VOCATIONAL REHABILITATION ADMINISTRATION PORTION UNIFIED STATE PLAN 2024-2027

(FINAL APPROVED)

PROGRAM-SPECIFIC REQUIREMENTS FOR STATE VOCATIONAL REHABILITATION (COMBINED OR GENERAL)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

A. STATE REHABILITATION COUNCIL.

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

Select A or B:

- (A) is an independent State commission
- (B) has established a State Rehabilitation Council
 - (B) has established a State Rehabilitation Council

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

Council Representative	Current Term Number/Vacant	Beginning Date of Term
		Mo./Yr.
Statewide Independent Living	Vacant	
Council (SILC)		
Parent Training and Information	First Term	05/2024
Center		
Client Assistance Program	Ongoing	01/2017
Qualified Vocational	Vacant	
Rehabilitation (VR) Counselor		
(Ex Officio if Employed by the		
VR Agency)		
Community Rehabilitation	First Term	07/2021
Program Service Provider		
Business, Industry, and Labor	First Term	07/2021
Business, Industry, and Labor	First Term	10/2021
Business, Industry, and Labor	Vacant	

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Business, Industry, and Labor	Vacant	
Disability Advocacy Groups	Second Term	07/2021
Current or Former Applicants for, or Recipients of, VR services	First Term	10/2023
Section 121 Project Directors in the State (as applicable)	N/A	
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	First Term	06/2021
State Workforce Development Board	First Term	04/2022
VR Agency Director (Ex Officio)	Ongoing	10/2021
Parent, Family Members or Advocates for People with Disabilities	First Term	10/2021

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

The Qualified Vocational Rehabilitation (VR) Counselor is a recent vacancy. The SRC sent the announcement to fill the position to the VR State Agency, the Graduated School of Rehabilitation Counseling and the Rehabilitation Counselors' College (Association).

On December 2023 the SRC sent to the Governor's Office a recommendation of a candidate to fill the Business, Industry and Labor Sector vacancy. Waiting for approval. Still having another vacancy for this sector (no candidate identified yet).

The ILC haven't send a representative although all the SRC follow up in this matter. The VRA will directly contact the ILC and the Governor's Office to follow up on the vacancies and expect results before September 2024.

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

The Puerto Rico State Rehabilitation Council (CERPR by its Spanish acronym) participated in the actions carried out by the Vocational Rehabilitation Administration (VRA) to comply with the development of the Comprehensive Statewide Needs Assessment of Vocational Rehabilitation Services, carried out during 2023. Also, it had the opportunity to provide its feedback regarding the Goals, Priorities and Strategies developed based on the study. Therefore, it provides the following recommendations to the VRA.

Goal 1

Achieve greater effectiveness in the process of providing services to applicants/consumers for a successful integration into the labor force.

Recommendations or Input of the CERPR:

- 1. Agrees and sees the established goals, priorities, and strategies as favorable, however, it recommends the agency makes sure to have the appropriate professionals to carry out and achieve the proposed strategies.
- 2. Requests information related to the established protocol for an employer to request the salary incentive.
- 3. It recommends that the protocol of granting the salary incentive is accessible and viable for the employers that are interested in requesting it.
- 4. Volunteers to collaborate with the VRA offering guidance to employers related to the benefits of hiring people with disabilities and other possible topics of interest. It also recommends offering guidance to the employers about the tax credits or exemptions that may be available to provide reasonable accommodations to its employees. The ADA National Network can be approached to receive guidance and assistance about these matters.
- 5. Recommends examining the viability of providing training to the agency's personnel in current affairs and to the employers in matters of interest, through the Technical Assistance Centers or other resources.
- 6. Recommends approaching the Manufacturers Association and requesting allowing the ARV to have some type of participation in the association's activities, with the objective of encouraging the employment of persons with disabilities.
- 7. Recommends approaching the Secretary of the Puerto Rico Department of Economic Development and Commerce to achieve an alliance to allow greater approximation with the employers and collaborative employment projects.

Goal 2

Contribute to increasing the skills and opportunities of students with disabilities through the provision of Pre-Employment Transition Services.

Recommendations or Input of the CERPR:

- 1. Agrees with the strategies designed for the provision of Pre-Employment Transition and Transition Services.
- 2. Recommends serving the greatest amount of youths and students with disabilities in all of Puerto Rico possible and provide more attention to the least served students with disabilities outside of the metropolitan area, especially in the center of the island.
- 3. Recommends maintaining the participation of the VRA personnel in the meetings of the Programming and Placement committee (COMPU by its Spanish acronym) of the young persons in transition and, for that, to have more communication between the Department of Education and the Vocational Rehabilitation Administration to find strategies to allow greater participation of the ARV personnel in those meetings during the whole year.

Goal 3

Strengthen administrative, programmatic, and technological procedures to achieve the required institutional efficiency.

Recommendations and input of the CERPR:

- 1. Recommends approaching the universities that offer careers in marketing, public communication, production, and digital video editing to explore a possible collaboration that allows the students to develop tools to accelerate the broadcasting of information and services; among them videos directed toward the students with disabilities, applicants/consumers, and employers. Among the possible educational institutions and other entities that could be contacted would be, for example: Sagrado Corazón University (Community Outreach area), Cinematography Science, Arts and Television College (CCAT by its Spanish acronym), Atlantic University, Channel 6, Arts and Technology Lyceum, among others.
- 2. Recommends the Vocational Rehabilitation Administration improving its webpage where all Normative Communications can be available to the people with disabilities, family members and public that want to know the public policy of the Administration. It recommends using the webpage of the Department of Education as reference, which is accessible and has the procedures manual, circular letters, forms, etc. for the benefit of the population which they serve.
- 3. Requests the ARV to share with CERPR the Normative Communications in the draft stage, so that the Council can carry out its role, established by the Rehabilitation Act, to actively participate in the development of the public policy of the Agency.

5. PROVIDE THE VR AGENCY'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS, INCLUDING AN EXPLANATION FOR THE REJECTION OF ANY INPUT AND RECOMMENDATIONS.

List each recommendation/input followed by the VR agency response

The VRA reviews the recommendations made by the CERPR to the VRA Portion of the Unified State Plan and presents the following information:

Goal 1

- 1. The VRA is constantly evaluating the personnel and recruiting needs, as well as the opportunities to establish collaboration with other entities to carry out some of the plan strategies.
- 2. Normative Communication No.: 2023-08, of Dec 14, 2022, establishes the procedure for the granting of salary incentives. It will be shared with CERPR.
- 3. The protocol established for granting incentives requires the employers to present the documents established by law to comply with the granting of contracts in the Government of Puerto Rico (ex. Certificate of Good Standing, among others).
- 4. We accept the recommendation.
- 5. We accept the recommendation.
- 6. VRA signed a Memorandum of Understanding (MOU) with the Puerto Rico Association of Industrials with the purpose of establishing an 'Alliance for work development for everyone in PR'. Through it, VRA will provide guidance to employers about vocational rehabilitation services, sensibility and other subjects, this, with the purpose of facilitating the referrals to promote the placement and teamwork. The first formal meeting related to this MOU to outline the work plan that will begin in all regions will take place on December 2023.
- 7. We accept the recommendation and inform you that the VRA participates in the meetings of WIOA State Board, that take place at the Department of Economic Development and Commerce. Also, VRA participates in the 15 Local Boards of Labor Development, island wide.

Goal 2

- 1. We adopt the reaction.
- 2. VRA provides services to youths and students with disabilities throughout the island following the same procedure in all regions.
- 3. We accept the recommendation and will approach the Department of Education to evaluate possible strategies.

Goal 3

1. We inform the CERPR that the VRA is working, through the Office of Communications, to establish agreements with institutions like the ones mentioned.

- 2. VRA is in the process of updating its webpage so it's easier for the user and has the necessary information. We adopt the recommendations, and they will be taken into consideration during this process.
- 3. We accept the recommendation and, as agreed previously with CERPR, we will begin the presentations of the draft of the normative communications, as of January 2024. In June 2023, the ARV had a monitoring process by the RSA, where the review of some public policies was recommended. RSA submitted the final monitoring report on April 2, 2024. Within the monitoring process, the VRA is awaiting approval of the Corrective Action Plan, among which are the communications to be reviewed. Once RSA approves the submitted Plan, draft communications will be submitted to the Council for review and corresponding recommendations. A time will be established for this process.

B. COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT (CSNA).

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

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

A. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES AND THEIR NEED FOR SUPPORTED EMPLOYMENT;

In this and the following sections, the results of the most recent Comprehensive Statewide Needs Assessment of Rehabilitation Services, carried out by the company Énfasis Puerto Rico, are presented. The contract for said study was signed in June 2023 and the final findings report was presented in November 2023. It should be noted that the VRA has worked on several of the findings presented below.

Before presenting the specific needs of individuals with the most significant disabilities, required under this section, we will present the Executive Summary explaining the methodology and general recommendations of the researchers.

EXECUTIVE SUMMARY

Introduction

• Goal: The Comprehensive Statewide Needs Assessment of the Vocational Rehabilitation Services in Puerto Rico 2023, from now on 'the Study', has as its goal: to provide the Vocational Rehabilitation Administration (VRA) and the State Rehabilitation Council of Puerto Rico with a document with valid and reliable quantitative and qualitative data on the needs of people with disabilities and the needs for rehabilitation services in Puerto Rico that allow them to develop their goals, priority areas and strategies; as well as review and strengthen vocational rehabilitation services as part of the Unified State Plan that will be submitted to the federal government in 2024. One of the objectives was to analyze the needs of specific groups with the purpose of identifying unmet or poorly met needs and emerging needs [individuals with most significant disabilities, students (14 to 21 years

old, studying at the secondary or post-secondary level), young people (14 to 24 years old, studying or not), and individuals belonging to minorities]. Énfasis is an independent consulting firm created in 1999 by Dr. Myrna Rivas, a social psychologist, which develops studies, assessments, and technical assistance for public and private entities in the social, education, health, and economic development areas. Énfasis was responsible for the previous 2020-2021 Study.

- Methodology: The information was collected through various primary and secondary sources. This multi-methods approach allowed us to contrast and compare the data obtained and conduct the triangulation of the findings, which provided greater reliability and validity to the analysis. As part of the Study, 41 semi-structured individual interviews were conducted with VRA key individuals and 46 with external key individuals, including Workforce Innovation and Opportunity Act (WIOA) partners. The Consumer Survey was administered, which achieved the participation of 382 applicants/consumers from six VRA regions (with a margin of error of +/-5% for a 95% confidence level); another Survey was administered that achieved the participation of 172 professionals and employers; eight focus groups were held with applicants/consumers; innovative and successful practices were identified; the socio-economic context of Puerto Rico was analyzed; and conclusions and strategic recommendations were prepared.
- Consumer profile: 53% of the applicants/consumers surveyed were men; this proportion was reversed in the focus groups. The average age was 25.9 years. 67% were between 16 and 24 years old. 41% were studying without working and 32% were working at the time of the consultation. 49% are outside the labor market, either because they study, are unemployed and are not looking for work, have conditions that prevent them from working, and so forth. Among those who work or worked, 51% indicated that they do so with a full-time employer; 35% part-time, and 14% do it in self-employment or their own business. 14% were supported employment consumers. Compared to the 2020-2021 Study, it was found that they carry out a greater diversity of jobs; the increase in jobs related to health, administrative, professional, and manufacturing services is striking. In the focus groups, a third of the individuals were working, another was studying, and another was unemployed and looking for work.
- Profile of professionals and employers: 68% were women; and 48% had been in their jobs for between 0 and 8 years, although key individuals had been in their jobs for much longer. 38% of those surveyed were from the VRA; 24% from other public agencies; 19% from employers, employment agencies, and so forth; 10% from community entities; and 10% from post-secondary institutions. Conditions that they serve or employ the most: Cognitive disorders; autism spectrum disorder; specific learning problems; psychosocial; attention deficit hyperactivity disorder; and depression. VRA employees perceive a significant increase in cases of autism compared to the previous Study. The families were identified as having limited economic resources (below the poverty line) and with little support.

Applicants/consumers consulted and their relationship with the VRA

- Initial processes: The majority of applicants/consumers indicated that they had learned about the VRA services through the public school where they studied. Several focus group participants who studied in public and private schools indicated that in private schools they were not told about the VRA. The majority indicated that the initial orientation they received at the VRA was "very good" (52%). Their main recommendations were: to have information and requirements accessible online; provide information in writing and with easy-to-understand writing and language; guide students and their families at various grade levels; and that the VRA staff be more receptive to repeat the orientation as many times as necessary.
- Eligibility process: 44% described the process for determining eligibility as "very good." This was the only topic where the perception of consumers with supported employment was more negative than the rest (in all the others, their evaluations were more positive). Consumers in the Southern Region expressed more positive satisfaction. In the focus groups, opinions were more divided: about 60% described the process as clear, that it lasted a reasonable time, and that the documents required were also reasonable; and the others indicated the opposite, that it took too long, they required many documents and evaluations and that they had to visit the VRA offices many times. 52% of those surveyed indicated that the process was carried out within the time established by the agency (60 days). A higher proportion of individuals in the Metro East and Central East regions expressed that the process "took longer." The main recommendations were: to expedite and comply with the stipulated time; inform and communicate to applicants what is happening with their case; follow up on cases, especially if they are under evaluation by other professionals or there was a change of counselor; request fewer evaluations, have professionals who can do them faster and at no cost to the applicant; have greater sensitivity and empathy; and effectively integrate technology and applications (apps) in the procedures and monitoring of the process. In the focus groups, they recommended that counselors communicate periodically with applicants, especially if the process has exceeded 60 days.
- Start of services: 42% indicated that the information they received about procedures and next steps (after being eligible) was "very good." Half of the people in the focus groups indicated that everything was very good, and the other half felt confused and had many doubts about what services would be offered to them, when, how, and so forth; who would call them; how often, and so forth. 37% indicated that the waiting time to receive the VRA services was "very good." This was one of the topics where lower satisfaction was observed (as in the previous Study). The majority recommended that once eligibility is reported, clearer written information should be provided on the procedures and next steps to initiate services and that it should be clearer on the VRA portal site. Several also indicated that they did not fully understand what services they would receive; they found out along the way.
- Relationship with counselors: 45% of respondents indicated that communication with their counselor was "very good." 22% indicated that they saw or spoke to each other at least once a month; and 19% every two to three months. 8% indicated that they had never spoken to or seen their counselor, only their technician. Only 30% of surveyed rated the

frequency as "very good." In the focus groups, the majority rated the frequency as insufficient. This was one of the topics with the lowest satisfaction (as in the previous Study). The Metro East Region had the most negative opinions and the South, West, and North regions had the most positive opinions. These recommended the counselors to be more receptive to answering questions; establish from the beginning what means they will use for communication between the parties; and how often the appointments would be.

- The counseling service: 45% of those surveyed described the services they have received directly from their counselor as "very good." 42% consider that their counselor did help them a lot in selecting an appropriate employment goal, and 33% expressed that they were "very satisfied" with the employment goal they selected with their counselor. In the focus groups, about 60% described the services as very positive for their personal development, respectful when defining goals, and expressed gratitude, but the others described counselors as deficient and shared their displeasure and dissatisfaction. They allege that the process of defining the goal was overwhelming. 43% indicated that communication with their counseling services technician was "very good." The main recommendations for counseling services were: to increase the frequency of contacts; listen, be more receptive, empathetic, and respectful of consumers' interests; review, increase, and expedite financial aid; give more follow-ups; and be more up-to-date with new careers, occupations, and youngsters' interests.
- Relationship with other VRA employees: 50% of those consulted did not give an opinion about the Assessment and Adjustment Centers (AAC) and 65% did not give an opinion about the Support and Employment Modalities Centers (SEMC, or "CAME" by its Spanish acronym) because they had not received these services. Among those who did respond, 47% indicated that AAC's communication and services were "very good"; and 47% also indicated that SEMC's communication and services were "very good". Several unemployed consumers expressed in the focus groups their frustration for not receiving more support in their job search and recommended that SEMC counselors and promoters work more as a team and be more initiative-taking in supporting and monitoring consumers. On the other hand, 44% indicated that the treatment of VRA employees was "very good" (it was 38% in the previous Study), as well as the administrative staff treatment.
- Support for employment and self-employment/own business: Only 19% of consumers indicated that they achieved some type of employment experience or job through VRA support. The highest proportion of individuals who did achieve support was observed in the Metro East Region; this is striking because this Region obtained a lower level of satisfaction on other issues. When compared with the previous Study, a reduction is observed in the perception of support received (it went from 28% to 19%). Only 31% expressed being "very satisfied" with the support, it was one of the topics with the lowest satisfaction. Much dissatisfaction was also expressed in focus groups; however, some participants were very grateful for the support received both for jobs and for businesses of their own. 59% of consumers indicated that they are interested in self-employment or businesses of their own and recommended that VRA focus much more on this alternative because even if someone is not interested at the moment, they could be interested later at another time in their life.

The needs of people with disabilities and underserved groups

Applicants/consumers' needs: The main general needs were: reasonable accommodations in employment (61%); financial aid; coordination with employers and employment agencies to achieve a first opportunity or employment experience; vocational or technical training, courses, or workshops; mental health services (including pharmacological); transportation; and development of innovative projects. The main needs in the area of vocational rehabilitation were: reasonable accommodations (59%); financial aid; coordination with employers and employment agencies; vocational or technical training, courses, or workshops; transportation (including driving classes and vehicle adaptation); coordination of services; and development of innovative projects. The need for more support was highlighted in the focus groups to obtain and retain employment; financial aid (faster and larger amounts); study and assistive technology equipment and materials arriving on time; and having access to psychological services (the topic of mental health came up in all groups).

Regarding unavailable services: 47% of those consulted indicated that "all the services" they have required from VRA have been available (it was 39% in the previous Study). Still, those who indicated that "very few were available" also increased (it went from 8% to 16%). They perceive that services that have been missing the most are: financial aid, which does not arrive or arrives very late (40%); support in finding or retaining employment and employment accommodations; vocational counseling and evaluation; and "all have been absent." Other services also mentioned were: psychological services; physical and other therapeutic therapy; occupational therapy, adjustments, and refreshers; transportation and mobility (including driving classes and vehicle adaptation); assistive technology equipment (including wheelchairs and equipment for the visually and hearing impaired); and of independent living and activities of daily living. 37% described the services as "very agile." The results were slightly more negative than in the previous Study: the "poorly" and "very poorly" totaled 14% and now 20%. Individuals who responded poorly or very poorly explained that they did so because of: the slowdown in the procedures to obtain a response or resolution for their case (45%); poor communication with the counselor; lack of access to financial aid, equipment, and materials; the lack of support for job search and placement; the lack of evaluations; little access to psychological services and therapies of all kinds; and the lack of support to obtain any professional license or certification when finishing school. In the focus groups, the individuals most satisfied and grateful with VRA had participated in supported employment services, Employment Clubs, and Work-Based Learning Experiences (pre-employment) or had received direct support for their jobs or own businesses.

Professionals and employers' opinions

The main general needs of the population with disabilities identified by professionals and employers were: reasonable accommodations in employment (47%); coordination with employers and employment agencies; vocational or technical training, courses, or workshops; mental health services (including pharmacological); financial aid; transportation; and self-intercession. Numerous complaints were collected about APS Healthcare's mental health services in all regions and their unwillingness to coordinate. The main needs in the area of vocational rehabilitation were: vocational or technical training, courses, or workshops (38%); reasonable accommodations in employment; coordination with employers; development of innovative projects; independent living services; coordination of services; and supported employment

services for the most significant. Internal key people highlighted the need for the VRA to have more and better-paid employees (counselors, vocational evaluators, transition analysts, occupational therapists, and sign language interpreters). People from other sectors highlighted: the need to insert the VRA into the business ecosystem to improve coordination with employers; strengthen employment services; interagency coordination; and those referred to independent living services.

Employers, factors preventing employment, and market trends in the VRA

- Employers' perception: Consumers gave 4.3 (on a Likert scale from 1 to 10) to the willingness of employers to recruit people with disabilities in Puerto Rico, professionals, and employers 4.5, internal key people 6.5, and external key people 7.5. Consumer evaluations were more negative than in the previous Study. Although the labor market appears to be more open to recruiting, they still do not experience it. In the focus groups, half expressed a negative perspective, and the other half observed a greater willingness and talked about their positive experiences with employers. The majority of professionals and employers consulted indicated that employers, although they need to recruit, still do not know how to make reasonable accommodations in the workplace, since they think they are expensive or complicated (65%); they fear lawsuits; Today's jobs require the employee to master multiple skills; and they are unaware of the positive qualities and successful experiences with this population. The premise "previous negative experiences with this population" was only mentioned by 3%. The majority recommended training employers, employment agencies, and Human Resources Managers on VRA services, legislation, reasonable accommodations, and successful cases. Key people recommended: training on accommodations with practical examples and successful cases that show the good qualities of these employees (stability, loyalty, responsibility, and so forth); creating a network of employers who are available to hire; and that the VRA has a more initiativetaking approach to the business sector. To further engage employers with the employment of students and young people with disabilities, it was recommended to continue with the Work-Based Learning Experiences model of the pre-employment transition services (PRE-ETS), which is perceived as one of the primary areas of the VRA progress in recent years.
- For applicants/consumers, the factors that prevent people with disabilities from obtaining or retaining employment were: "society's attitude, cultural prejudices" (49%); the bureaucracy and complexity of VRA processes; lack of support and monitoring in the workplace; adequate reasonable accommodations are not made in the workplace; and the disconnection between goals, skills and the labor market; lack of relation between what is studied and the employment. In the focus groups, they highlighted the need to have more support from the VRA in the employment search; more monitoring once they are at work; and access to mental health services to stay stable. For their part, half of professionals and employers pointed out the "little willingness of employers to recruit people with disabilities, fear of reasonable accommodation, lawsuits, dismissal, and so forth." Other factors were: the lack of a robust public transportation system; reasonable accommodations are not made; today's jobs require multiple skills to be mastered; lack of support and monitoring in the workplace; and lack of access to mental health and

emotional support services (including pharmacological); and the family's attitude or circumstances toward employment. Again, many criticisms of APS Healthcare services became known.

• Market trends in the VRA: The professionals and employers surveyed gave 4.6 (on a scale of 10) to the topic of how adapted VRA services are to labor market trends, internal key people 6.4; and external people 6. The recommendations were: training employers, employment agencies, and Human Resources Managers on VRA services, legislation, reasonable accommodations, and successful cases (41%); training counselors; and integrating more STEM occupations, teleworking, and innovations in employment options. Key people from other sectors were more insistent that the VRA must continue to create more links with the business ecosystem; continually train all their staff on the labor market since topics are continuously changing; promote more remote employment and teleworking; and promote more self-employment and/or own business initiatives.

Employee training, interagency collaboration

Training: The main recommendations of those surveyed were: to have a continuous training system within the VRA for all employees; offer mentoring and support for several months to new employees to facilitate their immersion and increase their retention and loyalty; training to manage the growing population with autism spectrum disorder; training on how to integrate technological goals, remote work, and self-employment. Learn more about the latest trends in the current job market (new jobs, changes in application processes, new resumes, interview formats, and so forth) and new assistive technology equipment. Key people from other sectors further emphasized that the VRA must strengthen its staff's knowledge of reasonable accommodations and how to communicate them clearly and in simple language to employers; employment statistics, occupation projections, and the business ecosystem of Puerto Rico; types of assessments (ecological, adaptive, test work experiences, simulations in real scenarios and other alternative vocational assessments). Other recommended topics were: mental health and drugs; self-employment and owning businesses; new careers and occupations of interest to new generations; the generation of Centennials, their interests and how to work on social skills (soft skills); and the effective treatment, communication, and follow-up of younger consumers (customer service).

Interagency coordination: Although there have been specific advances in the past three years, coordination between entities that serve people with disabilities in Puerto Rico is still perceived as weak and disjointed and with few links with the labor and business markets. The recommendations for coordination between the VRA and the DEPR were: to strengthen interagency communication at the central and regional levels through the designation of liaison people in each region who serve as a bridge to alleviate the communication of situations, attend to special cases, communicate agreements and guidelines, guide, and so forth; and to review public policy and sign new agreements between both agencies that clarify issues such as evaluations and assistive technology equipment. Other recommendations were: that the VRA attend the COMPU and the DEPR inform more about the dates; and that the VRA periodically visits and guides school staff and families in the schools themselves. The recommendations for coordination between the VRA and post-secondary institutions were: to clarify and modernize the VRA's public policy on the offer of training and programs that it can support; and that the VRA

periodically guides key personnel of these institutions about their role and services, as well as the importance of the employment goal ("We are not a scholarship"); appoint liaison people; that the VRA be more open to communicate and address students' particular situations; that the VRA visit these institutions and learn more about the changing academic offerings; and establishing more agreements between the VRA and institutions that train professionals in the agency's difficult-torecruit areas to offer incentives to students, internships and practical work exposure experiences. Recommendations to improve overall the VRA coordination efforts were: to designate liaisons at the central level and in each region to improve communication with other agencies; sign an interagency agreement for the management of cases of children and young people with disabilities in the custody of the Department of the Family (exempt from parent authorization); guide other agencies and employer/business associations about their role, employment accommodations with practical examples and successful cases; sign agreements with new private health service providers; ask APS Healthcare for more collaboration and better service for its consumers; co-organize collaborative training (cross training) with various entities; sign more agreements with other public and private agencies; and attend to more activities and special events organized by other entities. It was also recommended that the VRA ask for support from the technology staff of the Department of the Treasury to support the technological transformation and modernization.

General recommendations

- 1. Applicants/consumers: The main recommendations are summarized as follows: more support in the search and placement of employment and the necessary accommodations; financial aid and equipment; greater agility in all agency processes, especially in the eligibility process, evaluations, and aid payment; more communication and monitoring of counselors; and access to mental health services. The top priority services: more support for employment, self-employment, and accommodations; more financial aid for studies, food, transportation, equipment, materials, and so forth; improving counseling service, communication with counselors and follow-up; further agility in all services; faster assessments; and access to psychological services.
- 2. Professionals and employers: The main recommendations are summarized as follows: to review, temper, and update the VRA public policy to simplify, streamline, and optimize internal administrative processes; have more and better-paid staff and offer them ongoing training; and increase the VRA communication, agreements, and collaboration with the business/labor ecosystem and other public or private agencies. To attract individuals over 30 years old, they recommended: outreach campaigns that show people of all ages; and doing more outreach work in communities, municipalities, schools with the Adult Education Program, health service institutions (specialized hospitals, 330 Primary Health Centers), and so forth. The highest priority services were: counseling; search and placement services (regular or sustained -CRP-); vocational evaluation; occupational therapy, adjustments, and skills review; physical therapy and other rehabilitation services; and DEPR/VRA transition. The VRA employees emphasized the need for more and better-paid staff in all positions, especially vocational counselors and evaluators, occupational therapists, sign language interpreters, and transition analysts.

Additionally, the need for more staff for AAC services, physical therapy, and other rehabilitation services was highlighted; to improve the facilities where these services are offered at the Medical Center. People from other sectors emphasized more the need to strengthen job search and placement; integrate technology into administrative issues; and offer all services more comprehensively - counseling, SEMC, and AAC - ("They have to achieve more organic services, so people don't feel like they are always fighting against the current to get services"). In addition, they recommended continuing to increase what has worked: CRPs, Employment Clubs, and pre-employment services.

3. Innovative and successful practices: The people consulted shared fewer examples than in the previous Study. Some of these were: Integrated Community Service Centers (One Stop); Youth Apprenticeship, On the Job Training, and new Work-Based Learning Experiences with specific profiles of young people that last all year; Summer Camps (public housing and non-public housing) to reinforce pre-employment and independent living skills; outreach campaigns with the model of the Fundación Adecco (Spain); projects aimed at promoting business incubation with family support; Independent Living Housing Projects; Sheltered Workshop Programs; and the PEERS® Certificate: Program for the Education and Enrichment of Relational Skills that has proven to be effective with young people with autism spectrum disorder, attention deficit hyperactivity disorder, anxiety, depression and other socio-emotional problems.

Conclusions and Recommendations of the Research Team

Context analysis: The socio-demographic context of Puerto Rico has changed profoundly in the past ten years. The population has decreased by about 459 thousand people between 2010 and 2021, -12%, due to migration and a sustained decrease in the birth rate according to Census data. In 2021, 17% were under 18 years old, 61% were between 18-64 years old and 22% were over 65 years old. The population with disabilities has also decreased, although less than the rest of the population, going from 726,334 in 2010 to 712,517 in 2021, a slight reduction of 2%. This figure represents 21.8% of the population of Puerto Rico. Compared to data from the United States, the population in Puerto Rico is almost double that of the United States (13.0%). People with disabilities between 18-64 years old went from 378,514 in 2010 to an estimated 319,046 in 2021, which represents a reduction of 16%. However, the most important redaction occurred among those under 18 years old, from 67,585 in 2010 to 52,025 in 2019, a reduction of 23%; and to 42,913 in 2021, a reduction of 18% between 2019 and 2021.

Among people with disabilities, the poverty level is above that of people without disabilities, 47.0% compared to 38.7%, according to the ACS 2021. According to data from the Planning Board (2023), 47% of personal income comes from government transfers and other sources; in 2005 they were 29%. Government transfers favor the population that is not of working age, but also the working-age population that does not have a job or is actively looking for one. According to ACS 2021 data, 49.5% of households in Puerto Rico (577,665) received financial aid for food. One or more people with disabilities lived in 46.7% (269,619) of these homes. According to data from the U.S. Bureau of Labor Statistics, the unemployment rate in Puerto Rico has been decreasing in recent years, it went from 16% in 2011 to 8% in 2019 and 2020 and decreased to 6.0% in 2022.

25% of people with disabilities of working age (18-64 years) in PR are employed (79,881 people), compared to 58.3% of people without disabilities at that same age, according to data from the ACS 2021. In total, 7.7% of employed people in PR have some type of disability. The proportion of people with disabilities outside the workforce is very high, 69.9% of the total ACS 2019. In 2021, this proportion increased slightly to 70.1%. The groups with a higher proportion of active people (18-64 years) in the labor market (employed or unemployed) are people with vision and hearing difficulties, on the other hand, the groups with a higher proportion of people outside the labor market are those with independent living, self-care, and cognitive difficulties. Although the groups with the most people employed, in absolute terms, are those with vision, hearing, and cognitive difficulties, two of these are also the groups with the greatest number of people outside the labor market: individuals with mobility and cognitive difficulties, followed by independent living.

When comparing the validated fiscal year 2019-2020 data with the Department of Education's 2009-2010 enrollment data, we see a significant decrease of -41% in just 10 academic years. In the case of private schools, the reduction is even more marked with a -49% reduction in enrollment. For its part, the proportion of special education students compared to total enrollment is increasing in both public and private schools. The DEPR in 2020-2021 reported that they have an enrollment of 276,413 active students and 86,301 of these are special education; which represents 31% of the enrollment (DEPR, 2020). The student ratio in the fiscal year 2022-2023 is 81,309, accounting for 32% of enrollment. In 2022-2023, the most frequent categories of disabilities for students in the Special Education Program were: specific learning problems; other health impairments; speech and language problems; autism; and intellectual disability.

Conclusions of the Research Team: The review of the contextual data presents us with Puerto Rico facing important challenges such as the low birth rate, the migration of younger families with children, and a significant decrease in enrollment at the school and post-secondary level. But at the same time, there has been an increase in the proportion of students with special needs and a rise in conditions such as autism spectrum disorder. The context also presents us with a historically low unemployment rate and strong demand among multiple economic sectors that proactively seek labor. Although the economic and labor scenario is much more positive than three years ago, the VRA has not been able to capitalize on it favorably, and therefore, generate benefits and consequent opportunities for people with disabilities whom it must guide towards an employment goal. The agency must be more initiative-taking, effective, and responsive in its relationship with four main players: (1) applicants/consumers and their families; (2) potential employers; (3) agency employees; and (4) other entities that serve this population.

Ten recommendations from the Research Team:

- (1) Towards greater agility: It is urgent to review, temper, and update the VRA public policy to simplify steps, shorten times, and optimize administrative and programmatic processes, in order to offer faster and quality services to participants.
- (2) Towards greater transparency: Completely refocus the application, eligibility determination, and direct service processes to align it with the viewpoint and needs of the applicant/consumer and their families.

- (3) Towards greater effectiveness: Modernize and diligently process everything related to the request, management, and disbursement of direct financial aid to consumers; and payments or disbursements to post-secondary institutions and purchases from suppliers or other entities.
- (4) Towards more models such as the CRP: Continue, expand, and allocate more economic resources to Community Rehabilitation Programs and bring more supported employment services to people with more significant disabilities in all regions.
- (5) Towards a clear answer: Establish a Special Working Group (Task Force) that works for a defined time in the identification, resolution, or closure of cases that are in the process of determining eligibility and that are over 60 days or more; those that are in evaluation or reconsideration processes or that have been denied on several occasions.
- (6) Towards a specialized service: Create a Specialized Unit to provide vocational rehabilitation service to students, young people, and adults with autism spectrum disorder.
- (7) Towards a focused and motivated human resource: Have more and better-paid personnel, who receive continuous training. The professionals most in need are: vocational counselors, vocational evaluators, occupational therapists, transition analysts, sign language interpreters, physical therapists, and other rehabilitation services.
- (8) Towards more and better allies: Establish clearer agreements with the DEPR that clarify multiple issues such as evaluations and assistive technology equipment, and other entities to provide mental health services, among others.
- (9) Towards leadership: The VRA must establish and lead a Work Committee to promote the successful employment of people with disabilities in Puerto Rico.
- (10) Towards new populations: Bring guidance to schools and educational programs outside the DEPR, homeschooling associations, children's shelters, foster homes, and so forth.

1. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES

Most significant needs: No differences were observed between the needs identified by consumers of supported employment services and the others; although these emphasized more the need for mental health services (including pharmacological), general health, physical therapies, and other rehabilitation services. The main needs identified by them were: reasonable accommodations in employment; coordination with employers and employment agencies; vocational or technical training, courses, or workshops; coordination of interagency services; transportation; and development of innovative projects. 85% of these indicated that all or most of the services they needed were available (the average for all respondents was 47%). As indicated before, except for the eligibility process, this group expressed a more positive perception of the services received. The main needs for the group of professionals and employers surveyed were: coordination with employers; vocational or technical training, courses, or workshops; reasonable accommodations in employment; development of innovative projects; and independent living services. Most key people highlighted: the need to continue expanding supported employment services in all regions; promote more agreements with Community Rehabilitation Programs (CRP); and guide employers on accommodations with practical examples.

Recommendations to improve VRA services for people with most significant disabilities do not differ from those of the rest of the population. However, professionals and employers insisted on the need to have more CRPs for supported employment services in all regions; have more staff, especially counselors, vocational evaluators, occupational therapists, and sign language interpreters; streamline the eligibility process; and review, temper, and update the VRA public policy to make the agency more agile, effective, and technological.

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

According to the ACS 2021, 99.2% of people in Puerto Rico were hispanic or latinos (any race). PRVRA provides services to all eligible individuals with disabilities and no particular minority group was identified as part of this study. However, with the purpose to expand and serve a larger group of people with disabilities, the Agency maintains collaborative efforts with different agencies that can refer to the ARV, such as the Alliance of Autism, Significant Intellectual Disability (Department of Health), State Insurance Fund, Department of the Family, Department of Education, Deaf-Blind Project, Homeless Project. These collaborations allow us to reach into some of the groups identified as underserved.

Professionals and employers identified the following groups of individuals with disabilities as less served:

In general: Individuals with most significant disabilities (46%); private school students; Department of Education of Puerto Rico (DEPR) students who are and are not in the Special Education Program; individuals with autism spectrum disorder; young people who dropped out of school; minors in State custody; homeschooling students; individuals who reside in rural areas; individuals with transportation difficulties; and interested in self-employment or own business. Internal key people highlighted more individuals with most significant disabilities, with orthopedic situations, blind, deaf, deafblind, and over 30 years of age; in contrast, external people highlighted students from private schools, young people with autism, intellectual disabilities, minors in State custody and individuals who were victims of accidents or violent incidents. Race, national origin, or membership in the LGBTQ community were not identified as exclusion factors in this Needs Study or the previous one.

With most significant disabilities: People with intellectual disabilities; with autism spectrum disorder; with transportation difficulty; blind or visually impaired; who reside in rural areas; those over 30 years old; and with mobility impairments, orthopedic or wheelchair users. The VRA employees expressed that they previously served more people with orthopedic conditions, in wheelchairs, blind, deaf, deafblind, over 30 years of age, and accident victims (referred by the State Insurance Fund Corporation and the Administration of Compensation for Automobile Accidents (ACAA by its Spanish acronym). Recommendations to improve VRA services for people with more significant impairments do not differ from those of the rest of the population. However, professionals and employers insisted on the need to have more CRPs for supported employment services in all regions; have more staff, especially counselors, vocational evaluators, occupational therapists, and sign language interpreters; streamline the eligibility process; and review, temper, and update the VRA public policy to make the agency more agile, effective, and technological.

Students and youth: Students with disabilities from private schools (41%); students and young people with autism spectrum disorder; DEPR students who are and are not in the Special Education Program; young people who dropped out of school; students and young people with more significant disabilities; homeschooling students; minors under State custody; young victims of crime or accidents; and with intellectual disabilities. Key people were very vocal in expressing their concern about the increase in students and young people with autism spectrum disorder and the few job alternatives that are being opened for this group in Puerto Rico, unlike other jurisdictions in the United States, Europe, and other countries.

C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE WORKFORCE DEVELOPMENT SYSTEM; AND

Job Connection Centers: Good collaboration was found between these Centers and VRA. The main recommendations were: to have personnel specialized in sign language; have specialized equipment for people with visual and hearing impairments; to review the agreements between the VRA and each Local Development Area to establish a more systematic and frequent calendar of counselor visits; train all its staff to provide good service to the population with disabilities; develop collaborative training or cross training with the VRA and other WIOA partners; reach agreements on what information can be exchanged; and have accessible facilities for people with mobility impairments and wheelchairs. Few people knew about the "Proyecto Talento Infinito" [Infinite Talent Project], but they were interested in learning more about this initiative and recommended that it be made known to the VRA employees so they can refer applicants and consumers to these services.

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

Students and young people's needs: No differences were observed between the needs of students (14 to 21 years, studying at secondary or post-secondary level) and young people (14 to 24 years, studying or not), nor were differences observed between these groups and the rest of the population with disabilities. The main needs they identified were: reasonable accommodations in employment; vocational or technical training, courses, or workshops; financial aid; coordination with employers and employment agencies to achieve a first opportunity or labor experience; driving classes and vehicle adaptation; coordination of services; vocational rehabilitation counseling; vocational evaluation; communication skills; and placement and employment services. In the focus groups, the following stood out: financial aid for post-secondary studies; financial aid for other expenses (food, gasoline, lodging, materials, equipment); more support in the search and placement for employment (includes employment accommodations); and monitoring by their advisors. Services that they have required from the VRA and have not been available and/or have had to wait a long time before receiving them were: financial aid; employment and the need for accommodations; vocational counseling and evaluation; all the services; access to mental health services (including pharmacological);

occupational therapy, adjustments, and refreshers; transportation and mobility (includes driving classes and vehicle adaptation); and assistive technology equipment. Internal key people focused more on vocational counseling and assessment services; guidance to their families; and independent living and activities of daily living services. Key people from other sectors further emphasized the need to expand the offering of pre-vocational and technical workshops with innovative topics of interest to younger generations (baristas, graphic arts, pet care, drones, cosmetology, massage, tattoos, social networks, and so forth); interagency coordination; job search and placement services (includes accommodations); and access to quality mental health services. The employees of the Job Connection Centers identified as a problem the fact that young people arrive at them very disoriented regarding their vocational interests, without occupational skills, and with few communication skills. Furthermore, graduates of the DEPR Special Education Program do not have a Diploma with a degree, which makes it difficult to find a job.

As mentioned in section C, professionals and employers surveyed identified as the less served group of students and youth with disabilities, the followings: students with disabilities from private schools (41%); students and young people with autism spectrum disorder; DEPR students who are and are not in the Special Education Program; young people who dropped out of school; students and young people with more significant disabilities; homeschooling students; minors under State custody; young victims of crime or accidents; and with intellectual disabilities. Key people were very vocal in expressing their concern about the increase in students and young people with autism spectrum disorder and the few job alternatives that are being opened for this group in Puerto Rico, unlike other jurisdictions in the United States, Europe, and other countries.

IDEA Act Transition Services: The average score that consulted professionals and employers gave to the transition services provided by the DEPR was 5.5 (on a scale of 10) and the VRA was 6.5. Key people gave an average score of 6.5 to both agencies on this transition. About a third of those surveyed indicated that they have seen some positive developments in these services in the past three years as a result of the agreements reached between both agencies for preemployment services (under the WOIA Act). The main complaints focused on: the DEPR beginning the transition late; students arriving without basic skills for life or work; the VRA not having the necessary personnel to participate in the Special Education Programming and Placement Committees (COMPU, by its Spanish acronym), and to begin offering services (transition analysts, counselors, vocational evaluators, occupational therapists, and so forth); and that VRA does not process requests from students in transition quickly. The main recommendations were: offer occupational counseling, counseling for full career exploration and in earlier grades; recruit occupational or rehabilitation counselors; deliver assistive technology equipment to students on time and allow students to keep the equipment; and offer training for the development of social skills and independent living. As in the 2020-2021 Study, the issue of evaluations raised controversy and discomfort. On the one hand, the VRA staff understand that evaluations are often obsolete for the student's age, are not correct, and are of poor quality, therefore they have to be updated. The DEPR staff and people from other sectors understand that these reasons are valid and re-applying significantly affects the transition process, delays the prompt provision of services at the VRA, affects timely entry into post-secondary studies, and discourages applicants and their families. The topic of evaluations also came up in all focus groups; some participants expressed their complaints about the continuous evaluations they had to undergo for the VRA as part of the eligibility process, paying for them out of pocket. The main

recommendations were: to have more transition counselors and analysts; participate in COMPUs; clarify public policy between agencies (DEPR and the VRA) on evaluations and equipment; request fewer evaluations and have professionals who can do these evaluations faster and at no cost to the applicant; streamline and simplify administrative procedures; incorporate electronic and virtual processes; and better communicate to families the requirements, next steps to follow, services, and times/calendar.

WIOA Act Transition Services: Although the number of applicants/consumers who used preemployment services (Pre-ETS) was very low, they expressed high satisfaction with them. Several focus group participants spoke very positively about their Work-Based Learning Experiences (WBLE). The services best valued by professionals and employers consulted were WBA (9.2), followed by Career Exploration Counseling, Self-Advocacy Instruction, Counseling for Transition to Postsecondary Education or Employment, and the Workplace Readiness Training Service to Develop Social and Independent Living Skills. They highlighted that the VRA has given significant importance to the development of these services in the past three years and also expressed a good opinion of the external entities contracted. The main recommendations were: to have more personnel to coordinate these services; expand and diversify WBLE employers; connect these services with counseling; develop orientations, workshops, and experiences focused on specific groups (for example, those with autism disorders); and prepare virtual material so that students and their families can request them and take some of the tests, interactive workshops, or orientations remotely (online).

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

CRP: Consumers expressed high satisfaction with the services of Community Rehabilitation Programs (CRPs) that offer supported employment services; 80% indicated that the services were "very good" or "good"; and also, that all services were available. The professionals and employers surveyed gave them an average score of 8.5 (on a scale of 10); internal key people 8.2 and external key people 8.5. As in the previous Study, they were identified as one of the most positive areas of vocational rehabilitation services in the past three years. However, 95% of those consulted indicated that there are not enough CRPs and supported employment services to meet the demand in Puerto Rico. The main service gaps were identified in the western, eastern, and central areas of the Island. Some training recommendations were: types of evaluations (ecological, adaptive, test work experiences, simulations in real scenarios, and other alternative vocational evaluations); labor market trends and innovative strategies for placement and employment; and the management of groups with specific conditions (autism spectrum disorder). The main recommendations were: to expand the contracts and quotas of people served by the CRP; that the VRA promote the creation of more CRPs; that CRPs diversify the types of jobs they offer; that the VRA be more flexible about the length with certain groups and listen more to the CRPs perspective; and to strengthen communication between the CRPs (Network).

ILC: Although the number of applicants/consumers who used the services of the Independent Living Centers (ILC) was very low, they expressed good satisfaction with them. For their part, the score given by professionals and employers was 6.5; key people also gave 6.5, similar to the previous Study. The main recommendations were: to establish more specific agreements

between these Centers and the VRA for the referral of applicants and consumers; that the VRA train its staff on what ILCs are, when and how to refer them; to have more ILCs covering all regions; bring information from these ILCs to the DEPR so that no young person stays home after finishing school, especially those who are not eligible for VRA services; and that the State Independent Living Council, the Department of Health, and the VRA strengthen their communication about independent living services.

C. GOALS, PRIORITIES, AND STRATEGIES

Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of Section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under Section 107 of the Rehabilitation Act. VR agencies must—

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

Based on the results of the Comprehensive Statewide Needs Assessment of Vocational Rehabilitation Services, monitoring and performance results, State's priorities and other sources of information, the VRA, in coordination and collaboration with the State Rehabilitation Council (CERPR), identify the goals and priorities necessary to carry out vocational rehabilitation and supported employment programs. The SRC participates in the development activities of the CSNA and provides its input. Draft goals, priorities and strategies are developed by VRA and discussed with the Council in a formal meeting. Second year revisions are carried out in the same way.

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

A. SUPPORT INNOVATION AND EXPANSION ACTIVITIES;

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

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

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

As mentioned in the previous section, the VRA developed its goals, priorities and strategies based on the results of the Comprehensive Statewide Needs Assessment of VR Needs, performance accountability measures, SRC recommendations, monitoring results and State's priorities, among others.

Goal 1

Achieve greater effectiveness in the process of providing services to applicants/consumers for a successful integration into the labor force.

Related to this goal and CSNA recommendation 1, the VRA is in the process of reviewing/amending several of the regulatory communications associated with the service delivery process to applicants/consumers in accordance with the requirements of the Law and the recommendations made in federal monitoring. The Agency will train the VRCs in the implementation of guides and processes, with the purpose of offering successful service delivery. Likewise, results will be measured through reports generated annually on participants with employment outcome and consumer satisfaction surveys that will be carried out annually.

Priorities:

- 1. Emphasize the importance of applying public policy, counseling, and employment alternatives, in tune with the times and needs of the consumer.
- 2. Promote collaboration with other agencies and resources to ensure that applicants/consumers receive information and services necessary to enter the labor force.
- 3. Strengthen approaches and services to employers to promote the recruitment of people with disabilities.
- 4. Promote information exchange with applicants/consumers related to their vocational rehabilitation process.

Strategies:

- Increase the provision of general counseling service, career counseling and information exchange with applicants/consumers related to their vocational rehabilitation process.
- Implement and promote the use of the document sharing platform between counselor and consumer (PED)
- Promote the development of a platform for the applicant-consumer that allows the latter to learn about the status of his case (for instance: Awaiting documents from the applicant to determine eligibility; Referred to Vocational Evaluation; etc.).

- Offer formal training (with presentations), by the Central Level programmatic offices, directly to Vocational Rehabilitation Counselors, and technical assistance to the personnel of the Vocational Rehabilitation Counseling Services Centers in areas related to the new labor market trends (technological goals, remote work, online services); effective management of specific populations such as students and youth on the autism spectrum, with multiple conditions or mental health issues, among others; the ecological assessments, the new assistive technology equipment, self-employment initiatives, the registry and documentation of data for the RSA-911 report and performance indicators, among other topics.
- Promote the development of self-employment and remote job projects with other entities or agencies.
- Promote the development of job projects, work-based learning or job-related experiences for specific groups with significant or most significant disabilities.
- Refer VRA consumers and ineligible people with disabilities to Independent Living Centers.
- Strengthen coordination with the DLHR in order for the VRA personnel and consumers to
 participate, at least once a year in each region, in orientations and receive up-to-date
 information about the job market, high-demand jobs, and available opportunities.
- Develop an online referral exchange process with the Labor Connection Centers (formerly "Americans Job Centers").
- Continue the implementation of the electronic sharing of referrals with other entities, namely, the Department of Education, and the State Insurance Fund Corporation.
- Develop printed material, also accessible through the VRA website, about community resources available to address consumer's various needs.
- Coordinate the presentation of formal orientations to the VRA Rehabilitation Counselors on the services offered by programs under WIOA, at least once a year in each region.
- Expand outreach efforts to cover other demographic groups (e.g., municipalities, specialized hospitals, health providers, non-profit organizations that provide services to populations with significant disabilities, among others).
- Provide training and technical assistance to employers on: VRA services, recruitment of
 qualified people with disabilities, reasonable accommodation, among others. This
 includes approaches to individual employers and through public and private employer
 associations and agencies.
- Promote the granting of wage incentives to employers to increase employment opportunities for consumers.
- Continue providing physical and mental restoration services that are identified as necessary to achieve integration into the workforce.

Goal 2

Contribute to increasing the skills and opportunities of students with disabilities through the provision of Pre-Employment and Transition Services.

Priorities:

1. Serve as many youths and students with disabilities as possible.

In compliance with the total use of 15%, the VRA has developed the following measurement strategies to meet the implementation requirements and internal controls for the provision of pre-employment transition services:

- Quarterly meetings between the Pre-Employment Transition Services areas and the Finance Division to determine the amount of the minimum federal reserve and the amount spent.
- The Development of Internal Invoice Control and the Quarterly Report on Pre-Employment Transition Services.
- Training will be developed for Vocational Rehabilitation Counselors (VRC) and personnel who offer pre-employment transition services.
- Interagency coordination will be worked on with the University of Puerto Rico so that VRA consumers, who meet the criteria established for pre-employment transition services, participate in an Occupational Practice Work Experience.

Other Strategies:

- Maintain the participation of the VRA personnel at the meetings of the Committee on Programming and Placement (COMPU, by its acronym in Spanish) of youth in transition.
- Offer Pre-Employment Transition Services: Pre-Employment Transition Services Fairs,
 Boot Camps, Work-Based Learning Experiences and other activities will be carried out.
 Regarding the service delivery, training was coordinated for personnel who offer
 direct pre-employment transition services. The Pre-Employment Transition Area, under
 the VR Counseling Services Office, coordinates, develops and plans pre-employment
 transition services in accordance with WIOA requirements for students with all
 disabilities.
- Continue to identify new Transition referrals and the number of Transition referrals beginning to receive services during the program year.
- Continue orienting school staff, parents, and students about VRA services.
- Provide guidance on VRA services to home school and private schools students.
- Coordinate with the Department of Housing, Department of the Family, and community support groups to offer orientations in strategic places to identify out-of- school youths with disabilities who could benefit from VRA services.

Goal 3

Strengthen administrative, programmatic, and technological procedures to achieve the required institutional efficiency.

This goal will be measured through the activities directed towards that goal. For example, at least one new video, module or material developed by each programmatic area and published during the State Plan period and trainings provided to employees at least once a year.

Related to this goal and CSNA recommendations 5 and 7, the VRC receive trainings and follow up through their supervisors and work plans regarding timely actions for eligibility determination. IPE development and other actions.

Regarding staff motivation, through the Job Classification Plan, steps were taken to increase Counselor's salaries.

Priorities:

1. Facilitate processes using technology, review of public policy and staff strengthening.

Strategies:

- Implement technology projects to facilitate case management and document sharing, among others.
- Integrate visual information resources (videos) to the website for people with disabilities interested in VRA services, and students with disabilities.
- Integrate videos and material geared to employers and make them accessible through the social media networks of the VRA (e. g. videos of success stories of consumers who have been employed and how the VRA can help employers to recruit qualified individuals with disabilities).
- Offer training to personnel to strengthen the knowledge and skills necessary to perform their duties.
- Offer orientations (through formal presentations), once a year, for all the personnel on the VRA Portion of the Unified State Plan, the Strategic Plan/Annual Execution Plan and its Goals and Strategies.
- Continue to conduct periodic performance evaluations of agency employees to ensure institutional effectiveness.
- Update administrative, fiscal, and programmatic procedures in line with established state and federal regulations, as necessary, and to promote institutional efficiency.
- Carry out programmatic monitoring of the service provision process and quality control
 monitoring to ensure compliance with public policy, quality of reported data and to
 identify areas for improvement.
- Provide technical assistance based on the findings of the monitoring processes and identification of needs by personnel at the central or regional level or during studies conducted.

- Establish goals (quotas) of consumers placed in regular employment by the personnel of the Support and Employment Modalities Centers (SEMC).
- Establish goals (quotas) for the coordination of job experiences carried out directly by the personnel of the SEMC.

A. Support innovation and expansion activities;

Strategy:

• Continue funding the SCR and CILs to assist and support their operations, as well as develop, in conjunction with the VRA, better employment and independent living opportunities for our applicants/consumers.

B. Overcome barriers to accessing VR and supported employment services;

The VRA has services available and accessible to all individuals with disabilities. There is no difference as to the availability of services for groups of specific disabilities, or specific cultural or racial groups. For the purpose of promoting the participation in vocational rehabilitation services and supported employment, the personnel of the agency participate in community orientation activities, which is evidenced by quarterly reports submitted to the Central Office including activities and number of people oriented.

Also, the VRA carries out actions as necessary to continue ensuring that its facilities are accessible to all individuals with disabilities. For example: Leasing contracts with facility owners and contracts with Pre-ETS providers include a clause establishing structural accessibility requirements according to ADA.

C. Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post-secondary education, employment, and pre-employment transition services); and

See Goal 2 and strategies above.

D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.

Goal 1 and its strategies, specified above, apply to individuals under the VR and supported employment programs. However, additional goals and strategies for supported employment are included under description e.

The VRA continues to implement the following strategies to improve the performance with respect to evaluation standards and performance accountability measures:

 Continue the practice of regularly sharing statistical information with regional staff and providing technical assistance on WIOA Performance Indicators and data entry for the RSA-911 report (See Goal 1, fourth strategy, and Goal 3, eighth and ninth strategies, above).

- Continue promoting, among the Counseling Service Centers' staff, the use of the reports developed that allow them to see a list per work zone (caseload) with or without the information registered in the required fields, including:
- 1. MSG Active Cases: Shows the active cases of participants in each caseload and the registered dates for the elements 85, 343-347, and 401.
- 2. Cases st.26 and 28 Registration of Credentials: Shows closed cases upon receiving services, if they were registered as "Enrolled" in elements 78, 84 or 400, and whether they have Credential registration. This report allows the Counselor to identify cases that require follow-up for the Credential registration before concluding the period of one year after exiting. Furthermore, the projection is to develop a similar report for cases in st.20 and 22 (ready for employment and working).
- 3. Quarters for Post Exit Follow Ups: Displays a list of participants who exited the program after receiving services and the post exit employment data registered for second and fourth quarter follow-up. Staff have been provided with information on the importance of carrying out said follow-ups and data collection for performance indicators. In addition, the Office of Quality Control and Programmatic Management has referred to the Office of Information Systems the requirements for adjustments that the system needs in order to prevent data entry errors by the users and provide alerts for the registration of MSG and Credentials.
- Continue emphasizing the importance of services to employers, including the orientation and training to raise awareness of the benefits of recruiting and retaining individuals with disabilities, and technical assistance after placement (See Goal 1, strategies fourteenth and fifteenth, above).
- Continue sending or making available to the personnel of the Center for Vocational Rehabilitation Counseling Services the information of the Unemployment Insurance to complete the information about the employment indicators of the second and third quarters under WIOA.
- Continue promoting postsecondary education among its consumers and providing them with follow-up for the presentation of Credentials and proof of Measurable Skills Gained.

D. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

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

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

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

The following progress report corresponds to the Goals and Strategies established for PY 2022.

Goal 1

To achieve excellence in the service delivery to applicants/consumers for a successful integration into the workforce.

Strategy:

• Increase the provision of services such as general counseling, career counseling, and information sharing with applicants/consumers in connection with their vocational rehabilitation process.

Progress Report:

During PY 2022, the Vocational Rehabilitation Counseling Service Centers (VRCSC) provided 8, 311 counseling services. A target number was not established. During PY 2021, 3,907 individuals with disabilities received VR Counseling and Guidance.

Strategy:

 The programmatic offices at the Central Level shall provide the personnel of the Centers for Vocational Rehabilitation Services with technical assistance in areas pertaining to case management, public policy, and data registers and documentation for the RSA-911 report, among other areas.

Progress Report:

During PY 2022, the Quality Control and Programmatic Management Office (QCPMO) provided:

- 465 technical assistances to personnel at the regional and central level, and
- 20 training sessions for the personnel of the regional VRCSC (Vocational Rehabilitation Counselors, Supervisors, Directors, and Rehabilitation Counseling Service Technicians) as follows:

Date	Activity/Training Topic	Number of staff participants
July -1, 2022 (2 sessions)	Analysis of MSG data registry (2 sessions: VRCSC staff of the West	48
(2 303310113)	Region (AM) and Metro East Region (PM))	
Sept. 13 and 15, 2022	Performance During the Program Year (PY) 2021: Orientation for	30
Nov. 16, 17 and 22, 2022	Directors and Supervisors of	
December 21, 2022	VRCSC (Regions: North, West,	

Date	Activity/Training Topic	Number of staff participants
	Metro East, South, Center East, and North Center)	
February 1 and 8, 2023	Performance Indicators under WIOA and PY 2021 Performance (Region: North Center)	46
February 10, 2023, and March 10, 2023	Performance Indicators under WIOA and PY 2021 Performance (Region: South)	51
February 10 and 22, 2023	Performance Indicators under WIOA and PY 2021 Performance (Region: North Central)	32
February 24-2023 and March 17, 2023	Performance Indicators under WIOA and PY 2021 Performance (Region: West)	35
February 13 and 16, 2023	Performance Indicators under WIOA and PY 2021 Performance (Region: Metro East)	32
February 27 and 28, 2023	Performance Indicators under WIOA and PY 2021 Performance (Region: East Central)	39
	Total	313*

^{*}The number includes employees who participated in more than one training.

Related to the trainings mentioned above, although the PRVRA didn't achieve all PY2022 goals, the trainings contributed to a significant increase in four of five indicators compared to PY 2021:

Employment 2Q After Exit: PY2021:30%; PY2022: 49.9%

Median Earning: PY2021: 4,320; PY2022: 4,590

Employment 4Q After Exit: PY 2021: 39.7%; PY2022: 41.6%

Measurable Skills Gains: PY 2021: 38%; PY2022: 53%

Noncompliance with PY22 Negotiated Level of Performance for Employment 2Q After Exit was affected by the large number of case closures/exits performed during the last quarter of PY2021 since those had less time to complete 2Q post exit data. We received TA from RSA regarding this issue. Noncompliance with Credential Attainment was due to the large number of cold cases without Credential documentation and no way to locate or contact the participant to obtain it.

The Vocational Rehabilitation Counseling Service Office (VRCSO) offered training and technical assistance to employees of the Vocational Rehabilitation Counseling Service Centers (VRCSC) and other support personnel, thus achieving:

- 236 trained professionals at the VRCSC
- 679 technical assistances to VRCSC professionals

The Assessment and Adjustment Office (AAO) carried out the following training and technical assistance activities:

- Training of regional VRCSC personnel (Vocational Rehabilitation Counselors, Supervisors, Rehabilitation Counseling Service Technicians, Occupational Therapists, among others) on:
- 1. Sensibility towards the deaf population- on September 28 and 30 2022; 80 professionals participated.
- 2. Samples of Occupational Therapy Work and Skills to be Evaluated- on August 17, 2022; 35 professionals participated.
- Medical and psychiatric consulting within the analysis for eligibility and ineligibility determination:
- 1. January 25, 2023: 23 professionals of the North Center Region participated
- 2. February 3, 2023: 24 professionals of the South Region participated
- 3. February 8, 2023: 13 professionals of the Metro East Region participated
- 4. February 10, 2023: 17 professionals of the North Region participated
- 5. February 17, 2023: 22 professionals of the South Region participated

Supervisory personnel of the Assessment and Adjustment Centers (AAC) offered technical assistance to counseling professionals aimed at: reinforcing the referrals to the AACs, and to the Assessment and Adjustment Units (AAU) as well as public policy compliance, on the following dates:

- October 13 and 17, 2022 and December 12, 2022: three (3) professionals participated in the Mayagüez AAC,
- November 10, and December 22, 2022: ten (10) professionals participated in the Aguadilla AAC,
- November 21, 2022: three (3) professionals participated in the San Juan AAC.

The Finance and Budget Division offered technical assistance to counselors and support personnel on an ongoing basis during the period and answered the questions from directors at the Central Level, upon request. Such consultations were carried out through telephone and/or electronic communications.

In the VRCSC, the regional directors and supervisors offer training to Vocational Rehabilitation Counselors and Support Personnel through administrative meetings, where they discuss matters

related to the services delivery and the analysis of the communications, compliance with the public policy, among other aspects.

Strategy:

• Promote self-employment and remote jobs.

Progress Report:

9 consumers in the self-employment modality achieved an employment outcome during the period.

Strategy:

 Refer VRA consumers and ineligible individuals with disabilities to the Centers for Independent Living.

Progress Report:

The VRCSC achieved:

- 546 referrals of eligible consumers to the Centers for Independent Living (CIL).
- 190 referrals of ineligible individuals with disabilities to the CILs.

Strategy:

Reinforce the coordination with the Department of Labor and Human Resources (DLHR)
for the VRA personnel and consumers to receive conferences and up-to-date information
of the labor market, high-demand jobs, and available opportunities, at least once a year in
each region.

Progress Report:

The Support and Employment Modalities Centers (SEMC):

- Coordinated 13 activities with the DLHR to learn about the job trends and employer types.
- Offered 984 orientations to consumers.
- Offered 40 orientations to Vocational Rehabilitation Counselors and AAC on job market trends and high-demand jobs.

Strategy:

• Share referrals with the Americans Job Centers and other agencies and community organizations.

Progress Report:

The SEMCs:

- Received 29 referrals from the American Job Centers.
- Referred 133 individuals to the mandatory WIOA programs as follows: 25 referrals to Title I-Adult, Dislocated Workers, and Youth Program for Training; 0 for Micro-business Courses and Services; 12 referrals to Title II- Adult Education Program; 96 referrals to Title III-Wagner-Peyser Act.
- Received 10 referrals from agencies and community organizations.
- Made 9 referrals to agencies and community organizations.

Strategy:

• Coordinate the presentation of formal orientations to Rehabilitation Counselors of the VRA on the services offered under WIOA programs, at least once a year in each region.

Progress Report:

The VRCSO and VRCSCs:

Did not coordinate presentations to the VRC on the services offered under WIOA programs.

Note: The activity was not carried out due to limitations on the coordination and planning by both parties.

Strategy:

• Broaden the outreach efforts to reach other demographics (e. g. municipalities, specialized hospitals, health providers, nonprofit organizations that provide services to populations with significant disabilities, among others).

Progress Report:

The VRA participated in and offered:

- Service Fair in the municipality of Cabo Rojo for the purpose of offering an orientation on VRA services: 251 students benefited therefrom.
- Workshop: Mental health in the workplace, to the personnel of the company Corteva Agriscience in Salinas on October 24, 2022: 29 professionals participated.
- 54 orientations at: educational, government, mental health, hospital, and municipal entities.

Strategy:

Provide employers with training and technical assistance on: VRA services, recruiting of
qualified individuals with disabilities, job accommodation, among others. This includes
approaching individual employers and public and private associations and agencies
grouping employers.

Progress Report:

The SEMCs:

- Offered two (2) trainings to potential/existing employers as follows:
- 1. October 24, 2022 Vocational Rehabilitation Administration Services at the Transitional Service Center: seven (7) professionals participated.
- 2. October 28, 2022 –Diversity at Workplace for Individuals with Disabilities at Abbott Laboratories: 28 professionals participated.
- Offered 980 technical assistances to potential/existing employers, thus achieving: 180 inperson technical assistances; 298 technical assistances through telephone calls; 502 technical assistances through electronic means.
- Offered 1,267 *orientations* to potential/existing employers, thus achieving: 243 inperson; 537 through telephone calls and 487 through electronic means.
- Held 18 teleconferences with potential/existing employers.
- Participated in five (5) virtual talks/forums with potential/existing employers.

Strategy:

 Promote the granting of salary incentives to employers to increase job opportunities for consumers.

Progress Report:

The VRA did not execute contracts for salary incentives during the period.

Note: There was no request from employers to contract through the salary incentive.

Strategy:

 Develop videos and material geared to employers and make them accessible through the social media networks of the VRA (e. g. videos of success stories of consumers who have been employed and how the VRA can help employers to recruit qualified individuals with disabilities).

Progress Report:

The SEMC developed:

- Seven (7) orientation materials aimed at employers, as follows: One (1) quarterly newsletter (July 2022); Four (4) PowerPoint presentations (July and October 2022, and March 2023); Two (2) newsletters (April and January 2023)
- One (1) job club video (July 2022)

Goal 2

Contribute to the increase in skills and opportunities for students with disabilities through the provision of Pre-Employment Transition and Transition Services.

Strategy:

 Maintain the participation of the VRA personnel at the meetings of the COMPU of youth in transition.

Progress Report:

The Vocational Rehabilitation Counselors achieved a total of 22 participations at meetings of the Committee on Programming and Placement (COMPU, by its acronym in Spanish).

The Rehabilitation Counseling Analysts achieved a total of 3,941 participations at COMPU meetings.

Strategy:

• Offer Pre-employment Transition Services.

Progress Report:

16,321 students with disabilities received pre-employment transition services.

Note: 10% of students with disabilities participated in one or two activities during the period.

The VRA, represented by the Pre-employment Transition Service Office (PETSO):

- Executed 22 Collaboration Agreements to carry out Work-Based Learning Experiences (WBL) on July 2022, where the following participated:
- 1. Government agencies: 8
- 2. Municipalities: 10
- 3. Private companies: 4
- Executed 15 contracts to offer pre-employment transition services through service fairs, as follows:
- 1. Global Education Exchange Opportunities, Inc.
- 2. Future Learning FLC Corporation
- 3. INOVA Build Inc.
- 4. Emprende.PR LLC.
- 5. Centro de Adiestramiento para Personas con Impedimentos, Inc,
- 6. JF Educational Services Inc.
- 7. WES Innovation & Technology Inc.
- 8. Realizate

- 9. Colegio Único de Oportunidades
- 10. Vocational & Transition Services, PSC
- 11. Empleo Alianza, Corporation.
- 12. L & G Enterprise Inc.
- 13. New Vision, LLC
- 14. Diamar Aldrey & Associates, LLC
- 15. Integra Education Corporation
- Executed ten (10) contracts to develop the 2023 Summer Camp (June) for students with disabilities between the ages of 14 and 16 years to develop pre-employment skills by exposing them to the five (5) WIOA mandatory activities. Received 1,106 students with disabilities at the six (6) regions of the agency. The agency executed contracts with the following entities:
- 1. Future Learning FLC Corporation
- 2. New Vision, LLC
- 3. Emprende.PR LLC.
- 4. Centro de Adiestramiento para Personas con Impedimentos, Inc.
- 5. INOVA Build Inc.
- 6. Vocational & Transition Services, PSC
- 7. L & G Enterprise Inc.
- 8. WES Innovation & Technology Inc.
- 9. JF Educational Services Inc.
- 10. Realizate

Note: One (1) contract was cancelled during the period.

Prior to the execution of the contracts for the provision of the services through WBLE, Pre-ETS Service Fair, and the Summer Camp, the PETSO carried out the following activities:

- Prepared the Public Announcements to deliver applications for the WBLEs and the Guidelines for Proposals for the summer fairs and camps, thus achieving the following publications:
- 1. WBLE– Television: WIPR-*Notiseis* 360pr; Press: News Forum; Digital: YouTube (June 2, 2023) and through social media networks of the agency on May 23, 2023.
- 2. Service Fairs on the website of the agency on August 25, 2022.
- 3. 2023 Summer Camp Television WIPR-*Notiseis* 360pr; Press: News Forum and Weekly Newspaper *Visión al Servicio del Oeste*; Digital: YouTube (December 9 and 12, 2022, and

January 2023) and through the social media networks of the agency on November 29, 2022.

- Called and held a meeting with the Proposal Evaluation Committee of the agency on:
- 1. September 6, 2022, for Service fair proposals; 10 professionals participated.
- 2. April 4, 2023, for Summer Camp proposals; 11 professionals participated.

The Regional Pre-employment Transition Service Areas offered 1,167 orientations on the transition process, to the following:

• Parents: 451

• Teachers: 168

• Students: 548

Strategy:

• Continue identifying new Transition referrals, and those Transition referrals that begin to receive services during the program year.

Progress Report:

The VRA achieved:

- 1,874 transition referrals from schools that completed applications for service.
- 4,042 Individualized Plan for Employment were developed for youths between the ages of 14-24 years.
- 2,067 consumers (youths between the ages of 14-24 years) had an employment outcome.

Strategy:

• Continue offering orientations to the school personnel, parents, and students about the VRA services.

Progress Report:

10,454 orientations were offered about the transition process, to the following:

• Parents: 3,805

• Teachers:1,646

• Students: 5,003

Strategy:

 Provide orientations about VRA services to homeschoolers and students of private schools.

Progress Report

The VRCSO offered the following orientations to professionals of two (2) home schooling centers:

- Tu Norte Educativo: On February 22, 2023, which impacted two (2) people and identified 32 youths.
- Vil Art: On February 22, 2023, which impacted two (2) people and identified 40 youths.

Strategy:

 Coordinate with the Department of Housing, the Department of the Family, and community support groups to offer orientations in strategic places to identify out of school youths with disabilities who could benefit from VRA services.

Progress Report:

The Vocational Rehabilitation Counseling Service Centers Services offered:

- 25 orientations in scenarios outside of schools on February 22 and June 23, 2023
- 137 professionals were impacted
- 169 youths with disabilities were identified

Goal 3

Strengthen the administrative, programmatic, and technological procedures to achieve the required institutional efficiency.

Strategy:

 Implement technology projects to facilitate case management and document sharing, among others.

Progress Report:

The Information Systems Office (ISO) gave continuity to the two (2) projects related to technological innovations and improvements.

- New Case Management System (CMIS System)
- VRA Interactive System (IVRA Project)

Strategy:

• To add visual information resources (videos) to the website for individuals with disabilities interested in VRA services, employers, and students with disabilities.

Progress Report:

The ISO included three (3) publications on the website of the agency.

Strategy:

To offer training to the personnel to strengthen their knowledge and skills as necessary
to discharge their duties (e. g. effective communication, public policy, time management,
occupational match, case management in the event of most significant disabilities, among
others).

Progress Report:

The Office of Labor Relations and Human Resources (OLRHR):

Coordinated 60 training activities for the VRA personnel, achieving 1,837 participations (includes professionals who participated in various trainings during the period).

Some of the topics of higher interest were:

- Supervision academy;
- Vocational Interest Inventory Administration ARCI "Aguilar- Resto Career Indicator";
- Government resource administration;
- Assistive technology alternatives for employment and independent living;
- Effective communication in the workplace;
- 2023 Annual Convention of the Audiology Academy of Puerto Rico;
- Conference of professionals who provide assistance: Self-care strategies for professionals who provide assistance;
- Hope, Possibility and Effort: Advancing, Reaching, and Persevering in Times of Intense Challenges;
- Professional Ethics in Times of Zoonosis;
- Compassion Fatigue;
- Equal Pay for Equal Work;
- Generational Integration in the Work Environment
- Mental Health and Anxiety Disorders;
- Leadership, Motivation, and the Establishment of Work Teams;
- Project Management;
- Metrics of Success in the Professional Practice;
- Need for the inclusion of the rehabilitation counselor in the formation of the athlete and his role in sports;
- Strategic planning for supervisors;
- Mental Health First Aid;

- ARCI Test:
- Challenges and strategies in the supervision of professionals and students or recent research:
- Sign Language Sensibility;
- Sensibility Towards Deaf People;
- Supervision: Styles and how they can influence in the motivation of the employees;
- Public Service Values;
- Domestic Violence: Living Without Fear; and
- Others. See section VI. VR (i)(4)(A)

Strategy

• Continue conducting periodic employee performance evaluations to ensure institutional efficacy.

Progress Report:

The Office of Labor Relations and Human Resources (OLRHR) conducted:

745 evaluations during the period

Note: The performance evaluations are performed after the each evaluated semester concludes, based on this fact, 490 of the evaluations conducted from July to December 2022 pertain to the 2022 January to June semester; and 255 evaluations received between January and June 2023, pertain to the 2022 July to December semester.

Strategy:

• Update administrative, fiscal, and programmatic procedures in accordance with the established state and federal regulations, as needed.

Progress Report:

The AAO:

- Discussed the 2022-2023 Annual Execution Plan with the personnel of the office and established the Work Plan on July 7, 2022.
- Participated in a meeting with the directors of the VRCSO and SEMO to review the activities of the 2022-2023 Annual Execution Plan, on August 4, 2022.

The Offices of Labor Affairs and Human Resources and of Legal Affairs:

- Trained directors and supervisors of the six regions of the VRA and the Central Level in connection with the laws on public policy. The trainings were held as follows:
- 1. Center East Region on November 9, 2022

- 2. North Center Region on November 16, 2022
- 3. South Region on November 30, 2022
- 4. North Region on December 7, 2022
- 5. West Region on December 20, 2022
- 6. Metro East Region and Central Level on January 18, 2023

The laws and public policies considered were the following:

- Act No. 17 of April 22, 1988, Act to Prohibit Sexual Harassment in Employment.
- Act No. 217 of September 29, 2006, "Protocol for Managing Domestic Violence Situations at the workplace."
- Act No. 22 of March 29, 2013 "Act to set forth the public policy of the Government of Puerto Rico against discrimination based on sexual orientation or gender identity in the public and private sector."
- Act No. 212 of August 3, 1999, "Guaranteed Equal Employment Opportunities by Gender Act."
- Act No. 90 of August 7, 2020, "Act to Prohibit and Prevent Workplace Harassment in Puerto Rico."
- Act. 168 of May 4, 1949, as amended, "Act to require shopping centers, government centers, ports, and airports to establish dedicated areas for small children breastfeeding and diaper changing."

The VRCSO carried out the following activities:

- Developed Policy Directive No. 2023-01 to amend Policy Directive No. 2016-04 Procedure
 to recommend training services in the following categories: Training at a graduate college
 or university to pursue a master's or doctorate degree; Four-year training at a college or
 university to pursue a bachelor's degree or a four-year undergraduate degree; and
 Training at a Junio or Community College to pursue an associate degree or a certificate,
 August 9, 2022.
- Developed Policy Directive No. 2023-03 Amendment to Policy Directive No. 2022-22
 Procedure for the provision of interpretation services to deaf and partially deaf
 applicants/consumers of the Vocational Rehabilitation Administration, on August 19,
 2022.
- Developed Policy Directive No. 2023-04 to Repeal Policy Directive No. 2023-01, on September 1, 2022.
- Developed Policy Directive No. 2023-06 to Repeal Policy Directive No. 2009-20 Procedure to determine the financial contribution of the applicant to work experiences for evaluation/extended evaluation (ETFE/EE[ST.06]) purposes/consumer of VRA services at a cost and instructions to fill out the form: Financial Analysis for the Contribution to Services at a Cost, on December 12, 2022.

- Developed Policy Directive No. 2023-11 Official name of the regions that constitute the Vocational Rehabilitation Administration, on May 22, 2023.
- Reviewed the following communications:
- 1. Policy Directive No. 2010-06 Procedure for Evaluation and Adjustment Services for Adapted Driving Lessons and Adaptation of Motor Vehicles with Assistive Equipment in Puerto Rico and the United States for VRA Consumers.
- 2. Policy Directive No. 2015-02 Procedure to provide maintenance services to VRA applicants/consumers.
- 3. Policy Directive No. 2015-03 Amendment to the limit on the cost of transportation services to consumers who, even though they can stay, choose to travel daily to attend their rehabilitation training or services.
- 4. Policy Directive No. 2015-04 Procedure to provide transportation services to VRA applicants/consumers.
- 5. Policy Directive No. 2018-09 Amendment to the sponsorship of services to defray the difference in enrollment costs and maintenance services to VRA applicants/consumers.
- 6. Continued reviewing the Manual for Medical Procedures.

The VRCSC discussed:

- Policy Directive No. 2023-06, on December 12, 2022, at:
- 1. West Region on December 14, 2022
- 2. North and Metro East Regions on December 15, 2022
- 3. Center East Region on December 16, 2022
- 4. North Center Region on December 22, 2022
- 5. South Region on January 9, 2023
- Policy Directives No. 2023-07 and 2023-09, on December 14, 2022, at:
- 1. East Metro Region on December 15, 2022
- 2. North and Center East Regions on December 16, 2022
- 3. North Center Region on December 22, 2022
- 4. West Region on December 27, 2022
- 5. South Region on January 9, 2023

The PETSO updated the following documents:

- 1. Guidelines for Proposals, attachments, and related documentation for: Service Fairs (July 21, 2022) and 2023 Summer Camp (November 22, 2022).
- 2. WBLE Public Announcement (April 18, 2023); Pre-employment Service Fair (July 21, 2022) and Summer Camp (August 12, 2022).

- 3. Collaboration Agreement and related documents for WBLE on April 18, 2023.
- 4. Policies and Procedures for the Evaluation of Reasonability and Adjudicability of Costs in Pre-employment Transition Services on February 2, 2023.

The QCPMO:

- Developed Policy Directive 2023-02 Training on WIOA performance indicators and estimated annual achievements of program year 2021, on January 25, 2023.
- Shared with the VRCSO recent federal regulations on post-employment services to update the pertinent public policy.
- Shared with SEMO information about Customized Employment and Supported Employment, on April 20, 2023.
- Shared with the Administrator's Office information about Pre-ETS processes in Texas and Minnesota on January 27 and February 9, 2023.
- Participated in four (4) in-person meetings related to the VRA portion of the 2024 Unified State Plan to be developed with the central government, and the Department of Economic Development and Commerce, held by Premier Financial Services on February 22; March 14, May 2, and June 1, 2023, as part of the office's project management duties.
- Maintain communication through email regarding the requests for data and information and made recommendations for the 2024 Unified State Plan.
- In compliance with the federal regulations on conducting a Comprehensive Statewide Needs Assessment for Rehabilitation Services in Puerto Rico (CSNA), jointly with the State Council on Rehabilitation, formalized a project and the following activities were carried out:
- 1. Revised and updated of Request for Proposal (RFP) and the Public Announcement (February 2023)
- 2. Submitted to the Office of the Administrator the RFP and Public Announcement for recommendations/approval/publication, as pertinent, on January 31, 2023.
- 3. The agency carried out the publication of the Public Announcement in a newspaper of the island (on February 10, 15, and 20, 2023) for the purpose of announcing the period to submit proposals to develop a study on needs.
- 4. From February 15 28, 2023, eleven (11) RFPs were submitted.
- 5. Four (4) telephone consultations were answered in connection with the requirements established in the RFP.
- 6. On April 5, 2023, four (4) proposals were received to develop the study on needs.
- 7. Reviewed the Proposal Evaluation Form.
- 8. Submitted a Report on Answers of the VRA to questions issued by proponents, related to Attachment I of the RFP (March 21, 2023).

- 9. Requested the Operational Policy Administrator to call a meeting of the Proposal Evaluation Committee on April 5, 2023.
- 10. Called a meeting of the Proposal Evaluation Committee on April 10, 2023.
- 11. Drafted a Summary of Evaluated Proposals on April 19, 2023.
- 12. Submitted to the Administrator a Contract Award Recommendation regarding the CSNA (April 26, 2023).
- 13. Notified proponents of the award to the entity that shall be conducting the study (April 28, 2023).
- 14. Established the contract conditions for conducting the study; and
- 15. Called the pertinent entities and held the initial meeting related to the needs assessment (June 9, 2023), where nine (9) professionals participated.

The SEMO developed the following:

- Policy Directive No. 2023-05 Corrections to Policy Directive No. 2022-17 No Cost Codes for supported employment services, on November 1, 2022.
- Policy Directive No. 2023-08 Procedure to grant salary incentive to employers who employ consumers of the Vocational Rehabilitation Administration, on December 14, 2022.
- Policy Directive No. 2023-01 Contracts for Supported Employment Services with Community Rehabilitation Programs for 2022- 2023, on November 22, 2022.

The Fiscal Division developed:

- Policy Directive No. 2023-02 Close of fiscal year 2021-2022, on November 22, 2022.
- Policy Directive No. 2023-10 Close of state fiscal year 2022-2023, on April 17, 2023.

The Administration Office developed:

• Policy Directive No. 2023-03 Delivery of the proclamation of the rehabilitation counselors' week on March 16, 2023.

The Documents Division developed:

• Policy Directive No. 2023-04 Preventive measures for public document protection during the hurricane season, on May 26, 2023.

Strategy:

• Carry out program monitoring of the service delivery process and of quality control to ensure compliance with the public policy, the quality of data reported.

Progress Report:

The QCPMO conducted file monitoring for quality control of the RSA-911 data and provided inperson technical assistance to enable regional counseling supervisory personnel to conduct them, thus achieving:

- 111 reviews of physical files*
- 258 partial reviews of electronic files

*During the period, the number of reviews was limited given that other priorities were established to the office as well as due to personnel limitations.

The VRCSO conducted 24 internal monitoring of 41,070 service records of applicants/consumers to evaluate the service delivery process and take corrective actions to guarantee the services offered, thus achieving:

- 2 internal monitoring of the service delivery process, with 141 monitored records.
- 1 internal monitoring for the analysis of expired individualized plans for employment (St. 12) with 39,224 monitored records.
- 4 internal monitoring of the process to apply for services (60- day analysis on St. 02) with 274 monitored records.
- 1 internal monitoring of the process to determine eligibility with 112 monitored records.
- 4 internal monitoring to the process of case referred to the State Insurance Fund Corporation, with 193 monitored records.
- 1 internal monitoring of the budget management process with 165 monitored records.
- 1 internal monitoring of Trial Work Experience with 7 monitored records.
- 1 internal monitoring of the training process (St.18) with 110 monitored records.
- 3Internal monitoring of the maintenance service (lodging, transportation) with 374 monitored records.
- 1 internal monitoring of the transition process with 145 monitored records.
- 3Internal monitoring of the closing process for rehabilitated cases (St.26) with 209 monitored records.
- 1 internal monitoring of the stabilization, transition to extended support, and closing process (St.22) with 32 monitored records.
- 1 internal monitoring of the process to document the *Work Opportunity Tax Credit* form of the Bureau of Employment Security with 84 monitored records; and
- 70 corrective actions to guarantee the services offered to VRA consumers.

The VRCSC, through its directors and supervisors, conducted 6,592 internal monitoring of 14,347 files of applicant/consumer services to evaluate the service delivery process, thus achieving:

- 420 internal monitoring of the eligibility determination process, with 861 monitored records.
- 407 internal monitoring of the Individualized Plan for Employment process, with 430 monitored records.
- 157 internal monitoring of the transition process, with 650 monitored records.
- 1,064 internal monitoring of the budget management process, with 1,996 monitored records.
- 46 internal monitoring of the referral process (AAC or SEMC) with 71 monitored records.
- 125 internal monitoring of the process to apply for services (60- day analysis on St. 02) with 359 monitored records.
- 13 internal monitoring of trial work experiences / extended experiences (St.06) with 16 monitored records.
- 40 internal monitoring at the closing on St. 08 with 40 monitored records.
- 1 internal monitoring of the employment counseling service (St.14) with 1 monitored record.
- 467 internal monitoring of the training process (St.18) with 961 monitored records.
- 113 internal monitoring of cases ready for employment, with 122 monitored records.
- 200 internal monitoring of the stabilization, transition to extended support, and closing process (St.22) with 333 monitored records.
- 1,599 internal monitoring of the closing process for rehabilitated cases (St.26) with 1,881 monitored records.
- 8 internal monitoring of cases with over 9 years, with 1,267 monitored records.
- 15 internal monitoring of cases with over 10 years, with 15 monitored records.
- 1,439 internal monitoring of the case discussion process, with 2,090 monitored records.
- 185 internal monitoring of the process to refer cases to the Regional Advisory Committee, with 264 monitored cases.
- 162 internal monitoring of the technical assistance process (VRA-26, Financial Analysis, IPE, WIOA follow up, and others) with 579 monitored records.
- 12 internal monitoring of the process to submit reports on responses, with 19 monitored cases.
- 7 internal monitoring of the referral process for the self-employment modality (small businesses) with 9 monitored records.
- 21 internal monitoring of the transfer process, with 276 monitored records.
- 4 internal monitoring of quality control, with 22 monitored records; and

 87 internal monitoring to other service delivery processes (assistive and/or technological equipment, RSA-911 validation, quarterly goals, manuals, etc.) with 2,085 monitored records.

Strategy:

• Provide technical assistance based on the findings of the processes for monitoring and identification of needs by the central level or regional personnel.

Progress Report:

VRCSO achieved:

- 2,361 technical assistances through the automated user helpdesk for the provision of services, known as: Client Rehabilitation Information System or CRIS, and
- 4,660 technical assistances to VRC, counseling service supervisory personnel, CVEC directors and Regional Directors, to ensure compliance with the monthly monitoring processes, the strategic plan, performance indicators and metrics; and to increase the compliance level VRC that fail to achieve the established goals.

The QCPMO offered:

629 orientations and technical assistances through emails, calls, and in person to address needs, under the following main categories:

- 54 interventions related to questions about the fields of the RSA-911 Report or the CRIS Case Management System.
- 40 interventions related to the report of errors in programing of the system.
- 111 interventions for the correction of data entry in the system.
- 123 interventions related to Performance Indicators or Reports in general.
- 269 interventions related to the State Plan and the Strategic Plan, among other matters.
- 6 interventions related to Data Quality Control Monitoring of the RSA-911 Federal Report (in person).
- 18 interventions related to the need to strengthen knowledge on the Performance Indicators (in-person sessions at the regions): and
- 8 meetings with the personnel of the programmatic offices at the Central Level.

Strategy:

• Establish quotas for the SEMC of consumers placed in a regular job by the personnel of said centers, as well as employment experience coordination quotas.

Progress Report:

Achievements of the SEMC, in Regular Employment:

- 104 consumers had an employment outcome during the period.
- 14 employment experience developed.

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

Negotiated levels and performance for PY 2022:

Performance Indicator	Negotiated Level for PY 2022	Achievement
Employment Second Quarter After Exit Quarter	44%	40.9%
Employment Fourth Quarter After Exit Quarter	31.4%	41.6%
Median Earning Second Quarter	\$3,941	\$4,590
Credential Attained	36%	32%
Measurable Skills Gain	34.5%	52.5%

VRA was not able to achieve two of the negotiated levels: Employment 2Q: 3% discrepancy; Credential Attained: 4% discrepancy. The discrepancy in the 2Q employment indicator was mainly due to the difficulty in contacting participants after exit, a delay in obtaining the Unemployment Insurance records on time and the short period of time for the second quarter after exit data registry because most of the files were closed in the fourth quarter of the Program Year 2021. Discrepancy in the Credential Attainment was also due to the difficulty in contacting participants (cold cases).

To emphasize the importance of compliance with performance indicators and the time periods for data recording in the case management system, during PY 2022, the Quality Control and Programmatic Management Office provided trainings and technical assistance on an ongoing basis to the personnel of the Counseling Service Centers. Furthermore, it revised and updated the visual and explanatory resources which were posted on the internal webpage of the agency for the personnel to access it at any time. After the monitoring visit in June 2023, additional information was shared with the VR Counseling Centers Directors and VRC Supervisors, regarding the advantages of closing as many cases as possible during the first two quarters of the program year, which provides more time to complete second quarter follow-ups.

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

During PY 2022 the VRA carried out the following activities using innovation and expansion funds:

Activity: Continue funding the SCR and CILs to assist and support its operations as well as developing, in conjunction with the VRA, better opportunities for employment and independent living for our applicants/consumers.

Progress Report: The VRA provided a fund allocation to both councils. Furthermore, it maintains its representation in the agency as well as its collaboration with both councils.

Invoices processed (expenditures) during PY 2022 were:

SRC: \$83,195.11

ILC: \$36,246.98

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

1. ACCEPTANCE OF TITLE VI FUNDS:

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

The VRA has developed the following goals and plans for the distribution of Title VI, Part B funds:

Goal A

Continue to provide services to consumers identified for supported employment modality.

Goal B

Maintain a level of satisfaction of 85% of those consumers who received supported employment services at the closure of the case.

Plans, Strategies:

- Use other sources of funding, in addition to the ones from Title VI, Part B, needed to expand the provision of supported employment services.
- At the Support and Employment Modalities Centers (SEMC), receive and evaluate at least 150 new candidates for Supported Employment services, referred from the VRC.
- Contract and support community rehabilitation programs (CRPs) throughout the Island so that at least 80 consumers, who received supported employment services, are able to achieve an employment outcome.
- Provide services at the CRP to at least 160 new cases during the period.

- Expand outreach in order to attract other potential service providers. This, by providing orientations in graduate schools (e.g., counseling, occupational therapy) that might develop projects to provide supported employment services as part of internships and through greater dissemination in the media, among others.
- Strengthen the provision of supported employment services through training and technical assistance to the staff of the CRPs. The Support and Employment Modalities Office (SEMO) and the Support and Employment Modalities Centers (SEMC) will provide such technical assistance in aspects such as:
- 1. Guidance to new proponents about supported employment services, as requested.
- 2. Other aspects related to the provision of supported employment services and extended supports services.
- Continue administering satisfaction surveys of the consumer in terms of the services received in the CRPs and in the SEMC, in order to identify areas to be strengthened or improved.
- Continue conducting monitoring interventions to the CRPs in order to validate compliance with the provision of services established in the contracts.

Distribution of Title VI, Part B funds:

The estimated total of projected funds for the provision of supported employment services for is \$2,434,096 distributed as follows: \$300,000 from Title VI-B for the contracting of a CRP; and \$2,134,096 from Title I for the contracting of other CRPs and for expenses related to the supported employment services.

Use of Title VI funds after placement is set forth for the PRCs.

VRA established Regulatory Communication 2022-10 to address findings regarding SE A & B grants. We will incorporate detailed description of the process to identify SE-B grant on Youth with significant disabilities and 10% match.

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

Quality:

The *Workforce Innovation and Opportunity Act* (WIOA) of July 22 of 2014, emphasizes on the provision of the supported employment services for the consumers with the most significant disabilities. Therefore, the VRA in its mission to integrate the people with disabilities into the labor force and towards a more independent living promotes the provision of the supported employment services leading to an employment outcome.

The Support and Employment Modalities Office (SEMO), at the central level of the VRA, intends to collaborate, provide assistance and facilitate the applicability of the public policy to the Support and Employment Modalities Centers (SEMC), at the regional level, on career development services, services to employers and development of support and employment modes for the consumers. The SEMO staff contributes with other operational/administrative offices of the VRA, in the coordination and collaboration of efforts regarding the assessment services and the programmatic monitoring and interpretation of data/relevant information to ensure compliance with the VR Portion of the Unified State Plan and the Strategic Plan of the agency.

The VRA, through its SEMC, develops inter/transdisciplinary work teams to ensure that the supported employment services offered by the CRPs are provided uniformly, agile and responsive to the needs of the consumers with the most significant disabilities.

SEMO and SEMC staff also carry out monitoring activities with the purpose of verify compliance, project development, quality of services, identify limitations, use of resources, and consumer's participation, among others.

Scope and extent:

Individuals can receive up to 24 months of supported employment services, or more if necessary to achieve job stabilization. In addition, youth with disabilities may receive up to four years of extended services until the youth reaches 25.

The VR counselor identifies those consumers with the most significant disabilities who could benefit from supported employment, in accordance with the federal provisions set forth in 34 CFR 361.34. Such identification begins with the initial interview, the analysis of medical evidence, the analysis of pre-employment skills and any other aspect relevant to the evaluation process.

The supported employment modality is provided through the SEMC of the VRA; which offer support to the VR counselor in order to validate the vocational strengths and needs of the applicants/consumers, as well as to promote them towards competitive integrated employment under such supported employment modality. Prior to the consumer's referral to the SEMC, he may receive services in the center of Assessment and Adjustment Centers (AAC) of the VRA in order to be evaluated in the following areas:

- Personal skills, daily/family/community living
- Cognitive-Psychosocial skills
- Perceptual-Psychomotor skills
- Training, Job and Work skills

The referral to the AAC will identify that the consumer will be sent to a community rehabilitation program (CRP) to be serviced under the supported employment modality, whereby the evaluation process must have an ecological approach.

The supported employment process has been framed within the following five (5) stages developed for the provision of these services:

Stage I. Determination of Needs

- Revision of documents: assessment of pre-employment skills, needs and support resources
- Comprehensive situational evaluation
- Determination of needs through profile evaluation
- Support: consumer and family
- Drafting of Habilitation Plan.

Stage II. Vocational Preparation/Supplementary Assessment

- Ecological evaluation
- Possible revision of Habilitation Plan
- Continuous support

Stage III. Placement Services

- Marketing Plan
- Promotion
- Occupational analysis
- Job proposal
- Reasonable accommodation
- Recruitment process
- Revision of Habilitation Plan (if it applies)
- Meetings with the employer and the family
- Continuous support.

Stage IV. Training and Job Retention

- Intensive and moderate training
- Development of natural support networks
- Revision of Habilitation Plan (if it applies)
- Evaluation/monitoring
- Submittal of reports
- Meetings with the employer and the family
- Continuous support

Stage V. Stabilization and Closure

• Meetings with the employer and the family

- Beginning of the employment monitoring phase (minimum of 90 days)
- Consumer's performance evaluation carried out by the employer, supervisor and job coach.
- Identification of extended support to be provided by family, employees (co-workers), and community.
- Satisfaction survey about services provided to consumer/family/employer/counselor.

The previous information about quality, scope and extent of services apply also to youth. The VRA will continue to provide SE and Extended Services to youth with the most significant disabilities. Through CRIS case management system, the SEMC will identify those consumers between ages 14-24.

The timing of transition to extended services:

In accordance with WIOA, the VRA will make resources available for extended services to youth with more significant disabilities, for a period not to exceed four (4) years. These services will be provided through contracting of CRPs. The SEMC Analysts will receive the request for extended support services from employers and will negotiate with the CRP the service to be provided and the number of interventions needed to stabilize individual in employment. An authorization for services document will be created on the case management system.

In order to improve the quality, the scope and the extent of the supported employment services, the VRA is committed to meet the goals and the strategies established and described in the previous section e.2.

4. SECTIONS 101(A)(22) AND 606(B)(4) OF THE REHABILITATION ACT REQUIRE THE VR AGENCY TO DESCRIBE EFFORTS TO IDENTIFY AND ARRANGE, INCLUDING ENTERING INTO COOPERATIVE AGREEMENTS, WITH OTHER STATE AGENCIES AND OTHER APPROPRIATE ENTITIES IN ORDER TO PROVIDE SUPPORTED EMPLOYMENT SERVICES. THE DESCRIPTION MUST INCLUDE EXTENDED SERVICES, AS APPLICABLE, TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THE PROVISION OF EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES IN ACCORDANCE WITH 34 C.F.R. § 363.4(A) AND 34 C.F.R. § 361.5(C)(19)(V).

The VRA issues an annual public announcement for the contracting of CRPs that provide supported employment services to consumers with the most significant disabilities. The VRA currently maintains contractual agreements with CRPs across the island.

In accordance with WIOA, the VRA will make resources available for extended services to youth with more significant disabilities, for a period not to exceed four (4) years. These services will be provided through contracting of CRPs. The Support and Employment Modalities Centers' (SEMC) Analysts will receive the request for extended support services from employers and will negotiate with the CRP the service to be provided and the number of interventions needed to stabilize individual in employment. An authorization for services document will be created on the case management system.

At present, there is no procedure to offer extended services to adults. Currently, they rely on natural supports. However, the VRA will work with it.

F. ANNUAL ESTIMATES

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

1. ESTIMATES FOR NEXT FEDERAL FISCAL YEAR—

A. VR PROGRAM; AND

Priority Category	No. of Individuals	No. of Eligible	Costs of Services	No. of Eligible
(if applicable)	Eligible for	Individuals	using Title I Funds	Individuals Not
	Services	Expected to		Receiving
		Receive Services		Services (if
		under VR		applicable)
		Program		
Not applicable	35,000	25,000	18,933,441.73	0

B. SUPPORTED EMPLOYMENT PROGRAM.

Priority Category	No. of Individuals	No. of Eligible	Costs of Services	No. of Eligible
(if applicable)	Eligible for	Individuals	using Title I and	Individuals Not
	Services	Expected to	Title VI Funds	Receiving
		Receive Services		Services (if
		under Supported		applicable)
		Employment		
		Program		
Not applicable	442	150	2,434,096.00	0

G. ORDER OF SELECTION

- 1. PURSUANT TO SECTION 101(A)(5) OF THE REHABILITATION ACT, THIS DESCRIPTION MUST BE AMENDED WHEN THE VR AGENCY DETERMINES, BASED ON THE ANNUAL ESTIMATES DESCRIBED IN DESCRIPTION (F), THAT VR SERVICES CANNOT BE PROVIDED TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR AND ARE DETERMINED ELIGIBLE FOR SERVICES.
- * VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

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

2. FOR VR AGENCIES THAT HAVE DEFINED PRIORITY CATEGORIES DESCRIBE—
A. THE JUSTIFICATION FOR THE ORDER

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.

H. WAIVER OF STATEWIDENESS.

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

Not applicable.

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT.

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

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

A. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

B. THE NUMBER AND TYPE OF PERSONNEL THAT ARE EMPLOYED BY THE VR AGENCY IN THE PROVISION OF VOCATIONAL REHABILITATION SERVICES, INCLUDING RATIOS OF QUALIFIED VOCATIONAL REHABILITATION COUNSELORS TO CLIENTS;

C. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES IN 5 YEARS BASED ON PROJECTIONS OF THE NUMBER OF INDIVIDUALS TO BE SERVED, INCLUDING INDIVIDUALS WITH SIGNIFICANT DISABILITIES, THE NUMBER OF PERSONNEL EXPECTED TO RETIRE OR LEAVE THE FIELD, AND OTHER RELEVANT FACTORS.

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Counseling staff	116	50	166
Support staff	271	207	478
Administrative	249	124	373
Other staff	1	0	1

D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:

The current ratio is approximately 310 clients per VR counselor (36,000 active cases/116 VRC).

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

To articulate the Agency's functioning to address the needs of the population it serves, the VRA requires professional personnel related to the rehabilitation field, occupying various positions, as well as other support and administrative professionals. Support professionals also provide direct service to applicants/consumers, while the administrative staff contributes to the continuity of other necessary processes for the operation of the agency and the achievement of programmatic goals. As of September 30, 2023, the VRA has a payroll of 637 employees, of which 116 are VR Counselors managing caseloads, and the projection is to attend an estimate of 44,000 to 46,000 people with disabilities during program years 2024-2028. During PY 2028 the Agency projects to serve between 25,000 to 35,000 individuals (participants) with disabilities.

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

A. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM; THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

THE NUMBER OF STUDENTS WHO GRADUATED DURING THE PRIOR YEAR FROM EACH OF THOSE INSTITUTIONS WITH CERTIFICATION OR LICENSURE, OR WITH THE CREDENTIALS FOR CERTIFICATION OR LICENSURE, BROKEN DOWN BY THE PERSONNEL CATEGORY FOR WHICH THEY HAVE RECEIVED, OR HAVE THE CREDENTIALS TO RECEIVE, CERTIFICATION OR LICENSURE.

Institute of Higher	Type of Program	No. of Students	No. of Prior Year
Education		Enrolled	Graduates
University of Puerto Rico, Río Piedras Campus	Rehabilitation Counseling Graduate Program	66	23
Pontifical Catholic University of Puerto Rico, Ponce Campus	Rehabilitation Counseling Graduate Program	27	6
Central University of Bayamón	Rehabilitation Counseling Graduate Program	8	4
Central University of Bayamón	Bachelor of Psychology	54	8
Central University of Bayamón	Bachelor of Social Work	31	12
University of Puerto Rico, Medical Sciences Campus	Occupational Therapy	48	16
University of Puerto Rico, Medical Sciences Campus	Physical Therapy	79	20
University of Puerto Rico, Medical Sciences Campus	Master of Speech Pathology	30	23
University of Puerto Rico, Medical Sciences Campus	Nursing	218	114

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

The VRA's institutional mission is to provide vocational rehabilitation services aimed at the successful integration of people with disabilities into the workforce and the enjoyment of a more independent life. For this purpose, the VRA has professionals committed to public service, duly qualified to attend, in an agile and responsive manner, the vocational rehabilitation and independent living needs of people with disabilities, with priority given to those with the most significant disabilities.

To guarantee that we have the best qualified and fully trained personnel to provide services to people with disabilities, we offer professional development opportunities to our human resources. Also, we take into consideration their needs and recommendations for the best functioning of the agency.

Puerto Rico has various institutions of higher education that are preparing professionals in the rehabilitation field. The VRA has agreements with two (2) universities that prepare professionals in the rehabilitation counseling field. The purpose of such agreements is to provide the students the opportunity to carry out their practicum in facilities of our agency. In addition, the VRA recruits graduates from these institutions and others:

- University of Puerto Rico (UPR)- is the only public institution of higher education in Puerto Rico. It has its main campus in Río Piedras with 10 off-campus sites throughout the Island. The Graduate Program in Rehabilitation Counseling is at their Río Piedras Campus.
- UPR, Medical Sciences Campus, has the following programs: Occupational Therapy; Physical Therapy; Master's Degree in Speech Pathology; and Nursing.
- Pontifical Catholic University of Puerto Rico (Ponce) has Rehabilitation Counseling programs.

The VRA, through the Office of Labor Affairs and Human Resources and its divisions, is responsible for developing, updating, and implementing a plan for recruiting, preparing, and retaining qualified personnel to meet current and projected personnel needs. To comply with such requirement, the VRA will continue to carry out the following procedures and activities:

- Through the Job Classification Plan, steps were taken to increase salaries of the counseling staff.
- Identification and communication of the needs for recruitment, reclassification, training, or any other requirement related to human resources.
- Analysis and development of strategies based on the need for recruitment, reclassification, training, or any other requirement related to human resources.
- Realignment of staff to fill vacancies in consumer service centers (centers offering rehabilitation counseling, assessment and adjustment, support, and employment modalities); This strategy responds to the existing public policy of austerity. Likewise, it fosters employee development while serving the agency's staffing needs.
- Offering advice and support on matters concerning the best use of human resources, specifically assigned to the provision of direct services to meet the needs of consumers.

- Provide advice and support on matters concerning the management of the agency's human resources, maintaining close coordination with the program area.
- Planning and provision of human resources (involves the analysis, design, establishment and elimination of positions; selection and recruitment; and personnel evaluation system).
- Maintenance of a human resources inventory involving job classification, existing vacancies, identification of candidates for retirement, and succession planning. This information is analyzed annually to determine employment patterns, positions that are difficult to recruit, and the number of employees with 25 or more years of service.
- Projections of future needs for human resources (in a term of 1 to 5 years), by number and type of employee, emphasizing the staff that offers direct service to people with disabilities.
- Provide training and promote employee development.
- Establish objectives and types of training activities that will be offered to employees, to meet the programmatic and administrative commitments of the agency.
- Coordinate the training of VRA personnel with universities and other institutions that prepare professionals related to the field of rehabilitation.
- Maintenance of efforts to continue recruiting qualified personnel with disabilities. The
 VRA has rehabilitation counselors with diverse disabilities. We continue to emphasize
 compliance with Law 81, as amended, known as the Equal Employment Opportunity Law
 for Persons with Disabilities. As part of the evaluation of exam applications, an additional
 5 points are awarded to anyone who shows evidence of having some type of disabling
 condition.

The VRA recruits without distinction of age, race, color, gender, social or national origin, social condition, political or religious ideas. Our agency recruits based on the applicant's qualifications. The VRA Puerto Rico is the only Designated State Unit in the nation with more than 99% of its population being a minority (Hispanics and/or Spanish speakers).

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

I. PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

II. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO VR AGENCY PROFESSIONALS AND PARAPROFESSIONALS AND FOR PROVIDING TRAINING REGARDING THE AMENDMENTS TO

THE REHABILITATION ACT MADE BY THE WORKFORCE INNOVATION AND OPPORTUNITY ACT.

As established in the Procedures Manual for the Training of All Staff of the Vocational Rehabilitation Administration, the VRA promotes and emphasizes the continuing education of its employees. Therefore, it carries out the following activities to ensure having qualified staff:

- Identification and communication of training needs.
- Analysis and development of strategies based on training needs.
- Design of training activities to address topics concerning administrative/programmatic issues relevant to the VR program.
- Planning of training activities as a result of the needs identified in the needs assessment study, monitoring reports and performance evaluations.

Trainings to the newly recruited VR counselors cover in detail the following aspects: services provision process and federal regulations; assessment and adjustment services; support and employment mode services; productivity indicators; use of the computerized system to provide services; data on the federal RSA-911 Report; fiscal and budgetary aspects of the services provision process; independent living services; and the State Plan. Each topic is presented by the staff of corresponding areas, which allows employees to become familiar with the central office.

i. Particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998

The Program established under Act 264 of 2000, known as the Puerto Rico Assistive Technology Program Act (PRATP), as amended, is responsible for promoting changes in the public and private systems for the inclusion, independence and self-sufficiency of people with disabilities through the use of assistive technology. To do this, it maintains collaborative agreements with government agencies. The VRA maintains an agreement with the PRATP, which is under the University of PR's Medical Science Campus, for the exchange of resources, knowledge, and experience in matters of assistive technology.

The VRA offers assistive technology services in its six regions under the following categories: visual, auditory, mobility, communication, independent living, cognitive area, and access to computers. Services are provided by Occupational Therapists, Physical Therapists, Audiologists, Certified Teachers, Speech-Language Pathologists, Specialists in Services for the Blind and Visual Rehabilitation. These professionals have the required credentials and stay current in the field of AT. To this end, the Agency benefits from the collaboration with the PRATP, since its specialists offer training to VRA personnel on topics such as:

- Low, medium and high technology AT equipment
- AT legislation
- AT integration to assessment and adjustment processes
- AT alternatives for employment and independent living

- AT for specific populations (blind, learning disabilities, mobility impairments)
- New equipment on the market and free equipment alternatives
- Low cost or homemade AT equipment alternatives, among others

These and other training provided to VRA personnel have contributed to keeping their knowledge and skills updated, in turn influencing the provision of services to applicants/consumers, facilitating employment and independent living outcomes.

ii. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.

For the purpose of acquiring and disseminating significant knowledge of research and other sources to professional and paraprofessional staff of the agency, and also regarding the amendments to the Rehabilitation Act made by WIOA, the VRA has established the following procedure:

- 1. Presentation of the Comprehensive Assessment of Rehabilitation Needs results to staff.
- 2. Sending, through internal email, links to articles or information resources related to the rehabilitation field.
- 3. Collaboration with the Graduate School in Rehabilitation Counseling of UPR so that they share with the agency findings of research studies related to the rehabilitation field.
- 4. Allowing staff participation in continuing education courses, many of which contain information about research and evidence-based practices and strategies.
- 5. Trainings, technical assistance and normative communications related to the amendments to the Rehabilitation Act made by WIOA.
- 3. DESCRIPTION OF VR AGENCY POLICIES AND PROCEDURES FOR THE ESTABLISHMENT AND MAINTENANCE OF PERSONNEL STANDARDS CONSISTENT WITH SECTION 101(A)(7)(B) TO ENSURE THAT VR AGENCY PROFESSIONAL AND PARAPROFESSIONAL PERSONNEL ARE ADEQUATELY TRAINED AND PREPARED, INCLUDING—
 - A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE
 REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH
 PERSONNEL ARE PROVIDING VR SERVICES; AND

B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(II) OF THE REHABILITATION ACT, TO ENSURE THAT THE PERSONNEL HAVE A 21ST CENTURY UNDERSTANDING OF THE EVOLVING LABOR FORCE AND THE NEEDS OF INDIVIDUALS WITH DISABILITIES.

A. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services:

In Puerto Rico, the rehabilitation counseling profession is regulated by Law 58 of May 7 of 1976, as amended, known as the Regulatory Law of the Rehabilitation Counseling Profession in Puerto Rico. This legislation establishes that in order to practice as a rehabilitation counselor, the person must have a master's degree in Rehabilitation Counseling and a current state license issued by the appropriate Board of Examiners. It is also required that the professional maintains active his credentials and licenses in the Professional Registry of the Office of Regulation and Certification of Health Professionals, be a member of the College of Rehabilitation Counseling Professionals of Puerto Rico and comply with hours of continuing education. The VRA recruits personnel who meet these requirements in order to ensure the highest standards of the rehabilitation counseling profession.

Similarly, certification or license is required as a condition for employment, benefits and wages for: teachers, physical therapists, occupational therapists, speech/language pathologists, social workers, and psychologists, among others.

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

Currently, the VRA staff receive continuing education to keep them updated regarding issues related to people with disabilities. The Agency has developed the following strategies to maintain personnel standards consistent with the highest requirements of the state and applicable to the profession or discipline in particular:

- Annual review of certifications, licenses and continuing education of professions or disciplines
- Continue providing the staff with the necessary education and training for the optimal performance of their duties.
- Maintain an updated record of training, workshops, training, among others, offered to staff.
- Identify staff retraining needs to strengthen the performance of their duties.
- Annual evaluation of staff performance
- Reinforce working relationships with the local DOL to provide updated information regarding the labor market through formal trainings.

The following is a list of professional associations related to the field of rehabilitation available to provide training to staff:

 College of Rehabilitation Counseling Professionals of Puerto Rico (CPCR): Rehabilitation Counselors

- Association for Persons in Supported Employment (APSE): Personnel related to supported employment services, among others.
- National Council on Independent Living (NCIL): Independent Living Services Staff
- College of Occupational Therapy Professionals of Puerto Rico (CPTOPR): Occupational Therapists and Occupational Therapy Assistants
- College of Social Work Professionals of Puerto Rico (CPTSPR): Social Workers
- Association of Employee Assistance Professionals of Puerto Rico: Central Level Staff of the Employee Assistance Program
- Mental Health and Addiction Services Administration (ASSMCA): Staff of the Employee Assistance Program
- Academy of Audiology of Puerto Rico: Audiologists
- Puerto Rico Assistive Technology Program (PRATP): Occupational Therapists, Speech and Language Pathologists, Audiologists, among others.
- Puerto Rico Registry of Interpreters for the Deaf (PRRID): Interpreters for the Deaf
- Puerto Rican Physiotherapy Association of Puerto Rico: (Physical Therapists and Physical Therapy Assistants)
- National Clearinghouse of Rehabilitation Training Materials: Rehabilitation Counselors and Other Vocational Rehabilitation Professionals
- American Printing House for the Blind (APH): Independent Living

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

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

The agency, in its vision of being the leading agency in providing services to people with disabilities; provides staff with the necessary training and workshops to meet the communication needs of deaf, blind, and deaf/blind applicants/consumers. For this reason, agency staff participate in related training activities. In turn, the VRA has four (4) interpreters for the deaf who can be used when necessary to serve applicants or eligible individuals.

Since Puerto Rico is a Spanish-speaking country (English is used as a second language), we can communicate in the native language (Spanish) of our applicants/consumers. However, if an applicant/consumer only speaks English, we can also communicate in that language. In addition, the VRA can provide clients with alternative formats such as Braille and large print, among others.

The VRA installed a video interpretation system through the VRA facilities, which facilitates communication with the deaf population, regardless of whether the interpreter is physically in the place where the applicant/consumer requires the service.

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

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

In Puerto Rico, the Associate Secretary for Special Education and the VRA are in two different state departments (PRDE and PRDOLHR). The first one is responsible for the implementation of Public Law 108-446, as amended, known as the Individuals with Disabilities Education Improvement Act (IDEIA); the second one is responsible for the implementation of the Rehabilitation Act of 1973, as amended, and State Law 97-2000, as amended, known as the Vocational Rehabilitation Law of Puerto Rico. In addition to the aforementioned legislation, the State Law 51-1996, as amended, known as the Integral Educational Services for Persons with Disabilities, provides for the coordination to be achieved between various local agencies to ensure an effective transition of young people with disabilities coming from the Department of Education. Both agencies maintain cooperative ties related to the development of their respective human resources and as such, have been planning, developing, offering and/or participating in training activities since 1987. Some of the topics covered in such training include: transition from school to work; vocational evaluation; supported employment; IDEIA; Americans with Disabilities Act (ADA), Public Law No. 101-336, as amended; Workforce Innovation and Opportunity Act (Public Law 113-128 of July 22 of 2014); among others. In addition, both agencies are members of an advisory committee, which meets periodically to plan and join efforts in the development and implementation of transition services from school to work.

The efforts and alliances carried out under collaborative agreements with the PRDE, as well as with the PRDOLHR and its components, are conducive to the development of strategies and activities to comply with federal regulations. The VRA is responsible for monitoring the cooperative agreement with the DE. As part of this commitment, the agency participated in meetings with the Special Education Advisory Committee.

J. COORDINATION WITH EDUCATION OFFICIALS.

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

1. DESCRIBE PLANS, POLICIES, AND PROCEDURES FOR COORDINATION BETWEEN THE DESIGNATED STATE AGENCY AND EDUCATION OFFICIALS RESPONSIBLE FOR THE PUBLIC EDUCATION OF STUDENTS WITH DISABILITIES, THAT ARE DESIGNED TO FACILITATE THE TRANSITION OF THE STUDENTS WITH DISABILITIES FROM THE RECEIPT OF EDUCATIONAL SERVICES IN SCHOOL TO THE RECEIPT OF VOCATIONAL REHABILITATION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES.

VRA has the responsibility to comply with the requirements of Chapter 34 of the Federal Regulations Code (34CFR), Section 361.22, which states that the State Plan must contain plans,

policies and procedures for coordination between the Designated State Unit (VRA in Puerto Rico) and the Department of Education (DE) to facilitate the transition of students with disabilities, ages 14-21, from school to vocational rehabilitation services.

Similarly, the VRA has an interagency agreement as a result of the implementation of Law 51, known as the Law on Integrated Educational Services for Persons with Disabilities, of June 7, 1996. This Law assigns responsibilities to various government agencies for the purpose to provide services in a coordinated manner to people with disabilities.

The responsibilities assigned to the VRA by Law 51 are the following:

- 1. Evaluate, throughout the vocational rehabilitation counselor, the cases referred, in order to determine their eligibility for services, as established by state and federal guidelines.
- 2. Implement and provide independent living and vocational rehabilitation services to people with disabilities with the capacity to perform in some type of work, based on state and federal legislation.
- 3. Design an Individualized Plan for Employment (IPE), according to the needs of the person with disabilities and in accordance with current regulations. This plan includes:
- Application of guides and programmatic procedures for the provision of services
- Beginning and ending date of services
- Employment outcomes (regular employment, supported employment, self-employment or any other innovative option)
- Projected date for the achievement of the employment outcome
- Analysis to evidence the functional limitations of the consumer in relation to the employment outcome, outcomes of informed choice and the programmed services
- Recommended VR services which are necessary to achieve the selected employment outcomes
- Comparable services and benefits
- Costs of services
- Evidence of the financial participation negotiated between the VR counselor with the consumer/family, as applicable
- Evaluative criteria
- Specific responsibilities of the VRA
- Responsibilities of the consumer/representative
- Coordination with educational agencies
- Signatures of the parties and dates when plan is developed and approved
- Evidence in the IPE of the participation of the consumer (his own words) regarding the informed choice process and other actions taken during his VR process

- 4. Collaborate and participate in the drafting and implementation of the transition plan to adult life, whenever appropriate.
- 5. Provide Pre-Employment Transition services to students with eligible or potentially eligible disabilities.

The VRA recognizes the importance of the transition process in the youth with disabilities and will maintain its commitment in that it is carried out in accordance with federal and state regulations. The Agency is developing with the PRDE joint activities in order to strengthen the provision of transition services in general, and especially the pre-employment services to those youth with the most significant disabilities.

The VRA has a formal agreement with the SEA and the local DOL regarding Transition Services, which also includes responsibilities of both agencies related to the procedures for exchanging documentation regarding WIOA Section 511, as follows:

- -VRA's Transition Analysts will provide orientation to the local Department of Education staff regarding their responsibilities for compliance with Section 511 requirements and completion of an Orientation from VRA to DE Certification Form.
- -Local DE has the following responsibilities:
- 1. During the next 30 days after completion of each Transition activity or service, DE will send to VRA a Certification of Transition Service, as established in Section 397.30 of the CFR and WIOA's Section 511.
- 2. Provide to the youth with disabilities evidence of transition services completion, among others, within the next 30 days after each activity or service completion, in accordance with CFR 397.20 and WIOA Section 511.
- 2. DESCRIBE THE CURRENT STATUS AND SCOPE OF THE FORMAL INTERAGENCY AGREEMENT BETWEEN THE VR AGENCY AND THE STATE EDUCATIONAL AGENCY. CONSISTENT WITH THE REQUIREMENTS OF THE FORMAL INTERAGENCY AGREEMENT PURSUANT TO 34 C.F.R. § 361.22(B), PROVIDE, AT A MINIMUM, THE FOLLOWING INFORMATION ABOUT THE AGREEMENT:

A. CONSULTATION AND TECHNICAL ASSISTANCE, WHICH MAY BE PROVIDED USING ALTERNATIVE MEANS FOR MEETING PARTICIPATION (SUCH AS VIDEO CONFERENCES AND CONFERENCE CALLS), TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES AND OTHER VOCATIONAL REHABILITATION SERVICES;

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY PERSONNEL FOR STUDENTS WITH DISABILITIES THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS (IEPS) UNDER SECTION 614(D) OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT;

C. THE ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND

QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES;

- D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES.

 OUTREACH TO THESE STUDENTS SHOULD OCCUR AS EARLY AS POSSIBLE DURING THE TRANSITION PLANNING PROCESS AND MUST INCLUDE, AT A MINIMUM, A DESCRIPTION OF THE PURPOSE OF THE VOCATIONAL REHABILITATION PROGRAM, ELIGIBILITY REQUIREMENTS, APPLICATION PROCEDURES, AND SCOPE OF SERVICES THAT MAY BE PROVIDED TO ELIGIBLE INDIVIDUALS;
- E. COORDINATION NECESSARY TO SATISFY DOCUMENTATION REQUIREMENTS SET FORTH IN 34 C.F.R. PART 397 REGARDING STUDENTS AND YOUTH WITH DISABILITIES WHO ARE SEEKING SUBMINIMUM WAGE EMPLOYMENT: AND

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

A. Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services:

As mentioned in the previous section, in Puerto Rico Law 51 of June 7, 1996, as amended, the VRA through its operational components and the Department of Education through its Associate Secretariat of Special Education develop and implement a Transition program for young people with disabilities from school to the world of work for students with disabilities. Consultation and technical assistance may be provided using alternative means for meeting participation.

B. Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under Section 614(d) of the Individuals with Disabilities Education Act:

The VRA and the Department of Education maintain constant communication and collaboration with the purpose of developing new strategies for students with disabilities. Some of the responsibilities of both agencies are the following:

A. Vocational Rehabilitation Administration:

- 1. The Vocational Rehabilitation Administration, in coordination with the Department of Education, will provide Pre-employment Transition Services (PRE-ETS) to potentially eligible students with disabilities. Pre-employment services for students in the transition process are the following:
 - Job Exploration Counseling

- Work Based Learning Experiences
- Counseling on Enrollment Opportunities
- Workplace Readiness Training
- Instruction in Self Advocacy
- 2. The Vocational Rehabilitation Administration staff (Transition Counseling Services Analysts who work Transition or Vocational Rehabilitation Counselors) may provide technical assistance to Education Department personnel by sharing, in orientations or meetings, information that contributes to such personnel have a better understanding about:
 - Medical and other aspects related to impediments.
 - Requirements to request services and eligibility criteria of the Vocational Rehabilitation Administration.
 - How school personnel can assist the student in preparing to receive the services of the Vocational Rehabilitation Administration.
 - Identification of transition needs, such as assistive technology, orientation training and mobility; in other aspects.
 - The scope of pre-employment transition services and the requirements to benefit from them under WIOA.
 - The responsibilities of the Educational Agency compliance with Section 511 of WIOA in order to complete the Personnel Orientation Certification form of the Department of Education by the Vocational Rehabilitation Administration.
- 3. Offer guidance to parents and to students with disabilities, coordinated with the contact person identified in each school, about the Vocational Rehabilitation Administration, application process and scope of services to be provided to people with eligible disabilities, in addition to transition services of pre-employment and the criteria to receive them. These orientations may be offered in general orientation activities coordinated by the school, and in the meetings of the Programming and Location Committee (COMPU), among others.
- 4. Evaluate through the Vocational Rehabilitation Counselor, the referred students to determine their eligibility for services, as established by applicable federal and state laws and regulations.
- 5. Inform in writing, to the official of the agency that refers the case, the criteria used to determine that the student is or are not eligible to receive services from the Vocational Rehabilitation Administration and the basis on which that determination has been made.
- 6. Collaborate and participate in the drafting and implementation of the transition services established in the Individualized Educational Program (PEI) of the school to adulthood, every time the person is cited or convened for that purpose. Such participation may be face-to-face, by telephone (teleconference), virtual or any other permissible means.
- 7. Design an Individualized Plan for Employment (PIPE), according to the needs of the person with disabilities eligible for the Vocational Rehabilitation Administration, on or before the student leaves school.

- 8. Provide vocational rehabilitation services and other transition services necessary, identified, and recommended in the Individualized Plan for Employment, for vocational rehabilitation of the eligible student in the context of their employment goal.
- 9. Design and implement mechanisms for the collection of statistical data.

B. Responsibilities of the Department of Education:

- 1. Identify the population to be referred for evaluation of the Vocational Rehabilitation Administration, according to the eligibility criteria established by the applicable laws and regulations, through the procedure agreed by the agencies.
- 2. Any referral to the Vocational Rehabilitation Administration must include the following:
 - Student's Social Security Number
 - Updated Psychological Medical Evidence
 - Academic History and Report Cards
 - Psychosocial History
 - Vocational Evaluation based on Law No. 263-2006
 - Copy of the Certification of Functional and Pre-Employment Academic Skills based on Law 53-2016
 - Copy of the Individualized Educational Program (PEI)
 - Services Plan. Section 504 or others that apply
 - Any other document that applies

In the case of pre-employment transition services, the Department of Education will offer and certify the following information:

- Student's Social Security Number
- Date of birth
- Age
- Race
- Ethnicity
- School of origin and town
- Town of residence of the student
- Grade enlisted
- If the student receives special education or Section 504 services
- Any others that may apply

- 3. Coordinate and offer the provision of services considering the Transition Services developed in the Individualized Educational Programs to ensure an effective transition of young people with disabilities to post-school life.
- 4. Coordinate with the officials of the Vocational Rehabilitation Administration orientations directed to parents, students and school staff related to the services available to students in the process of transition to adult life.
- 5. Provide academic and vocational services to the population with disabilities, according to applicable federal and state laws and regulations.
- 6. Collaborate with the Vocational Rehabilitation Administration in the objective of providing placement and follow-up services to students with disabilities until they graduate from high school, turn twenty-one (21) years of age or complete education services special.
- 7. Provide through their schools, the human resources for the development of the necessary basic academic and occupational skills, according to the needs identified in the results of the vocational evaluations and according to what is established in the Individualized Educational Program (PEI).
- 8. Provide those related services, support and technological assistance required to achieve the educational objectives of the student in the school environment or context.
- 9. Evaluate, together with the staff of the Administration of Vocational Rehabilitation, the achievements in its implementation.
- 10. Notify the Vocational Rehabilitation Administration, fifteen (15) calendar days in advance, when the participation of its officials in a COMPU meeting is required, for the development of transition services in the PEI.
- 11. Identify alternative means of participation in COMPU meetings, such as teleconferences, virtual and/or any other means that are permissible.
- C. The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services:

The Vocational Rehabilitation Administration will use funds to provide Pre-employment Transition Services (PRE-ETS) to potentially eligible students with disabilities and vocational rehabilitation services to eligible individuals. Also, the VRA's Transition Counseling Services Analysts and Vocational Rehabilitation Counselors are highly qualified staff. The Department of Education will provide the educational and transition services established by law.

- D. Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals:
 - 1. Transition process for students with disabilities begins at schools through orientation provided by the Transition Counselor (TC) of the VRA, to teachers, students with disabilities and/or parents. As a result, meetings of the Placement and Programming

- Committee (PPC) take place, and decisions are made about IPE recommendations. A plan of action is developed, and the TC may accept the referral of the student with disabilities.
- 2. The PPC compiles medical information related to the student's disability and functional level at the time of the referral.
- 3. The TC sends those referrals to the Vocational Rehabilitation Counselors (VRC) at the corresponding VRA regional office and coordinates VRC participation in PPC meetings of eligible students with disabilities.
- 4. When existing information doesn't describe the current functional level of the student, the VRC will perform a preliminary evaluation and consult with the TC as to which evaluations may be available through the Department of Education to complete the evaluation process.
- 5. The VRC requests medical consultant's opinion under the following situations:
- When advice is needed about functional limitations caused by the student's physical or mental disability
- When clarification about medical aspects of disability is needed to facilitate VRC decision making process and service planning. Eligibility determination is made by the VRC.
- 6. Eligibility criteria will be applied considering physical and mental functional limitations, functional capacity, vocational interests, skills, abilities, life experiences and others, identified through the evaluation stages for eligibility determination.

E. Coordination necessary to satisfy documentation requirements set forth in 34 C.F.R. part 397 regarding students and youth with disabilities who are seeking subminimum wage employment:

The VRA has a formal agreement with the SEA and the local DOL regarding Transition Services, which includes responsibilities of both agencies related to the procedures for exchanging documentation regarding WIOA Section 511, as follows:

- -VRA's Transition Analysts will provide orientation to the local Department of Education staff regarding their responsibilities for compliance with Section 511 and completion of an Orientation Certification Form.
- -Local DE has the following responsibilities:
- 1. During the next following 30 days after completion of each Transition activity or service, DE will send to VRA a Certification of Transition Service, as established in Section 397.30 of the CFR and WIOA's Section 511.
- 2. Provide to the youth with disabilities evidence of transition services completion, among others, within the next 30 days after each activity or service completion, in accordance with CFR 397.20 and WIOA Section 511.
- F. Assurance that, in accordance with 34 C.F.R. § 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 C.F.R. § 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage:

The SEA and LEAs will not enter into a contract or other arrangement with an entity, as defined in 34 C.F.R. § 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.

K. COORDINATION WITH EMPLOYERS

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

The designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR Service:

The VRA continues to work with employers to identify opportunities for integrated competitive employment and career exploration. For this purpose, it has Support and Employment Modalities Centers(SEMC), whose staff is responsible for working with employers. They contact new potential employers, as well as those who employ people with disabilities for the purpose of promoting employment opportunities and making their facilities available for career evaluation and exploration activities.

SEMC also organize training activities for employers, through which their knowledge is increased regarding the population with disabilities and the benefits of using them, among other topics. Also, participate in job fairs, where information is provided on the services of the VRA and qualified candidates are marketed.

2. Transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities:

In compliance with WIOA, the VRA has been carrying out activities aimed at offering preemployment transition and transition services aimed at helping students with disabilities to a successful transition to post-secondary life, as well as individuals with disabilities that we serve. See the Progress Report section for details of activities carried out (achievements).

Consistent with the mandate to provide pre-employment transition services to students with disabilities, the Vocational Rehabilitation Administration developed a Cooperative Agreement for interagency coordination with government agencies, municipalities or private employers so that they participate in a Work Based Learning Experience, performing the tasks identified and agreed to, in compliance with the Workforce Innovation and Opportunity Act (WIOA). For these purposes, the pre-employment services area, when offering said activity, guides employers who will offer employment opportunities to students with disabilities who qualify, according to WIOA. This guidance has the purpose of establishing the responsibilities of the VRA and the employer. Likewise, at this time information about the services offered by the Vocational Rehabilitation Administration is provided.

L. INTERAGENCY COOPERATION WITH OTHER AGENCIES

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

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

The VRA has representation in the Assistive Technology Advisory Council of Puerto Rico in order to exchange professional knowledge and to continue referring consumers who could benefit from services such as building and adaptation of equipment, among others. The Council is composed by members representing government agencies and people with disabilities representing the public interest, and VRA's participation is mandatory. The main function of the Council is to respond and represent people with disabilities for the establishment, implementation and evaluation of the Puerto Rico Assistive Technology Program, which is under the University of Puerto Rico Medical Sciences Campus, in order to facilitate information, availability and access to assistive technology (AT). The Director of the VRA's Evaluation and Adjustment Office is the agency's representative at the Council. VRA's participation consists in attending meetings to:

- Provide information to facilitate changes or current processes improvement for AT service delivery to people with disabilities.
- Facilitate coordination of VRA consumers in the AT Annual Needs Assessment
- Offer recommendations for plan development in order to address AT needs, plans implementation and results evaluation.
- Share with members of the Council information about training opportunities on AT topics (forums, symposiums, conferences, etc.).
- Share information about local and federal legislation regarding AT services.

2. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

At the moment, the VRA is not using services, facilities or a program carried out by the Under Secretary for Rural Development of the US Department of Agriculture.

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

WIOA promotes that vocational rehabilitation agencies reach groups and entities that provide services to young people, including young people with disabilities, and makes direct reference to programs such as Job Corps. For this purpose, the Vocational Rehabilitation Administration (VRA) developed public policy to establish the referral process for the Job Corps Program (JC).

This is a free education and vocational training program administered by the federal Department of Labor, which provides services to at-risk youth between the ages of 16 and 24, with the purpose of preparing them for employment. This is a process that facilitates the exchange of referrals,

orientations between programs, and the provision of services for those young people who are eligible to VRA.

- VRA will refer to Job Corps out-of-school youth who might benefit from their services (including training), and Job Corps will also refer individuals to VRA.
- VRA will send to JC reports about eligibility determination on those referrals.
- JC may provide information/training to VRA staff regarding services available at JC and any other topic identified or beneficial to both parties.
- VRA and JC will provide services island wide, according to their resources.

4. STATE USE CONTRACTING PROGRAMS;

VRA does not utilize services and facilities of agencies and programs with respect to state use contracting programs.

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

The Medicaid staff can provide VRA staff with information about the program and also orientations to help them identify individuals with disabilities not receiving services from Medicaid that may be potential beneficiaries. Receiving needed services from Medicaid is a way to provide adequate conditions to benefit from the vocational rehabilitation process to achieve competitive integrated employment. Although Medicaid participants can receive VR services with or without a formal agreement between agencies, and are currently receiving services from the VRA, the agency will coordinate a meeting with Medicaid representatives to discuss topics related to the scope and preparation of a formal collaborative agreement.

VR staff is attending interagency meetings with the local Department of Health and the extended services topic will be addressed. Other agencies' models will be evaluated.

6. STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES;

The VRA participates actively in the meetings of the State Council on Developmental Disabilities (SCDD), providing input on topics discussed, as well as in other activities, such as discussion forums, that promote employment opportunities for this population. It also shared its employers' list with the SCDD and VRA staff is available to support their efforts in order to develop competitive integrated employment opportunities.

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

This Advisory Council of Substance Abuse and Mental Health of Puerto Rico is composed of government agencies, mental health patients and family members. It is supported by the

Substance Abuse and Mental Health Services Administration (ASSMCA, by its Spanish acronym). This is the organization selected by the Health Insurance Administration of Puerto Rico to carry out operational functions of the Health Plan and offer treatment for mental health conditions, alcohol and drug abuse in the San Juan and Western regions. The VRA is a mandatory member of this council and participates in the planning for the provision of these services.

VRA participates as a member of the Advisory Council of Substance Abuse and Mental Health of Puerto Rico. The Council's mission is to promote compliance with federal public law and the public policy of the Commonwealth of Puerto Rico, in order to offer adequate mental health and substance abuse services and promote a better quality of life for people and their families. The Council's objectives are to:

- 1. Participate in the writing and implementation of the Block Grant, in accordance with Section 1915 (a) of the federal law.
- 2. Participate in the development of the State Plan for the Mental Health and Substance Abuse Services Administration.
- 3. Review and evaluate adequacy and distribution of mental health and substance abuse services in PR to identify service needs.
- 4. Advocate for people with mental health and substance abuse disabilities in PR, in order to guarantee establishment of a high-quality integrated service system.

Functions of each member, including VRA, are:

- 1. Attend meetings
- 2. Active participation in deliberation and vote processes
- 3. Staying informed and updated about matters of interest for mental health and substance abuse services improvements
- 4. Participate in activities and perform assigned tasks
- 5. Participate in the Council's working groups.

Every situation regarding an applicant/consumer is managed with the corresponding member. Annually, the VRA submits to the Council a report of mental health impairments attended in the Agency. On the other hand, cases with mental health conditions may request VRA services as self-applicants or through "Atención Primaria de Salud" (APS, by its acronym in Spanish), which are companies contracted by the Health Insurance Administration to offer mental health and substance abuse services to beneficiaries of the Government Health Care Insurance.

The VR Counselor maintains contact with the APS social workers or case manager in order to offer integrated services, including public health actions such as: diagnostic, prevention, and occupational services by the VRA.

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

The VRA has collaborative agreements with the following agencies, corporations and programs not carrying out activities under the Statewide Workforce Development System:

University of Puerto Rico

The VRA coordinates the placement in its own agency of internship as well as practicum students of the master's degree program in Rehabilitation Counseling. These students are a potential human resource to be recruited once their professional credentials are completed. Also, the Graduate School of Rehabilitation Counseling carried out the *Comprehensive Assessment of Vocational Rehabilitation Needs* during 2016-2017.

The VRA has VR counselors placed in the facilities of the Río Piedras and Mayagüez campuses of the UPR for the provision of services to eligible students. The VRA also maintains a collaborative agreement with the Humacao Campus and the Medical Sciences Campus of the UPR so that Occupational Therapy students will carry out practices in the VRA.

State Insurance Fund Corporation

The VRA maintains a *Contractual Agreement of Comprehensive Action for the Rehabilitation of Injured Workers* under the SIFC. Act 182-1951, as amended, authorizes the SIFC to invest in the vocational rehabilitation of its beneficiaries who have disabilities for work. The VRA receives an annual allocation of funds of \$600,000, which is used to match federal funds.

Institute of Developmental Disabilities

The VRA maintains collaboration with and representation in the IDD in order to meet the service needs of the population with developmental disabilities. It has participated in activities aimed at the population with autism, which were coordinated by the IDD.

Caribbean Planning and Work Incentive Assistance Program

The VRA contains a public policy that those consumers who receive SSDI will be referred to this program. The purpose of the referral is that these beneficiaries who are interested in getting a job will be oriented as the impact that the salary will have on the disability benefits they receive, the counseling service needed for benefits planning.

Department of Veterans Affairs

The VRA participates in activities and meetings coordinated by this agency, in order to offer referred eligible veterans with disabilities access to the various services available to achieve competitive employment.

State Independent Living Council (SILC)

The VRA, SILC and independent living centers promote collaborative actions with other public or private organizations that offer services to the population with significant disabilities. They also join efforts to increase the opportunities for community support services for such population. The Normative Communication No. 2011-19 establishes the referral procedure to the independent living centers of those disabled persons who are not eligible for services under Title I, but who

could benefit from services provided in such centers. The VRA allocates funds to the SILC for its operations under the Innovation and Expansion Section.

Department of Health - Division of Services for People with Intellectual Disability (DSPID)

The DSPID is based on a *Community-Based Service Plan*, whose main focus is the deinstitutionalization of people with intellectual disabilities. The VRA offers orientation to the staff of the DSPID and provides services to referred individuals who are eligible.

State Council on Developmental Disabilities

VRA supports and participates in activities related to services for people with developmental disabilities. Also attends assigned work committees.

Private IHE and Non-Profits

Carlos Albizu University. The VRA maintains a collaborative agreement with this university for the practicum of psychology students in our facilities.

The VRA maintains a collaborative agreement with Catholic University of Puerto Rico for the placement in our facilities of practicum and internship students of the Rehabilitation Counseling Department.

9. OTHER PRIVATE NONPROFIT ORGANIZATIONS.

Approval of Proposals:

In 2023, the VRA reviewed the guidelines for formalizing contractual agreements with private non-profit organizations. These guides are intended to guide the proponent regarding the principles and procedures for generating a service proposal. They offer an outline of how the proposals will be presented and the order that will govern them. Likewise, they include the documents that must be attached as part of the proposals submitted.

Currently, the VRA has the following guides:

- Guide for the preparation of proposals to offer services to VRA consumers under the Supported Employment Modality
- Guide for the preparation of proposals to offer Pre-Employment Transition Services
- Request for Proposal for the Comprehensive Statewide VR Services Needs Assessment

This contracting process begins with a Public Notice in written press, which establishes the deadlines for the collection of the Proposal Guide in reference and the deadline for the delivery of the proposal. Once both processes have passed, a Proposal Review Committee analyzes them according to the guidelines, and based on the results, they make recommendations to the Administrator, then beginning the hiring process.

In compliance with the established federal regulations, the VRA assigns responsibility to the programmatic areas of the agency to carry out monitoring activities to those organizations

contracted for the purpose of verifying compliance, project development, services offered, difficulties encountered, use of resources, beneficiary participation, among other matters.

The VRA is willing to establish collaborative agreements with other nonprofit organizations that provide services to people with disabilities, with the purpose of receiving referrals and offering training.

ASSURANCES

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

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

The State Plan must include

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

The State Plan must include

- 3.e. as applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.
- 3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
- 3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
- 3.h. the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.
- 3.i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.
- 3.j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
- 3.k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.
- 3.l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).
- 3.m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.
- 4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:
- 4.a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.
- 4.b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act.
- 4.c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.
- 4.d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.
- 4.e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.

The State Plan must include

- 4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act
- 4.g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.
- 4.h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act.
- 4.i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs.
- 4.j. With respect to students with disabilities, the State,
- 4.j.i. has developed and will implement,
- 4.j.i.A. strategies to address the needs identified in the assessments; and
- 4.j.i.B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
- 4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113).
- 4.j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of preemployment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
- 5. Program Administration for the Supported Employment Title VI Supplement to the State plan:
- 5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.
- 5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
- 6. Financial Administration of the Supported Employment Program (Title VI):

The State Plan must include

- 6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(H) and (I) of the Rehabilitation Act.
- 6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.
- 7. Provision of Supported Employment Services:
- 7.a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.
- 7.b. The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.

Do you attest that these assurances will be met? Yes

VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

States must provide written and signed certifications that:

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

[1] Public Law 113-128.

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Vocational Rehabilitation Administration

- 2. IN THE EVENT THE DESIGNATED STATE AGENCY IS NOT PRIMARILY CONCERNED WITH VOCATIONAL AND OTHER REHABILITATION OF INDIVIDUALS WITH DISABILITIES, THE DESIGNATED STATE AGENCY MUST INCLUDE A DESIGNATED STATE UNIT FOR THE VR PROGRAM (SECTION 101(A)(2)(B)(II) OF THE REHABILITATION ACT). AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (DESIGNATED STATE AGENCY OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT)[2]AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[3], THE REHABILITATION ACT, 34 CFR 361.13(B) AND (C), AND ALL APPLICABLE REGULATIONS[4], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE TO STATES UNDER SECTION 111(A) OF THE REHABILITATION ACT ARE USED SOLELY FOR THE PROVISION OF VR SERVICES AND THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;
- [2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.
- [3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.
- [4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

ENTER THE NAME OF DESIGNATED STATE AGENCY

Department of Labor and Human Resources

- 3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY, OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT, AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[5], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[6], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER TITLE VI ARE USED SOLELY FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES AND THE ADMINISTRATION OF THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;
- ^[5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.
- [6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

- 4. THE DESIGNATED STATE UNIT OR, IF NOT APPLICABLE, THE DESIGNATED STATE AGENCY HAS THE AUTHORITY UNDER STATE LAW TO PERFORM THE FUNCTIONS OF THE STATE REGARDING THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE VR PROGRAM IN ACCORDANCE WITH 34 CFR 361.13(B) AND (C);
- 5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.
 - 6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.
- 7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

María M. Gómez-García

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

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

Administrator

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

FOOTNOTES

- [1] Public Law 113-128.
- [2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.
- [3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.
- [4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.
- [5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.
- [6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

CERTIFICATION SIGNATURE

Signatory information	Enter Signatory information in this column
Name of Signatory	María M. Gómez-García
Title of Signatory	Administrator
Date Signed	02/28/2024

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

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

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

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

Effectiveness in Serving Employers

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

Performance	PY 2024 Expected	PY 2024	PY 2025 Expected	PY 2025
Indicators	Level	Negotiated Level	Level	Negotiated Level
Employment (Second Quarter After Exit)	45.0%	41.0%	45.0%	41.5%
Employment (Fourth Quarter After Exit)	33.0%	41.7%	33.0%	42.0%
Median Earnings (Second Quarter After Exit)	4,020	4,600	4,020	4,625
Credential Attainment Rate	38.0%	32.2%	38.0%	32.5%
Measurable Skill Gains	35.0%	43.6%	35.0%	44.6%
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

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

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - VOCATIONAL REHABILITATION

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

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

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

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

- 1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
- 2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

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

Please refer to GEPA 427 - Form Instructions for Application Package

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

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

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

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

The VRA has services available and accessible to all individuals with disabilities. For the purpose of promoting the participation in vocational rehabilitation services and supported employment, the personnel of the agency participate in community orientation activities. There is no difference as to the availability of services for groups of specific disabilities, or specific cultural or racial groups. Moreover, the VRA carries out transactions as necessary to continue ensuring that its facilities are accessible to all individuals with disabilities.

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

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

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

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

The followings are areas for improvement, based on the most recent CSNA, and the actions VRA will take to address those:

- 1. Need to expand the dissemination of information about ARV in private schools and on the website:
 - Orientations will be coordinated at the island level in private schools and groups of "homeschoolers" will be reached.
 - Information material will be included on the ARV website and applicants will be guided in this regard and on the Agency's social networks.
- 2. Need to streamline the provision of services:
 - Public policies will be reviewed to streamline access and receipt of services.
- 3. Limitation of PRC:
 - Notice for request for proposals will continue to be published.
- 4. Collaboration with employers:
 - A collaborative agreement was carried out with the PR Industrials Association.
 - Meetings began with employers from various geographic areas to consider the process of notification of available positions and consumer referrals.
 - Iob fairs will be held.

- 5. Additional training on special conditions such as Autism and significant impairments:
 - The ARV will carry out training coordination.
 - 3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

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

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

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

The followings are areas for improvement, based on the most recent CSNA, and the actions VRA will take to address those:

- 1. Need to expand the dissemination of information about ARV in private schools and on the website:
 - Orientations will be coordinated at the island level in private schools and groups of "homeschoolers" will be reached.
 - Information material will be included on the ARV website and applicants will be guided in this regard and on the Agency's social networks.
- 2. Need to streamline the provision of services:
 - Public policies will be reviewed to streamline access and receipt of services.
- 3. Limitation of PRC:
 - Notice for request for proposals will continue to be published.
- 4. Collaboration with employers:
 - A collaborative agreement was carried out with the PR Industrials Association.
 - Meetings began with employers from various geographic areas to consider the process of notification of available positions and consumer referrals.
 - Job fairs will be held.
- 5. Additional training on special conditions such as Autism and significant impairments:
 - The ARV will carry out training coordination.

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

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

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

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

Areas for improvement will be addressed starting in PY 2024 and will continue during the State Plan duration.

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - SUPPORTED EMPLOYMENT

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

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

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

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

- 1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
- 2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
- 3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
- 4. What is your timeline, including targeted milestones, for addressing these identified barriers?
- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic

disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.

- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

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

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

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

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

The VRA has services available and accessible to all individuals with disabilities, including supported employment participants. For the purpose of promoting the participation in vocational rehabilitation services and supported employment, the personnel of the agency participate in community orientation activities. There is no difference as to the availability of services for groups of specific disabilities, or specific cultural or racial groups. Moreover, the VRA carries out transactions as necessary to continue ensuring that its facilities are accessible to all individuals with disabilities.

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

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

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

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

The limited number of Community Rehabilitation Programs (CRP) was identified as an area for improvement, based on the most recent CSNA. Also, the need of more trainings to VR staff regarding specific disabilities.

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

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

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

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

Notice for request for PRC proposals will continue to be published and trainings will be provided to VR staff.

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

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

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

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

Areas for improvement will be addressed starting in PY 2024 and will continue during the State Plan duration.

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult program, Dislocated Worker program, Youth program, Wagner-Peyser Act program, Adult Education and Family Literacy Act program, and the Vocational Rehabilitation program— and also submit relevant information for any of the eleven partner programs it elects to include in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. 24 If included, Combined State Plan partner programs are subject to the "common planning elements" in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

[24] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

PERFORMANCE INDICATOR APPENDIX

VOCATIONAL REHABILITATION PROGRAM (COMBINED OR GENERAL) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for

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

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

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

Effectiveness in Serving Employers

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

Performance	PY 2024 Expected	PY 2024	PY 2025 Expected	PY 2025
Indicators	Level	Negotiated Level	Level	Negotiated Level
Employment (Second Quarter After Exit)	45.0%	41.0%	45.0%	41.5%
Employment (Fourth Quarter After Exit)	33.0%	41.7%	33.0%	42.0%
Median Earnings (Second Quarter After Exit)	4,020	4,600	4,020	4,625
Credential Attainment Rate	38.0%	32.2%	38.0%	32.5%
Measurable Skill Gains	35.0%	43.6%	35.0%	44.6%

Performance	PY 2024 Expected	PY 2024	PY 2025 Expected	PY 2025
Indicators	Level	Negotiated Level	Level	Negotiated Level
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹ The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.