

**Statewide Assessment -- 2016 COMPREHENSIVE STATEWIDE ASSESSMENT of the REHABILITATION NEEDS of INDIVIDUALS with DISABILITIES in MARYLAND**

**Maryland Division of Rehabilitation Services and Maryland State Rehabilitation Council**

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## Executive Summary.

The Maryland Division of Rehabilitation Services (DORS) and the Maryland State Rehabilitation Council (MSRC) continually assess the rehabilitation needs of Maryland citizens with disabilities, as part of its state and strategic planning process. DORS and the MSRC hold annual public meetings and the MSRC regularly provides input on Agency planning, policy development and recommendations. The results of the consumer satisfaction surveys are also reviewed in order to provide insight into the rehabilitation needs of Maryland Citizens with disabilities.

This year the Division in collaboration with the MSRC undertook the triennial comprehensive needs assessment in compliance with the Code of Federal Regulations at 34 CFR (361.29). One member of the MSRC was an integral part of this fourteen-member Needs Assessment team which (1) collected and analyzed relevant existing data and (2) conducted and analyzed findings of supplemental surveys, focus groups held during the DORS public meetings, and key informant interviews, in order to ascertain the needs of individuals with disabilities throughout the state.

## Required Elements.

The results of the comprehensive statewide needs assessment include the following required elements:

1. The rehabilitation needs of individuals with disabilities residing within Maryland, particularly the vocational rehabilitation needs of --
  - A. Individuals with most significant disabilities, including their need for supported employment services
  - B. Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program
  - C. Individuals with disabilities served through other components of the statewide workforce investment system
  - D. Youth with disabilities, and students with disabilities, including
    - 1) Their need for pre-employment transition services or other training services
    - 2) An assessment of the needs of individuals with disabilities for transition services and pre-employment transition services, and the extent to which such services are coordinated with local education agencies
2. An assessment of the need to establish, develop, or improve community rehabilitation programs within the State.

## Recommendations from the Focus Areas of the Needs Assessment Addressing the Required Elements.

1. **Develop a strategic plan for fulfilling WIOA requirements**, in collaboration with workforce and educational partners.
2. **Evaluate staffing needs within DORS**, including a detailed analysis of required work functions, who will perform these functions, and how work performance will be evaluated, and considering how to increase the number of DORS staff able to communicate using American Sign Language (ASL), such as by including “ASL-preferred” on all announcement for direct-hire positions.
3. **Provide opportunities for mutual training and collaboration between DORS and other workforce programs**, especially the American Job Centers, TANF, and community colleges, to strengthen the network of partners at the local level and increase staff knowledge about services offered by these programs.
4. **Increase the agency’s capacity to fully utilize the 15% reserve fund for pre-employment transition services (Pre-ETS) statewide** by sufficiently aligning staff resources according to need, encouraging more Community Rehabilitation Programs (CRPs) to offer Pre-ETS as a fee-for-service, implementing updated Memorandums of Understanding with each of the local education agencies, developing WTC summer programs for deaf and hard of hearing, and considering how to use remaining reserve funds for authorized activities.
5. **Improve customer service and maximize staff time by utilizing technology** (e.g. Smartphone applications, electronic signatures, etc.) to expedite communication between DORS and consumers, community rehabilitation programs, and other workforce programs.
6. **Develop a system for consumers to provide feedback on their satisfaction with services at key points during the rehabilitation process**, establishing formal procedures for tracking consumer complaints in order to identify staff training needs.
7. **Improve information and referral services to American Job Centers and other workforce partners for individuals on the DORS waiting list**, especially Social Security Ticket to Work holders who may benefit from Work Incentive Planning and Assistance (WIPA) programs and Employment Network services, while waiting for DORS services to be available.
8. **Improve the variety of employment opportunities available to DORS consumers** by increasing staff knowledge of current labor market trends, collaborating with community colleges to develop Pre-Apprenticeships and Registered Apprenticeship programs for high growth industries in Maryland in collaboration with workforce and educational partners; by providing customized

employment services; and by increasing opportunities for DORS consumers to participate in internships.

9. **Create a catalogue of standard letters in the same foreign languages for which the DORS Application is already available** to ensure individual understanding of services and their rights and responsibilities, during the rehabilitation process.
10. **Increase technology training opportunities for DORS consumers** to include advanced training on Apple software/devices and access technology used in competitive integrated employment.
11. **Expand and increase, as appropriate, the programs and services designed specifically for individuals who are deaf and hard of hearing, including students in need of Pre-ETS**, by evaluating the Rehabilitation Communication Services pilot to determine whether services and outcomes have improved, establishing an in-state Pre-ETS program to complement existing out-of-state programs, and providing consultation services for other WIOA workforce programs on using technology to communicate with deaf individuals.
12. **Promote comprehensive rehabilitation services for Deaf-Blind individuals by reconvening a Deaf-Blind workgroup** to collaborate closely with grassroots organizations, community partners, advocacy groups and the Helen Keller National Center, ensuring that Deaf-Blindness remains a priority for the agency.

## **Introduction.**

### **Impact of Federal Funding and State Government Personnel Actions on Staff Capacity.**

As emphasized in the previous three Needs Assessments, the DORS waiting list and delays in service provision remain a prominent concern and constitute the most prominent barrier to vocational rehabilitation services for individuals with significant disabilities in Maryland. As of the completion of this Needs Assessment, over 3,500 eligible individuals with significant disabilities are placed on a waiting list for vocational rehabilitation services lasting up to 28 months. Clearly, individuals on the waiting list are the most seriously unserved of populations. Several factors currently prevent DORS from moving people from the waiting list.

#### **1. Sequestration.**

Since sequestration began, Maryland DORS has been fairly flat funded in its base level funding. Congress has passed the FY 17 VR appropriations bill, and the high level funding for VR continues to be basically flat when compared to FY 16. On top of that, Congress has applied a 6.9% sequestration cut. Maryland DORS estimates a \$2.8 million dollar loss in funding as a result. While DORS has received a re-allotment of funds over the years that helped negate the lack of growth in base funding, an agency cannot rely on that funding as it is unpredictable from one year to the next.

#### **2. Pre-employment Transition Services 15% Reserve Fund Requirement.**

The Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act (WIOA), requires VR agencies to reserve not less than 15 percent of the Federal VR allotment to provide, or arrange for the provision of, pre-employment transition services (Pre-ETS) for students with disabilities transitioning from school to postsecondary education programs and employment in competitive integrated settings. This requirement to reserve 15% of the state grant also applies to re-allotted funds, and leaves only 85% of the annual budget remaining for services to adults. These factors have and will continue to contribute to the waiting list. During fiscal year 2015, DORS received approval to hire six additional contractual positions from the state. However, since these new staff will be 100% devoted to provision of Pre-ETS, their performance is not expected to result in a decrease in the agency's waiting list for VR services.

### **3. Federal Requirement to Invest in the State Workforce System Infrastructure with VR Grant Funds.**

The Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act (WIOA), requires VR agencies to begin setting aside a percentage of the VR Grant to support entities within the State administering WIOA programs. This percentage will increase by .25 percent over four years, capping at 1.5% of the VR Grant per year. Based on FY 16 funding levels, DORS estimates this set aside requirement to equal up to \$1.8 million over the next four years.

#### **State Government Personnel Actions.**

From 2006-2016 the VR program has seen a 19% reduction in its permanent workforce due to Statewide budget constraints and the State's desire to reduce the overall size of the State's workforce. In addition, staff vacancies are affecting vocational rehabilitation specialists/counselors, as well as most other agency staff, and continue to be another significant factor in the agency's ability to shorten the waiting list and provide services to individuals with significant disabilities on a more timely basis. The state government hiring freeze, which intensified during the recession, has continued to result in extended periods of vacancies after staff leave the agency. During federal FY 15, DORS field offices experienced 23 vacancies, which is equivalent to approximately 18% of the VR counseling positions. In light of the new responsibilities placed on DORS with the implementation of WIOA, DORS may again need to request an exemption to the state hiring freeze for vocational rehabilitation specialist positions.

#### **Use of DORS Public Meetings for CSNA Information Gathering.**

Throughout this 2016 CSNA report, the DORS public meeting is frequently mentioned as a methodology used during the assessment period. These meetings were held on six dates in July and August in Annapolis (10 attendees), Baltimore (17 attendees), Easton (14 attendees), Westminster (7 attendees), and Wheaton (38 attendees), and remotely via teleconference (12 attendees). Other than in Westminster, where only DORS staff were present, each of the other meetings enjoyed a variety of attendees, including DORS staff, Community Rehabilitation Program (CRP) staff, consumers, advocates, and others. During the agenda for each of these meetings, CSNA focus groups were convened. Each focus group had a facilitator and two individuals to take notes, and the facilitator explained the purpose of the CSNA and reviewed confidentiality requirements.

Participants were given the opportunity to provide feedback on the major topic areas of the CSNA, including:

1. The rehabilitation needs and barriers encountered by the following groups of individuals with disabilities:
  - a. Those with most significant disabilities, including their need for supported employment
  - b. Those from minority populations, the unserved, and the underserved
  - c. Those served by other workforce programs
2. The need for transition services, including pre-employment transition services, among students with disabilities, and how Vocational Rehabilitation and the LEA's can partner together in the provision of these services
3. The need to establish, develop, and/or improve Community Rehabilitation Programs

## **DORS Regions.**

Following the 2013 CSNA, DORS reorganized the regions within the Office of Field Services (OFS) during federal Fiscal Year 2014. The Regions and counties served by each are identified below:

- Region 1: Serving Allegany, Carroll, Frederick, Garrett and Washington Counties
- Region 2: Serving Anne Arundel, Calvert, Caroline, Charles, Dorchester, Queen Anne's, St. Mary's, Somerset, Talbot, Wicomico and Worcester Counties
- Region 3: Serving Baltimore City and Eastern Baltimore County
- Region 5: Serving Baltimore, Cecil, Harford, Howard and Kent Counties
- Region 6: Serving Montgomery and Prince George's Counties

The Office of Blindness and Vision Services (OBVS) operates from three Regional offices. The office locations and counties served by each are identified below:

- Cumberland: Serving Allegany, Carroll, Frederick, Garrett, Montgomery and Washington Counties
- Baltimore: Serving Baltimore City and Baltimore, Howard and Harford Counties
- Annapolis: Serving Anne Arundel, Calvert, Caroline, Cecil, Charles, Dorchester, Kent, Prince George's, Queen Anne's, St. Mary's, Somerset, Talbot, Wicomico and Worcester Counties



## **I. Comprehensive Assessment of the Vocational Rehabilitation Needs of Individuals with Disabilities in Maryland.**

### **A. Individuals with Most Significant Disabilities, Including Their Need for Supported Employment Services.**

#### **1. The Need of Individuals with Most Significant Disabilities for Supported Employment Services in Maryland**

##### ***Background.***

An increased need for supported employment services, including extended services for youth with most significant disabilities for a period not to exceed four years, is anticipated for several reasons:

- Section 511 of WIOA states that the DSU must provide youth with disabilities documentation that the youth have completed certain activities, such as receipt of transition services and Pre-Employment Transition services, under the VR program prior to the youth engaging in subminimum wage employment.
- In Maryland SB 417/HB 420: Individuals With Disabilities: Minimum Wage and Community Integration (Ken Capone Equal Employment Act) was passed during the 2016 Maryland Legislative Session. The bill phases out the authority for the Commissioner of Labor and Industry to authorize a work activities center or other sheltered workshop to pay a subminimum wage to an employee with a disability. It also restricts the authority of a work activities center or other sheltered workshop to pay a subminimum wage and/or a sub-prevailing wage to an employee with a disability. Beginning October 1, 2020, the Developmental Disabilities Administration (DDA) may not fund providers that pay individuals less than the minimum wage under a specified federal certificate.

Other considerations:

- According to Maryland State Department of Education (MSDE) data described later in this report, over 1,000 students with Intellectual Developmental Disabilities or Autism are expected to exit school each year for the next several years. While not all of these students are expected to require supported employment, many of those who would benefit from these services will exit prior to age 21 and will be subject to the Development Disabilities Administration (DDA) Waiting List.

- Per the Maryland Developmental Disabilities Coalition FY 2016 DDA Budget Fact Sheet reports that the DDA Waiting List has increased nearly 4% from 7,700 to over 8,000 children and adults.

**Methodology:** DORS data review.

DORS data was reviewed to assess the number of initial Individualized Plans for Employment (IPEs), identified as Supported Employment plans, developed during FY 13 through FY 15.

**Discussion.**

- **Number of Supported Employment Plans Developed Each Year:**
  - In FY 2013, of 5,178 plans initiated, **1,556** (30%) were supported employment plans. Out of 1,556 supported employment plans, **455** (29%) were developed for youth with disabilities age 24 and younger.
  - In FY 2014, of 5,274 plans initiated, **1,626** (31%) were supported employment plans. Out of 1,626 supported employment plans, **419** (26%) were developed for youth with disabilities age 24 and younger.
  - FY 2015, of 5,276 plans initiated, **1,501** (28%) were supported employment plans. Out of 1,501 supported employment plans, **340** (23%) were developed for youth with disabilities age 24 and younger.
- **Specific Populations Provided Supported Employment Services each year:**
  - The numbers of EBPSE individuals served rose 51% from **1,841** in FY 2013 to **2,783** in FY 2015.
  - The number of GTYI students served decreased 12% from **1,199** in FY 13 to **1,046** in FY 15, during which DORS ceased to use the Governor's Transition Youth Initiative Fund with the Youth Supported Employment Fund when preparing authorizations for services.

**Needs/Concerns Identified.**

- The overall number of initial plans developed during the year, which included supported employment services, decreased 3% from 1,556 in FY 2013 to 1,501 in FY 2015. This is largely due to the 6% decrease in initial plans, which included supported employment, developed for youth with disabilities age 24 or less at application during this same period, when initial plans were more frequently being prepared for students in high school before long-term funding for supported employment could be verified.
- During this same period, the percentage of initial plans developed for individuals referred by community rehabilitation programs and including supported

employment services increased from 77% in FY 2013 to 84% in FY 2015. This is largely due to the strong collaboration between DORS and BHA to ensure that both DORS staff and CRPs are working effectively to maximize the braided funding mechanism.

- With the potential influx of over 3,000 sub-minimum wage earners applying for vocational rehabilitation services during the next 3 years and the requirement to be able to evaluate their potential for competitive integrated employment, DORS may need to establish a waiting list for individuals assigned to Order of Selection Category I: Most Significantly Disabled.

### ***Recommendations.***

- Examine DORS policy regarding supported employment in light of WIOA requirements regarding Section 511 and provisions for customized employment and extended services.
- Develop a strategy for increasing the number of students with disabilities exiting high school to whom extended services can be made available.
- Update the DORS and DDA MOU considering whether a braided funding mechanism similar to the DORS and BHA model can be utilized.
- Partner with DDA, BHA, and 14c certificate holders to plan for implementation of Section 511 requirements.

## **2. Individuals who are Blind/Visually Impaired and Deaf-Blind.**

As reported in the 2013 State Plan Needs Assessment attachment, the Maryland Division of Rehabilitation Services and the Office for Blindness & Vision Services (OBVS) are committed to providing quality and specialized services to Maryland citizens who are Blind, Visually Impaired, and Deaf-Blind. Together, the Office for Blindness & Vision Services and the State Rehabilitation Council, Blind Services Committee Provides oversight and leadership in guiding policies and enhancing services to Maryland citizens. The Office for Blindness and Vision Services (OBVS) operates the following programs and services for eligible participants:

- i. Vocational Rehabilitation Counselors are located throughout the state in DORS field offices and at the Workforce & Technology Center. The staff is providing employment and independent living services for individuals who have a goal of employment.
- ii. Rehabilitation Teachers for the Blind are also located throughout the state in DORS field offices and at the Workforce & Technology Center. The staff is providing independent living assessments and services to individuals who have a goal of employment. Additionally, these

Rehabilitation Teachers are providing in home teaching for our Independent Living Older Blind Grant (ILOB). They assess for areas such as: mobility training, household management skills, and communication device training.

- iii. OBVS has on staff a Deaf-Blind Specialist whose role is to provide technical assistance and support to all staff on issues pertaining to Deaf-Blindness. Another major component of her role with the Division is to communicate with the Deaf-Blind Community, expanding program development, and manage the agencies VR SSP program.
- iv. The Maryland Business Enterprise Program for the Blind (MDBEP) is also operated through the Office for Blindness & Vision services and provides opportunities for individuals who are legally blind to operate vending, gift shops or other food service facilities in federal and other property.
- v. Services for the Blind and Visually Impaired (SBVI) is a center based program for individuals who are Blind, and Visually Impaired, is located at the Workforce & Technology Center (WTC). SBVI addresses areas of independent living, mobility, technology, and communication training in a residential setting. The program also has a support group for individuals in need of this service.

### ***Prevalence (Blind/Visually Impaired).***

According to the 2014 American Community Surveys there are 59,439 individuals in the State of Maryland with vision loss, who are between the ages of 18 and 64. During the past three year, DORS served 1,159 individuals for whom blindness was reported to be their primary impairment, and 180 of these were youth in transition when applying for services.

### ***Methodology: Blindness Services Survey.***

A survey regarding blindness services was emailed to stakeholders, consumers, community partners, caregivers and DORS staff to solicit feedback regarding the unmet needs of individuals who are blind or visually impaired. DORS received 39 completed surveys via email, and the responses are as follow:

### ***Needs/Concerns Identified.***

- The need to improve job placement methods to ensure individuals, especially those who complete trainings and internships, receive continuous assistance and have access to job leads through various mediums.
- The need for more comprehensive and intensive blindness skills training to help consumers become proficient in independent living/daily living skills as a necessary precursor for a successful employment outcome.

- Concerns related to technology, especially the lack of advanced technology/computer training being offered to consumers.
- Concerns regarding employers', including Society of Human Resource Management (SHRM), lack of knowledge regarding blindness and workplace accommodations
- Concerns regarding transportation for consumers in rural areas.

### ***Recommendations.***

- Hiring additional DORS staff with specific knowledge of blindness and visual impairments including Staff Specialists, Orientation & Mobility Specialists, Rehabilitation Teachers, Employment Specialists, Rehabilitation Technology Specialists, and VR Counselors; to ensure more personalized services, increased counseling services, and driven with a customer service approach that is fully embraced and actualized.
- Enhance and emphasize counselor role in (1) Advising consumers about the full scope of services, the rehabilitation team and process, including expediting services to those in job jeopardy to ensure the consumer has the opportunity to gain knowledge and skills necessary to maintain current employment. (2) Focusing on capabilities and individualized needs and learning styles, (3) Facilitating access to assistive technology (4) Minimizing gaps in the provision of services and (5) Increasing timeliness of the services provided.
- Explore home based employment and/or self–employment opportunities for the addressed population.
- Provide updated technology trainings to DORS consumers including more advanced trainings on Apple software/devices and access technology used in competitive integrated employment.
- Explore possible solutions, to issues related to limited transportation, to assist those in more rural areas have full access to DORS services.

### ***Prevalence (Deaf-Blind Community).***

There is little data available on individuals experiencing a significant level of both vision and hearing loss in Maryland, but the number does appear to be relatively low. The 2014 National Child Count of Children and Youth who are Deaf-Blind, administrated by the National Center on Deaf-Blindness, identified 178 children or youth with significant levels of dual sensory loss in Maryland. Over the past 3 years DORS has provided vocational rehabilitation services for 113 individuals who are Deaf-Blind, and 20 of these were transition age youth.

### ***Methodology: Deaf-Blind Services Survey.***

A survey regarding Deaf-Blind (DB) services was emailed to stakeholders, consumers, community partners, caregivers and DORS staff to solicit feedback regarding the unmet needs of individuals who are deaf-blind. 41 returned surveys were received via email.

### ***Methodology: DORS Public Meetings.***

During the meeting which took place in Wheaton, Maryland, 15 Deaf-Blind community members attended to express their concerns regarding DORS services and other related community services. As in the previous Needs Assessment survey, there were universal themes of transportation, communication, and support services as major unmet needs of individuals who are Deaf-Blind. The concerns expressed are summarized below:

### ***Needs/Concerns Identified.***

- Lack of skilled professionals and customized services to address the employment and independent living needs of the Deaf-Blind Population. Services that are currently lacking include a comprehensive community based statewide Support Service Program (SSP), adjustment to blindness services, psychological services, and employment services
- Lack of counselors within OBVS that understand the complexities of Deafness. DORS should be providing services through direct communication and not through interpreters.
- Few employers are willing to hire Deaf-Blind consumers due to fear of liability issues, lower work production and uncertainty of complex accommodations.
- Lack of technology resources including skilled technologists to train on devices, and funding to repair expensive devices such as braille displays and other equipment.

### ***Recommendations.***

- Increase flexibility and consider supporting and funding “unconventional” VR services that may be exclusive to this disability, in light of their unique needs and complexities. Unconventional VR services could include: hiring Deaf-Blind mentors to work with consumers to increase advocacy skills and decrease isolation, offering Pro-Tactile and Tactile ASL trainings to ensure effective communication for consumers and decrease misunderstandings, and incorporating Support Service Providers (SSPs) as job coaches.
- Enhance career services for Deaf-Blind individuals. Employ the assistance of experts to assist with navigating the complexities associated with job development and placement. This includes services such as SSPs, Orientation and Mobility, Rehabilitation Teaching, and Assistive Technology.
- Expand staff and advocate for community resources to provide a full range of independent living and employment services to Deaf-Blind, including older Deaf-Blind, within DORS and community programs/providers (qualified interpreters,

technologists, teachers, counselors, therapists, psychologists, psychiatrists and other professionals).

- Explore means of increasing access to transportation; limitations are primarily due to the communication barriers.
- Reconvene a Deaf-Blind workgroup to collaborate closely with grassroots organizations, community partners, advocacy groups and Helen Keller National Center, ensuring that Deaf-Blindness remains a priority for the agency.

### 3. Individuals who are Deaf, Hard of Hearing and Late Deafened.

#### *Prevalence.*

Per the U.S. Census Bureau 2014 American Community Survey 1-Year Estimates, over 158,000 Maryland citizens report having a hearing disability. 35% (55,855) of these individuals are ages 18 to 64, and nearly another 5% are under age 18. Individuals who are deaf and/or hard of hearing constitute 2,423 of the consumers served by DORS between FY 13 and FY 15 (approximately 6% of the total served), and 702 of these were transition youth at the time of application.

#### *Methodology.* Deaf and Hard-of-Hearing (DHOH) Open Online Survey.

An on-line survey for the Deaf and Hard-of-Hearing (DHOH) community was used to evaluate how effectively DORS meets the needs of DHOH individuals. This survey was sent directly consumers, DORS staff, CRPs, members of the grassroots community, interpreters, and was also made publicly available on the DORS website during the three weeks that it was available. The link to the survey is shareable and 95 individuals provided responses to the survey questions.

#### *Survey Responses.*

When asked about their satisfaction with services, respondents gave the following scores:

- Speed of service: 55%
- Quality of service: 58%
- Confidence in services: 58%
- Accessibility of services: 75%
- Cost of services: 63%
- “Deaf-Friendliness:” 63%
- Effectiveness in currently meeting the needs of DHOH job-seekers in Maryland: 76%

### ***Needs/Concerns Identified.***

- Length of waiting list to access services and lack of results
- Insufficient number of rehabilitation counselors for the Deaf (RCDs)
- Communication (including interpreters) and lack of job coaches
- Lack of awareness of accommodations needed for Deaf employees
- Lack of accessibility to accommodations needed for Deaf employees
- Discrimination
- Lack of English skills
- Lack of Driver's License
- Issues with SSI/SSDI

In addition, respondents spoke of perceived barriers to accessing DORS services, including unresponsiveness on the part of the counselors, and spoke of the need to reduce the waiting list, to have more counselors to respond to inquiries, to increase availability of job coaching services, to provide assistance with college and finding internships, and to provide more interpreting services.

### ***Recommendations.***

- Begin to include "ASL preferred" on all direct-service position to grow the number of signing staff at DORS.
- Provide adequate support to the RCDs to help with time management and prioritization.
- Invest in Deaf services within the agency and at CRPs:
  - Because DHOH resources are limited in Maryland, the agency needs to explore, at the national level, programs which are helping consumers to better prepare for self-advocacy, personal growth, internships, and jobs.
  - Deaf Self Advocacy Training (DSAT) train-the-trainer classes are needed for DORS RCDs, as well as for Rehabilitation Communication Specialists, and Maryland School for the Deaf staff, so that consumers have additional opportunities to learn self advocacy skills.
- WTC also needs to expand services and trainings that are easily accessible to deaf and hard of hearing consumers.

### ***Methodology: Key Informant Interview.***

The agency's Staff Specialist for Deaf and Hard of Hearing (DHOH) Services, was provided an opportunity to review the needs, concerns, and recommendations regarding Deaf and Hard of Hearing services in the 2013 CSNA, and was then asked to comment on current services and share any recommendations for future improvement.



## ***Needs/Concerns Identified.***

- **Order of Selection:**

In 2013, there were a large number of DHOH individuals who fell under Category II of the DORS Order of Selection who are placed on the waiting list and who are in need of assistance for job retention. In 2016, this is still true. DORS RCDs need to be encouraged to fully utilize a recently introduced Functional Capacities Assessment form to more clearly define an applicant's eligibility status and order of selection.

- **Transitioning Youth:**

In 2013, the CSNA reported that transitioning students need to have more opportunities for basic work experiences and exposure to role models to develop an understanding of employer expectations and to develop a strong work ethic rather than being satisfied with remaining on government assistance. In 2016, this is still true, and even more so because of the requirement to make pre-employment transition services available for students with disabilities. There are very few community rehabilitation programs that offer opportunities for youth who are deaf to participate in a work-based learning environment. Gallaudet University (GU) and National Technical Institute for the Deaf (NTID), continue to offer Science, Technology, Engineering, and Math (STEM) summer camps and other summer learning programs on campus. We are committed to serving consumers that participate in these camps and summer learning programs, but the associated out-of-state costs are high. There is a need for these types of programs to be offered in-state to provide increased access for all deaf students.

- **American Job Centers:**

In 2013, American Job Centers, then known as One-Stop centers, were not adequately serving DHOH individuals, due primarily to a general lack of staff trained on how to communicate with these individuals. In 2016, these same issues are ongoing, as many American Job Centers are still referring applicants back to DORS, due to a lack of understanding as to how they can communicate with or work with an individual who is deaf.

- **Foreign-Born:**

In 2013, the CSNA found a significant increase in foreign born deaf consumers, who often had complex communication needs preventing their successful involvement in services such as Adult Basic Education/GED or training from other agencies. In 2016, Certified Deaf Interpreter (CDI) service utilization has resulted in some improvements in Adult Basic Education (ABE) through the assistance of the Office of Deaf and Hard of Hearing (ODHH). ODHH is currently working with the Department of Labor, Licensing, and Regulation (DLLR) to

update their policies regarding working with foreign populations. ODHH still refers most deaf individuals to DORS for employment-related services.

- **Veterans:**

In 2013, veterans returning from service with hearing loss often received limited assistance from other agencies and faced great difficulty adjusting to their disability. Today, Veteran Affairs works with family and veterans who have hearing loss to assist with coping and communication. Technical assistance is provided at Bethesda Hospital where professionals have received training to learn more about "hidden" disability loss.

- **Cost of Interpreter Services:**

In 2013, the CSNA reported that many employers seemed reluctant to hire deaf and hard of hearing individuals due to concerns over paying for interpreting services or other accommodations. Today, businesses are still reluctant to pay for interpreter services due to a lack of knowledge regarding the use of tax credits. However, Video Remote Interpretation (VRI) training has become more popular and provides a short-term resolution for improved communication in the workplace.

### ***Recommendations.***

- DORS RCDs and WTC Deaf Unit staff need updated career counseling training regarding current job trends to explore with their consumers the most viable post-secondary training options. There appears to be an increasing amount of employment opportunities in technology-related careers that require an Associate's Degree (AAS), such as: Mobile application development, 3d Graphics technology, Biomedical Technology Technician, and various Healthcare training programs.
- Collaborate with colleges, including Gallaudet U. and NTID, to better track employment outcomes of students who obtain 2 and 4-year degrees.
- To help address staffing challenges experienced by CRPs and to improve the low success rate of deaf consumers served by CRPs, consider expanding the Rehabilitation Communication Specialists (RCS) pilot so that RCS' will have more opportunities to work with CRPs. The RCS 6-month pilot is currently underway in Region VI and the Elkton district office. Rehabilitation communication specialists work in partnership with a consumer's DORS counselor to provide individualized employment services ranging from self-advocacy and job readiness to job development and job retention with consumers who are experiencing difficulties with communication that have created long-term unemployment or under-employment.

- Evaluate the RCS Pilot to determine the successful placement rate and to analyze its overall cost-effectiveness. According to anecdotal reports of counselors and RCS Monthly Progress Reports received thus far, the services provided by the RCSs are adding a much-needed valuable service that is empowering consumers to obtain solid jobs with a career path, not simply “soft money” jobs which often result in recurring referral to DORS.
- Since the State of Maryland has accepted a new contract with Visual On-Site Communication, the quality of interpreter services has improved, but there are still ongoing referral and/or scheduling issues for consumers in rural areas, such as the Eastern Shore and Western Maryland. Recommend addressing these issues.
- The American Job Center staff often do not know how to access deaf services due to a lack of related knowledge and skills. Identify DORS staff to provide consultation services to American Job Center staff on using VRI services to meet communication needs.
- Create a resource guide for staff working with special populations including foreign born deaf individuals, transitioning youth and people who are hard of hearing/late deafened.
- Design a Maryland DORS Pre-ETS program for DHOH students to complement existing programs, such as those currently offered by G.U. and NTID: Discover Your Future (DYF) and Explore Your Future (EYF). Perform a Cost-Benefit analysis to compare the value of providing these services in- vs. out-of-state.
- Offer students a Deaf Self-Advocacy Training course to increase their independence and enhance their ASL skills so that they may better communicate with employers and leaders.

#### **4. Individuals with Intellectual and Developmental Disability, including Section 511 Considerations.**

##### ***Introduction.***

WIOA Section 511 does not require a DSU to identify individuals who are currently earning sub-minimum wage. However, DORS has compelling reasons for developing a proactive approach for managing these referrals, including the sheer number of individuals in Maryland currently earning sub-minimum wage who could self-refer or be referred to the agency at any time to obtain the documentation required to continue earning sub-minimum wages, and the implications of Maryland SB 417/HB 420: Individuals With Disabilities: Minimum Wage and Community Integration (Ken Capone Equal Employment Act), signed into law on May 19, 2016 described in the background

discussion for the Need of Individuals with Most Significant Disabilities for Supported Employment Services in Maryland on page 9 of this report. Because the majority of 14c certificate holders are also programs funded by the Developmental Disabilities Administration, it is understood that the majority of individuals working for subminimum wage are individuals with intellectual and developmental disabilities. As such, this section of the Needs Assessment will focus on the use of 14c certificates in Maryland and the impact for VR in providing the services required by WIOA for individuals employed in these settings.

### ***Prevalence.***

Data available on the Department of Labor, Licensing and Regulation, Wage and Hour Division (WHD) was reviewed for Maryland. This data was current through March 2016. Information was compared to the DORS Fee Schedule to determine which geographic regions the providers primarily serve.

An analysis of the information available noted that 36 CRPs have 14c certificates permitting them to pay sub-minimum wages. All but two of the CRPs are currently providing services for Maryland VR. Of the 36 CRPs mentioned above, 3,469 Individuals are being paid through the use of sub minimum wage certificates. Five CRPs have more than 200 individuals involved in subminimum wage work. Of the top five, the highest is 387 and the lowest 214.

Over DORS five regions the Wage and Hour Division information translates as follows:

- Region 1: 479 Consumers (7 CRPs)
- Region 2: 1,406 Consumers (12 CRPs)
- Region 3: 258 Consumers (3 CRPs)
- Region 5: 606 Consumers (8 CRPs)
- Region 6: 720 Consumers (6 CRPs)

### ***Needs/Concerns Identified.***

- Significant impact to DORS capacity in specific geographic areas regarding the ability to provide required counseling/guidance to individuals engaged in sub-minimum wage employment.
- Need to establish how the work will be allocated within the regions. This will especially affect areas where counselors already have over 200 individuals on their caseloads.

### ***Methodology: Public Meetings and DORS Survey.***

Providers expressed significant concern regarding how to streamline the DORS referral process for individuals currently working below minimum wage. Other providers had

questions about whether training would be provided on the new regulations for competitive, integrated employment as they are unclear about how it all fits together.

### ***Needs/Concerns Identified.***

- Need to establish liaisons with providers who have been issued 14c certificates, and to implement a protocol for initially obtaining specific information that identifies the individuals already working at subminimum wage who will need to be counseled.
- Need to create an on-going process for the annual counseling of individuals who choose to remain in sub-minimum wage employment.
- Need to continue to provide opportunities for our CRPs to participate in the training being provided to DORS counselors in regard to what constitutes competitive, integrated employment.

### ***Recommendations.***

- Review literature from Office of Disability Employment Policy and Vermont Conversion Institute and, in collaboration with CRPs, evaluate how to implement 511 WIOA requirements within the agency and each region.
- Establish a process for obtaining consumer information from CRPs with 14c certificates for individuals working at subminimum wage.
- Provide training opportunities to DORS staff and CRPs in the implementation of Section 511 especially around competitive integrated employment.

## **5. Individuals with Severe and Persistent Mental Illness**

### ***Introduction.***

Information from the 2013 Comprehensive Needs Assessment noted that the utilization of mental health supported employment services varies by county. Additionally, a documented need was to examine longitudinal data to inform program development and staff and provider training.

### ***Prevalence.***

Per a Behavioral Health Organization (BHO) Services Report provided by the Maryland Department of Health and Mental Hygiene (DHMH) Behavioral Health Administration (BHA) for claims paid through June 2016, over 68,000 individuals in Maryland are being served by the BHA and, of those, 3,054 are receiving long-term funding for supported employment.

***Methodology:*** DHMH and DORS Data Comparison.

A policy and braided funding mechanism with BHA assures that the individuals BHA report as receiving SEP services are individuals referred to DORS for the provision of job coaching for job development and intensive job coaching at the onset of employment. To assess whether supported employment services for individuals with Severe and Persistent Mental Illness are being appropriately integrated between DORS and BHA statewide according to this braided-funding policy, the BHO Services Report data on the number of individuals served by County paid through June 2016 was compared to DORS data on the number of individuals with a priority population diagnosis served under an Individualized Plan for Employment through June 2016.

The results of this comparison are provided in the table below. For each County, the table displays the total number receiving any Behavioral Health Administration (BHA) services, the total receiving BHA supported employment funding, the total receiving services from DORS under an IPE, and the total number of Community Rehabilitation Programs (CRPs) approved both by DORS and BHA to provide services in the County.

County	Total receiving any BHA service	Total receiving BHA supported employment funding	Total receiving services from DORS (in a Plan)	# DORS/ BHA CRPs
Alleghany	1,695	25	43	2
Anne Arundel	4,959	202	245	4
Baltimore City	22,454	364	765	15
Baltimore County	9,795	215	365	7
Calvert	732	83	120	1
Caroline	495	16	15	2
Carroll	1,442	157	203	5
Cecil	1,608	28	69	1
Charles	1,326	141	110	1
Dorchester	771	28	22	1
Frederick	2,002	176	128	1
Garrett	340	19	12	2
Harford	2,733	62	95	4
Howard	1,753	202	126	3
Kent	279	14	13	1
Montgomery	5,470	741	430	4
Prince George's	5,970	169	369	3
Queen Anne	384	24	17	1
Somerset	396	11	18	0

County	Total receiving any BHA service	Total receiving BHA supported employment funding	Total receiving services from DORS (in a Plan)	# DORS/ BHA CRPs
St. Marys	1,158	181	140	2
Talbot	378	12	17	0
Washington	2,632	116	145	1
Wicomico	1,776	50	96	3
Worcester	794	18	24	0
<b>Total</b>	<b>68,062</b>	<b>3,054</b>	<b>3,587</b>	<b>33*</b>

\*Total number of DORS approved BHA CRPs. Some providers provide more than one service including: BHA SEP (12); EBPSE (13); and ACT (10).

DORS next evaluated whether each Region has a sufficient distribution of DORS counselors with technical specialties to serve consumers with severe and persistent mental illness and to function as liaisons with BHA-approved CRPs.

The table below displays for each DORS Region the distribution of consumers receiving BHA supported employment services, the number of DORS consumers with priority population diagnoses receiving services under DORS Individualized Plans for Employment, the number of BHA-approved CRPs, the number of DORS counselors with technical specialties to serve this population, and the average number of consumers per counselor.

DORS Region	# BHA SEP Consumers	# DORS Consumers in Plans	# BHA *CRP Locations	# DORS Technical Specialists	Average # of Consumers Per DORS Liaison
1	493	531	10	6	88
2	766	824	15	9	91
3	364	765	15	11	70
5	521	668	9	9	74
6	910	799	8	6	133
<b>Total</b>	<b>3,054**</b>	<b>3,587</b>		<b>41</b>	

\*There is an overlap of CRP locations within Regions, and one provider may provide services in more than one county within the same region and/or more than one region.

### **Needs/Concerns Identified.**

- A review of DORS information for individuals with a potential priority population diagnosis (e.g. Major Depression, Bi-Polar Disorder, or Schizophrenia) who were in an Individualized Plan for Employment (IPE) in SY2016 found that DORS is capturing a majority of the individuals reported to be receiving SEP through BHA.
- In Baltimore City it appears that DORS is working with about twice the number of individuals reported by BHA. This may be due to a number of factors: counselors, other than those with the behavioral health supported employment expertise, are

working with those individuals and are not aware of supports available in the community, miscoding of primary diagnosis, or they may be carryover cases from previous years that have been closed/discharged from the BHA system.

- In Region 6, there appears to be a need for additional CRPs and additional counselors with a technical specialty to service this population.

### ***Recommendations.***

- Information related to the psychiatric disability identified by DORS needs to be further researched for accuracy and source.
- Continue to monitor statewide and regional trends of individuals accessing Behavioral Health Supported Employment services through BHA and DORS.
- Provide training to DORS staff regarding behavioral health services, eligibility criteria, and the referral process for assisting individuals to access BHA support.
- Assure that DORS counselors are aware of the BHA liaisons in their offices so they may receive consultation in the identification and provision of appropriate support services.

### ***Methodology.*** DORS Public Meetings

Attendees were asked about providing services for students with mental health issues as an underserved population.

### ***Needs/Concerns Identified:***

- Assure information regarding Pre-Employment Transition Services is being made available to BHA providers who could consider developing these programs.
- Continue to collaborate with BHA in the development of IPS (Individualized Placement Services) services for Students and/or transition age youth.
- Collaborate with BHA in the provision of Early Intervention Program (EIP) for youth in their initial psychotic episode.

### ***Recommendations:***

- Continue to work with BHA providers to develop Pre-Employment Transition Services for transitioning students.
- Maintain collaborative efforts with BHA in the development of IPS services for students and transition age youth and in the provision of the EIP.
- Use DORS media to highlight programs that emphasize DORS and BHA collaboration in providing services to transitioning students.



## INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES AND INDIVIDUALS WITH DISABILITIES WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VOCATIONAL REHABILITATION PROGRAM.

### 1. Individuals With Disabilities Who Are Minorities.

#### *Introduction.*

The Maryland 2013 Comprehensive Assessment of the Needs of Individuals with Disabilities identified a need for DORS to enhance services to minority individuals with disabilities, focusing especially on those from the Hispanic and Asian communities. DORS continues to be committed to increasing and improving services for minority populations.

#### *Prevalence.*

According to the 2010-2014 US Census, 14.2% of the population in Maryland are foreign-born, and 47.5% of these individuals are naturalized U.S. citizens.

##### **Hispanic:**

- 8.8% of the population is identified as Hispanic (2010: 8.2%).
- 7.0% of the population here 5 years or more speak Spanish at home, and, 3.2% indicate they speak English less than “very well.”

##### **Asian:**

- 5.9% of the population is identified as Asian (2010: 5.5%).
- 3.7% of the population here 5 years or more speak a foreign language at home, and 1.6% indicate they speak English less than “very well.”

#### *Methodology.*

AWARE data was reviewed to assess the numbers of individuals served by DORS who speak a foreign language, and the numbers of Hispanic and Asian served, in particular. As indicated in below, DORS has maintained consistent service levels for individuals from Hispanic backgrounds and has seen a modest increase in individuals served from Asian backgrounds:

##### **Hispanic:**

- FY 13 numbers served: 721 (3.0% of total served)
- FY 14 numbers served: 722 (3.0% of total served)
- FY 15 numbers served: 725 (3.0% of total served)

##### **Asian:**

- FY 13 numbers served: 588 (2.0% of total served)
- FY 14 numbers served: 607 (2.2% of total served)
- FY 15 numbers served: 650 (2.4% of total served)

### ***Needs/Concerns Identified:***

- Individuals from Hispanic and Asian backgrounds continue to be underrepresented among individuals receiving services.
- Less than 1% of those served during the past three years report having a primary language other than English, suggesting that individuals for whom English is a second language may not know how to access services.
- More than half of the foreign-born individuals are not U.S. citizens.

### ***Methodology.*** DORS Public Meetings

Attendees commented on the unmet needs of individuals who are minorities.

### ***Needs/Concerns Identified.***

- Comments focused on the need for an increase in the number of foreign languages for which interpretation is available, as well as for more flexibility in scheduling. Currently, the state contract provider requires a minimum of two weeks notice to schedule an interpreter, and has a 24 hour cancellation policy.
- A CRP providing services in the D.C.-Metro area spoke to the need to deliver presentations about services in person, using presentation materials in the language of the target audience, and spoke of having introductory remarks for her business available in multiple languages, including Spanish, Hindi, Mandarin, Portuguese, German, and French.
- DORS staff also noted during this CSNA the need for standard letters to be available in foreign languages, as the Application for Rehabilitation Services is already.

### ***Recommendations.***

- Consider targeted outreach efforts, in collaboration with workforce and education partners, to increase the numbers of minorities provided VR services, with emphasis on Hispanic and Asian individuals with disabilities.
- In addition to providing the Application for Rehabilitation Services and other required documents in foreign languages, provide a catalogue of standard letters in the same foreign languages for which the application is already available to ensure individual understanding of services, their rights, and responsibilities, during the rehabilitation process.
- Equip counselors with information to share with non-Citizens on how to become legally allowed to work in the U.S.

## **2. Individuals with Disabilities Who Have Been Unserved, Or Who Are Underserved By The Vocational Rehabilitation Program.**

### ***Introduction.***

Certainly, as it was during the 2013 CSNA, individuals on the waiting list continue to be the most recognizable underserved population, and their needs and how the agency may address those needs are addressed here. In addition, other unserved and underserved populations have also been identified.

Due to budget reductions which lead to loss of positions, lengthy delays in filling vacant positions, WIOA requirements, and other factors, the agency has been unable to remove any consumers from our waiting list since April 2015. These factors have also caused staff to have less opportunity to reach out to unserved and underserved populations.

### ***Prevalence.***

During the past 3 years, the primary counselor assigned to a caseload has changed for nearly 50% (60 out of 124) of the agency's vocational rehabilitation caseloads. Slightly less than 50% of these caseloads are currently assigned to vocational rehabilitation technical specialists, suggesting that at least half of the agency's consumers are currently being served by counselors with less than 3 years of experience.

### ***Methodology.*** DORS Public Meetings

Attendees identified multiple groups of individuals who could potentially be considered unserved or underserved by DORS.

- Consumers who are currently on the DORS waiting list (Category II).
- Consumers who appear to be higher functioning than they really are. More comprehensive assessment for individuals with Asperger's Syndrome or who have had traumatic brain injuries, for instance, may be needed to determine their true order of selection.
- Transient individuals, including youth in and out of foster care programs.
- Individuals, including students, with persistent mental illness or dual diagnosis, unspecified learning disabilities, and Autism.
- Refugees

Potential barriers to receiving vocational rehabilitation services experienced by these groups are listed in the needs and concerns below:

### ***Needs/Concerns Identified.***

- DORS caseloads are large and expected to grow larger due to regulatory changes, as is the DORS waiting list; decreasing staff opportunity to provide targeted outreach.
- Communication/language barriers decrease effectiveness of print materials.
- Lack of transportation needed to apply for or participate in services.
- Lack of direct services available in rural areas (e.g. Western Maryland and Eastern Shore), especially for individuals with TBI or individuals who are deaf/blind;
- Insufficient college programs to support students with Autism.
- Lack of quality controls, leading to inconsistency in service delivery practices from one office to the next.

### ***Recommendations:***

- DORS should conduct a detailed analysis of which work functions, including current case management procedures, are required and who must perform them to ensure that required services are consistently and appropriately provided, in light of the publication of the WIOA final regulations on August 19, 2016. Such an analysis should include input from front-line counselors, district supervisors, regional directors, network technicians and programmers, and others, as needed, to ensure a comprehensive review process.
- DORS may wish to pilot various case management approaches which appear to hold promise. For instance, the agency may choose to assign counselors a specialty based upon their work strengths. For example, Counselor A may meet with a consumer to gather all pertinent intake information (e.g. demographics, documentation of disability, etc.), then Counselor B may provide all services related to implementation of the IPE, while Counselor C may manage all financial matters for an assigned number of consumers (e.g. issue and track purchase authorizations and Maintenance and Transportation logs), Counselor D may assist consumers to access services in the community to address barriers affecting their ability to become or maintain employment.
- DORS may wish to recruit at least two other workforce programs to apply together for the Workforce Innovation Technical Assistance Center (WINTAC) grant to pilot a new approach to communicating with consumers, using Smartphone technology. This approach could assist personnel within these programs to acquire required documentation for federal reporting.
- DORS may wish to consider moving further in the direction of becoming fully electronic by permitting field office staff to shred, rather than file in hard copy

folders, all documents which they first scan and attach into the AWARE case management system.

- DORS may also wish to finalize an approach to be used for obtaining electronic signatures, which would, among other advantages, assist staff to be more efficient in sending out authorizations for services.

As DORS navigates changes in policies and procedures related to WIOA regulations, an analysis of case management will need to occur to ensure compliance with WIOA regulations and that DORS meets the rehabilitation needs of the unserved and/or underserved groups listed above.

**Methodology:** DORS Survey.

As part of the current Needs Assessment, a survey was made available on line to consumers, advocates, families and community rehabilitation programs. 226 responses were received from consumers, parent/guardians, family members and service providers.

### **Needs/Concerns Identified:**

The survey asked respondents to identify any unmet rehabilitation and employment needs of individuals with disabilities:

- 28% mentioned inadequate employment options,
- 27% of respondents raised customer service and procedural concerns, including responsive communication, timely return of administrative approvals, and completion of required documentation,
- 12% spoke of the need for more training options,
- 10% raised transportation-related concerns,
- 8% raised issues around the waiting list, and
- 5% mentioned the need for DORS staff to be more actively reaching out to the community.

### **Recommendations.**

- In collaboration with WIOA workforce partners, provide staff training on labor market analysis, utilizing readily available on-line tools and software to assist in vocational guidance and counseling during plan development and the job search process.
- Develop a system for consumers to provide feedback on their satisfaction with services at key points during the rehabilitation process, such as after their initial interview (Do they have any questions?), while on the waiting list (Have they

been referred to other WIOA workforce programs?), after development of the Individualized Plan for Employment (Do they understand their plan and believe they will become employed as a result of this plan?), and after they have been referred to a CRP for job placement (Is the job developer identifying job leads that fit their experience, interests, abilities, etc.?).

- Develop a quality control system for evaluating how effectively and accurately staff integrate policy and procedure change into their work routine. This approach should encourage staff feedback, and include a rapid response when staff development needs are identified.

### ***Methodology.*** Key Informant Interview and Data Analysis

Data analysis and interview with the DORS staff specialist for Social Security Programs in the DORS Program Income office, regarding the status of individuals on the waiting list who are Social Security claimants and recipients.

### ***Needs/Concerns Identified.***

- Individuals may be placed on the waiting list, while their applications for Social Security benefits are pending, or may choose to apply for Social Security benefits at any time after being placed on the waiting list.
- 39% of DORS consumers on the waiting list reported being Social Security recipients at the time of application.
- Via the Ticket to Work Verification Portal, DORS Program Income staff determined that 44% of those currently waiting for services are Ticket holders, indicating that at least 5% of consumers on the waiting list became Social Security beneficiaries after entering the waiting list.
- Since counselors and consumers do not routinely communicate during this waiting period, counselors often miss potential opportunities to request new diagnostic information from the Disability Determination Services regarding their consumers—information which, if available, may provide sufficient support for increasing their consumer’s disability priority to Category I: Most Significantly Disabled.
- These individuals may be considered underserved because they are most likely not being advised by their DORS counselors of services available through Work Incentive Program and Assistance (WIPA) providers and/or Employment Networks.

### ***Recommendations:***

- Develop a system for routinely comparing the DORS waiting list with the Disability Determination Services (DDS) list of open claims so that counselors

may have the opportunity to secure the consumer’s permission to request any available documentation when it is most readily available.

- Implement a strategy for informing Social Security beneficiaries in general and Social Security Ticket to Work holders in particular about WIPA and EN services that may be available while they are waiting for agency services to be available.

### C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE INVESTMENT SYSTEM.

**Introduction:** Maryland’s State Combined Workforce Plan

In October 2015, Governor Larry Hogan determined that Maryland would have a combined state plan, requiring the Department of Labor, Licensing and Regulation (DLLR), the Department of Human Resources (DHR), and the Maryland State Department of Education (MSDE) to work collaboratively to develop a strategic and operational plan to include the following programs:

<b>WIOA State Plan Program</b>	<b>Core WIOA Program as determined by law</b>	<b>Additional WIOA Program as determined by the Governor</b>	<b>MD State Agency Responsible for Oversight</b>
Adult Program	•		DLLR
Dislocated Workforce Program	•		DLLR
Youth Program	•		DLLR
Wagner-Peyser Act Program	•		DLLR
Adult Education & Family Literacy Act Program	•		DLLR
Vocational Rehabilitation Program	•		MSDE
Temporary Assistance for Needy Families Program		•	DHR
Trade Adjustment Assistance for Workers Program		•	DLLR
Jobs for Veterans State Grant Program		•	DLLR
Reintegration of Ex-Offenders Program		•	N/A

Source: <http://www.dllr.maryland.gov/employment/wioa.shtml>

- **Maryland American Job Centers (a.k.a. One-Stops).**

***Prevalence.***

During the previous three years, the agency has seen a decrease in individuals reporting that they were referred by the One-Stops.

- FY 13: 361 individuals referred
- FY 14: 280 individuals referred
- FY 15: 221 individuals referred

The agency would like to investigate the reason for this decline, so that this trend may be reversed, and the partnership between these programs may be strengthened.

***Methodology:*** DORS Survey of American Job Center Personnel.

To assess how effectively DORS staff are collaborating with the Maryland American Job Centers a survey was distributed to the staff of these Centers in Maryland. Fifteen surveys were completed and will be used in this assessment of the utilization of the Maryland American Job Centers by individuals with disabilities. The results of the survey are as follows:

- When asked how often do you collaborate /partner with the Division of Rehabilitation Services (DORS) staff, 13.3% of respondents replied “Never,” 73.3% replied “Occasionally,” and 13.3% replied “Frequently.”
- When asked to rate on a scale of 1 to 10 (with 1 being completely unsatisfied and 10 being completely satisfied) their overall satisfaction working with DORS, the satisfaction rating came to an average of 70% with the majority responding with a rating of 8 or higher.
- When asked about their awareness of services provided through the Division of Rehabilitation Services to individuals with disabilities to help them develop employment related skills, 73.3% of respondents indicated that they are aware of VR services and 26.7% indicated that they were not aware.
- When asked whether they have received information or training on what is considered an appropriate referral to the Division, 60% indicated that they had at least some training and 40% indicated they had not been trained.
- When asked whether they had referred individuals to the Division for services, 73.3% indicated that they had and 26.7% indicated that they had not.
- Of those who advised that they had referred individuals to the Division, 45.4% indicated that these referrals resulted in the individual receiving services, and



54.5% indicated that they did not know whether the individuals had begun receiving services.

### ***Needs/Concerns Identified.***

- The results of the surveys completed by the staff of the Maryland American Job Centers indicate a general knowledge of the Maryland Division of Rehabilitation Services and the help and services provided to individuals with significant disabilities to help them prepare for and find employment.
- 86.6% of the Maryland American Job Center respondents indicate they collaborate with DORS staff “occasionally” or “frequently.” A majority of the respondents (73.4%) did indicate “occasionally” when responding to this question.
- 54.5% of those who made referrals to the Division were unaware of the outcome of those referrals.

### ***Methodology:*** Public Meetings.

Additional information on how the Maryland American Job Centers are utilized by individuals in the State in gaining employment was obtained by the Division of Rehabilitation Services during the annual meetings that it conducts as part of its yearly planning process. During these public meetings DORS counselors, service providers, and job seekers were asked a set of questions to gain a better understanding of the Job Centers’ role in the rehabilitation and employment process.

### ***Needs/Concerns Identified.***

- The responses given by individuals attending the public meetings indicated that the services offered by the Job Centers are difficult to access and are not geared to individuals with disabilities.
- Individuals with disabilities who do try to use the Job Centers are often referred to the Division of Rehabilitation Services for help in finding employment.

### ***Recommendations.***

- Since the survey indicates that the staff of the American Job Centers have received limited training on when an individual with a disability would be appropriate to refer to the Division for services to assist them in becoming employment ready, the Division may wish to explore the understanding of the Job Center staff as to when it is to the benefit of the individual to be referred to the Division for services.
- Develop a strategy for sharing outcome information with the American Job Centers regarding individuals served by both programs

- **Other Workforce Programs**

***Prevalence.***

During this 2016 CSNA, DORS utilized a variety of methodologies to assess the approximate numbers of individuals with disabilities in Maryland served by partner programs identified within the Maryland State Combined Workforce Plan.

***Methodology:*** Literature Review.

The Maryland Department of Labor, Licensing, and Regulation (DLLR) Division of Workforce Development and Adult Learning WIA 2014 Annual Report was reviewed for information regarding the numbers of individuals with disabilities who were accessing services through WIA partner programs.

During Program Year 2014:

- The Adult Program served 207 individuals with disabilities.
- The Dislocated Worker Program served 130 individuals with disabilities.
- The Youth Program served 637 youth with disabilities.
- The Wagner-Peyser Act Program served 9,388 individuals with disabilities.
- The Adult Education and Literacy Services Program served 680 individuals with disabilities.

***Methodology:*** DORS and Maryland DHR Data Review.

Each year between FY 13 and FY 16, about 650 DORS consumers reported receiving financial support from DHR when they applied for vocational rehabilitation services. During FY 16, DHR provided Temporary Cash Assistance (TCA) to 6,611 adults with disabilities. In addition, DHR provided long-term Temporary Disability Assistance Program (TDAP) support for 16,751 individuals with disabilities.

***Needs/Concerns Identified.***

- The number of individuals with disabilities referred to DORS from the Department of Human Resources (DHR) is expected to increase during the next three years, as DHR, DLLR, and DORS roll out a Temporary Cash Assistance (TCA)/Workforce Innovation Opportunity Act (WIOA) partnership across the 12 Local Workforce Development areas in Maryland.

- Identify DORS counselors to serve as liaisons to the local DSS offices in each of the 12 jurisdictions.

***Methodology:*** Maryland Judiciary Case Search.

During this CSNA, DORS sought to determine the approximate number of DORS consumers who may require assistance overcoming barriers to employment resulting from having a record of arrest or conviction found in the Maryland Judiciary Case Search. Out of 23,808 individuals who applied for DORS services between FY 13 and FY 15, fifty (50) were randomly sampled, and their names and birth dates were looked up in the Maryland Judiciary Case Search. Of these, 56% (28) were found to have a history of being subject to some stage of the criminal justice process within Maryland.

***Needs/Concerns Identified.***

- Due to the lower number of consumers randomly sampled for this Maryland Judiciary Case Search process, the percentage reported here is not statistically significant and should be viewed cautiously. However, this result suggests that additional review is warranted.
- DORS has not consistently used one field in the AWARE case management system over time to track the number of individuals who report having a history of justice involvement or who have lost job offers due to background checks.
- Based on anecdotal reports from DORS Business Service Representatives and Employment Specialists, as well as CRP job development staff, it does appear that businesses frequently perform background checks and subsequently revoke job offers made to DORS consumers. These instances have the potential to jeopardize job opportunities for future DORS consumers.

***Recommendations.***

- Identify DORS counselors to serve as liaisons for local Department of Social Services offices, and provide opportunities for mutual staff training.
- Provide training to familiarize DORS staff with the services available from the various partner programs in the combined state plan, including those who can assist DORS consumers who have records of arrest or conviction.
- Provide information to counselors on industries and business in Maryland which routinely run background checks before hiring, so counselors can have that for reference when providing vocational guidance and counseling, especially during plan development and prior to job search.

### 3. Maryland Community Colleges

#### *Introduction.*

With the implementation of WIOA, there is increased focus on the outcomes of individuals involved in post-secondary education, in general, as well as an expectation that workforce programs, including VR, will utilize community colleges to prepare individuals for employment within the local labor market. Community colleges continue to remain a major component of Maryland’s Workforce Investment System, as well as a primary training provider to DORS consumers for both credit and non-credit instruction leading to workforce certificate training.

While strides have been made partnering with community colleges there are additional objectives to be met, including advancing apprenticeship as a workforce strategy. Working with community colleges to expand the scope of services provided through Registered Apprenticeship Programs could help state and local workforce systems transform how they meet the needs of businesses and workers and fully achieve the vision for the workforce system under WIOA.

**Methodology:** Review of DORS Service Data.

The closed cases of consumers for whom DORS authorizations were issued to community colleges in Maryland before or during the past three federal fiscal years were reviewed.

#### *Discussion.*

During the past three federal fiscal years, DORS closed the cases of 823 individuals after providing financial assistance for them to attend community college programs. The chart below provides data on the rehabilitation rate of these DORS consumers, the count of individuals closed unsuccessfully and successfully, the total paid to each college and the average cost per individual.

Community College	Rehab Rate	Closed Unsuccessful	Closed Rehabilitated	Grand Totals		
	Percent	Count	Count	Count	Paid	Avg. Cost
Allegany College Of Maryland	60.87%	9	14	23	\$37,580	\$1,634
ANNE ARUNDEL COMMUNITY COLLEGE	56.41%	17	22	39	\$62,685	\$1,607
Baltimore City	52.63%	9	10	19	\$25,588	\$1,347

	<b>Rehab Rate</b>	<b>Closed Unsuccessful</b>	<b>Closed Rehabilitated</b>	<b>Grand Totals</b>		
Community College						
Carroll Community College	49.23%	33	32	65	\$95,018	\$1,462
Community Colleges of Baltimore County	56.54%	83	108	191	\$403,425	\$2,112
Cecil College	78.57%	3	11	14	\$17,169	\$1,226
Charles County Community College	50.00%	1	1	2	\$1,894	\$947
Chesapeake College	76.47%	4	13	17	\$40,419	\$2,378
College of Southern Maryland	49.31%	73	71	144	\$204,256	\$1,418
Frederick Community College	56.25%	14	18	32	\$49,314	\$1,541
Garrett College	50.00%	4	4	8	\$11,433	\$1,429
Hagerstown Community College	56.52%	20	26	46	\$51,849	\$1,127
Harford Community College	25.00%	15	5	20	\$31,317	\$1,566
Howard Community College	45.24%	23	19	42	\$72,658	\$1,730
Montgomery College	65.43%	28	53	81	\$92,077	\$1,137
Prince George's Community College	44.68%	26	21	47	\$66,986	\$1,425
WOR-WIC COMMUNITY COLLEGE	70.97%	9	22	31	\$26,690	\$861
<b>Grand Total</b>	<b>55.50%</b>	<b>371</b>	<b>450</b>	<b>821</b>	<b>\$1,290,360</b>	<b>\$1,475</b>

During the past three federal fiscal years, DORS has provided financial assistance for 906 individuals to attend community college programs. The cases for 620 of these individuals are still open. The chart below provides data on the rehabilitation rate of the 285 consumers whose cases have already been closed.

	<b>Rehab Rate</b>	<b>Closed Unsuccessful</b>	<b>Closed Rehabilitated</b>	<b>Grand Total</b>
<b>Community College</b>	<b>Percent</b>	<b>Count</b>	<b>Count</b>	<b>Count</b>
ALLEGANY COLLEGE OF MARYLAND	57.14%	3	4	7
Anne Arundel Community College	85.71%	2	12	14
Baltimore City Community College	33.33%	2	1	3

	<b>Rehab Rate</b>	<b>Closed Unsuccessful</b>	<b>Closed Rehabilitated</b>	<b>Grand Total</b>
Carroll Community College	60.00%	6	9	15
Community Colleges of Baltimore County	72.46%	19	50	69
Cecil College	100.00%	0	3	3
Chesapeake College	80.00%	2	8	10
College of Southern Maryland	71.70%	15	38	53
Frederick Community College	75.00%	2	6	8
Garret College	50.00%	1	1	2
Hagerstown Community College	87.50%	2	14	16
Harford Community College	100.00%	0	3	3
Howard Community College	53.85%	6	7	13
Montgomery College	66.67%	11	22	33
PRINCE GEORGE'S COMMUNITY COLLEGE	58.82%	7	10	17
St Marys College Of MD	N/A	0	0	0
WOR-WIC COMMUNITY COLLEGE	84.21%	3	16	19
Grand Total	71.33%	81	204	285

**Analysis:**

- When considering all 821 individuals whose cases were closed during the past three fiscal years after having received financial assistance for community college participation at some point while their case was open with DORS, the success rate is 54%.
- After subtracting the 285 individuals who participated in community college programs during the past three years (285) from the 3-year total of all cases closed (821), the remaining 536 individuals are those who participated in community college programs prior to FY 13 and who were closed during the last three years. The success rate of these individuals is 46%.
- The success rate of the 285 individuals who participated in community college programs during the past three years and whose cases were subsequently closed was 71%.

### ***Needs/Concerns Identified.***

- Community college participation appears to be quite effective in preparing individuals with disabilities for employment when brief training is sufficient for them to become employed.
- Community college participation appears to be less likely to result in successful employment outcomes when the individual's participation in that training occurred several years ago. This may be due to a number of reasons. For instance, these individuals may have chosen not to continue attending community college after giving it a try, or they may be continuing after not achieving the grades necessary to continue receiving DORS funding and choosing to have their cases closed, or they may have continued on to further their education and then lost touch with their DORS counselor.

### ***Recommendations.***

- DORS consumers who have attended Cecil College, Chesapeake College, and Wor-Wic Community College, and, within the past three years especially, Anne Arundel Community College, Frederick Community College, and Hagerstown Community College, appear significantly more likely to have had their cases closed successfully employed. This merits further exploration into the partnership practices of the DORS staff and Disability Support Services (DSS) staff at those particular community colleges in order to determine whether there are any promising practices contributing to that success.
- The agency may also want to study why very few authorizations are being issued to certain community colleges, as this may be indicative of assistance being provided in another way, such as providing Maintenance and Transportation expenses for college, which were not taken into consideration here, or this may be indicative of a perceived lack of training opportunities for individuals with disabilities in those areas.
- The agency may also find it helpful to collaborate with community colleges at an organizational level to track the education and employment success of individuals with disabilities after they exit community college programs, especially as these are common measures shared by all workforce programs, including community colleges.

***Methodology:*** Disability Support Services Professionals Survey.

An on-line survey for Disability Support Services (DSS) professionals was used to evaluate how effectively DORS collaborates with DSS staff to meet the needs of students with disabilities. This survey was sent directly to members of the Maryland Association of Higher Education and Disability (MD-AHEAD), and was also made

publicly available on the DORS website during the three weeks that it was available. 28 individuals provided responses to the survey questions.

### **Survey Responses:**

- When asked if they refer consumers to DORS, 67% indicated that they do.
- When asked how often they partner with DORS staff, 57% stated occasionally, 25% stated frequently and 17.9% indicated never.
- When asked to rate their overall satisfaction with DORS (with 1 being completely unsatisfied and 10 being completely satisfied), 24 individuals responded to this question, and the average overall satisfaction rating with DORS was 5.
- When asked what assistance or services are most requested from DORS, respondent answers clustered around the following partnership activities and services:
  - Collaboration on various transition activities with the high schools, such as DSS and student college orientations
  - Funding to assist students with higher education costs
  - Counselor consultation about student accommodations and academic goals
  - Assessment services to assist with documenting student need for reasonable accommodation
  - Assistance for students to acquire and learn to use adaptive technology
  - Social skills groups for individuals on the Autism spectrum
    - Weekly one on one and small group meetings during the school year (the DORS Pathways Program)

When asked about their expectations when working with a DORS counselor, respondent answers suggested that the following attributes were most important:

- Professionalism, including timely services and responsiveness to students and DSS personnel.
- Competency, including knowledge regarding higher education and reasonable accommodations
- Provision of technical assistance, equipment and training, and additional resources that the college may not provide and of which the college personnel may be unaware.

### ***Needs/Concerns Identified.***

- Although 67% of those surveyed, indicated that they do refer consumers for DORS services, they do not all collaborate with DORS staff, and the majority of those who do (57%) indicated that they do so only occasionally.



- DSS professional staff indicated that their overall satisfaction with DORS staff was 5 on a scale of 1 – 10.
- DSS professional staff indicated that they most frequently refer students for accommodations, tuition assistance and assistive technology from DORS staff.
- It appears that DSS staff expects DORS staff to be professional, knowledgeable, and responsive in a timely manner, and to provide additional resources and be competent and responsive.

### ***Recommendations.***

- Consider establishing a liaison relationship with each DSS office, to strengthen the partnership between DORS field staff and DSS staff in community colleges, as not all community college DSS professionals are familiar with DORS services and support.
- Pursue training for DORS staff on 504 and accommodations in higher education.

### ***Methodology:*** Public Meeting Forum.

During the 2016 DORS Public Meetings, attendees were asked several questions regarding Maryland Community Colleges, including:

- How effectively are community colleges addressing the needs of students with disabilities?
- What barriers to success do students with disabilities encounter at community colleges?
- How can DORS best work with community colleges to facilitate the success of students with disabilities?

### ***Needs/Concerns Identified.***

- Some Community College staff come across as not open to assisting students,
- Community Colleges provide recommended accommodations differently in different locations, sometimes using older equipment as an accommodation and often depending on the professor's interest and willingness to accommodate.
- One community college was reported as refusing to provide physical accommodations for a student to navigate through a door.
- One community college was reported as refusing to provide interpreter services within the classroom.

- One community college was reported to discourage students with disabilities from registering for full-time schedules, assuming inability due to disability.
- Community college personnel report not being allowed to talk with parents.

An attendee suggested that the DORS Business Service Representatives or the DORS Transition Staff Specialist, once hired, could offer education on accommodations and support services to facilitate the success of students with disabilities in college settings.

### ***Recommendations.***

- To facilitate the success of individuals with disabilities being served at community colleges, first ensure that they are not spending extra time trying to facilitate to communication between DORS and DSS.
- Significant accommodation and accessibility issues were raised. Improved communication between DORS and DSS will facilitate more timely, proactive, and collaborative responses to these issues before too much time has elapsed for the student to be successful.

### ***Methodology:*** Literature Review.

CSNA committee members reviewed the U.S. Department of Labor (DOL) Office of Disability and Employment Policy (ODEP) July 2015 report on [REGISTERED APPRENTICESHIP PROGRAMS: IMPROVING THE PIPELINE FOR PEOPLE WITH DISABILITIES](#), and Department of Labor data regarding apprenticeship opportunities and participation in Maryland.

### ***Discussion.***

- 91% of Registered Apprenticeship (RA) Program participants remain employed after completing their programs, with average annual starting wages above \$50,000.
- Nationally, more than 52,500 participants graduated from the apprenticeship system during FY 15.

According to The United States Department of Labor, the chart below shows Maryland's 2014 Fiscal Year Totals as it relates to Apprenticeships:

<b>State Name</b>	<b>Active Apprentice</b>	<b>New Apprentices</b>	<b>Completers</b>	<b>Active Programs</b>	<b>New Programs</b>
<b>Maryland</b>	<b>9,130</b>	<b>3,630</b>	<b>545</b>	<b>1,228</b>	<b>88</b>

### ***Needs/Concerns Identified.***

- DOL found that, despite their initiatives in promoting apprenticeship, a majority of disability-serving organizations that work with people with disabilities may not be aware of the potential that exists for creating pre apprenticeship or Registered Apprenticeship (RA) programs.
- The scarcity of apprenticeship programs for people with disabilities suggests that disability service providers need to be made aware of RA programs and of the important role they can play in partnering with RA sponsors to support making RA opportunities available to more people with disabilities.
- Promoting more apprenticeship training through apprenticeship-community college collaboration can help to reduce costs for RA sponsors and disadvantaged students, including youth with disabilities, while also offering apprentices the benefit of earning college credits from community colleges.
- Need to increase recruitment efforts and tracking of apprenticeship participation and success at the community college and DORS level.
- During transition planning, students with disabilities should be encouraged to consider apprenticeship programs.
- Employer impressions of individuals with disabilities in general may be still be limiting the number of apprenticeship opportunities available to this population.

### ***Recommendations.***

- Collaborate with the Department of Labor, Licensing, and Regulation (DLLR), Maryland State Department of Education (MSDE), and the Maryland Higher Education Commission (MHEC) to convene a roundtable of employers to discuss how to increase the number of individuals with disabilities participating in pre-apprenticeship and apprenticeship programs in growth industries in Maryland.
- Identify community colleges to provide basic skills training and pre-apprenticeship programs to prepare students with disabilities for future

apprenticeship opportunities as a pre-employment transition service (work readiness).

- Use the Workforce & Technology Center (WTC) in various ways to increase the number of businesses offering apprenticeships in growth industries in Maryland and to increase the number of individuals with disabilities involved in these programs, such as:
  1. Assisting WIOA workforce partners to establish Pre-Apprenticeships and Registered Apprenticeship programs.
  2. Hiring additional DORS/WTC staff to provide consultation services to Community Colleges, DLLR and businesses, as needed to ensure individuals with disabilities are fully included in these pre-apprenticeship and registered apprenticeship programs.
  3. Assessing and recruiting youth and adults with disabilities for Pre-Apprenticeship programs and Registered Apprenticeship programs, and collaborating with BSR's & Pre-Employment Transition Services (Pre-ETS) providers to incorporate apprenticeships into transition planning.
  4. Explore if WTC can provide related technical instruction that can be used within a registered apprenticeship program.

## **D. Youth with Disabilities and Students with Disabilities**

### **1. Their Need for Pre-Employment Transition Services (Pre-ETS) or Other Transition Services.**

#### ***Prevalence.***

The need for pre-employment transition services and other transition services in Maryland is most evident when reviewing the post-school outcomes of students receiving Special Education, as reported on the Maryland Report Card.

- In 2014, 4.73% of students in Grades 9-12 receiving Special Education services dropped out of school, compared to 2.72% of students in regular education.
- 70% of the Class of 2014 students receiving Special Education services graduated high school, compared to 90% of students in regular education.
- Similarly, in 2014, 41.5% of students who received Special Education services in high school were attending college 16 months post high school, compared to 72.1% of students who were in regular education.

Theoretically, students receiving pre-employment transition services to increase, for instance, their self-advocacy and independent living skills, would be encouraged to remain in high school and plan to pursue post-secondary education or employment.

One would also expect that many of the Maryland high school students with Intellectual Development Disorder (IDD) or Autism who entered Grades 9-12 during 2015 would certainly benefit from such services. Regarding these students, the Maryland State Department of Education (MSDE) provides the numbers below.

High School Students with Intellectual Development Disorder (IDD):

- 9th Grade - 623
- 10th Grade - 476
- 11th Grade - 514
- 12th Grade - 665

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Total – 2,278

High School Students with Autism:

- 9th Grade - 883
- 10th Grade - 716
- 11th Grade - 748
- 12th Grade - 692

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Total – 3,039

During summer 2016, the George Washington University conducted an inter-disciplinary survey of vocational rehabilitation and special education staff involved in providing transition services specifically for students with autism. Of the 15 respondents who were from Maryland, 70% indicated that students, youth, and young adults seeking higher education do so by pursuing a two-year community college program.

## **2. Assessment of the Needs of Individuals with Disabilities for Transition Services and Pre-Employment Transition Services & the Extent To Which Such Services Are Coordinated with Local Education Agencies**

DORS would like to assess the current need for Pre-Employment Transition Services (Pre-ETS) statewide as well as what the availability is of such services. As a result of the Workforce Innovation and Opportunity Act of 2014 (WIOA), DORS is now required

to set aside 15% of our federal allotment to provide Pre-Employment Transition Services to students with disabilities between the ages of 14 and 21, and are to be available to all students with disabilities regardless of the severity of their disability.

Pre-ETS are very specific in nature and include the following:

- Job exploration counseling
- Work-based learning experiences
- Counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs
- Workplace readiness training to develop social and independent living skills
- Instruction in self-advocacy, including peer mentoring

### ***Background.***

DORS has been reviewing proposals submitted by CRPs, secondary schools, and colleges and universities, desiring to begin offering pre-employment transition services as a fee-for-service. The current, statewide distribution of these offerings is below:

- Region 1 has 1 CRP & 1 secondary school (Maryland School for the Deaf)
- Region 2 has 3 CRPs & 2 college programs
- Region 3 has 3 CRPs & 1 secondary school (Maryland School for the Blind)
- Region 5 has no CRPs & 1 college program
- Region 6 has 5 CRPs & no secondary or college programs

There are three additional programs available out-of-state for students who are deaf.

DORS seeks to use this CSNA to acquire a better understanding of the numbers of potentially eligible VR consumers who will be able to participate in these services in the next few years, as well as which LEAs are already providing these services, and where there may be opportunities for collaboration.

***Methodology:*** Survey of Local Education Agencies (LEA).

- Surveys were sent to each of the Local Education Agencies to determine (1) which of the 5 Pre-Employment Transition Services are currently provided by the schools as part of secondary transition, (2) of those services provided, which can be further enhanced by partnering with DORS, and (3) which services are not currently available in their respective geographical areas.

- Data collection related to the number of potential Pre-Employment Transition Services applicants statewide utilizing both data provided by MSDE and data found on the Maryland Report Card.

### ***LEA Survey Responses.***

Note: The information summarized below represents only the responses received from seven of the local education agencies surveyed. This is considered a representative sample for purposes of this CSNA.

#### **Job Exploration Counseling:**

- Baltimore County Public Schools
- Caroline County Public Schools
- Carroll County Public Schools

#### **Work-Based Learning:**

- Baltimore City Public Schools
- Caroline County Public Schools
- Carroll County Public Schools
- Dorchester County Public Schools
- Howard County Public Schools
- Worcester County Public Schools

#### **Counseling on Enrollment Opportunities:**

- Baltimore City Public Schools
- Caroline County Public Schools
- Carroll County Public Schools
- Worcester County Public Schools

#### **Workplace Readiness Training:**

- Baltimore City Public Schools
- Baltimore County Public Schools
- Caroline County Public Schools
- Carroll County Public Schools
- Dorchester County Public Schools
- Worcester County Public Schools

#### **Self-Advocacy Instruction:**

- Caroline County Public Schools
- Carroll County Public Schools

- Worcester County Public Schools

### ***Needs/Concerns Identified.***

#### **Baltimore County Public Schools:**

- Not enough school staff to do career exploration in the community
- Would like to see DORS assist with Career exploration – maybe through presentations
- Would like to see DORS assist with job development for those required to complete service learning hours
- Need workplace readiness training available for diploma kids
- Need Self-Advocacy Instruction

#### **Baltimore City Public Schools:**

- Travel Training
- More Career Assessments and job exploration counseling
- More job readiness and placement opportunities

#### **Carroll County Public Schools:**

- More Counseling on Post-Secondary enrollment opportunities

#### **Dorchester County Public Schools:**

- Expand work-based learning opportunities

#### **Howard County Public Schools:**

- Summer Employment not available

#### **Worcester County Public Schools:**

- More opportunities for Career counseling for diploma kids A need to expand work
- More work based learning, work readiness training, self-advocacy instruction needed for diploma kids

#### **Maryland School for the Blind**

- More Pre-Employment Transition Services in general for those with severe developmental disabilities
- More work based learning for blind students



- More opportunity for Workplace readiness skills

**Methodology:** Data Collection.

Students with 504 Plans in 2015  
(Source: Maryland Report Card):

- Elementary Students – 8,317
- Middle School Students – 8,010
- **High School Students - 10,379**

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Total - 26,706

High School Students with Individualized Education Plans (IEP) in 2015  
(Source: Maryland State Department of Education):

- **9th Grade – 9,973**
- **10th Grade – 7,232**
- **11th Grade – 6,110**
- **12th Grade – 4,025**

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Total - 27,340

**Total Number of Students Potentially Requesting Pre-ETS in FY 16: 37,719**

**Needs/Concerns Identified.**

- It is anticipated based on data collected that the number of students accessing DORS services will increase each year
- It is anticipated based on data collected that the number of HS students with Autism will increase each year
- It is anticipated that the number of students with IDD accessing DORS services will increase each year as a result of WIOA requirements related to Section 511
- DORS Transitioning caseloads will continue to grow each year;

**Recommendations.**

- DORS needs to continue to expand the availability of Pre-Employment Transition Services statewide, and especially in DORS Region V.
- DORS needs to align its staffing and caseload assignments to have sufficient counselors available to coordinate the provision of pre-employment transition services.

### 3. Pre-Employment Transition Services 15% Set-Aside Calculation.

#### *Number of Students with Disabilities in the State.*

In any given year over the next four years, approximately 10,000 high school students with 504 plans and 27,000 students with Individualized Education Plans could potentially request pre-employment transition services.

During federal FY 15, DORS received 1,061 applications from students in school who were less than age 22. During federal FY 16, DORS received 1,527 applications from students in school as of August 24, 2016, and anticipates an additional 100 applications from students in school by September 30, 2016. Given these numbers, DORS is projecting the number of applications from students with disabilities to increase by approximately 50% each year for the next three years, as follows:

- FY 17: 2,440 students
  - FY 18: 3,660 students
  - FY 19: 5,490 students
- Estimated Total: 11,590 students**

#### *15% Reserve Fund Usage to Date and Fiscal Forecasting:*

In FY15, the agency needed to reserve \$6,000,000, which was the equivalent of 15% of its VR grant for that year. Assuming that figure does not change over the next three years, then DORS will need to pay \$18,000,000 in the provision of pre-employment transition services between FY 17 and FY 19.

At the close of FY 16 and after 24 months available to spend the initial 15% reserved out of the FY 15 VR grant, DORS will have spent approximately \$4,000,000 in pre-employment transition services, including purchased services, agreements for Pre-ETS Summer Youth Employment Programs, and DORS personnel costs. That is an average of \$2,000,000 per year. During that same period of time, 1,850 students will have been served. This means the average per student cost for pre-employment transition services is currently \$1,080.00.

Dividing the estimated \$18,000,000 combined 3-year reserve by \$1,080 per student indicates that DORS will need to provide pre-employment transition services for approximately 16,666 students between FY 17 and FY 19.

The estimated total number of students who will require pre-employment transition services, based on a projected 50% increase in applications each year for the next three years, is 11,590. This is 5,076 students shy of the number required to expend the

15% reserve fund, and that assumes that each of those 11,590 students will require DORS funding to receive pre-employment transition services.

This suggests that a minimum of \$5.4 million may need to be spent on authorized pre-employment transition services activities to ensure that the 15% reserve fund is fully expended.

The opportunity to hire six, full-time, contractual counselors specifically to provide pre-employment transition services will certainly help boost the number of students provided pre-employment transition services. However, these counselors will not be able to manage the number of students required to pay out the reserve fund fully. They will need assistance, either from other VR counselors or, when possible, newly hired staff.

### ***Recommendations:***

- DORS is committed to serving students with disabilities by providing Pre-Employment Transition Services. The delivery and tracking of these services to Students with Disabilities and eligible Youth with Disabilities will require DORS to update its Memorandum of Understanding with each of the local education agencies. The MOU will need to clearly delineate who will be providing and funding the services in order to avoid duplication and/or supplantation of services.
- Consider how to increase the number of counselors dedicated to the provision of pre-employment transition services.
- Consider how to use the 15% reserve fund for authorized activities.

## **II. Assessment of the Need to Establish, Develop or Improve Community Rehabilitation Programs within the State**

### ***Introduction:***

The success of DORS consumers is due in many instances and respects to the partnerships DORS has established with Community Rehabilitation Programs which provide a number of direct services throughout the state. Efforts are made throughout the year to ensure that there is a sufficient number of CRPs to provide employment services to consumers statewide.

To assess the need to establish, develop or improve community rehabilitation programs within the State, DORS reviewed the results from (1) a survey of CRP Executive Directors, CRP front line staff and DORS staff as part of a grant received from ICI UMass in 2014/2015, (2) four focus groups related to the ICI UMass project, (3) an

Agency survey regarding unmet needs and (4) focus groups conducted through Agency Public Meetings in 2016.

**Methodology:** DORS Fee Schedule Review.

Community Rehabilitation Program Distribution by DORS Region:

- Region 1: 41
- Region 2: 46
- Region 3: 32
- Region 5: 44
- Region 6: 43

### **Discussion.**

While allocation of CRPs by Region would appear to be robust, there are a number of CPRs that have become relatively inactive and provide little to no services in collaboration with DORS. For Region 1: 2 providers. For Region 2: 6 providers. For Region 3: 4 providers. For Region 5: 7 providers and Region 6: 10 providers.

**Methodology:** ICI Survey of CRPs and DORS Staff.

Information was requested from CRPs and DORS staff as part of a DORS project to consider a rate adjustment for job coaching for job development and job coaching for job support and to elicit feedback on the current service structure, reporting requirements, and monitoring areas. 51 responses were received from CRPs and 48 from DORS staff.

### **Discussion.**

Information from both CRPs and DORS staff indicates: a desire for additional training and job placement programs for consumers available in all geographic areas, more training available for CPRs to increase skill level of job placement staff (especially related to customized employment and disability information as it pertains to an individual's limitations on a job and in the selection of an appropriate placement), and higher level skills training in IT, administrative, and medical office work. Additionally, there were numerous comments from both CRPs and DORS staff that better collaboration is needed in the areas of communication, especially in returning phone calls and emails.

**Methodology:** ICI Focus Groups of DORS consumers.

4 groups were held as part of information gathering for the ICI project. Two groups took place in a rural setting and two in a suburban area. At each location one group was

scheduled for the morning and another in the afternoon. A total of 2 consumers attended each session.

### ***Discussion.***

While turnout may have been low, there were similarities in information consumers shared: concerns about waiting for services at both the CRPs and DORS and the amount of actual time staff spent with them in the provision of services. Of particular interest was that consumers who had a clear understanding of the roles and responsibilities (theirs, the DORS counselor, and the provider) responded more favorably to services. Consumers who were satisfied with communication and their DORS counselor reported more optimism regarding their outcome and overall satisfaction.

### ***Methodology:*** 2016 DORS Survey.

As part of the current Needs Assessment, a survey was made available on line to consumers, advocates, families and CPRs. Responses were received from consumers, parent/guardians, family members and service providers.

### ***Discussion.***

An overarching theme was the need for transportation and employment options close to public transportation, especially in rural areas. Additional comments included: a need for services designed for individuals who require a higher level/professional placement than what is typically considered entry level, a need to address the prolonged wait for assistance in job development, and for DORS to work more closely with CRPs who are referring consumers to DORS.

### ***Methodology:*** 2016 DORS Public Meetings.

Information from CRPs that attended the public meetings indicated a need for employment services for students with mental health needs and a need for funding to develop programs not just fee-for-service. Areas for expansion include CRPs for the Deaf Blind, Deaf and Hard of Hearing, and Individuals with Blindness. These are also addressed in other areas within the needs assessment.

### ***Recommendations:***

- Develop additional training for both CRPs and DORS staff in service areas, particularly for job development and services that are new to both entities such as customized employment.

- Continue to enhance collaboration between DORS and CRPs focusing on communication and working relationships.
- Determine if inactive CRPs will begin to provide services to DORS consumers and if not, remove from DORS CPR list.
- Develop resources, including CRPs, for DORS counselors to be able to access employment services for individuals requiring professional level job placement.
- Expand the number of CRPs to provide employment services for specialized populations including Deaf Blind, Deaf and Hard of Hearing, and Individuals with Blindness.