided both virtual and in-person training opportunities to educators, internal team members, businesses, as well as students and parents. Specific tailored information was provided to support the understanding of each group type as the Division provided information sessions for parents, businesses, and educators. Additionally, through the Division's work on the Pathways to Partnership grant, a need was identified to focus on increasing and improving work-based learning experiences for students with most significant disabilities. Educators, businesses, WIOA partners, and the Division continue to engage in this work to improve these opportunities during the next two years of this state plan cycle.

4. Strategy: Continue efforts to establish a comprehensive and complimentary Pre-ETS evaluation and monitoring strategy.

During the 2-year state plan cycle, the Division implemented pre-surveys, annual progress check ins, and post-surveys for students who are engaging in pre-employment transition services. This data collection will demonstrate a baseline prior to service delivery for each student and regular progress check-ins to demonstrate progress in each service category. Pre-ETS Team Members provide services to each student based on the request for service and demonstrated need. The Division has also continued to engage in case file reviews with the leadership team to review case documentation and progress with the participant. The Division also restructured the Pre-ETS team to include specialized roles to align with checks and balances in service provision and in case documentation requirements. The Division will further implement evaluation and monitoring of the Pre-ETS program in the next two years of the state plan cycle.

### Goal 3: Improve outreach and engagement through individualized services to Idaho businesses.

#### **Priority 1: Work with the business community to improve understanding and utilization of IDVR business services. (B, C, D)**

1. Strategy: Identify business groups (i.e., Chamber, Workforce Development groups, Society for Human Resource Management (SHRM) that could benefit from networking with IDVR.

The Division has engaged with various employer groups throughout the state to provide education on the services that the VR program provides to businesses to support in accessing untapped talent, and to maintain employees with disabilities as part of their workforce. Through outreach, the Division has partnered with Chambers to provide training on the business services provided by the VR program to their members and has collaborated on events to engage their members with the VR program to connect students and job seekers to the members. The Division has also ensured a presence and leadership role amongst the regional Business Services One-Stop Outreach Teams (BOOST) across the state. The Division has also worked with industry groups to provide information regarding services available to the members of the industry group that are provided by the Division and workforce partners. The Division will continue this work with partners during the next two years of the state plan cycle to support business services outreach.

2. Strategy: Identify opportunities to provide education and training on the scope and availability of IDVR business services to provide customized business solutions.

The Division has increased outreach to businesses across the state in the two-year plan cycle and had an increase in training provided to businesses throughout the state both through customized training provided, and through attendance at the Division's virtual training sessions open to the business community to gain a greater understanding of disability employment topics. The Division has also had an increase in direct collaboration with businesses leading to employment outcomes for VR participants, and businesses engaged in a variety of work-based learning experiences due to the increased outreach and education of the business community regarding the services offered by the VR program. The Division will

continue this work with partners during the next two years of the state plan cycle to support business services outreach. The Division will continue this work with businesses during the next two years of the state plan cycle to support services to businesses.

3. Strategy: Expand business spotlights to each IDVR Center.

The Division has continued to host business spotlights during the two-year state plan cycle and has seen an increase in spotlights across the state with 16 spotlights completed in PY24 from 5 that were completed in PY23. Of those spotlights completed, 13 were focused on business partners spotlighted in local communities, and 9 were businesses partners that span across the state. The Division will continue this work with businesses during the next two years of the state plan cycle to support services to businesses.

4. Strategy: Continue to improve IDVR website business page for useability and improved business content.

In the past two years of the state plan cycle, the Division has engaged in efforts to update the business services pages and completed annual content updates across that section of the Division's website to comply with Federal law. Additionally, the Division added more links and resource information for businesses to connect with the Division's business services team, and to other resources that may support the business community to hire and retain qualified staff with disabilities as part of their workforce. The Division will continue this work with businesses during the next two years of the state plan cycle to support services to businesses.

**Priority 2: Evaluation of new Business Relations Team to determine effectiveness and promote the continuous improvement of business outreach activities. (A, B, C, D)**

1. Strategy: Continue efforts to align IDVR BOOST team activities with the workforce development system, including at the local level as indicated by the CSNA.

The Division has established itself as a core member of the regional business services one-stop outreach groups across the state. The Division has assigned the business services specialists to provide leadership within these groups, and to support the objectives of these teams to provide more unified and collaborative business services. The Division has taken a leadership role in the objective of identifying and leading a collaborative business services activity for the Business Services One-Stop Outreach Teams (BOOST). Through this, the Division has coordinated business spotlights, tours, and other group activities to engage with businesses and share about the services that the WIOA and BOOST partners can provide. The Division has experienced an increase in business contacts entered into the Division's case management system in the two years of the state plan cycle with 1452 in PY23 to 1786 in PY24 and 5246 in PY25. The Division will continue this work with partners during the next two years of the state plan cycle to support services for businesses.

**Priority 3: Improved utilization of business engagement partnerships with the local workforce**

**system. (B, C, D)**

1. Strategy: Continue efforts to align IDVR activities with the workforce development system, including aligned business engagement strategy at the state and local level.

The Division has established itself as a core member of the statewide leadership and regional business services one-stop outreach groups across the state. The Division served as a core partner to identify the statewide objectives for the regional business service outreach teams which require a business services partner meeting and a joint business services activity to be completed each quarter. To support these statewide goals, the Division has assigned the business services specialists to provide leadership within these regional teams, and to support the objectives of these teams to provide more unified and collaborative business services. The Division will continue this work with partners during the next two years of the state plan cycle to support services for businesses.

- (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*

For the most recently completed program year, Idaho in the 1<sup>st</sup> quartile among all states for each performance indicator apart from median earnings, where we are ranked in the 2<sup>nd</sup> quartile. For the 1<sup>st</sup> time since reporting began, Idaho has failed to exceed negotiated performance levels for 3 of the 6 performance indicators. We have seen our levels in these indicators plateau over the past few program years, and future negotiations will include discussion about what performance levels are reasonable and appropriate given our performance relative to other states.

<b>Performance Indicator</b>	<b>Actual Level</b>	<b>Negotiated Level</b>
Employment 2nd QTR after Exit Rate	61.35%	65.50%
Employment 4th QTR after Exit Rate	60.20%	63.20%
Median Earnings	5,936	5,000
Credential attainment Rate	56.50%	63.70%
Measurable Skill Gain Rate	68.50%	57.50%

- (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 Division utilizes Innovation and Expansion (I&E) funds to provide support for the Idaho State Rehabilitation Council. This includes costs associated with meeting location and logistics, travel, disability related reasonable accommodations for council members, and administrative supplies. SFY25 expenses totaled \$8,942.

The Division also utilizes I&E funds for allowable expenses of the Idaho State Independent Living Council (SILC). The Division will reimburse up to \$129,500 of allowable expenses along with the SILC providing

the associated matching funds of \$35,049. This is an annual agreement with SILC.

**(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.*

*(B) VR agency does NOT elect to receive title VI funds and understands that supported employment services must still be provided under title I.*

(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 Division receives 100 percent of the title VI grant funds allotted to WIOA Title-IV and works with ICBVI on co-enrollment when SE services are indicated for their participants. The Division utilizes an auto budgeting feature within the Aware case management system to prioritize title VI grant funds and automatically draw from the appropriate fund stream depending on the age of the individual engaging in SE services (youth or general). For example, controls exist where both youth and SE conditions must be valid for the auto budget to draw from the youth SE pool. If the youth pool is exhausted the system will search for funds in the adult title VI fund before defaulting to Title I funds which are then used to support all additional SE and youth extended services (YES), when required. Currently Idaho has extended service providers who can fund these services and YES funds are not needed.

**Goal 1 Priority 3: Improve Community Rehabilitation Program (CRP) Service provision quality and quantity (including Supported Employment) for Idahoans with the Most Significant Disabilities.**

1. Strategy: Complete rate methodology/recalibration (to include SE rate). This is a part of a greater Innovation and Expansion strategy the Division is engaged in. The new rates proposed are designed to be rates that support quality Community Rehabilitation Program Services and may include the need to support a limited period of subsidized training for Idaho's CRPs, or other mechanisms of compensation for strategic initiatives above and beyond typical expenses for CRP services. The Division anticipates it may utilize Innovation and Expansion funds for CRP improvement within this 2-year state plan cycle.

The Division has engaged in a review of the rate study that was completed and has engaged with Rehabilitation Services Administration (RSA) to work towards implementing updated methodology and payment structure in alignment with the Division's Corrective Action Plan with RSA and the rate study that was completed. The Division continues to engage with RSA in this process and expects to implement updated rate structure and fees for CRP services in this 20-year state plan cycle. The Division has also engaged with a workgroup to assess mechanisms for compensation for enhanced outcomes for VR participants served by CRPs. This workgroup has

paused their work until the updated rate structure is implemented but will resume meeting to continue this work to create incentive payments linked to the Division's primary performance indicators and participant outcomes.

2. Strategy: Implement newly revised CRP Monitoring Protocol designed to promote two-way data-driven continuous improvement conversations/increase feedback, relevance, and understanding between IDVR and Idaho's CRPs (to include SE specific quality data-driven conversations built into the CRP monitoring process).

The Division has outlined additional revisions to the CRP Monitoring Protocol as part of updates to the CRP Manual as part of the Division's Corrective Action Plan with RSA. The Division anticipates obtaining approval on the updated CRP manual and implementing the additional updates to this monitoring protocol within this 2-year state plan cycle.

- (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.*

Supported employment means competitive integrated employment (CIE), including customized employment (CE), or employment in an integrated work setting in which an individual with a most significant disability, including a youth with a most significant disability, is working on a short-term basis toward CIE that is individualized, and customized, consistent with the unique strengths, abilities, interests, and informed choice of the individual, including ongoing support services for individuals with the most significant disabilities. SE can be provided by VR for a period of time not to exceed 24 months, unless the VRC and participant jointly agree to extend the time to achieve the employment outcome identified in the IPE.

SE services are restricted to those participants assigned to the Most Significant Disability (MSD) category. The Disability Priority Page in the Aware case management system is used to document the justification of priority category assignment. The category assignment is also displayed on the eligibility determination.

Furthermore, SE is indicated for individuals for whom competitive integrated employment (CIE) has not historically occurred, or for whom CIE has been interrupted or intermittent as a result of a significant disability; and because of the nature and severity of their disabilities, need intensive supported employment services and extended services after the transition from support provided by the Division in order to perform this work.

A Comprehensive Assessment of Rehabilitation Needs (CARN) must contain information supporting a need for SE and ES prior to engaging a participant in SE services. Any additional assessments/evaluations purchased by the Division to determine this need should be conducted in an integrated setting to the

greatest extent possible.

SE refers to support services, like job coaching, provided after placement and before the individual reaches initial stability, and prior to utilization of extended services, or long-term supports.

Extended Services (ES) are those services, including Youth Extended Services (YES), provided after the assessment of initial stabilization when required for an individual to maintain employment and to sustain employment stability. The Division limits the provision of extended services exclusively to youth.

Youth Extended Services (YES): WIOA requires the Division to make YES available when youth have no comparable ES resources available in the community. YES can continue to be provided until: Comparable benefits become available (External funders are identified) OR YES is provided for four years OR The individual reaches the age of 25 and no longer qualifies under the definition of 'youth'. The Division does not provide Extended Services to participants 25 years old or over as this is an explicitly prohibited activity under WIOA. Youth extended services are only available to youth with most significant disabilities using Titles I and VI funding; and supported employment services are only available to individuals with most significant disabilities.

Supported Employment services under the Division are only offered by qualified providers who meet the criteria to become a CRP with the Division under Idaho Administrative Procedure Act (IDAPA) 47.01.01.402: Provision of Community Rehabilitation Program Services.

The Division is committed to the advancement of opportunities for eligible individuals, including youth with the most significant disabilities, and encourages employment in the least restrictive and most integrated environments possible. The Division has established and continues to maintain strong working relationships with pertinent state agencies such as the Department of Health and Welfare (H&W). Under H&W, Home and Community Based Services (HCBS) Waiver and Aged and Disabled Waiver are the two main extended services funding sources for Idahoans in need of Supported Employment. The third funding source is the Extended Employment Services Program which has moved from under the Division to IDH&W, eliminating any potential conflicts or perceived conflicts for serving individuals seeking non-CIE employment. This program is funded through State appropriations only. The primary service providers for extended supports under the three main funding sources are Idaho's CRPs.

The Division will continue to work closely with each program overseeing these resources to provide appropriate referral and utilization of these external sources of extended services funding. The following provides more detail on the working relationship between each ES entity and the Division:

IDH&W provides the following guidance on extended services under Idaho's Health & Welfare banner:

The Supported Employment Agency Recommendation must be completed by the Idaho Division of Vocational Rehabilitation (IDVR) when transitioning from vocational rehabilitation services or by the Supported Employment Agency (Community Rehabilitation Provider) identified on the plan or addendum. Documentation must include:

- Amount of Service
- Level of Support Needed
- Employment Goals
- Transition Plan

The Division provides funding for job development services and initial job coaching through a Community Rehabilitation Provider (CRP) agency. As soon as the person becomes employed, it is critical to work quickly to ensure there is no gap in the individual's job coaching support in the workplace. The CRP will communicate to the Service Coordinator/plan developer that the participant has been hired so planning for transition to Medicaid-funded Supported Employment services [extended services] can begin. An Employment Agency Recommendation form has been developed to assist with the transition process. It includes information from the CRP agency about the participant, their job tasks in the workplace, and a recommended level of service needed by the participant. This information will be used by the plan developer to complete an addendum to the Individualized Services Plan. A transition meeting will be called and facilitated by the Vocational Rehabilitation Counselor. This meeting should include the Service Coordinator/Plan Developer, guardian and any other identified members of the Person-Centered Planning team to ensure all parties understand the utilization of Medicaid Waiver Supported Employment funds and to obtain any signatures can be gathered as needed for addendum or plan development. IDH&W refers to CARF and RSAS (or equivalent) accreditation bodies for service provider requirements in order to receive waiver funding.

EES extended services are provided under EES policy which requires the certification of an extended employment service provider. These providers are approved by the EES program administrator on a case-by-case basis.

If a youth with a disability has been determined to need an SE strategy and an extended service funding source is not available yet, the Division will utilize VR funds for the required timeframes or until the funding becomes available for long-term support.

The Division has developed policies to ensure that Youth Extended Services (YES) can be provided for up to four years as needed for IDVR participants under the age of 25 following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. Upon exhaustion of Title VI funds reserved for youth supported employment, the Division will continue to support YES with Title I funds, as required by WIOA, and will continue to leverage other sources of extended services. YES funds are considered only when external sources of extended services funding are immediately unavailable and would unnecessarily interrupt the continuity of services.

The Division supports the utilization of Natural Supports where available and encourages the development of Natural Supports for all SE participants. Natural Supports are supports and services typically available to other employees OR supports created to provide supports through people or other resources typically available in the work, home, and community environment.

Stakeholder commitment for Natural Supports includes a Plan for change and the Division encourages a written commitment by the individual providing the natural supports, including contact information for a

soft handoff in the event a support loss is anticipated.

The following must be satisfied before VR can close an SE case successfully:

- The individual must have completed SE services and is no longer receiving VR funded services including extended services for youth under VR. Those receiving YES remain an open case in the VR system.
- The individual has maintained employment stability for a period of 90 days after transitioning to extended services.
- Employment meets the definition of CIE.
- The employment is consistent with the vocational goal specified in the IPE.
- At the end of the 90 days the participant and VRC agree that the participant is performing well in employment (a lack of employer agreement would indicate instability).
- The individual is informed, through appropriate modes of communication, about the availability of Post-Employment Services.

The 2023 CSNA addresses the needs of individuals with the most significant disabilities in Idaho. Individuals survey results identified barriers to getting a job: Lack of training, lack of job skills, mental health concerns, and employer disability concerns were each cited by over 50 percent of respondents. Lack of job search skills was also a noted barrier for 38.7% of respondents. Concerns over loss of benefits were cited by 28.9% of respondents.

To address these needs, the Division has engaged in substantial quality improvement initiatives to impact Supported Employment services:

Enhanced CRP Monitoring Protocol (Launching in PY 26/27):

The Division has developed a revised CRP monitoring protocol and included it in the updated CRP Manual that continues to be under development as part of the Division's Corrective Action Plan (CAP) with RSA. The CRP monitoring process drafted by the Division will occur annually and comprises two key elements: an off-site quality assurance and compliance-based review and an on-site discussion and data review. The off-site review involves examining CRP data in the Division's case management system. The monitoring reports shall quantitatively details findings, recommendations, and observations. Findings necessitate a corrective action plan (CAP) from CRPs within 90 days, to address non-compliance issues. Recommendations suggest improvements, while observations note points of interest. Subsequently, discussions between the Division and CRPs ensue to address findings and CAP development. The on-site component occurs biennially, addressing the off-site report, CRP-specific data, participant satisfaction, service access, communication, and business issues.

CRP Meetings:

The Division hosts regular statewide CRP meetings every odd number month to foster ongoing dialogue and information sharing between the Division and the CRP vendor community working with IDVR. These sessions facilitate collaborative updates, feedback exchange, and dissemination of best practices, aligning with the evolving needs of the vocational rehabilitation landscape.

*(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 CFR 363.4(a) and 34 CFR 361.5(c)(19)(v).*

The Division does not establish cooperative agreements with private nonprofit vocational rehabilitation service providers. Services are purchased on a fee for service referral basis. The Division maintains a Community Rehabilitation Providers (CRP) portal on the Division's website. The portal hosts communication relevant to CRPs and IDVR's CRP Manual.

CRPs provide specific services for participants based on a fee-for-service or through a specific contract award. Idaho CRPs must be accredited by either the Commission on Accreditation of Rehabilitation Facilities (CARF) or the Rehabilitation Services Accreditation System (RSAS) or follow the alternative pathway through ACRE or CESP completion for sole-proprietors. Additionally, CRPs must follow the process and procedures articulated in this manual and undergo successful monitoring by IDVR to continue a working relationship with the Division. This manual addresses the Idaho Division of Vocational Rehabilitation's state-federal program. The CRP Manual outlines the service billing criteria and process required before the Division will process bills, including prohibitions on billing for multiple participants. This section also mandates notification in the eventuality of anticipated service discontinuation and prohibits participant abandonment (instead requiring at least 30 days notification for a soft handoff to another CRP ahead of CRP closure in a region). A dispute resolution process including an escalation chain is also established in this section of the guide.

The Division identifies allowable services in the CRP Manual under the Service Definitions. The Division continues working with CRPs to strengthen understanding of documented progress toward SE stability and to meet SE reporting requirements.

The Division is in the process of implementing an updated CRP manual and contracts under the Division's Corrective Action Plan with RSA that outline a CRP fee schedule for allowable costs using information from a third-party contractor to support informed, impartial, and fair rates for services to accompany a quality initiative which is targeted at improving overall CRP participant satisfaction (including SE services).

**(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 CFR § 361.29(b), annual estimates must include the following projections:

(1) *Estimates for next Federal fiscal year—*

According to 2024 ACS 1-year estimates (Table S1810: Disability Characteristics) there are 290,887 Idahoans living with a disability. Of this total 203,822 are between 18 and 74 years of age with 21.5 percent of Idahoans with disabilities age 75 or older. 2024 annual averages for employment status by disability status indicates a labor force participation rate of 62.6 percent overall and 24.5 percent for Americans with a disability (BLS.gov). Using age stratified data published by BLS and the ACS allows a rough estimate of Idahoans who are in the labor market but are unemployed while accounting for varying unemployment rates and participation rates across age categories. This estimate provides a conservatively high figure to utilize for those Idahoans who may be eligible for Title-IV programs and are unemployed. This number does not include Idahoans with disabilities who may be seeking advancement or maintenance of employment.

**Table [VR.X] Estimated Eligible Idahoans in Labor Market**

ACS 2024 1-year Age	ACS 2024 Idaho Population	Idahoans with a Disability	Percent of Idahoans with a Disability	BLS 2024 Age	BLS 2024 Unemployed in Labor Force with a Disability (US)	Estimated Eligible Idahoans in Labor Market
18 to 34	448,819	51,857	11.6%	16 to 34	15.23%	3488
35 to 64	712,144	98,996	13.9%	35 to 64	6.57%	2639
65 to 74	210,415	52,969	25.2%	65+	4.60%	452
75+	136,675	62,549	45.8%	65+	4.60%	452
<b>Total:</b>						<b>7,031</b>

Additional perspective can be gained by looking at recent service trends within the Division which provide a more accurate ongoing foundation to conduct projections for program expenditures.

(A) *VR Program; and*

**Table [VR.X] Projected Adequacy of Funding for Vocational Rehabilitation Services (ID-G)**

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
MSD	2,864	1,580	\$1,550,048	1,284
SD	2,482	444	\$1,556,173	2,038
D	2,081	402	\$1,988,871	1,679

The Division expended \$4,988,871 in Title I funds on services across 7,427 eligible individuals in PY 2025. The Division utilizes a 103% and 105% approach to account for increases in eligible individuals due to population growth, outreach, and increases in costs of services. The State Plan requires a one-year estimate for PY 2027 which utilizes the 105% adjustment included in the VR Program table above for an estimated total projection of \$5,238,315. The Division is currently in Order of Selection with 1,519 individuals in the MSD category on the waitlist as of 1/16/2026.

*(B) Supported Employment Program.*

**Table [VR.X] Projected Utilization of Title I and Title VI Funds**

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
MSD	233	80	\$ 838,103	3,440

The Division provided Supported Employment (SE) services to 222 individuals in PY 2024 at a total cost of \$838,103 with an average cost of \$3,775 per case. The Division receives \$300,000 in supplemental funds for the SE program, half of which are reserved for youth SE. The Division first exhausts Title VI SE funds within each category (youth/adult) prior to continuing SE provision with Title I general program funds. Roughly 80 (79.47) participants can be supported under the SE grant under PY 2024 conditions. PY 2026 estimates for SE indicate 233 SE participants using 105% projections from PY 2024 actuals with the additional estimated 153 participants SE services supported under Title I general funds. This increases the estimated cost for PY 2024 SE services using both Title I and Title VI funds to \$880,008.

**(g) Order of Selection.**

*The VR agency is **not** implementing an order of selection and all eligible individuals will be served.*

*The VR agency is implementing an order of selection with one or more categories closed.*

*\* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an 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.*

*(1) For VR agencies that have defined priority categories describe—*

*(A) The justification for the order.*

Due to the State of Idaho budget process, the Division’s spending authority is set by a legislatively approved appropriation of funds (both federal and non-federal funds are subject to this). The state has a constitutional mandate to have a balanced budget, and this must be followed by the Division.

With a projected deficit between estimated revenue and budgeted state appropriation, the Governor of Idaho directed state agencies with General Fund appropriation to reduce their appropriation by 3% in SFY 2026. This reduction limits the amount of matching funds to access the federal grant funding. Therefore, the Division does not have the funds available to provide the full range of VR services to all eligible individuals. Specifically, the Division will not have the state spending authority/appropriation to cover anticipated plan services and obligations in FFY 2026 due to number of individuals currently on the waitlist for VR services and estimated average costs over the lifetime of a participant's case with IDVR. The Governor also directed agencies to make the 3% reduction in General Funds an ongoing reduction for SFY 2027 and beyond.

In order to be in compliance with the Division's state approved spending appropriation and the Division will continue to utilize Order of Selection to manage its financial capacity to provide services to eligible individuals. The VR agency historically was obligating more funds than were available pursuant to Idaho's constitutional balanced budget requirement, and available Federal funds is driving the need for continued utilization of OOS for the Division.

The Division engaged community partners and the public to provide information about Order of Selection and address questions and concerns before implementation of the Order.

In accordance with the Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act of 2014, and its regulations, a designated state unit must implement an order of selection when there are insufficient resources to serve all eligible participants who apply for services.

The Division continues to have insufficient resources to serve all eligible participants. There are multiple factors contributing to the lack of resources leading to the need to continue to utilize Order of Selection with categories closed. They include:

- Disallowed costs to be paid by State only, non-match funds reducing funds available to match the federal award
- Reduction in federal funds available from the FFY25 grant due to reduced state match spent
- Number of eligible individuals on the waitlist
- Increased cost of services to program participants as a result of:
  - Rate increases for goods and services paid to vendors
  - Increases in high-cost or ongoing services determined as necessary to support the vocational goal
- Individuals remaining in an individualized plan for employment longer as a result of activities like participation in post-secondary education which come with increased costs for tuition
- Staff capacity with reduced hiring in 2024-2025
- Disrupted cashflow with the Division's route payment processes with RSA under its specific conditions for the FFY24-26 grant awards

- Expected reduction in SSA Cost Reimbursement income available to the Division

Expenditure projections for FFY2026 and FFY2027 indicate a shortage in funding, making it necessary to continue to utilize an order of selection.

The fiscal status of the agency will be monitored on a monthly basis to determine when the Division can open categories and release participants from the waitlist should sufficient funds become available. If new applications or needs for services decline, opening closed categories will be a top priority.

- (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*

As part of every participant’s eligibility determination process, a qualified Vocational Rehabilitation Counselor that meets Qualified Rehabilitation Professional standards in the State of Idaho will evaluate: 1) disability-related functional limitations; 2) anticipated number of needed services; and 3) whether services are anticipated to be needed over an extended period to time. The VRC will use these criteria to assign eligible participants to one of three priority categories, based on the severity of the participant’s disability. Priority categories ensure that VR services are prioritized for individuals with the most significant disabilities.

**Idaho Division of Vocational Rehabilitation Disability Priority Categories**

**Priority 1: Most Significant Disability (MSD)**

The participant meets the criteria established for a significant disability; and:

1. Experiences a severe physical and/or mental impairment that seriously limits three or more functional categories (such as mobility, work skills, self-care, interpersonal skills, communication, self-direction, or work tolerance) in terms of an employment outcome; and
2. Requires multiple VR services over an extended period of time.

**Priority 2 - Significant Disability (SD)**

The participant meets the criteria established for a disability; and:

1. Experiences a severe physical and/or mental impairment that seriously limits one or more functional categories (such as mobility, work skills, self-care, interpersonal skills, communication, self-direction or work tolerance) in terms of an employment outcome; and
2. Requires multiple VR services over an extended period of time.

**Priority 3 - Disability (D)**

The participant has a physical or mental impairment; and:

1. His/her impairment constitutes or results in a substantial impediment to employment; and
2. Who can benefit in terms of an employment outcome from the provision of vocational rehabilitation services.

Participants who are beneficiaries of Social Security Disability Insurance (SSDI) or recipients of Supplemental Security Income (SSI) for disability reasons are presumed eligible for VR services and to be an individual with a Significant Disability (SD) with their SSA award letters. Additional documentation is needed to substantiate whether an individual has a most significant disability.

After the presumption of eligibility, a VRC may review additional documentation to determine if the individual may be re-categorized as an individual with a most significant disability (MSD).

Priority categories will be assigned consistently, objectively, and with participant rights to review and due process. Consistent with federal regulations, the Division will not consider duration of residency in Idaho State, type of disability, age, sex, race, color, national origin, type of expected employment outcome, source of referral, particular service needs or anticipated service costs, individual or family income level, when assigning a priority of service category.

- (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 PY 2026 and PY2027**

Under the Order of Selection, the Division will prioritize resources to serve individuals with most significant disabilities who are most in need of vocational rehabilitation services, per the following specifications:

- Continue to serve existing participants with an approved Individualized Plan for Employment (IPE) in all disability priority categories
- Continue to provide Pre-employment Transition Services (Pre-ETS) to eligible students if those students have begun pre-employment transition services prior to application and eligibility and to all potentially eligible students with disabilities in accordance with order of selection requirements.
- Serve individuals from the waitlist in eligibility status and new applicants based on disability priority of service category and date of application for VR services.

The Division currently has the Most Significantly Disabled (MSD) partially open as of October 27<sup>th</sup>, 2025, and plans to continue to serve off the waitlist from the Priority 1 MSD disability priority category through FFY2026 as resources are determined available. Closed categories include Priority Category 2 (Significantly Disabled), Priority Category 3 (Disabled). Eligible individuals in these categories will continue to be placed on the waitlist until resources become available.

The Division must also continue to provide pre-employment transition services, and necessary assessment/auxiliary aids and services, to potentially eligible and VR-eligible students who began

receiving services prior to being determined eligible and placed on a waitlist or to students released from the waitlist.

The Division is taking a measured approach to serving off the waitlist and tracking its expenditures. If average case expenditures rise above the projected case costs, the Division will need to adjust its cadence to serve off the waitlist. If actual expenditures increase at a lower rate, additional individuals can begin to be released from the waitlist. The Division's budget status is reviewed at least biweekly by the Fiscal Officer with the strategic leadership team including the Division's Administrator.

### **Information and Referral for Individuals placed on the waitlist**

The Division's policy and procedures on Order of Selection describes information and referral (I & R) as a service provided throughout the vocational rehabilitation process and for individuals who, when determined eligible, are placed on the waitlist when the agency is under an order of selection. Policy also describes the purpose and scope of I & R services and minimum federal requirements.

Those placed on the waitlist are informed of their eligibility, that the Division is not currently serving their Priority of Service Category, and that they have been placed on a waiting list for services. Participants are advised that they can discuss the decision and possible redetermination of the category with their local office. Information on participant rights and responsibilities, information about Order of Selection, and information on specific workforce programs that may be able to help meet vocational rehabilitation needs while they wait for IDVR services to become available. This includes programs carried out by partners in Idaho's workforce development system, as well as other federal or state funded workforce programs.

In addition to resources discussed with participants in their intake meeting with VR, enclosure with their eligibility letter, the Division's website also hosts resources that may be available to those placed on the waitlist.

Local offices maintain a comprehensive list of organizations, including other workforce development programs, to which participants can be referred. IDVR staff use these resource lists to explore options that meet the participant's needs. To the extent possible, the list includes specific points of contact within the organization.

A notification is sent to all individuals on the waiting list to notify them of their status on the waitlist and to remind them to keep their contact information up to date with the Division. Individuals on the waiting list may choose to be removed or provide information for redetermination of their category placement.

If a participant requests a formal referral, IDVR staff are required to prepare and send a written referral to the organization best suited to meet the specific employment needs of the participant. In addition, the Division will provide the participant with the following:

1. A copy of the written referral notifying the other Federal or State program about the referral;
2. The point of contact and organization the participant is referred to;

3. Information about the most suitable services to prepare for, secure, retain, or regain employment (the purpose for referral).

### **Waitlist Management**

On a monthly basis, the Divisions Strategic Leadership Team will review:

- Projected and actual revenues and expenditures
- Staff capacity and caseloads
- Projected and actual number of participants being served in each disability priority category
- Number of individuals on the waiting list for services in each disability priority category
- Application trends for each disability priority category
- Number of potentially eligible students with disabilities receiving Pre-ETS
- Pre-ETS expenditures

These discussions will inform decisions about changes in the open and closed disability priority service categories, including the timing of opening categories and releasing participants from the waitlist.

For closed categories, the Division will maintain a waiting list of individuals according to their disability priority category and date of application. This list will be used to manage updates to participants on the waitlist. Participants will be served from the waitlist in order of date of application and category until the category is opened. Categories will be opened when resources are sufficient to serve all participants in the service category including all individuals assigned to the category upon eligibility determination and those individuals on that disability priority category's waitlist. Once a closed category is opened, then individuals on the next category's waitlist may begin to be served in order of application date.

- (2) *Has the VR agency elected to serve eligible individuals outside of the order of selection who require specific services or equipment to maintain employment?*

Yes.

**(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 CFR 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 CFR 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."*

Not Applicable.

**(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 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 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;*
  - (B) *The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and*
  - (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.*

*IDVR Personnel Projections*

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Chief of Field Services (General Program)	1	0	1
General Program Management Staff (Center Managers and Supervisors)	9	1	5
General Program Qualified Rehabilitation Professionals – VR Counselors	13	9	20
General Program Vocational Rehabilitation Specialists	15	0	0
General Program Vocational Rehabilitation Assistants	17.125	2	0
General Program VR Coordinators	0	22	10
General Program Technical Records Specialist 1	0	3	2
Intake and Eligibility Unit Qualified Rehabilitation Professionals	2	0	2
Intake and Eligibility Unit VR Coordinators	0	3	2
Pre-ETS and Business Services Manager	1	0	0
Pre-ETS Program Management Staff (Program Manager and Supervisors)	4	0	2
Pre-ETS Program Qualified Rehabilitation Professionals- VR Counselors	8	2	7
Pre-ETS VR Coordinators	15	4	8
Pre-ETS Technical Records Specialists 1	2	0	2
Business Services Supervisor	1	0	0

Business Services Specialists	3	1	4
Planning and Evaluation Manager	0	1	0
Business and Program Analysts	3	1	1
Program Technician Specialist	1	0	0
Contracts and Vendor Relations Specialist	0	1	0
Training and Development Team (including Training and Development Manager)	3	1	3
Fiscal Team	6	1	4
Administrative Assistance (Central Office Support)	2	0	1
Deputy Administrator	1	0	0
Administrator	.5	1	0
Human Resources (reassigned to DHR)	0	0	0
Budgeted Full-Time positions = 140.875, including 6 part-time positions.			

(D) *Ratio of qualified VR counselors to clients: [text box]*

(E) *Projected number of individuals to be served in 5 years: [text box]*

The Division served 7,427 eligible individuals in PY 2024. The Division, assuming a 3 percent annual growth rate, projects serving 8,610 eligible individuals in PY 2029.

PY25	7,650
PY26	7,880
PY27	8,116
PY28	8,359
PY29	8,610

(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.*

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
Idaho State University	MA in Clinical Rehabilitation Counseling	3	9

(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 Division has implemented several strategies to improve recruitment and retention of all Division team members.

The Division implemented formal changes to allow for greater flexibility to support work-life balance through an updated Alternate Work Schedule policy to offer greater flexibility in work schedules in an effort to improve team member recruitment and retention. A significant portion of team members have taken advantage of the increased flexibility in the Division's 2025 updates to the alternate work schedule policy, which directly impacts their job satisfaction.

The Division will continue to recruit qualified applicants from Rehabilitation Counselor Education programs. The Division maintains relationships with numerous institutions that provide educational programs that meet the Division's Qualified Rehabilitation Professional (QRP) standards. The Division has also engaged in agreements with several university programs to support IDVR team members and potential interns to complete their required practicum and internship hours with the Division.

The Division continues to face challenges in recruiting qualified applicants. The entry-level wage for a Qualified Rehabilitation Professional (QRP) is lower than comparable state and private positions with similar educational requirements. The Division has recently increased starting wages for the QRP role by collapsing the two QRP positions into one job description allowing the Division to hire at the higher salary. Additionally, the Division has begun work to implement a differentiated practice model which has been implemented on the Pre-ETS program with current evaluation for future implementation on the General program team. This differentiated practice model will support the Division's need to have team members that meet the QRP standard but become less reliant on the number of positions that must meet this requirement for the provision of VR services.

To increase the Division's effectiveness in hiring and retaining qualified team members, especially for the QRP positions, the following strategies continue to be supported:

- Flexibility in work schedules
- The Division supports paid (IDVR employees) and unpaid internships (non-employees) for master's level students in programs that meet the Division's QRP standard.
- Collaborating with Division of Human Resources to demonstrate need for increased wages for State employees to be competitive
- Improved Job Announcements

The Division conducts exit interviews with team members, when possible, to determine whether there are areas of concern affecting team member retention. The current trend suggests counselors are leaving VR for positions which do not require a master's degree and/or are paid more per hour. Idaho has a very low unemployment rate, wages in the private sector continue to outpace public sector employment.

Employee turnover for the past program year for the QRP position was 34 percent including vacancies from internal promotions. Exit interviews noted the Division's Order of Selection impacted

the decision for QRPs that sought other employment opportunities.

The Division has invested in improving Agency culture, morale, and tenure through annual employee engagement plan development based on employee satisfaction surveys completed by the Department of Human Resources (DHR). The Division currently works with DHR for recruitment of open positions and seeks all available opportunities to share QRP openings broadly to reach untapped talent pools that meet the minimum qualifications of these positions and to support reasonable accommodation requests to ensure equitable access to the VR application and hiring processes for all applicants.

- (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. [text box]*

The Division maintains a statewide policy on employee training and development to foster ongoing professional development for all professional and paraprofessional team members. Individualized training requests are evaluated and approved based on course content focused on core vocational rehabilitation services. The Division's use of the YESVR platform allows IDVR team members to access training by national experts in Vocational Rehabilitation and allows the Division's Training and Development team to develop and assign in-time asynchronous trainings that are able to be loaded and tracked through the platform to ensure training consistency across the agency.

The Division conducts an annual training needs assessment with team members to gather information on team member training needs to provide subjective information IDVR team member's training needs. The Division uses this information to provide training for IDVR team members and to develop annual training plan. The Division collects objective information on training needs through annual case file review process, which identifies specific areas of training needs for professional and paraprofessional team members.

Statewide training provided to team members in PY2024 included statewide training, including Financial Participation Assessment (FPA), Order of Selection (OOS) training, Sara training (client communication software), and fiscal training to include implementation of a multi-level payment approval process to increase financial accountability of program expenditures. In PY2024, the

Division partnered with Vaybrant Consulting for support bringing fiscal practices into federal compliance. Training related to contracted support provided to the Division included statewide training on new approval processes for Individualized Plan for Employment (IPE) and authorization approvals, payment reviews, and targeted fiscal department training to improve payment efficiencies. Finally, statewide multi-day training was completed to comply with the Division's Corrective Action Plan (CAP) requirements. The Agency maintains its status as a pre-approved entity to provide CRCC CEUs for agency-sponsored training.

The restructuring in PY2022 and creation of the Training Department has allowed the Division to better meet employee training needs, along with increasing the ability to more quickly recognize and adapt to shifting training priorities. Division training specialists coordinate with supervisors and managers in their assigned geographical regions to meet training needs at the local level and develop and provide statewide training under the direction of the Training and Development Manager when training needs are identified by Division leadership. Training specialists provide individual and small group trainings to new employees and coordinate learning opportunities with current Division team members. New employee training also includes standardized formal trainings and small group live trainings during an employee's first six months. Ongoing, training specialists work with their regional leadership to identify and address individual and regional training needs. The training team continues to leverage technology by creating asynchronous trainings relevant to identified training needs. Asynchronous trainings are available to all Division team members and are updated regularly to meet program requirements.

The Division continues to work with RSA grant-funding programs in the areas of Quality Management, Quality Employment, Pre-ETS programs, and Vocational Rehabilitation Counseling. Training is offered as available to IDVR team members from these partners to support skill acquisition and job competency.

The Agency continues to support succession planning and leadership development. The Division has launched a new training plan to include leadership training topics to be delivered at monthly All Managers' meetings by the Training and Development Manager. The Division has also implemented a new process for developing workgroups to support various projects and initiatives by creating task focused workgroups to encourage growth and leadership in team members by leveraging a strengths-based approach to form the members of the workgroups.

- (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*

The State of Idaho does not have a state licensure for rehabilitation counseling. The Division's personnel standards satisfy Federal requirements as outlined in 34 CFR 361.18(c). The Division currently has a three-pronged counselor position career ladder which includes Vocational Rehabilitation Specialist (under fill position), Vocational Rehabilitation Counselor (Qualified Rehabilitation Professional or QRP) and QRP level Training Specialists. The Division is also in the process of developing a new mentoring program that will provide training and leadership opportunities to team members that display strengths in their work quality to act as a peer mentor in the area of their strengths to leverage a strengths-based peer mentoring training and development model.

The Division has one Qualified Rehabilitation Professional (QRP) level: Vocational Rehabilitation Counselor (VRC). The standards that satisfy the Agency's Comprehensive System of Personnel Development (CSPD) policy for VRC positions are described below.

The Division's current minimum educational qualifications to satisfy qualified rehabilitation professionals (QRP) include:

- Current Certified Rehabilitation counselor (CRC) designation obtained through the Commission on Rehabilitation Counselor Certification (CRCC) or eligibility to sit for the CRC certification exam; or
- Graduation from a program accredited by the Council for Accreditation of Counseling and Related Education Programs (CACREP) or the Commission on Rehabilitation Education (CORE) with a master's degree in Rehabilitation counseling; or
- Holds a current license as a Licensed Professional Counselor (LPC), or Licensed Clinical Professional Counselor (LCPC), or Licensed Clinical Social Worker (LCSW), or Licensed Masters Social Worker (LMSW), or Licensed Marriage and Family Counselor (LMFT or LMFT-A) \* issued by the State of Idaho Division of Occupational Licensing; or
- A Doctorate degree in Philosophy, Psychology, Counseling or Social Work plus a minimum of two years of relevant work experience; or
- Master of Social Work (MSW) degree plus a minimum of two years of relevant work experience; or
- Master of Special Education (MSPed) plus a minimum of two years of relevant work experience.
- Master of Forensic Psychology **plus** a minimum of 2 years of relevant work experience.
- Master of Marriage and Family Therapy (MFT) plus a minimum of 2 years of relevant work experience.

Employees that were previously hired into the Vocational Rehabilitation Specialist (VRS) level must obtain education and/or experience that meets the requirements of the Division's QRP standards to obtain a promotion and work independently in a Vocational Rehabilitation Counselor, Qualified Rehabilitation Professional (VRC QRP) position with the Division.

The incumbent VRS's employed by the Division will be required to meet the Division's CSPD

standard to become eligible to be hired into a VRC QRP position. The Division has placed an indefinite pause of the prior 5-year requirement to meet QRP standards from the time of hire due to changes in the state's hiring practices that now require the utilization of skills-based hiring. The Division will not engage in further hiring of VRS position due to this State of Idaho hiring requirement update. Due to this, the Division is currently in the process of reclassifying the current Vocational Rehabilitation Specialist position to a Vocational Rehabilitation Coordinator position on the General team and will sunset the VRS position once this reclassification process is fully completed. This reclassification was completed for the Pre-ETS program during the Pre-ETS restructuring that was implemented on October 27<sup>th</sup>, 2025.

*(B) The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.*

The Division is committed to providing all employees with professional development opportunities which will enhance employee job performance; support the Agency's mission, values and goals; and lead to successful employment outcomes for individuals with disabilities.

The Division has established education and experience requirements for each position in the Agency with a focus on alignment of requirements contained in section 101(a)(7)(B)(ii) which meet or exceed the standards required in 101(a)(7)(B)(ii)(I)-(II) including a requirement for a master's or doctoral degree in vocational rehabilitation or a related field to be recognized as a qualified rehabilitation professional at the Division. When unable to hire QRPs for the VRC position, the Division supports a Vocational Rehabilitation Specialist position with fewer requirements (explained under section 3(a) above, but requirements which are specifically outlined to meet the conditions of the 21<sup>st</sup> century workforce understanding. The Division hires with a preference for people who have experience of working with people with disabilities, particularly around advocacy and providing direct support.

With the increased WIOA emphasis on workforce development the Division will also concentrate on providing training to strengthen business relationships and increase knowledge of local labor market relevance and employer needs. The Division will establish ongoing requirements to participate in continuing education around a 21<sup>st</sup> century understanding of the workforce including periodic updates on LMI and career pathways and evolving regional labor trends and expectations.

*(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 Division provides or purchases interpreter or language services required to access program services. The Agency continues to work with the Division of Human Resources to determine a process and standards to assess team member competency in Spanish or other foreign languages. If

team members meet competency standards, they may work with and interpret for customers who's primarily language is other than English.

Since Idaho has a separate entity that addresses issues related to low vision and blindness, The Division does not provide specific training to its team members in braille, but instead either refers or jointly serves customers who require braille to the Idaho Commission for the Blind and Visually Impaired.

*(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 Pre-ETS and Business Services Manager will facilitate the required coordination with the State Department of Education and provision of Pre-Employment Transition Services, as required under WIOA.

The Pre-ETS and Business Services Manager has knowledge of IDEA personnel qualifications, under 34 CFR 300.156. Training and education will be identified for team members regarding service provision, coordination and best practices in serving students with disabilities. The Pre-ETS and Business Services Manager and the Pre-ETS Program Manager are assigned as active members of the Idaho Interagency Council on Secondary Transition and the Special Education Advisory Panel, which promotes interagency cooperative planning, information sharing, and the collaborative use of resources at the state and local level. This Council works to ensure that training needs are adequately identified and then addressed through shared training opportunities. In addition, the Pre-ETS and Business Services Manager is a co-lead along with a representative from the State Department of Education for the Idaho Transition Team, who is tasked with providing training, disseminating information, and enhancing competitive integrated employment opportunities for students with disabilities in Idaho.

Training opportunities offered by the Division, which are relevant to both educators and vocational rehabilitation professionals, will be open to school staff for participation when practicable. For example, in the fall of 2025, The Division brought together public educators and VR Pre-employment Transition Services team members at the Pathways to Partnerships Conference and at the Envision Employment Summit. The Pre-ETS and Business Services Manager assures that the Strategic Leadership Team (SLT) is kept up to date on any relevant updates or changes. The SLT takes the information from the meeting and shares it with their relevant program team members. The Pre-ETS and Business Services Manager works collaboratively with the Training and Development Manager to develop and provide specific training for the Agency for those team members primarily responsible for working with VR participants. Finally, the Pre-ETS and Business Services Manager, or their delegate, participates in Special Education Advisory Panel for the State Department of Education.

**COOPERATION, COLLABORATION, AND COORDINATION (Section 101(a)(11) of the Rehabilitation Act)**

**(i) 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 following section outlines how The Division meets the requirements of 34 CFR 361.22: Coordination with education officials.

The Division has developed and maintains policies and procedures for IDVR team members in Section 9 of the Field Manual: Pre-Employment Transition. This section contains comprehensive field guidance on Pre-ETS.

The Division maintains multiple documents for the purposes of Pre-ETS planning including:

1. the Formal interagency agreement,
2. Statewide goals for post-secondary options,
3. Local Education Plans, and
4. Other relevant plans (as needed).

1. The Formal interagency agreement was developed by the Division, SDE, and ICBVI. This agreement meets the requirements of 34 CFR 361.22(b) by addressing eligibility criteria, collaborative service provision, consultation, and technical assistance, including the programmatic and fiscal responsibilities for each agency, as well as procedures for outreach, application (when required) and early engagement. The latest amended agreement is in effect as of March 2023. Current revisions are in process to ensure ongoing collaboration across the partners and that the agreement remains relevant and aligns with federal requirements.
2. The Statewide Post-secondary Plan includes the following goal: Facilitate systems change in Idaho by creating and scaling up a coordinated system of service delivery. Some strategies applied to address these goals are the following:
  - a. Strategy: Develop a common language framework with outcomes, benchmarks, and services
  - b. Strategy: Complete the Idaho Secondary Framework to include sequencing of services and individualized planning tool
  - c. Strategy: Clarify and understand roles and responsibilities  
Strategy: Build capacity to fulfill roles based on presumed competence of each individual
3. Local Education Plans are used to target technical assistance, professional development, and assistance to build collaboration between the LEA and the Division. Planning at the

local level is a general preference of Idaho's LEAs. The State Department of Education has been awarded a Rehabilitation Services Administration Disability Innovation Fund Program grant that will close in 2028. Through this grant, six Local Interagency Leadership Teams were established around the state. The agencies involved include a local education agency, statewide Parent Information Training Center, local Center for Independent Living, the Division and additional outside partners as appropriate.

Division Policy: Pre-Employment Transition Services for Students and Youth outlines Division policy for internal team members and includes sections on Pre-ETS, Service Provision and Collaboration with Schools, Potentially Eligible Students, Pre-ETS services for students, youth with a disability, student with a disability, IPE development, Pre-ETS services exemption from financial participation, auxiliary aids or services, and guidance for Pre-ETS delivery under Order of Selection IDVR Policy defines Student with a Disability including age and education requirements within this policy. The earliest age that students can engage in Pre-ETS is 14, as agreed by the Division and ICBVI. This age was determined through collaboration with our blind agency ICBVI and the state department of education during development of our Interagency Agreement. The age is documented in our Interagency Agreement. It has been communicated to IDVR team members through the Division's policy.

Division Procedures: Pre-Employment Transition Services: This document is a guide for IDVR team members outlining Pre-ETS Procedures. This guide outlines some contract processes and guides to help IDVR team members understand the differences in how contracts are framed, but all contract requirements and actual contracts are conducted as separate formal processes. Contracts are either written by the Pre-ETS and Business Services Manager with assistance from the Contracts and Vendor Relations Specialist and approved by our AG or following all required policies and rules outlined by the Idaho Division of Purchasing. The Division's team members can only approve and authorize services within the context of their position, approval authority, and as outlined in policies and procedures.

- (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 CFR 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 CFR part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and*
- (F) *Assurance that, in accordance with 34 CFR 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 CFR 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.*

The Division and the SDE have developed a comprehensive formal interagency agreement which addresses collaborative service provision. This agreement specifies the programmatic and fiscal responsibilities for each agency and identifies the minimum age for service delivery to students with disabilities. The minimum age is 14 for service delivery to students with disabilities.

Pre-Employment Transition Services will be provided to students with disabilities who are potentially eligible or eligible for VR services. The latest amended agreement is in effect as of March 2023. The agreement is reviewed annually for relevance and will be amended by mutual consent as needed.

The formal interagency agreement with the Division, Idaho State Department of Education (SDE), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains several provisions designed to promote communication and the sharing of technical expertise in post-secondary planning.

The agreement stipulates that the vocational rehabilitation agency must provide consultative and technical assistance services to assist educational agencies in planning for the high school exit of students with disabilities from school to post-school activities, including employment.

The agencies agree to:

1. Encourage staff to work closely with LEAs to ensure coordination between education services, pre-employment transition services, and vocational rehabilitation services.

2. IDVR and ICBVI counselors will provide training and information to school district personnel, students and families on pre-employment transition and vocational rehabilitation services, including their role as IEP team members.
3. IDVR and ICBVI counselors are available to consult with educators concerning pre-employment transition and vocational rehabilitation services for students to assist them toward employment.
4. IDVR and ICBVI counselors will collaborate with the LEAs in their service area to identify a process for the counselors to provide input and participate in the development of the post-secondary services included in IEPs.
5. IDVR and/or ICBVI counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and/or student's parent or legal guardian. VR counselors may attend either in person or via video or telephone. The IDVR and/or ICBVI counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
6. IDVR and ICBVI counselors will consult with educators concerning referral of students to IDVR and/or ICBVI for rehabilitation services, including pre-employment transition services. Students with blindness or visual impairments should be referred to ICBVI. Students with multiple disabilities may have dual cases with both IDVR and ICBVI to provide rehabilitation services.
7. IDVR and ICBVI counselors will accept referrals for pre-employment transition or vocational rehabilitation services, when appropriate, and will work collaboratively with input from the student's IEP team, for service provision and/or to develop an IPE. The vocational rehabilitation counselor, student, student's parent or legal guardian, and members of the student's IEP team will collaborate to identify required vocational rehabilitation services that will move the student towards their employment goal.
8. IDVR and ICBVI counselors will help students and youth with disabilities develop and participate in Pre-Employment Transition services, including work-based learning opportunities, provide information, support, and guidance to transition students, parents, and schools to promote effective post-secondary services, help eligible students develop an IPE, plan and promote the use of Pre-ETS, identify and help students and their families access other appropriate resources, help students obtain technology evaluations, recommended assistive technology, and training in the use of purchased equipment, when appropriate.
9. All Vocational Rehabilitation State Plan requirements, including Order of Selection, will apply to all services provided under this cooperative agreement.

Furthermore, the formal interagency agreement with the Division, Idaho State Department of Education (SDE), the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains several

provisions designed to facilitate the development and implementation of Individualized Education Programs (IEPs). The agencies agree to cooperate in the development of students' Individualized Education Programs (IEPs) and any relevant Individual Plan for Employment (IPEs). Development of the IEP is vested with the IEP team, including the student and his/her parent or guardian. Approval of the IPE is vested with the Division or ICBVI, the student and his/her parent or guardian.

To accomplish the tasks outlined in the formal Interagency Agreement the Division, ICBVI, the SDE do the following:

- The Idaho Interagency Council on Secondary Transition is established by the Superintendent of Public Instruction to advise, review, analyze, and monitor the implementation of the State's Interagency Agreement on Secondary Transition. The authority to establish this Interagency Council lies in IDEA Section 640(b)(1)(A) and regulation 300.154. The Division continues to be involved in the Idaho Interagency Council on Secondary Transition with the purpose of ensuring that students with disabilities experience a collaborative, comprehensive system that facilitates a smooth exit from secondary school to adult life. The goal of this group is to increase the number of students with disabilities who are actively engaged in post-secondary education, employment, and community activities. Interagency cooperative planning, information sharing, and the collaborative use of resources assist in accomplishing IDVR's mission at the state and local level. Members include the Idaho Division of Vocational Rehabilitation (IDVR), Idaho State Department of Education (SDE), Idaho Commission for the Blind and Visually Impaired (ICBVI), Idaho Educational Services for the Deaf and Blind, Idaho Parents Unlimited, Council on Developmental Disabilities, Department of Labor, Boise State University, Idaho State University, The Assistive Technology Project, Idaho Health and Welfare, Juvenile Corrections, Department of Correction, and LEAs.
- The Division's Pre-ETS team members attend hundreds of IEP meetings statewide each year where they discuss Pre-ETS and VR services with students and families. The Division also created a one-page Request for Pre-Employment Transition Services form that is easy to complete to receive Pre-ETS. The Division is in the process of evaluating steps to create a secure online form to further streamline the request for services process. This makes the process of receiving Pre-ETS quick and easy for students and families. When the Division receives a request form, someone will reach out to the student and/or family to discuss the VR program, order of selection, and what additional services can be made available to the student when they fully participate in the VR program. Additionally, while receiving Pre-ETS, students are provided with information about the VR program and how VR can support students with employment and educational goals.
- The Division also conducts significant outreach as part of collaboration with LEAs to discuss both Pre-ETS and the VR program. They are also provided with information on the VR

eligibility process, so they can provide this information to families. The Pre-ETS Program Manager attends regional special education directors' meetings to present on Pre-ETS and VR services. The Division also presented at the 504 coordinators meeting, the superintendents meeting, and the statewide Pathways to Partnerships Conference. The Division provides numerous presentations at Tools for Life, which is a conference that students with disabilities attend. Presentations include information on Pre-ETS, VR services, and the VR eligibility process.

- Lastly, the Division has developed an informational packet for students and families that can be shared by teachers at IEP meetings when the VR counselor is not able to attend. When the student is currently engaged with VR services, the teacher will receive information on what the student has participated in with the Division and what next steps may be. The Division developed two videos that have been shared with teachers on Pre-ETS and the VR program as well as the eligibility process for VR. These videos are maintained on the VR website. These videos were disseminated to LEA staff via the State Department of Education's Transition Coordinator.

**(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.*

#### **Agency Business Services Structure:**

The Division continues to provide coordination of employer related outreach efforts within the Division and coordinated services under the aegis of WIOA through partnerships with Titles I-IV and other combined state plan partners. The Division continues to evolve services provided to business and has plans for continued improvement of business services, additional training for Division team members, increasing the quality of services provided to business, as well as improving coordination with WIOA plan partners.

Over the last two years, the Division continued to engage in coordinated business services internally through the Business Services Program Unit. This team was comprised of one business services specialist that was the point of contact for business services for each Center with the activities of the team directed by the Business Services Supervisor and the Pre-ETS and Business Services Manager. This team has supplanted the prior model of having the VR Counselors complete business services in addition to their caseload work.

In August 2023, the Division hired its first of four Business Services Specialists that are located within across the state geographically and report to the Business Services Supervisor to ensure a dedicated focus on establishing and developing quality relationships with businesses across the

state. With the current Division structure, there will be one dedicated team member to serve four distinct geographic areas of the state. These positions are dedicated to engaging employers to provide outreach, education, and business services throughout the state. Currently, the agency has three of the four positions filled, will complete recruitment and onboarding for the current vacant position in 2026.

### **Collaboration with One-Stop Partners:**

The Division continues to collaborate with Titles I-IV programs and other combined state plan partners. The Division's Pre-ETS and Business Services Manager is a member of the Statewide One-Stop Business Services Leadership Team that collaborates across the WIOA partners to assess progress and goals toward a more unified approach to the delivery of business services in Idaho. The Division was a leader in the development of regional business services outreach One-stop teams (BOOST or RBS). These teams have requirements to have at least one meeting and one partner activity completed quarterly. The Division acts as a primary contributor to the quarterly activities across the regional business services teams with the requirement for the regional business services specialist to lead at least one of the quarterly partner activities each year as a core partner.

### **Increasing Understanding of Business Needs and Communications:**

The Division has utilized its case management system to develop a system for developing thorough documented business profiles. This process is being refined to ensure that knowledge of business partners is readily available to all Division team members that would be beneficial to understand to support outcomes for job seekers and students accessing VR services.

The Division has identified increased communication plans to support the outreach to businesses including the implementation of monthly email newsletter type communications out to business partners, increased marketing of training opportunities, and partnership with chambers and other entities to market VR trainings and services on their website platforms.

Additionally, the Division completed an update to its external website on the business services pages to increase the information available to businesses on the services that VR can provide to support employers to obtain, maintain, and advance individuals with disabilities as part of their workforce.

### **Increasing Business Access of VR Services:**

The Division continues to strive to become a dependable and useful resource for business to fill open positions. The Division continues to host and maintain a 'Jobs in Idaho' page as an employer recruitment resource.

The Agency leadership team collaboratively continues to work to identify ways that the Division can better meet the needs of businesses to include identifying training and education, services, and partnership options that the Division can make available to meet business needs.

The Division has continued to provide virtual Business Spotlight Sessions which allow businesses a

platform to share information about their business and their needs in a group setting. Since the implementation of the Business Spotlight sessions in April 2021, the Division has continued to refine this business service and now offers business spotlights regionally, in addition to statewide business spotlights. The Division has also ensured collaboration with One-Stop partners and invites partners from the WIOA programs, in addition to other workforce program partners to attend to learn more about these businesses, their goals, and hiring needs to support job seekers utilizing workforce services to obtain and maintain employment.

The Division piloted a series of trainings for businesses throughout calendar year 2024 in collaboration with Idaho Commission for the Blind and Visually Impaired that was comprised of 5 sessions focused on supporting employers to hire and maintain individuals with disabilities as part of their workforce. Due to the success of this pilot, the Division implemented a monthly training series that took place in calendar year 2025 with co-presenters from various partners that brought expertise in various areas to support the monthly training topic for businesses. In addition, the Division completed a 5 session series for National Disability Employment Awareness Month in October 2025 with ICBVI. Due to the ongoing positive feedback and interest from the business community in these trainings, the Division will continue its DREAM training series as a core service to businesses to support the facilitation of VR services for participants to reach a successful employment outcome.

### **Supporting Job Seekers and Students to Access Employment Opportunities:**

With the development of business services specialist positions, the Division is reevaluating its communication plan for effective communication of business services information with other IDVR team members. The Division has implemented a change to have the business services specialists in each center to be responsible for having a standing agenda item on each center monthly team meeting to assure that relevant and timely sharing of business services information is able to happen in these meetings. The business services specialists also host monthly office hours in their regional areas where team members on the Pre-ETS and General teams are able to drop in to ask questions, or to attend in-time training on topics relevant to supporting students and job seekers to access career exploration, work-based learning experiences, and employment opportunities.

The business services team is also leading efforts and hosting workshops for students and job seekers working with the VR program to increase their skills for connecting with employers for work-based learning experiences and employment opportunities through job readiness workshops that provide the attendees increased understanding around current resume trends, job seeking skills and how to apply in a digital age to job openings, how to market yourself to employers, interview skills, and how to disclose their disability and request reasonable accommodations.

The business specialists also consult with the local economists at the Idaho Department of Labor to provide up to date local labor market information (LMI) to the Pre-ETS and General teams to support understanding of the realities of employment opportunities in local communities for both students and job seekers working with VR to better understand the impact of LMI on their potential

employment goals and outcomes. In addition to providing LMI data to the VR Counselors, they also connect with employers and provide bi-weekly workforce updates to their regional teams to assure ongoing up to date information about employment opportunities to support the facilitation of VR services for job seekers and students working with VR.

The Division also specifically addressed the intersection of business and pre-employment transition services. The Division has implemented performance goals for team members under the Pre-ETS and business services programs to work collaboratively to provide work-based learning experiences to students with disabilities. Through these goals, multiple new Pre-ETS services that include community business support were developed and implemented to include a career exploration fair in Coeur d'Alene and business tours in Idaho Falls. In addition to these larger scale events, smaller local collaboration has taken place that includes setting up business tours for students receiving Pre-ETS services, informational interviews, and business speakers arranged to provide career exploration experiences to groups of students.

The business services specialists will work closely with the Pre-ETS counselors to understand needs and identify additional opportunities for students to complete various types of work-based learning experiences. Subsequently these teams will work with businesses to facilitate the identified services for students.

IDVR Business Services Specialists worked collaboratively with the Training Team and the Pre-ETS Supervisors to deliver training to the Pre-ETS team members on how to engage with employers to support the development of Pre-ETS services that require business participation. Additionally, the Business Specialists also supported the delivery of training for Pre-ETS team members by US DOL staff to ensure Pre-ETS team members understand Child Labor Laws and their impact on students completing work-based learning experiences to ensure compliance with state and federal requirements. The Business team has also developed and delivered several trainings to support Pre-ETS team members to help them to understand employer requirements under the ADA for supporting students when students are engaged in a work-based learning experience with a business. This cross training of business and Pre-ETS personnel is essential to advancing our Pre-ETS WBLE strategy and expanding business partnerships to support students and job seekers to learn about and access career opportunities in their local communities.

In November 2022, the Division joined the Rural Youth Apprenticeship Development (RYAD) grant efforts which then concluded in 2025. Through collaboration with the RYAD grant project, the division has developed an outline for a pre-apprenticeship program for students engaged with the Division and receiving Pre-ETS services. The Division is in the development stages for this pre-apprenticeship structure with the goal is to implement this pilot in the 2026-2027 school year.

**(I) 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:*

The Idaho Division of Vocational Rehabilitation (the Division or IDVR) and the following entities have entered into or are developing formal agreements with programs to outline and explain the collaborative relationship between the program and the Division. The agreements outline some or all of the following: goals, planning processes, information sharing and confidentiality, technology, accountability, service delivery support, cost sharing, annual action plans, duration, amendments, and termination/conflict resolution, when applicable.

The cooperative agreements with agencies mentioned in this section of the state plan were created to allow for more efficient service delivery to those populations under each cooperative agreement. They have allowed for more efficient referral, eligibility determination and collaborative service provision. Participants have benefited from these cooperative agreements because of the well-established relationships and improved understanding of cross-program requirements. Participants also receive more effective referral and expedited service provision because of the established agreements.

The Division's case management system collects outcome data for individuals served under many of these agreements. The Division has yet to analyze this information for program improvement purposes.

*(1) State programs (designate lead agency(ies) and implementing entity(ies)) carried out under section 4 of the Assistive Technology Act of 1998;*

The program which carries out the statewide Assistive Technology program for Idaho is the Idaho Assistive Technology Project (IATP), housed by the Center on Disabilities and Human Development at the University of Idaho. IATP's goal is to increase the availability of assistive technology devices and services for older persons and Idahoans with disabilities. The Division and IATP have had a long-term working relationship to assist IDVR participants with assistive technology services and devices, to include VR representation on the IATP Council. The Division is in the early development stages of formalizing a cooperative agreement with IATP. The components of the cooperative agreement will include coordination and availability of services, the reciprocal referral process, and other programs and resources available through the Idaho Assistive Technology Project.

The collaboration between the Division and IATP has improved access to Assistive Technology (AT) services and devices for those individuals with disabilities who can benefit from these services. IDVR team members have a linkage directly to AT resources our existing collaborative efforts to include AT assessments, services, and devices from AT subject matter experts. AT services and devices can reduce barriers to employment, allowing individuals with disabilities the opportunity to be more productive and succeed in employment. The Division does not currently track outcomes related to services provided under this agreement but is looking to internally boost assistive technology as a strategy in this state plan and will look at overall provision of AT as a peripheral measure. The formal agreement with IATP has been delayed due to the Division's priorities to address corrective actions with Rehabilitation Services Administration (RSA) related to

the Division's allowability of purchased services. Once the Division has updated its purchase of services and rate setting policies, it will re-engage with the IATP to continue efforts to draft and finalize a contract.

*(2) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;*

The Idaho Division of Vocational Rehabilitation does not engage in any programs carried out by the Under Secretary for Rural Development of the U.S. Department of Agriculture.

*(3) Non-educational agencies serving out-of-school youth;*

The Division does not currently have formal agreements with non-educational agencies serving out-of-school youth.

Out-of-school youth (youth ages 14-24 not enrolled in a secondary program) are encouraged to complete their high school education or pursue a formal or self-study GED program whenever possible to increase their options and access to postsecondary opportunities. This includes referral to Idaho Career & Technical Education's Adult Education program (available to those over the age of 16). Idaho Job Corps maintains a partnership with GED providers to offer a path to a high school diploma or GED for those age 16-24.

The WIOA Title-I Youth program under the Idaho Department of Labor (IDOL) focuses on education, training, and employment opportunities for out-of-school youth. WIOA Youth provides an array of services to qualifying youth including dropout recovery services, paid and unpaid work experiences, occupational skill training, leadership development opportunities, facilitation of employer connections, interviewing skills, and mentoring.

Numerous regional partnerships take advantage of local resources or serve as referral sources to the Division to engage out-of-school youth. These resources differ by location with a common theme of providing a mechanism of outreach for out-of-school youth.

*(4) State use contracting programs;*

Through the State Use Contracting program, Community Rehabilitation Programs provide skill development and training for individuals with disabilities. While many programs providing state use goods do not meet the competitive integrated employment criteria established under WIOA, the program does generate income for CRPs allowing increased stability of their overall programs with supplemental revenue. Fiscally healthy CRPs are then able to continue operations in their Competitive Integrated Employment divisions. This indirectly benefits those participants of the Division who require CRP services.

*(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 Idaho Department of Health and Welfare (IDHW) maintains all related programs in the state including the state Medicaid program, the state Developmental Disabilities Program, and the state Mental Health program. Under Medicaid, IDHW operates the Idaho Home and Community Based Services project.

Since July 2020, the Division has had a formal signed agreement with the IDHW as it relates to Title XIX of the Social Security Act outlining the following areas:

- Service delivery coordination to maximize participant choice and outcomes
- Per 34 CFR 361.24 this agreement clarifies the roles, responsibilities of the Division and IDH&W concerning common consumers.
- Interagency dispute resolution
- Information to increase interagency collaboration
- Information identifying the interagency coordination responsibilities for the purposes of promoting the coordination and timely delivery of employment services.
- Authority and funding clarification.
- Outlines points of collaboration.
- Methods of Referral
- Confidentiality of Records
- Agreement termination provisions

The Division's collaboration with IDHW has been significant in the area of supported employment. We have a process that easily and conveniently identifies what services participants are eligible for through approved Medicaid Waivers. This occurs through an individual release of information, but the process is agreed upon by both agencies and is very timely. This provides the Division with timely understanding of services that can assist an individual with the VR process, employment needs and a funding source if extended services are necessary to maintain employment.

The Division has established procedures for appropriate referral to the Extended Employment Services (EES) program which also supports CIE extended services. EES services are utilized when available ahead of IDVR's Youth Extended Services, which are allowable when no other source of funding is available. To date both IDHW waiver programs and EES programs are able to field all extended services requests.

*(6) State agency responsible for providing services for individuals with developmental disabilities;*

The Division has a working relationship with the Adult Developmental Disabilities Services (ADDS) program under the IDHW. There currently is no formal agreement. The Division's collaboration with IDHW has been significant in the area of supported employment. A significant portion of the SE population are individuals with developmental disabilities. The Division and ADDS has a process that

easily and conveniently identifies what services participants are eligible for through Medicaid Waiver. This occurs through an individual release of information, but the process is agreed upon by both agencies and is very timely. This provides the Division with timely understanding of services that can assist an individual with the VR process, employment needs, and a funding source if extended services are necessary to maintain employment.

*(7) State agency responsible for providing mental health services;*

The Division and Idaho Department Health and Welfare (H&W) Behavioral Health no longer have a formal agreement in the delivery of behavioral health services. However, the Division has representation on the State Planning Council on Behavioral Health. The purpose of this Council is to 'serve as an advocate for adults with serious mental issues, children with severe emotional disturbances, and others with mental health or substance use needs. Expand, improve, notify, or transform Behavioral Health service delivery system for individuals with severe mental illness, serious emotional disturbance, and substance use disorders to ensure access to treatment, prevention, and rehabilitation services, including those services that go beyond the traditional behavioral health system. Advise the State Behavioral Health Authority on problems, policies and programs and provide guidance to the State Behavioral Authority in the development and implementation of the State Behavioral Health Systems Plan. Monitor, review, and evaluate the allocation and adequacy of behavioral health services throughout the state not less than once a year. Serve as a vehicle for intra- and inter-agency policy and program development. Present to the Governor and legislature by June 30 of each year a report on the Council's challenges and achievements and impact on the quality of life that Behavioral Health services had on Idaho citizens. The Council will incorporate recommendations for service system improvements submitted by the regional behavioral health boards.' Referrals come to the IDVR local offices through community behavioral health organizations.

*(8) Other Federal, State, and local agencies and programs outside the workforce development system;  
and*

**Idaho Industrial Commission (ICC):** This agreement outlines the relationship between the Division and the ICC with regard to persons injured on the job who may also have other non-work-related injuries. The Industrial Commission will be the lead Agency for injured workers in Idaho and will refer them to the Division when they are unable to return to previous or similar employment due to the work-related injury.

The cooperative agreement with the Idaho Industrial Commission benefits participants who have experienced an industrial injury, covered by worker's compensation law. Participants benefit in terms of access and service provision because of the well-developed relationships fostered by this agreement. Participants' receipt of services is generally faster and more streamlined because program staff have strong working relationships and an understanding of the requirements of each program. Currently outcomes are not being tracked in the Division's case management system.

**Independent Living:** The Division is the Designated State Entity (DSE) for the Title VII Part B funds

distributed by the Administration for Community Living (ACL). The Division currently contracts and allocates a percentage of the total grant funds to the following entities:

- Idaho Commission for the Blind and Visually Impaired (ICBVI)
- State Independent Living Center (SILC)
- Living Independence Network Corporation (LINC)
- Disability Action Center – Northwest (DAC)
- Living Independently for Everyone (LIFE)

The Division projects distribution of funds based upon percentages agreed to by participating entities and has finished transitioning to the following percentage split which will be utilized for the two years covered by this state plan:

Federal Award Share by Independent Living Program: FFY 2026 and FFY 2027

	Organizations Percentage of Total Award
SILC	30.0%
ICBVI	21.0%
LINC	24.5%
LIFE	19.5%
DAC	5.0%
Total	100.0%

Part B funds are used to enhance and expand core independent living services.

This agreement is to describe the transfer VR funds for IL activities as outlined in Section 705 and 713 of the Rehabilitation Act of 1973 as amended by WIOA. This agreement increases the IL centers' ability to provide services to individuals with disability who require independent living services. The Division does not track services or outcomes as they relate to this cooperative agreement.

**Project Search:** Project Search is a high school transition collaborative effort between school districts, VR, and host businesses. It is an international, evidence-based model which prepares transition students identified as requiring long term supports for the world of work, thus helping them move into community employment after high school graduation. The Project Search program combines two hours of daily classroom training along with four hours of unpaid internship. These internship experiences are provided in three different eight-week rotations and can include: housekeeping, dietary, laundry, childcare, and equipment transportation. Even though the students may not be hired by the host business, they are better prepared for work and better able to access employment after Project Search completion.

This collaborative agreement describes the roles, responsibilities, and process between all parties involved. Students participate in internships and other Pre-ETS activities in several rotating work sites. Students develop work skills which will increase their employment options at the completion of the program. Students will either participate in Pre-ETS as a potentially eligible student or as an eligible participant through an approved IPE. The Division maintains employment information on all successful outcomes.

**Tribal VR (Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Bannock Tribe, and Shoshone/Paiute Tribe):** The Division entered into one collaborative cooperative agreement with all four federally funded Tribal VR programs in the state. The updated cooperative agreement addresses WIOA requirements, specifically to include address transition services to students and youth with disabilities.

The intent of the agreement is to develop and implement a cooperative system for providing vocational rehabilitation services to eligible American Indians with disabilities and to promote and enhance to the greatest extent possible vocational rehabilitation services like that of those provided by the State of Idaho. The Division has the basic responsibility to provide rehabilitation services to eligible participants in the State of Idaho. The Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Paiute and Shoshone/Bannock Tribe, through a Federal Section 121 grant, will work cooperatively with the Division.

American Indian (or Alaska Native) participants benefit from the enhanced cross program collaboration described in this cooperative agreement. They experience greater access to services in an expedient manner because of the well-developed relationships and increased collaboration fostered by the agreement. IDVR team members are provided with cultural awareness and sensitivity training, so they are better prepared to engage with shared participants. Participants also receive a comprehensive array of unduplicated service.

Currently outcomes are not being tracked in the Division's case management system. The Division still needs to evaluate a better method for collecting jointly served participants.

**U.S. Department of Veterans Affairs (VA) Veterans Readiness and Employment (VR&E) Program and the Division:** This cooperative agreement is entered into by the U.S. Department of Veterans Affairs (VA) Veterans Readiness and Employment Program (VR&E) and the Idaho Division of Vocational Rehabilitation with the purpose of ensuring seamless, coordinated, and effective vocational rehabilitation services to Idaho's veterans with disabilities and dependents with disabilities, improving cooperation and collaboration between the two agencies, avoiding duplication of services, improving inter-agency communication, and to establish staff cross-training opportunities. This agreement was last updated in November 2023.

Veteran participants with disabilities jointly served by VR&E and IDVR receive faster, more streamlined access to services and shared program resources because of the increased collaboration created by this agreement.

Currently outcomes are not being tracked in the Division's case management system. The Division needs to evaluate a better method for collecting jointly served participants.

**Idaho Department of Labor as an Employment Network:** The Idaho Department of Labor (IDOL) has revised their PPLUS agreement with the Division. American Dream Employment Network (ADEN), an administrative EN, has taken over the technical assistance and training of PPLUS for IDOL. The PPLUS agreement describes the referral process between the Division and ADEN/IDOL under the SSA's Ticket to Work program authorized under the Ticket to Work and Work Incentives Improvement Act of 1999 (P.L. 106-170, Title 1, Subtitle A, 42 U.S.C. 1320b-19 et seq.) and the revised regulations Social Security promulgated under 20 CFR Part 411 that took effect July 21, 2008. The Agreement further describes the responsibilities of each agency in working with Social Security beneficiaries (those receiving SSI/SSDI benefits).

The cooperative agreements with Employment Networks, including the agreement with IDOL, assist those participants who could benefit from additional supports and services needed to maintain their employment. The Division has experienced low volume referrals to ENs across the state, however the Division continues to reinforce the value of services provided by ENs for participants who could benefit from additional supports to maintain their employment. The Division continues to educate team members and works with ENs to market their services to increase the number of referrals. Outcomes are not tracked in the Division's case management system.

**Adult Corrections:** The Division in collaboration with the Idaho Department of Correction (IDOC), had a Memorandum of Agreement (MOA) to provide a cooperative effort in the delivery of comprehensive vocational rehabilitation services to participants who are involved with the criminal justice system. This MOA was cancelled by IDOC due to funding constraints in the most recent PY.

**Students with Disabilities:**

The Division is beginning to see more students reach their employment goal because of the early engagement with teachers, parents, and students. The Division has a dedicated team of 33 individuals on the Pre-ETS team who are engaged with schools. VR Team Members who only serve students and youth typically are more knowledgeable and specialized in serving this population. IDVR's case management system does capture employment outcomes for students who apply for VR services. Not all potentially eligible students apply for services, however those that do are also being tracked. Referrals to the Division are made by school counselors, special education teachers, self-referral, outside entities, or by word of mouth. The Division participates in coordination efforts with local education agencies as well as the State Department of Education to create additional opportunities for students.

*(9) Other private nonprofit organizations.*

The Division is engaged with over 30 Community Rehabilitation Programs across Idaho, of which less than half are private nonprofit organizations. These entities tend to be the largest, most established CRPs in the state and often serve multiple centers. While formal agreements do not

currently exist, the Division is engaged in the process of updating the CRP manual and developing contracts as part of its Corrective Action Plan with Rehabilitation Services Administration (RSA).

**VOCATIONAL REHABILITATION CERTIFICATIONS AND ASSURANCES CERTIFICATIONS**

<b>States must provide written and signed certifications that:</b>	
1.	<i>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>8</sup> and its State Plan supplement under title VI of the Rehabilitation Act;</i>
2.	<i>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)(ii) 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 (enter the name of designated State agency or the designated State unit when the designated State agency has a designated State unit)<sup>9</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>10</sup>, the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations<sup>11</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;</i>
3.	<i>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>12</sup>, the Rehabilitation Act, and all applicable regulations<sup>13</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;</i>
4.	<i>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);</i>
5.	<i>The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.</i>
6.	<i>All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.</i>

7.	<i>The (enter title of State officer 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;</i>
8.	<i>The (enter title of State officer below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;</i>
9.	<i>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.</i>

**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:*

<b><i>The State Plan must provide assurances that:</i></b>	
1.	<b><i>Public Comment on Policies and Procedures:</i></b> <i>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.</i>
2.	<b><i>Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement:</i></b> <i>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 C.F.R. 76.140.</i>

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:
- (a) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.
  - (b) either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.
  - (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.
  - (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).
  - (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.
  - (f) as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
  - (g) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
  - (h) the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.
  - (i) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.
  - (j) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
  - (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.
  - (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).
  - (m) the submission of reports as required by section 101(a)(10) of the Rehabilitation Act

4.	<p><b>Administration of the Provision of VR Services:</b> <i>The designated State agency, or designated State unit, as appropriate, assures that it will:</i></p> <ul style="list-style-type: none"> <li>(a) <i>comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.</i></li> <li>(b) <i>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.</i></li> <li>(c) <i>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.</i></li> <li>(d) <i>determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.</i></li> <li>(e) <i>comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.</i></li> <li>(f) <i>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.</i></li> <li>(g) <i>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.</i></li> <li>(h) <i>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.</i></li> <li>(i) <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.</i></li> <li>(j) <i>with respect to students with disabilities, the State:</i> <ul style="list-style-type: none"> <li>(i) <i>has developed and will implement,</i> <ul style="list-style-type: none"> <li>(A) <i>strategies to address the needs identified in the assessments; and</i></li> <li>(B) <i>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</i></li> </ul> </li> <li>(ii) <i>has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25), and 113).</i></li> <li>(iii) <i>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.</i></li> <li>(iv) <i>has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25), and 113).</i></li> <li>(v) <i>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.</i></li> </ul> </li> </ul>
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5.	<p><b>Program Administration for the Supported Employment Title VI Supplement to the State plan:</b></p> <p>(a) <i>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.</i></p> <p>(b) <i>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.</i></p>
6.	<p><b>Financial Administration of the Supported Employment Program (Title VI):</b></p> <p>(a) <i>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.</i></p> <p>(b) <i>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.</i></p>
7.	<p><b>Provision of Supported Employment Services:</b></p> <p>(a) <i>The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.</i></p> <p>(b) <i>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</i></p>

Do you attest that these assurances will be met?

**Yes**

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

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

Idaho Division of Vocational Rehabilitation Mission and Vision Statements:

**Mission:** To prepare individuals with disabilities for employment and career opportunities while meeting the needs of the employer.

**Vision:** An Idaho where all individuals with disabilities have the opportunity to participate in the workforce and employers value their contributions.

**Core Values:** Accountability, Respect, and Teamwork

**Division Policy:** IDVR strives to provide all individuals, regardless of disability, with physical and programmatic access to its program. If during the course of VR services, the participant needs an accommodation in relation to access to VR services, the participant should submit a request for accommodation to their VR Counselor. The Division incorporates access and participation language throughout the Policy Manual:

- IDVR eligibility policy and order of selection policy provide for access to services for individuals with the Most Significant Disabilities first, in the absence of resources.
- IDVR policies require the Division to communicate in methods requested by the applicant or participant, and to seek understanding initially, and communicate again over time when necessary to further promote understanding, access, and full participation for all served by the Division.
- Development of the Individualized Plan for Employment, per policy, works to address individual barriers as experienced by the participant through planned services and appropriate referrals where indicated.
- Comprehensive assessment policy indicates additional exploration of a continuum of needs addressing common and unique barriers (when indicated) which may impact the participant their chosen vocational goal.
- Program materials are provided in the participant's preferred language (collected upon application), and materials are remediated for accessibility prior to publication (and further upon request). Auxiliary aids and services are provided for access where needed for the purposes of eligibility determination or accessing services.
- IDVR's Strategic Plan is focused on outreach to traditionally underserved populations in order to promote statewide access and participation.

The Division's commitment to access is also advanced by the IDVR's representation on the Idaho Workforce Development Council (WDC) and the American Job Center One-Stop Committee. The WDC has an additional responsibility to ensure all affiliate and comprehensive AJCs are assessed annually for physical and programmatic accessibility, in accordance with section 188, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990.

The Division is committed to statewide access for individuals with all types of disability and backgrounds, absent a formal policy.

IDVR's mission is fulfilled through the provision of vocational rehabilitation programs and services:

1. Pre-Employment Transitions Services for students ages 14-21 and services to Youth ages 16-24.
2. To prepare individuals for competitive integrated employment in high demand occupations and careers.
3. Vocational Rehabilitation counseling and guidance, career and training services, and job placement supports and services.
4. Adjustment to disability counseling.
5. Resources and education and training services for employers who hire or retain employees with disabilities.
6. Supported and customized employment programs for individuals with the most significant disabilities.
7. Engaging employers, parents, local education agencies, businesses, and other key stakeholders in training and education regarding the abilities and potential of people with disabilities.

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

1. Language barriers - IDVR ensures that individuals receive information in their language by identifying and arranging appropriate translation and interpretation services, including services for individuals who are deaf or hard of hearing. The Division is also updating its public website to meet digital accessibility requirements to align with Federal law.
2. Transportation is one of the most significant barriers for individuals in Idaho, especially for individuals with mobility limitations or individuals who otherwise cannot access public transportation.
3. Idaho is primarily a rural state.

4. Access to Wi-Fi or other technologies.

*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?*

1. Language barriers –IDVR materials such as application, brochures and other printed materials are available in multiple languages If not readily available, the Division will arrange appropriate translation and interpretation services including services for individuals who are deaf or hard of hearing. The Division will continue to provide translation services via State Contracted Vendors. The Division is updating its public website to meet digital accessibility requirements to align with Federal law.
2. Transportation – The Division supports various types of transportation services for individuals lacking or requiring access to this service to achieve an employment outcome. The Division may assist with Assistive Technology services or devices or vehicle modification. The Division also educates the VR Counselors to assist individuals who lack transportation through counseling and guidance to understand options to secure employment close to the individual’s home or to consider remote work opportunities.
3. The Division will continue statewide outreach efforts once able to serve more consistently from the waitlist.
4. Access to Wi-Fi or other technologies – The Division ensure that technological needs impacting progress toward an employment outcome are addressed by the counselors in the individual’s comprehensive assessment. The Division can support participants through rehabilitation technology services, as well as costs needed for Wi-Fi or related service needed to achieve an employment outcome. Counselors also refer participants to any state or federal resources that may be available.

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

1. Language barriers
  - Continue to provide translation services and create materials in additional languages as needed. (on-going)
  - Continue to utilize Language Link for translation services. (on-going)
  - Continue to provide ASL interpreter services for individuals who are deaf and hard of hearing. (on-going)
  - Continue to advance the accessibility of the IDVR website. (on-going)
2. Transportation

- Continue to address transportation needs of participants in the comprehensive assessment. (on-going)
  - Continue to have IDVR representation on transportation council (on-going).
3. Rural and low socioeconomic status (SES)
- Continue outreach efforts to rural communities and agencies who serve individuals and families of low SES (on-going).
4. Access to Wi-Fi or other technologies
- Continue to address technology needs of individuals in the comprehensive assessment process (on-going).
  - Work with Idaho Assistive Technology Project (IATP) to improve counselor understanding and accessing to technology resources. (within 18 months)

**Section 427 of the General Education Provisions Act (GEPA)** (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for the Supported Employment 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 statewide access to, and participation in, its Federally funded, State-level project or activity.

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

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

Idaho Division of Vocational Rehabilitation Mission and Vision Statements:

**Mission:** To prepare individuals with disabilities for employment and career opportunities while meeting the needs of the employer.

**Vision:** An Idaho where all individuals with disabilities have the opportunity to participate in the workforce and employers value their contributions.

**Core Values:** Accountability, Respect, and Teamwork

**IDVR Policy:** IDVR strives to provide all individuals, regardless of disability, with equal physical and programmatic access to its program. If during the course of VR services, the participant needs an accommodation in relation to access to VR services, the participant should submit a request for accommodation to their VRC. The Division incorporates access and participation language throughout the Policy Manual:

- IDVR eligibility policy and order of selection policy provide for access to services for individuals with the Most Significant Disabilities first, in the absence of resources.
- IDVR policies require the Division to communicate in methods requested by the applicant or participant, and to seek understanding initially, and communicate again over time when necessary to further promote understanding, access, and full participation for all served by the Division.
- Development of the Individualized Plan for Employment, per policy, works to address individual barriers as experienced by the participant through planned services and appropriate referrals where indicated.
- Comprehensive assessment policy indicates additional exploration of a continuum of needs addressing common and unique barriers (when indicated) which may impact the participant's chosen vocational goal.
- Program materials are provided in the participant's preferred language (collected upon application), and materials are remediated for accessibility prior to publication (and further upon request). Auxiliary aids and services are provided for access where needed for the purposes of eligibility determination or accessing services.
- IDVR's Strategic Plan is focused on outreach to traditionally underserved populations in order to promote greater statewide access and participation.

The Division's commitment to statewide access is also advanced by IDVR's representation on the Idaho Workforce Development Council (WDC) and the American Job Center One-stop Committee. The WDC has an additional responsibility to ensure all affiliate and comprehensive AJCs are assessed annually for physical and programmatic accessibility, in accordance with section 188, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990.

The Division is committed to statewide access of VR services, absent a formal policy.

IDVR's mission is fulfilled through the provision of vocational rehabilitation programs and services:

1. Pre-Employment Transitions Services for students ages 14-21 and services to Youth ages 16-24.
2. To prepare individuals for competitive integrated employment in high demand occupations and careers.
3. Vocational Rehabilitation counseling and guidance, career and training services, and job placement supports and services.
4. Adjustment to disability counseling.

5. Resources and education and training services for employers who hire or retain employees with disabilities.
6. Supported and customized employment programs for individuals with the most significant disabilities.
7. Engaging employers, parents, local education agencies, businesses, and other key stakeholders in training and education regarding the abilities and potential of people with disabilities.

The existing mission, policies and commitments of the agency are squarely aligned with participation in the proposed activity (Supported Employment). Quality SE provision itself is essential in the promotion of participation of participants in CIE: This core service is designed to maximize the employment potential of individuals with the most significant disabilities and supports are inherently designed to bridge participation in competitive integrated employment for these traditionally underserved population with barriers to employment.

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

1. Language barriers – IDVR participants may require program information in language other than English or in alternative formats. The Division coordinates professional translation and interpretation services, including certified American Sign Language (ASL), to support effective communication for all individuals. The Division is updating its public website to meet digital accessibility requirements to align with Federal law.
2. Transportation is one of the most significant barriers for individuals in Idaho, especially for individuals with mobility limitations or individuals who otherwise cannot access public transportation.
3. Idaho is primarily a rural state.
4. Access to quality job supports provided through a Community Rehabilitation Program.

*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?*

1. Language barriers – The Division provides program materials in English and arranges professional translation and interpretation services through State contracted vendors when additional language or alternative communication formats are needed. The Division contracts with certified American Sign Language (ASL) interpreters to support individuals who are deaf or hard of hearing. The Division is updating its public website to meet federal law.
2. Transportation – The Division supports various types of transportation services for individuals lacking or requiring access to this service to achieve an employment

outcome. The Division may assist with Assistive Technology services or devices or vehicle modification. The Division also educates the VR Counselors to assist individuals who lack transportation through counseling and guidance to understand options to secure employment close to the individual's home or to consider remote work opportunities.

3. The Division will continue statewide outreach efforts once able to serve more consistently from the waitlist.
4. It is a major priority for the Division to improve the quality services provided by a Community Rehabilitation Program, as identified in this State Plan.

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

1. Language barriers

- Continue to provide translation services and create materials additional languages as needed. (on-going)
- Continue to utilize Language Link for translation services. (on-going)
- Continue to provide ASL interpreter services for individuals who are deaf and hard of hearing. (on-going)
- Continue to advance the accessibility of the IDVR website. (April 2026 and on-going)

2. Transportation

- Continue to address transportation needs of participants in the comprehensive assessment.
- Continue to have IDVR representation on transportation council (on-going).

3. Statewide outreach efforts

- Continue state outreach efforts.

4. Access to quality CRP services. (on-going)

- Continue to foster and develop individuals interested in providing job support services to individuals with disabilities. (on-going)