

COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS
OFFICE OF VOCATIONAL REHABILITATION
2020-2023 STATE PLAN
Draft

Office of Vocational Rehabilitation Executive Summary

The Commonwealth of the Northern Mariana Islands (CNMI), Office of Vocational Rehabilitation (OVR) portion of the Unified State Plan is submitted to the Rehabilitation Services Administration (RSA) of the U.S. Department of Education (DOE) to describe the vocational rehabilitation and supported employment services provided to CNMI residents with disabilities under Title I and Title VI, Part B of the Rehabilitation Act of 1973, as amended. As a core partner in the CNMI workforce development system as identified in the 2014 Workforce Innovation and Opportunity Act (WIOA), OVR's State Plan is an Appendix to the CNMI's Unified State Plan, which is submitted every four years through the CNMI Statewide Workforce Development Board (SWDB) and CNMI Department of Labor. A comprehensive review of the current State Plan covering program years 2020-2023 resulted in modifications to several descriptions, namely:

- (a) Input of State Rehabilitation Council
 - (i) Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development
 - (k) Annual Estimates
 - (n) Goals and Plans for Distribution of Title VI Funds
 - (o) State's Strategies
 - (p) Evaluation and Reports of Progress: VR Goals

The 2020-2023 VR State Plan was developed in collaboration between the Office of Vocational Rehabilitation and the State Rehabilitation Council (SRC) and incorporated some of the findings and recommendations from the Program's most recent Comprehensive Statewide Needs Assessment (CSNA) that continue to be relevant to the State Plan. The triennial CSNA will be conducted in FY 2020.

The WIOA implementation continues to require significant changes to the OVR and supported employment programs with prominence being placed on transition services to youth and students with disabilities, business/employer engagement, program partnerships, and competitive integrated employment. The VR State Plan, demonstrates the Program's commitment to the empowerment of individuals, and to maximizing their employability, independence, and integration into the workplace and community.

KEY PRIORITIES

The SRC and OVR jointly developed the key priorities and goals to ensure the alignment with WIOA and include transition services for qualified youth and students with disabilities, business engagement, program partnerships and increasing competitive integrated employment. To this, the following key priorities and goals identified are:

Priority 1: Transition and Pre-Employment Transition Services (PreETS)

Goal: Full implementation of pre-employment transition services through the realignment of staff and service delivery methods.

Goal: Expand and improve the CNMI's service delivery infrastructure and the Program's capacity for making available PreETS to students with disabilities in need of such services by utilizing pre-employment transition services Authorized and Coordination Activities.

Priority 2: Business/Employer Engagement

Goal: Increase partnerships with local businesses to develop or expand work experiences through on-the-job and work experience training, internship/ apprenticeship, and employment opportunities for qualified adults and youth with disabilities.

Goal: Develop systems capacity, knowledge and skills to effectively meet the needs of businesses/employers.

Priority 3: Competitive Integrated Employment

Goal: Increase competitive integrated employment opportunities, supports and outcomes for adults and youth with disabilities, particularly those with the most significant disabilities.

Priority 4: Agency Performance

Goal: Improve overall Agency performance

The OVR, along with the Disabilities Network Partners (DNP), service providers and partners in the local public agencies, provides the VR services to applicants and eligible consumers. To date, the CNMI has one CRP in operation, which has created a challenge for the program. The program has been working to increase its service delivery capacity by filling and creating much needed positions to ensure the provision of services. Federal and State local funds are used to provide a broad range of VR services, which include counseling and guidance; assessment, training, and education; transportation; mobility/auxiliary aids; job search and placement; job acquisition/retention services; post-employment services; and, accommodations connected to the consumer's vocational goal.

The implementation of the Unified State Plan is the collective efforts of the Statewide Workforce Development Board, OVR, SRC, WIOA core partners, the DNP, and community programs to work towards the common goals and outcomes. The VR State Plan is the program's roadmap to achieve OVR's mission to increase employment and promote independence of eligible individuals with disabilities residing in the Commonwealth of the Northern Mariana Islands

Program-Specific Requirements for Vocational Rehabilitation

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

* *Sec. 102(b)(D)(iii) of WIOA*

a. Input of State Rehabilitation Council

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;

The CNMI State Rehabilitation Council has been working with OVR on various issues, such as regulatory reforms, pre-employment transition services, business engagement and competitive integrated employment. The SRC has been keeping abreast of program issues and activities through its quarterly and committee meetings.

The SRC jointly reviewed, developed and agreed to the program's priority goals in the VR portion of the Unified State Plan for the next four years. The recommendations are provided below:

SRC Comment/Recommendation on Business/Employer Engagement:

The SRC recommends that OVR maximize public service announcements on the radio and in the newspapers, to increase awareness of OVR's services offered to Businesses, and continue its employer's forums at the quarterly SRC meetings.

OVR Response:

OVR agrees and will make every effort to announce OVR outreach activities to businesses/employers to increase public awareness and most especially access to, and participation in the VR program. The OVR will also continue its partnerships with the DNP as well as the SWDB to ensure trainings requested by employers are completed, especially in the areas of disability awareness and etiquette. The employment specialist, who works closely with businesses/employers in finding qualified individual with disabilities, will also ensure that requests made for trainings are brought to the attention of the appropriate trainers.

SRC Comment/Recommendation on Transition and PreETS:

The SRC recommends the leveraging of both internal and external funds and resources to bring the Pre-Employment Transition Services to more students on all three islands. The SRC also recommends to collaborate with the DNP and other partners to explore alternative options in transportation, accommodations and supports, which includes assistive technology resources, to assist potentially eligible students who participate or wish to participate in PreETS.

OVR Response:

OVR agrees that it should work on increasing the number of potentially eligible students served under PreETS. The program, under the new administrator is currently undergoing a reorganization that would see a formulation of a PreETS team. The PreETS team will provide direct services (required), and authorized activities to all the high schools. The OVR is also committed to working with the Transition Coalition and DNP to leverage funds for PreETS.

SRC Comment/Recommendation on Competitive Integrated Employment:

The SRC recommends that OVR continue its work with the Statewide Development Board (SWDB) towards that establishment of the American Job Center (aka One-Stop) utilizing the appropriate measures outlined in the MOU. This would increase the OVR consumers opportunities in searching for and obtaining competitive integrated employment.

OVR Response:

OVR makes note of the recommendation; OVR will continue to work with the SWDB in advocating for a “physical” American Job Center. As of PY 2019, a location for the AJC was identified, although due to the extensive renovations needed to ensure accessibility and functionality appropriations are still being ascertained.

2. the Designated State unit's response to the Council’s input and recommendations; and
Please refer to A-1 above.

3. the designated State unit’s explanations for rejecting any of the Council’s input or recommendations.

Not applicable

b. Request for Waiver of Statewideness

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. *a local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;*

The CNMI OVR has not requested a waiver.

2. *the designated State unit will approve each proposed service before it is put into effect; and*

Not applicable

3. *All State plan requirements will apply requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.*

Not applicable

c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System.

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 with respect to:

1. Federal, State, and local agencies and programs;

The CNMI OVR continues with its efforts to maintain or develop cooperative arrangements or agreements with various local, State, and Federal agencies and entities for referrals, training, services, facilities utilization, potential cost-sharing, and advocacy activities. These agencies include:

- *State Rehabilitation Council* for information/referral; outreach to increase education/awareness; collaboration/coordination and support for activities sponsored by the Disability Network Partners including the Transition Coalition; program review and

evaluation including guidance on effective strategies to improve services and overall VR agency performance; employer engagement through Council-sponsored Employer Forum during all general membership meetings; etc.

- *Statewide Independent Living Council* for information/referral, peer counseling, IL skills training, advocacy, transition services (transition from nursing homes and other institutions to community-based residences; assisting individuals to avoid institutional placement; and transition of youth with significant disabilities after completion of secondary education to postsecondary life), and transportation services).
- *CNMI Council on Developmental Disabilities* for systemic change, public policy development, advocacy, empowerment training including self-advocacy, identification of barriers to employment and community inclusion for individuals with developmental and other disabilities, referral services, and collaboration and coordination with public education, Medicaid, and self-advocates, and awareness activities during Developmental Disabilities and Employment Awareness Month and/or other disability-related awareness activities throughout the year.
 - Trankilu Alternative Financing Program for assistance in securing a loan with a local bank toward the purchase of the needed AT device or equipment at a low interest rate.
- *Commonwealth Healthcare Corporation:*
 - Transitional Living Center for Work Experience Training for OVR and CGC's mutual consumers and Day Treatment Program to help increase function and independence.
 - Non-Communicable Disease Bureau (NCDB) for information/referral, public education and awareness, advocacy, and training assistance.
 - Students and Youth with Special Health Care Needs Program for care coordination of services to target group between birth and 21 years old.
 - Community Guidance Center (CGC) for referral of rehabilitation services and increased collaboration/coordination of mutual clients to ensure meeting their employment and rehabilitation needs.
 - Maternal and Child Health's Prevention Program for the promotion of health and wellness of women, infants, children (including children with special healthcare needs), adolescents and their families; cost-sharing of DNP-sponsored activities; information/referral; and outreach to increase education and awareness.
- *Office of the Governor:*
 - CNMI Medicaid Office for cost-sharing arrangements for services provided and referrals. Though a Memorandum of Understanding (MOU) with Medicaid exists, a current review may be required.
 - Medical Referral Services (Rota and Tinian Centers, Guam, Hawaii, etc.) for service coordination; logical support; exploration of and utilization of comparable services/benefits; cost-sharing for provision of off-island medical services referral to mutual consumers.
- *Scholarship Office* for educational financial assistance at the Northern Marianas College and other institutions of higher education (IHE), referral of students to OVR for assistance and internships, and job/career exploration including information on rehabilitation careers.
- *Northern Marianas College:*
 - The University Center for Excellence in Developmental Disabilities for faculty, student, and family training and advocacy, accommodations, increased awareness and empowerment in the postsecondary setting, and referral services.

- Counseling Office, Disability Support Services for referrals, sensitivity training, transition, accommodation assistance, financial aid counseling, and counseling on postsecondary educational opportunities.
- Adult Education and Literacy Program for educational and job skill training and referral services.
- Postsecondary Supports Pilot Project for information/referral; pre-employment transition services related to counseling on postsecondary options and instructions in self-advocacy; collaboration and coordination related to student accommodation; and individualized supports to students with disabilities.
- *Department of Community and Cultural Affairs:*
 - Office on Aging which provides information & referral; transportation services as well as the coordination of the Older Americans Awareness Month activities in May; and Senior Community Service Employment Program for subsidized part-time employment opportunities for low income individuals aged 55 years and older.
 - Division of Youth Services for referrals and assistance on outreach.
 - Nutrition Assistance Program for referrals and food assistance.
 - Low Income Home Energy Assistance Program for assistance, utility subsidies and referral services.
 - Child Care Program to assist individuals with disabilities and low income families to pay for child care while working, attending school or training.
 - Commonwealth Respite Service Program for information/referral; outreach to increase education/awareness; volunteer training program to increase capacities leading to potential self-employment opportunities.
- *Carolinian Affairs Office* for referrals and outreach and collaboration/coordination for the translation of VR program materials in the Carolinian vernacular, if needed.
- *Saipan Chamber of Commerce* for sponsorship of employers' training and education, mentoring & jobsite training, and referral services (employment engagement).
- *Society for Human Resource Management and Rotary Club* for employer engagement:
 - Information, referral and advocacy
 - Employer awareness and education
 - Collaboration with OVR for Work Experience (WE) and On-the-Job Training (OJT) placements
- *Northern Marianas Protection and Advocacy Systems, Inc.* for advocacy training, seminars, workshops, referrals, and cost-sharing of activities including National Developmental Disabilities and Employment Awareness Month (DDEAM).
- *CNMI Center for Living Independently* for advocacy and IL skills training, information/referral, peer counseling, transition, and transportation.
- *Mayors' Offices of Saipan, Tinian, and Rota* for referrals, outreach, program support services and coordination, and utility subsidies payment.
- *Karidat* for temporary housing, maintenance expenses, food assistance, and referral services.
- *Ayuda Network* for referrals and inter-agency updates, training and development.
- Commonwealth Office on Transit Authority (COTA) for transportation services, public education and awareness, and information & referral services.
- *CNMI WIOA Core Programs* through the *State Workforce Development Board* for leveraging of resource and expertise to provide mutual clients including students and youth with disabilities with training and employment preparation services, referrals, data

sharing, collaboration/coordination with respect to the American Job Center (aka One-Stop), and other authorized activities per WIOA.

- *Disability Network Partners* for ongoing discussions about issues affecting the disability community in the CNMI, information sharing, cost-sharing on disability awareness as well as employer engagement activities and training opportunities, referrals, technical assistance, etc.
- *CNMI Transition Coalition* for improved collaboration and coordination aimed at improving school to work transition services and preparing students with disabilities for the 21st century workforce through the provision of pre-employment transition services (Pre-ETS).
- *Veteran's Affairs Office* to assist in the coordination of services for common consumers and delivery of quality services for qualified disabled veterans.
- *Department of Corrections / Division of Youth Services* in developing a collaborative relationship with the Department of Corrections (DOC) and the Division of Youth Services (DYS) to coordinate service activities for individuals with disabilities who are interacting with the juvenile justice system, child welfare as well as adults scheduled for release. OVR will work with DOC in assisting inmates with disabilities with determining if they are eligible for OVR services. If found eligible, helping them to prepare for a successful employment transition as a component of their parole process.
- *Special Education Program* for referrals and the coordination and collaboration of the provision of pre-employment transition services to students with disabilities as defined by WIOA.
- *Office of U.S. Congressman Gregorio Kilili Sablan* for information/referral; outreach to increase education/awareness; participation in the annual Veterans Resource Fair sponsored by Cong. Sablan's Office.
- *Northern Marianas Trades Institute* for consumer training, job preparation, and placement; information/referral; outreach to increase education/awareness; support for and provision of student accommodation.
- *The Lady Diann Torres Foundation Disability Center* for information/referral; outreach to increase education/awareness; provision of training to individuals with disabilities to increase employability; provision of training to other community stakeholders including service providers, employers, the DNP, etc. to increase knowledge and capacities around disability employment.

2. State programs carried out under section 4 of the Assistive Technology Act of 1998;

- Trankilu Alternative Financing Program (also known as the Assistive Technology (AT) Loan Program) for affordable loans made available to anyone who intends to purchase assistive technology, adapted vehicles, or modifications for a CNMI resident with a disability. Employers (provided that the assistive technology is to benefit exclusively the individual with a disability) and entrepreneurs with disabilities may qualify to participate in this program. They provide AT training as well as information and referral services. TAFP works in collaboration with the CNMI Assistive Technology Program to provide AT training.
- The CNMI Assistive Technology Program is a federally-funded program under the CNMI Council on Developmental Disabilities and authorized under the Assistive Technology Act of 1998. In 1994, the CNMI Council on Developmental Disabilities was funded to develop, implement, and administer a Commonwealth-wide program to meet the assistive

technology needs of persons with disabilities, which was known as STRAID. However, as a result of the new requirements of the Assistive Technology Act of 1998, as amended, the program is now called the CNMI Assistive Technology Program (CNMI ATP), which is under the CNMI Council on Developmental Disabilities. The CNMI ATP provides assistive technology-related services CNMI-wide to help children and adults with disabilities live productive, independent, and good quality lives. As an AT Act program, CNMI ATP carries out state level and leadership activities. State level activities consist of Alternative Financing Program (Trankilu Alternative Financing Program), Device Reutilization Program, Device Loan Program and Device Demonstration Program. Furthermore, CNMI ATP conducts state leadership activities CNMI-wide such as training, technical assistance, public awareness and outreach, information dissemination and referrals, and coordination and collaboration with various public, private and non-government entities.

3. Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture;

The CNMI OVR does not currently have cooperative agreements with any programs funded under the USDA.

But, as previously stated, the OVR will, when appropriate, continue to develop agreements with other state and local agencies that are not part of the statewide workforce investment system, including programs carried out by the Under Secretary for Rural Development of the Department of Agriculture and State programs, when such agreements will benefit the vocational rehabilitation of persons with significant disabilities.

4. Non-educational agencies serving out-of-school youth; and

- Workforce Investment Agency (WIOA Title I Program) for leveraging of resources and expertise to provide mutual clients including students and youth with disabilities with training and employment preparation services, referrals, data sharing, collaboration/coordination with respect to the American Job Center (aka One-Stop), and other authorized activities per WIOA.
- Continue to maintain and strengthen relationships with the Northern Marianas Trades Institute for continued referrals of VR clients to NMTI for training preparation in the workforce in conjunction with OJT placement in the public or private sectors and to provide guidance/technical assistance to the trades school in the area of reasonable accommodation and effective communication with individuals with varying disabilities.
- Latte Training Academy for workforce development providing skilled and certified (Allied Health, Hotel & Hospitality, Business, and Information Technology) vocational training and career enhancement.
- Island Training Solutions for practicable ready to use training for public and private sector staff and management in Customer Service Team Building, Problem Solving, etc.

5. State use contracting programs.

Not applicable

d. Coordination with Education Officials

Describe:

1. DSU's plans

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

Section 20 of OVR's Policy and Procedures Manual states: "The Rehabilitation Act of 1973, as amended, requires the development of cooperative agreements, formal interagency agreements and memorandums of understanding, as appropriate, with other public agencies (CFR 361.22, CFR 361.23, 361.24). The cooperative agreement is designed for use whenever public agencies enter into agreements and does not involve an exchange of funds. This may be accomplished by executing a COOPERATIVE AGREEMENT BETWEEN PUBLIC AGENCIES, and obtaining required signatory approvals. The Rehabilitation Act of 1973, as amended, also allows for third-party cooperative arrangements (CFR 361.28). Interlocal contracts with public agencies may be entered into by executing an INTERLOCAL CONTRACT BETWEEN PUBLIC AGENCIES and obtaining required signatory approvals. The interlocal contract is designed for use whenever public agencies contract with one another for the performance of any government service" (p. 78).

Where specifically School-to-Work Transition is concerned, the CNMI Office of Vocational Rehabilitation (OVR) and the Public School System-Special Education Program (PSS-SPED), in FY 2018, re-evaluated their existing Interagency Cooperative Agreement (ICA) and made necessary revisions per the requirements of the Workforce Innovation and Opportunity Act (WIOA) of 2014. Section 8 of the ICA talks about Pre-Employment Transition Services: "The Rehabilitation Act of 2014, as amended (under Title IV of the Workforce Innovation and Opportunity Act signed into law by President Obama on July 22, 2014) requires OVR to provide eligible students with disabilities under IDEA or Section 504, ages 16-21 years, with pre-employment transition services (PREETS), such as: Job exploration counseling, Work-based learning opportunities, Counseling on post-secondary educational opportunities, Workplace readiness training, and Instructions in self-advocacy. PSS-SpEd will provide assistance to OVR in the coordination with employers on transition services including PreETS for students with disabilities" (p. 3).

Procedures regarding the timely development and approval of individualized plans for employment for all CNMI OVR consumers, including students with disabilities, may be found in the Policy and Procedures Manual, under Section 16: INDIVIDUALIZED PLAN FOR EMPLOYMENT (IPE): "After determination of eligibility, Counselor shall develop an individualized plan for employment (IPE) within 60 work days, and the identification of rehabilitation needs, there will be an IPE initiated" (p. 35). In addition to the ICA, the School-to-Work Transition Guidelines provides more practical information including best practices for delivering transition services. According to the Guidelines, the CNMI OVR must ensure that the "Individualized Plan for Employment (IPE) should be completed as soon as eligibility has been determined but no later than 60 days, and the necessary information has been gathered. An IPE should be in place prior to graduation or exit from school. The IPE is to be coordinated with the student's Individual Education Program (IEP) that is developed by the school system's transition team" (p. 2).

2. Information on the formal interagency agreement with the State educational agency with respect to:

A. consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;

Section 3 of the Interagency Cooperative Agreement states that the “OVR and PSS-SpEd will engage in providing the other with consultation and technical assistance to plan for and ensure the smooth transition of students with disabilities” (p. 2).

VR staff are essentially a resource for schools and families to help educate students about supports needed for a smooth transition from school to work, further training, education and/or independent living. To achieve this objective, the following general activities are completed:

- Consulting with and educating schools, parents, students, and other agencies about VR services.
- Conducting outreach that includes VR orientation presentations, dissemination of VR brochures, and technical assistance with transition IEP planning.
- Participation in transition fairs, job fairs, and other activities targeting parents and students to increase appropriate referrals.
- Conducting early identification and assessment of student needs for transition services.
- Bringing the VR program to the school campuses through continued co-location efforts.
- Communicating relevant VR policy which may impact a student’s application or eligibility for VR services.

B. transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

Section 3 of the Interagency Cooperative Agreement states that the “OVR’s involvement during the transition planning phase of the IEP helps to ensure that the vocational or employment-related provisions of the IEP provide a bridge to the vocational rehabilitation services needed under an IPE for those students determined eligible for the vocational rehabilitation program” (p. 1).

As an extension of the 2018 Interagency Agreement between the Office of Vocational Rehabilitation and the Public School System-Special Education Program, the School to Work Transition Guide (SWTG) was developed to ensure a smooth transition process. This guide suggests best practices that can be used as a tool to assist in the improvement of communication, coordination, and services for students with disabilities transitioning from school to work. It was designed to be useful for all persons and agencies (stakeholders) involved in the transition process. This document varies depending upon the stakeholder’s needs at the time of use. The Agencies and Programs involved in the development of this guide agreed to the following core values:

- Transition is Essential: Transition is important for all students, regardless of disability. Transition provides the focus and early planning for all youth with disabilities to move towards achieving their goals.
- Individualization: Transition services are not the same for all students. Services are person-specific and developed with the young adult, their family, and those who know them well based on their interests, abilities, and needs.
- Outcome Focused: Transition services are specific outcomes driven activities designed to help students achieve their goals of training/education, employment, and independent living.

- **Achieve More Together:** Working together, as equal partners, creates a seamless transition from school to work. All can assist the student and their families identify their needs and develop plans to meet these needs. Everyone has something to contribute and leveraging of funds and staff leads to exceptional outcomes.
- **Student and Family Involvement:** Students and their families are actively involved in the entire transition process including service decisions. They are full and meaningful partners in the process.
- **Identification of Roles and Process:** Identifying the roles of every partner and the processes needed, sets clear expectations between partners about areas of focus and expertise, responsibilities, and where to go for assistance beyond the individual programs scope of practice. Knowing where to go for the right answers allows for smooth discussions about possibilities.
- **Increase Understanding:** Share information so all partners are aware of available resources to help in transitioning.

C. roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

Reference: An Interagency Cooperative Agreement Between The Office of Vocational Rehabilitation (OVR) And The Public School System-Special Education Program (PSS-SPED) April 02, 2018.

Section 10 - Mutual Responsibilities

- **Training and Technical Assistance:** OVR will provide consultation and technical assistance to PSS-SpEd that will assist in the planning and transition of all students with disabilities who are eligible or potentially eligible from school to post-school activities, including employment. Develop and provide common training and professional development opportunities to improve transition and employment results to youth.
- **Planning and Coordination:** Joint collaboration in the development/continuation of a work group (Transition and Coordination Team-TACT) that targets the improvement of transition to employment outcomes in integrated, community settings for students with disabilities. The TACT will also explore and identify pre-employment transition services and transition-related services (work-based learning; internships; apprenticeships; dual enrollment programs; industry recognized credential programs and college programs). (Supporting document: School to Work Transition Guidelines) Ensure mutual support for and participation in the respective programs required State Plan and Needs Assessment process. Further, parties agree to work collaboratively to coordinate with and engage employers on pre-employment transition services and transition services for you and students with disabilities.
- **Data Sharing:** Sharing of data, within the bounds of confidentiality, of eligible students regarding transition services and outcomes.
- **Transition Services/Accommodations:** Identify and disseminate information about pre-employment transition services and transition services, accommodations, employment services, effective practices/strategies that create positive employment outcomes to program staff, partners, families, individuals, employers, and public and private stakeholders.
- **Assistive Technology:** Upon completion of the free appropriate public education (FAPE) of many eligible students, PSS-SpEd is left with items of assistive technology which have been required by student's IEPs and which have been customized for particular students or

are otherwise unlikely to be used by different students. Such items of assistive technology often are stored until they become obsolete.

- Co-Location Initiative: Parties agree to continue to lend their support for OVR staff, i.e., vocational rehabilitation counselor, to be based at the public high schools for a rehabilitation program, conduct Q&A with stakeholders, i.e. students, parents, and school personnel, entertain applications for vocational rehabilitation services, conduct initial interviews, and increase referrals to OVR.

Section 11 of this document describes further the roles and responsibilities for each agency as applicable to their regulatory authority.

Section 12 - Financial Responsibility of the Interagency Cooperative Agreement States: When a student with a disability is both in school and has an IPE with OVR, the cost of services necessary for both the student's education and for the student to become employed, will be delineated between PSS-SpEd in terms of what will work with PSS-SpEd representative in determining which is needed to complete high school coursework and which services pertain to fulfilling the IPE.

When another adult service provider agency has been identified by the IEP team (that can pay part or all of the cost of a specific service or device), a representative of that agency shall be invited and included in the IEP meeting where the responsibility for payment is negotiated. Arrangements to share the cost of a given service or device will be fully reflected and explained in the IEP or the IPE, or both. (Note: OVR is a secondary source of financial assistance.)

Section 4 - Transition Planning Related to the Individualized Education Program (IEP): Schools usually designate a staff person as a Transition IEP Coordinator. This person is responsible for communicating the student's transition services needs to agencies representatives who were unable to attend. For CNMIPSS-SpEd, responsibility for the coordination of transition services is transferred to the school level and falls within the purview of SPED teachers.

The school must obtain agency commitments to provide or pay for needed transition services or reconvene the IEP to determine alternate methods for meeting the student's needs. It is important to the VR Counselor to respond to school staff on the progress of mutual students, with appropriate parental, legal guardian, or student (at age 18) consent.

D. procedures for outreach to and identification of students with disabilities who need transition services.

Reference: An Interagency Cooperative Agreement Between The Office of Vocational Rehabilitation (OVR) And The Public School System-Special Education Program (PSS-SPED)

Section 5 - Procedures for Outreach - OVR and PSS-SpEd will continue to support outreach activities that will increase referrals to OVR in an effort to provide eligible students with disabilities a smooth school to work transition. (Refer to the School to Work Transition Guidelines for detailed description on procedures for outreach.)

Outreach activities of the VR Counselor are primarily focused on providing information about VR to school staff, students, parents, community professionals, and others interested in pre-employment transition services and 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 following:

- Vocational Rehabilitation program purpose
- Eligibility requirements
- Procedures
- Scope of services that may be provided to eligible students
- Pre-employment transition services that may be provided to potentially eligible students

The VR Counselor can provide information regarding OVR services that can be passed on to students and their families by contacting the SPED Teacher, Transition Coordinator, SPED Coordinator, or School Counselor. Ways the VR Counselor may conduct outreach include:

- Providing VR brochures and business cards to the school
- Presenting at the first Open House or Orientation held at the school
- Conducting regularly scheduled school visits (co—location)
- Participating in Transition and job fairs at the school
- Attending school IEP meetings when invited
- Speaking about pre-employment transition services and VR services at school staff meetings, teacher in—service training, student/parent group meetings, or interagency meetings

The VR Counselor should work with school staff to ensure referrals of students with disabilities to the OVR program at the beginning of the school year as follows:

- Referral for pre-employment transition services beginning at age 16 for all students with disabilities who may need them
- Referral and application for OVR services is recommended at age 16 for students who are involved in or plan to be involved in Community-Based Work Experiences (CBWE)
- Although OVR does not impose an age limit on when a student can apply for VR Transition services, they encourage students to do so two years prior to school exit
- Students at high risk of dropping out should be referred if they are old enough to begin training or searching for employment
- The VR Counselor may act in an advisory capacity for at—risk youth who are too young to apply and/or do not have a disability

This should allow sufficient time for determining eligibility, identifying OVR service needs, referring students to community services, and developing the approve IPE prior to the student's exit from school.

Section 8 - Services Prior to Referral Transition services, including pre-employment transition services, may be provided by OVR to students with disabilities beginning at age 16 (or younger, if the IEP team determines it is appropriate), who have not yet applied for VR services. Consultation to students and families, technical assistance to schools, and participation in IEP meetings when invited.

OVR will collaborate withPSS-SpEd to provide any or all of the five pre-employment transition services required activities described in the next section to students with disabilities (ages 16-21, or younger, if the IEP team determines it is appropriate).

e. Cooperative Agreements with Private Nonprofit Organizations

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

There are no private non-profits providing VR services in the CNMI.

f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

A fee for services arrangement is in place with only one (1) private company to provide job coaching services: Marianas Health. The job coaches assist individuals with most significant disabilities during their participation in the work experience and/or on-the-job training programs. When necessary, the services of a job coach is procured to assist newly-hired consumers to ease their transition into employment.

Personal assistance services are provided to consumers with most significant disabilities to help them to further maintain their employment through the choosing of their own PAs who are compensated by OVR.

The CNMI continues to have a very limited number of community rehabilitation programs (CRP), supported employment and extended service providers. This creates challenges in providing for a comprehensive support services, which are required for a successful program. Discussions with public agencies and organizations to provide and/or fund supported employment and extended services are ongoing. In addition, CNMI OVR will continue to identify individuals who have received training to provide supported employment services to VR consumers. Consorted efforts continue in the recruiting of retired special education teachers to provide job coaching services.

g. Coordination with Employers

(Formerly known as Attachment 4.8(b)(5)). Describe how 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 services; and

CNMI OVR will strengthen collaboration and coordination with employers to identify competitive integrated employment and career exploration opportunities to facilitate VR services for consumers with disabilities to prepare them for employment by:

- Contacting and engaging in meaningful conversations with employers individually to learn about their specific business culture and needs,
- Attending and networking with employers at events such as the Chamber of Commerce, Society for Human Resource Management (SHRM), Rotary Club, Hotel Association of the Northern Mariana Islands (HANMI) and other similar venues,
- Utilize the support and expertise of the State Rehabilitation Council (SRC), especially those who represent business/industry/labor, to help facilitate employer engagement activities and gauge effectiveness,

- Partner with the State workforce development board and Disability Network Partners to work with employers to identify opportunities for competitive integrated employment,
- Participate in job/career fairs sponsored by various partners within our community, including but not limited to Public School System co-op education and training program, Northern Marianas College, and those sponsored by employers both in the public and private sectors,
- Gather feedback from employers via formal survey instrument or informally through regular every day discussions/conversations,
- Work with our Disability Network Partners to consider inclusion of a few employers from different segments of the workforce to attend, participate, become involved in DNP activities promoting competitive integrated employment,
- Share program information with employers and consider linking up the OVR website to employers' websites. Information could also be shared through email and by posting on bulletin boards of various companies,
- Provide professional development and support to the Employment Specialist, whose duties and responsibilities revolve around business relations and employer engagement,
- The Saipan Chamber of Commerce had graciously offered for OVR to utilize the Chamber's website as a repository of disability employment resources for employers, and
- The SRC general membership meetings will provide an opportunity to listen to and/or address employer or business concerns via the Employer Forum segment of the agenda. This practice started in PY 2017 during the Council's 12/21/17 general membership meeting and will continue for all subsequent regular meetings.

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

CNMI OVR will strengthen collaboration and coordination with employers to identify competitive integrated employment and career exploration opportunities to facilitate Transition services, including Pre-Employment Transition Services (Pre-ETS) for students with disabilities to prepare them for employment by:

- Contacting and engaging in meaningful conversations with employers individually to learn about their specific business culture and needs, and what opportunities could be available to PreETS, especially with regards to Work-Based Learning Experiences (WBLE) and transitioning students,
- Attending and networking with employers at events such as the Chamber of Commerce, Society for Human Resource Management Rotary Club, and/or other similar venues,
- Utilize the support and expertise of the State Rehabilitation Council (SRC), especially those who represent business/industry/labor, to help facilitate employer engagement activities and gauge effectiveness,
- Partner with the State workforce development board and Disability Network Partners to work with employers to identify opportunities for competitive integrated employment as well as WBLE opportunities,
- Participate in job/career fairs (for consumer or student support) sponsored by various partners within our community, including but not limited to: Public School System co-op education and training program, Northern Marianas College, and those sponsored by employers both in the public and private sectors,
- Gather feedback from employers via formal survey instrument or informally through regular every day discussions/conversations,

- Work with our Disability Network Partners to consider inclusion of employers from different segments of the workforce to attend, participate, become involved in DNP activities promoting competitive integrated employment as well as for Pre-Employment Transition Services (i.e. WBLE/OJT/Apprenticeship Programs)
- Share program information with employers and consider linking up the OVR website to employers' websites. Information could also be shared through email and by posting on bulletin boards of various companies,
- Ensuring proper supports and training for the Employment Specialist whose duties and responsibilities revolve around business relations and employer engagement,
- OVR utilizes the Chamber's website as a repository of disability employment resources for employers, and for the promotion of PreETS, and
- The SRC general membership meetings provide an opportunity to listen to and/or address employer or business concerns via the Employer Forum segment of the agenda. This forum also affords OVR the opportunity to promote and market the PreETS and transitioning students.

h. Interagency Cooperation

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

1. the State Medicaid plan under title XIX of the Social Security Act;

During the general membership meeting of the CNMI Council on Developmental Disabilities (CDD) on 11/12/15, of which the OVR and the Medicaid are members, formal discussions on how we can collaborate with Medicaid to provide longer term supported employment and extended services to people with the most significant disabilities through applicable waiver(s) was initiated. The Medicaid Administrator informed council members that because of a Medicaid cap for the CNMI and other territories, certain waivers are not applicable, and until such time that the cap is lifted, Medicaid will be unable to provide home and community—based services in support of competitive integrated employment. The Medicaid continues to provide services under their State Plan of 1989. Mandatory services include: inpatient services; outpatient services; other lab and x—ray; nursing facility services (only when referred off— island); physician's services; early and periodic screening, diagnosis, and treatment for children under 18; home health care (only when referred off— island); family planning services; and rural health clinic (only when referred off— island).

In addition, optional services are also covered, such as: clinic services; optometry services; other practitioner services; dental services; physical and occupational therapy (rehabilitation); speech, hearing, and language disorders; prescribed drugs, dentures, prosthetic devices, and eyeglasses; wheelchair; medical supplies; and transportation (to off— island facility only). Continued discussions with Medicaid by the CNMI Disability Network Partners (OVR included) will be planned including obtaining federal— level guidance and technical assistance on how CNMI's current Medicaid restriction on the cap may be overcome to provide additional longer term services needed by people with more significant disabilities in order to achieve competitive integrated employment.

2. the State agency responsible for providing services for individuals with developmental disabilities; and

CNMI OVR partners with the Council on Developmental Disabilities by engaging in activities that promote and improve our public VR program; identify and address the employment and other needs of people with disabilities; strengthen partnerships among the local Disability Network Partners (OVR, CDD, Northern Marianas Protection & Advocacy Systems, Inc., University Center for Excellence in Developmental Disabilities, Transition Coalition, employers, community rehabilitation programs, etc.); advocate that people with disabilities receive timely and quality services from community providers; educate the public on the mandates of federal and local statutes as they pertain to people with disabilities; leveraging of resources and expertise on similar State Plan goals/objectives for the benefit of VR consumers and potential applicants; among other things.

Collaboration with the CDD takes on the following form:

- Regular communications throughout the year.
- Involvement in mutual councils and boards, such as the Council on Developmental Disabilities, the State Rehabilitation Council, the Special Education State Advisory Panel, the Ayuda Network, the Consumer Advisory Committee of the University Center for Excellence in Developmental Disabilities, the Statewide Independent Living Council, etc.
- Involvement in mutual coalitions, for instance, the Transition Coalition and the Disability Network Partners.
- Attendance and participation at each respective programs' public hearing or forum to help inform the State Plan development.
- Leveraging of resources and expertise in areas of employment, advocacy, and systems change resulting in competitive, integrated, and timely services.
- Information and referral related to employment.

CNMI CDD is committed to promoting systems change, providing advocacy, and supporting the independence, productivity, integration, and inclusion of individuals with developmental and other disabilities in our island community.

3. the State agency responsible for providing mental health services.

The Community Guidance Center (CGC) is the primary provider of mental health and substance abuse services for all individuals residing in the CNMI. It incorporates all outpatient mental health services and administers all Federal health programs in the CNMI related to mental health and substance abuse, as well as all other publicly funded mental health services. Through collaboration and establishing interdependent relationships with other system providers, CGC is committed to providing high quality mental health and substance abuse treatment and other therapeutic services to the multi-diverse population of the CNMI, as well support services to families and friends, community outreach, prevention and education services, and referral assistance to other community resources.

OVR initiated discussions with CGC about possibly entering into a memorandum of understanding (MOU) on how to better serve mutual consumers in achieving competitive integrated employment. This project continues in PY 2020 and final reviews were completed by the CGC's legal counsel and is currently under review with OVR's legal counsel for finalization and implementation.

i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development

(Formerly known as Attachment 4.10)). Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

1. Data System on Personnel and Personnel Development

A. Qualified Personnel Needs.

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

i. the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

The qualifications of CNMI OVR staff are under consistent annual review to identify educational and training needs that are required to enhance professional development. These needs are incorporated in individual staff development plans that conform to both CNMI Personnel Service System Rules & Regulations (PSSR&R) and VR standards as established in the Rehabilitation Act Amendments of 1998.

All counseling professionals who do not meet these standards will be required to demonstrate significant progress per Section 101(a)(7) of the Rehabilitation Act. Activities that will continue to be conducted on an annual basis include:

- Projections on the number of VR consumers to assess staffing needs, and to maintain or plan appropriate and adequate staffing levels;
- Findings of monitoring reports, SRC recommendations, Consumer Satisfaction Survey results, and performance evaluations will be reviewed for staffing suggestions. Other documents, such as reviewers' comments on the State plan development, deficiencies noted in submitted quarterly/annual RSA reports, and monitoring reports will also be reviewed;
- Consulting with VR staff to identify training topics to support personnel development;
- Partnering with the Disabilities Network Partners (DNP) to identify mutual training needs that would allow for the leveraging of funds;
- Ongoing reviews of progress on the individual professional staff development plan.

ii. the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

The Office of Vocational Rehabilitation currently employs sixteen (16) personnel that provide VR services to an estimated three hundred (300) individuals/consumers per year.

VR administrative support and services are provided by:

- One (1) Director
- One (1) Fiscal Officer with over thirty (30) years dedicated to CNMI OVR
- One (1) Executive Secretary
- One (1) Data Analyst
- One (1) Administrative Clerk,

Direct VR/ILOB services are provided by:

- One (1) Case Services Manager
- Three (3) VR Counselors (General),
- One (1) Employment Specialist.
- One (1) VR Pre-Employment Transition Coordinator,
- One (1) PreETS Specialist,
- One (1) PreETS Training Assistant,
- One (1) ILOB Case Worker Assistant, and
- Two (2) VR Counselor Aides.

iii. projections of the number of personnel, broken down by personnel category, who will be needed by the State 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.

Due to CNMI OVR’s increased outreach activities, the program anticipates about a 5% increase in the number of individuals/consumers that will be served in PY 2020. The OVR has also increased activities in seeking out potential applicants at the public high schools as well as the college and trades school campuses. In addition, VR Counselors make regular visits to the islands of Tinian and Rota thereby receiving a steady number of applications through the year, not to mention those received from Saipan. Current counselor caseload average fluctuates between 56 to 88 (*does not include PreETS*). In addition, WIOA puts special emphasis on employer engagement activities as employers comprise VR’s second customer base. This said, CNMI OVR successfully pursued the recruitment and hiring of its Employment Specialist who officially assumed his position on October 16, 2017. In addition, CNMI OVR will pursue the re-certification of the Case Service Manager position in the near future. The chart below represents current and projected vacancies by job title:

| Job Title | Total Positions | Current Vacancies | Projected Vacancies |
|----------------------|-----------------|-------------------|---------------------|
| Director | 1 | 0 | 0 |
| Fiscal Officer | 1 | 0 | 1 |
| Executive Secretary | 1 | 0 | 0 |
| Administrative Clerk | 1 | 0 | 0 |
| Data Analyst | 1 | 0 | 0 |

Direct Service Providers:

| Job Title | Total Positions | Current Vacancies | Projected Vacancies | Staff to Consumer Ratio |
|----------------------------|------------------------|--------------------------|----------------------------|--------------------------------|
| Case Services Manager | 1 | 0 | 0 | |
| VR Counselor | 3 | 0 | 0 | 100 |
| VR Counselor Aide | 2 | 0 | 0 | 150 |
| ILOB Case Worker Assistant | 1 | 0 | 0 | 50 |
| Employment Specialist | 1 | 1 | 0 | 150 |
| PreETS Coordinator | 1 | 0 | 0 | 264 |
| PreETS Specialist | 1 | 1 | 0 | 264 |
| PreETS Training Assistant | 1 | 0 | 0 | 264 |

VR Counselors are exclusively responsible for the five non–delegable functions (eligibility determination; priority of service; Individualized Plan for Employment approval and signature; Individualized Plan for Employment revisions or amendments; and determination that a successful employment outcome has been achieved and the record of services can be closed). Collectively, the VR Counselor, VR Counselor Aide, Employment Specialist, and Case Services Manager focus on providing VR services necessary for consumers to prepare for, find, and retain employment. The PreETS Coordinator, Specialist and Training Assistant provides direct services to potentially eligible students.

B. Personnel Development

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

CNMI OVR has one (1) VR Counselor with a general caseload who completed the San Diego State University’s (SDSU) Master’s degree program in Rehabilitation Counseling via distance learning in the fall 2019 semester. The VRC anticipates completing her CRC by the spring of 2020.

CNMI OVR continues to encourage its counseling support staff to enroll at the Northern Marianas College at the level of their professional development needs and requirements.

CNMI OVR will continue to explore educational and training opportunities offered by other educational institutions that can further assist with enhancing the professional development of its staff.

ii. the number of students enrolled at each of those institutions, broken down by type of program; and

Currently the CNMI OVR has two VR counselors as well as the Acting Case Services Manager who are awaiting the opening of a new cohort with the SDSU Master’s program. Additionally, there is one VR counselor pursuing a Master’s degree in rehabilitation counseling from San Diego State University through distance learning.

iii. 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.

None

2. Plan for Recruitment, Preparation and Retention of Qualified Personnel

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit 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 CNMI OVR continues to maintain its affiliation with the San Diego State University (SDSU) as there are no institutions of higher education within the CNMI, Micronesia, or Hawaii that offers a Master's in Rehabilitation Counseling. CNMI OVR's recruitment efforts include contacts at SDSU and with the National Rehabilitation Leadership Institute (NRLI) as well as the Council of State Administrators of Vocational Rehabilitation (CSAVR), to name a few, for referrals or information about recent graduates in the field.

CNMI OVR will continue its efforts in obtaining a list of CNMI students who are pursuing a 4-year degree in Rehabilitation and Human Services at the Northern Marianas College as well as those who are receiving local scholarship assistance and majoring in related fields at off-island universities and/or colleges. These students will be sent information about careers in rehabilitation counseling in hopes of igniting interest via brochures and information packets provided to the CNMI Scholarship Office.

Job skills development for current personnel will be accomplished through enrollment in appropriate classes at the Northern Marianas College. Staff's educational, skills, and professional development will also be reinforced by regularly scheduling staff to attend job skills training sessions conducted by other government or partner agencies, as well as in-service trainings provided by staff.

Other recruitment and retention activities include:

- Participating in job fairs and career day activities to generate interest and awareness among college and high school students including students with disabilities of potential career opportunities in the field of vocational rehabilitation;
- Encouraging students who are ready to graduate from high school and post-secondary institutions to file resumes that may be considered if and when a VR vacancy is created through retirement, resignation, promotion, or transfer of existing staff and when additional counseling positions are established in the future;
- CNMI OVR leadership will continue to identify trainings for managers to ensure they are able to assist employees in effectively dealing with stress;
- Providing supports to staff in the form of problem-solving sessions along with coaching, leadership, and mentoring services. A structured mentoring program aimed at pairing a more experienced staff with a less experienced employee will help to promote and encourage the development of specific job skills, provide ongoing feedback, and create an individual growth or career plan for staff;
- CNMI OVR will remain committed to providing its staff, especially those providing direct services, with opportunities to meet agency standards as well as career advancement.

CNMI OVR utilizes and practices the same recruitment strategy and procedure administered under the local Office of Personnel Management (OPM). Currently, CNMI OVR does not use nor does it have a different recruitment procedure or system to reach minorities and individuals with disabilities.

The CNMI government is in itself a minority as one of the five (5) insular areas; therefore, CNMI residents, for the most part, are considered minorities. It is important to point out that since the inception of the CNMI government in 1978, the OVR was also instituted as an agency and all its employees were and continue to be representative of minority groups. Currently, at least eight (8) of CNMI OVR's sixteen (16) staff members are individuals with disabilities. CNMI OVR

promotes the employment of qualified individuals with disabilities without regard to race, disability, etc.

3. Personnel Standards

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit 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

To ensure that CNMI OVR counselors are comparable to U.S. mainland rehabilitation counselors, CNMI OVR maintains adherence to the WIOA requirements for qualified rehabilitation counselors, which is a Bachelor's degree in Special Education, Humanities, Vocational Rehabilitation Counseling or related field from an accredited U.S. College or University.

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.

All delegable functions (determination of eligibility, IPE development, IPE amendment, annual review of the IPE, and closures) are performed by staff who are qualified VR professionals who meet WIOA standards.

To ensure progress of CNMI OVR's professional and/or paraprofessional staff development, VR counselors' transcripts, student records, and grades are submitted to the OVR director or designee for periodic review to determine progress.

4. Staff Development

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. System of staff development

A system of staff development for professionals and paraprofessionals within the designated State unit, 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

CNMI OVR's ongoing staff development activities which incorporate both on- and off-island opportunities include:

- Enrolling in relevant courses offered at the Northern Marianas College and any other organizations or institutions that offer coursework that will enhance job skills;
- Attending related trainings, workshops, and seminars offered by other government agencies and organizations as well as in-service trainings provided by CNMI OVR staff or its community partners;

- Attending conferences and workshops that cover specific VR-related issues to enhance program knowledge and practices and to earn VR counselor professional certifications and Continuing Education Units;
- Coordinating intensive training sessions with WINTAC or other designed specifically for VR staff covering a variety of subjects that will enhance work skills, professional development, and program knowledge;
- Initiating inter-agency awareness through trainings and workshops covering VR issues with appropriate staff from partner agencies and other organizations; and
- Continued networking with San Diego State University-National Rehabilitation Leadership Institute (SDSU-NRLI) graduates and the Council of State Administrators of Vocational Rehabilitation (CSAVR) for assistance in VR counseling, management, and staff training needs.

The educational needs for CNMI OVR personnel are determined based on:

- Input from the State Rehabilitation Council,
- Findings of the RSA Monitoring Report,
- Comprehensive Training Needs Assessment,
- Individual Staff Performance Evaluations, and
- Staff input into their individual training needs.

B. Acquisition and dissemination of significant knowledge procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

CNMI OVR continues to identify and engage in web-based trainings as appropriate at minimal to no cost to the program. All staff development activities are supported by our Title I-Basic Support grant. CNMI OVR plans to maintain its relationship with WINTAC and SDSU-II to provide needed trainings in topic areas determined important to enhance job skills as well as to improve the general performance of our VR program.

Continuous sharing of information, especially those obtained at trainings, conferences, seminars, webinars, etc. are highly encouraged among staff members. Monthly staff meetings offer a welcome venue to share, review, and discuss various VR materials or literature. Quarterly meetings of the councils (SRC & SILC) also offer a forum for information sharing. In addition, CNMI OVR's website offers a wealth of information to benefit a wide audience including VR staff themselves.

5. Personnel to Address Individual Communication Needs

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 majority of CNMI OVR staff members are multi-lingual, with personnel who can speak, read, and/or write in English, Chamorro, Carolinian, Chuukese, and Palauan. Upon availability, OVR staff participate in beginning ASL classes for the Disability Network Partners sponsored by the University Center for Excellence in Developmental Disabilities at no cost to the program. Certified ASL interpreters are utilized for consumers who are deaf or hard of hearing.

6. Coordination of 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 FY 2019, CNMI OVR and the Public School System-Special Education Program (PSS-SPED) completed two (2) personnel development activities through joint training sessions that involve CNMI OVR employees and PSS-SpEd faculty/staff. WINTAC and NTACT provided the training and technical assistance (which also included specific partners), on the WIOA requirements and implementation on topics that included pre-employment transition services (Pre-ETS) and coordination with education officials for improved services to students with disabilities as they transition from high school to postsecondary activities including competitive & integrated employment, continued education, and/or independent living. Follow up trainings and activities will be planned to ensure continuous improvements.

j. Statewide Assessment (Formerly known as Attachment 4.11(a)).

1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:

A. with the most significant disabilities, including their need for supported employment services;

In 2017, CNMI OVR contracted the professional services of San Diego State University-Interwork Institute to conduct a comprehensive statewide needs assessment (CSNA) of the VR needs of people with disabilities residing in the Commonwealth. In part, the purpose of the needs assessment was to help inform the development of OVR's State Plan. Plans are currently in place to conduct the triennial CSNA in PY 2020.

Itemized below are the needs of individuals with most significant disabilities, including their need for supported employment services, and the recommendations offered to OVR based on the results of the most recently-conducted CSNA:

- “The need for work incentives counseling and benefits planning remains a major need in CNMI. OVR should ensure that all SSA beneficiaries, especially young people, have access to benefits planning so that they can help counter the fear of benefits loss through work. OVR consumers are referred to the SSA office for benefits planning currently, but it would be helpful for at least one individual at OVR to become an expert on SSA work incentives so that OVR can provide benefits counseling directly.
- The lack of an extended service providers continues to support the need for the development of natural supports for OVR consumers that need SE to be successful at work. OVR should continue to communicate with the Medicaid program in CNMI to see if they are willing to submit a Home and Community-Based Waiver to use for extended services.
- Several individuals indicated that individuals with disabilities in CNMI should do volunteer work more often as a strategy to show employers that they can perform the essential functions of the job.
- Although the program does not have specific job opening information for CNMI, the Labor Market Information System called The Career Index Plus can provide individuals with disabilities in CNMI some very valuable information on career exploration and qualifications for specific occupations. This program is free of charge for all individuals and can be accessed at www.thecareerindex.com.
- OVR should provide training on supported employment to their counselors on a regular basis, especially with the passage of WIOA and the changes to the SE program” (p. 36).

B. who are minorities;

The CSNA report also captured information regarding recommendations to assist minorities as well as individuals that are unserved or underserved to better have access to and participate in VR:

- “OVR should investigate whether the use of software programs like Skype can increase communication with Tinian and Rota residents so that there is a mechanism in place for these residents to interact with OVR staff on more frequent basis that once a month. If there is a lack of Internet access on the islands, OVR should consider working with a consumer who is interested in self-employment to establish an Internet Café on island which could serve multiple purposes including a more frequent access point to OVR.
- Because of the stigma attached to disability in some of the distant villages, it would be helpful for OVR to develop an education campaign in partnership with the local schools that could reach families in the distant areas.
- The use of telemedicine was recommended as a way to meet the medical needs of residents in Tinian and Rota. It was suggested that OVR or some other government agency write a grant proposal for telemedicine for the neighbor islands.
- In order to increase the level of direct service to Tinian and Rota, the core partners should consider cost-sharing for an employee that can be paid by the Mayor’s office and each agency could share a percentage of the individual’s salary and allocate that percentage of work time for the program accordingly” (pp. 41-42).

C. who have been unserved or underserved by the VR program;

Please see response to (B) above.

D. who have been served through other components of the statewide workforce development system; and

The following information was extracted from the 2017 CSNA report:

- “OVR needs to implement a tracking and reporting system for consumers that have been referred to, or are co-enrolled in the WIOA program.
- OVR and the WIOA program should continue to use OJT as a strategy to provide employment opportunities for individuals with disabilities in CNMI. The use of OJTs was mentioned as potentially very beneficial for individuals living in Tinian and Rota due to the lack of any training providers.
- OVR should work closely with the WIOA program to set aside a set number of work-based learning opportunities for students with disabilities annually.
- OVR and the WIOA program should target a set number of co-enrolled individuals with disabilities to share funding for training and employment services. The concept of shared or braided funding is viewed positively by both organizations, but it was difficult to identify any concrete examples of this in CNMI.
- OVR and WIOA should provide regular and frequent cross-training for their staff on program flow and processes.
- OVR should encourage individuals with disabilities that they refer to the WIOA program to self-disclose that they have a disability so that both programs can get a better idea of how many clients they have in common. This will help with reporting for the common performance measures as well.

- The WIOA program should make their written material about programs and services available in multiple formats.
- OVR, the WIOA program and Adult Education should pilot a universal intake process to make co-enrollment a seamless transition for clients with disabilities and to ease the paperwork burden on clients for all programs.
- OVR should provide training to the core partners in CNMI on how to recognize, accommodate and effectively work with individuals with hidden disabilities” (pp. 54-55).

E. who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

The following information describes the needs of transition-aged youth with disabilities in the CNMI and is taken from the new comprehensive statewide needs assessment report:

- “The pre-employment transition services program needs to be marketed to students and parents so that they are familiar with the possible activities and the purpose of the program.
- OVR should develop a way to track graduating students and those that receive pre-employment transition services in order to help reduce the number that lose contact after graduation.
- OVR needs to ensure that they are taking advantage of the summer youth program through the Title I youth program. Youth with disabilities should be engaging in these opportunities along with all other youth in CNMI.
- OVR has been working with the WINTAC in the area of implementing pre-employment transition services. It would be helpful for OVR to ensure that they work with WINTAC to develop internal control policies and procedures on pre-employment transition services expenditures and service delivery.
- The need to establish high expectations for youth continues to be a recommendation. Youth with disabilities need to be encouraged to reach high and not to settle for a life of dependence on public support. Family education and peer mentoring can help set high expectations.
- OVR should encourage the pursuit of postsecondary education by assisting individuals to obtain part-time employment while they go to school and utilizing OVR resources for this purpose. This will help address the financial need of individuals and will help OVR achieve their common performance measures associated with credential attainment and skills gains.
- The Department of Education should ensure that IEPs are developed using person-centered planning. It would be helpful to ensure that all Special Education teachers have regular training on person-centered planning.
- The OVR counselor needs to be invited to every IEP as long as the student is agreeable to this.
- OVR should utilize social media to communicate with young consumers and help keep them engaged in the VR process” (pp.50-51).

2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and

Information below was also taken from the CSNA report covering fiscal years 2014-2017:

- “Because the number of CRPs is very low in CNMI, OVR should continue to try and develop individual service providers to provide common service needs like job placement and job coaching. In addition, OVR should consider investigation whether the secondary

school system staff or Northern Marianas College staff can be funded to provide services for OVR consumers” (p. 57).

OVR continues its research into the establishment of CRP’s in the CNMI. Currently the program utilizes the only CRP in the CNMI that strictly offers job coaching services.

3. 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 the Individuals with Disabilities Education Act .

There is general consensus among community partners/stakeholders that students with disabilities will better prepare for the 21st century workforce through the provision of transition career services and pre-employment transition services. Curriculum on work readiness provided either in a classroom setting or community-based by private community rehabilitation programs/vendors should focus on helping the students to enhance their skills including soft skills and communication skills thereby boosting self-confidence for increased positive outcomes throughout the employment process. Our VR Counselor is in regular contact with the school personnel through co-location presence as well as attendance at IEP meetings. To also better improve experiences and outcomes, employers must be supported with information and instructions as well as educated on innovative strategies with regards to how best to communicate or interact with students with varying disabilities and meet their unique needs.

The most recent CSNA report noted that each of the pre-employment transition services (e.g. Job exploration counseling; Work-based learning experiences; Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education; Workplace readiness training to develop social skills and independent living (often referred to as soft skills); and Instructions in self-advocacy, which may include peer mentoring) “is a need on a recurring basis when discussing the needs of transition-age youth in CNMI” (p. 45). In addition, the “following themes emerged across all data gathering methods regarding the needs of youth with disabilities in transition in CNMI:

- A lack of work skills, soft skills, work experience and knowledge regarding the expectations of the workforce are all barriers to employment for youth with disabilities in CNMI.
- OVR should engage youth in the schools at an early age and maintain contact with them upon graduation.
- Disability still has a stigma attached to it for many families in CNMI, so the need for education about disability remains high” (p. 43).

OVR will continue to maximize all efforts to increase successful transition outcomes in collaboration and coordination with community stakeholders including our education partners through transition including pre-employment transition services.

k. Annual Estimates

Describe:

1. The number of individuals in the State who are eligible for services;

The number of individuals in the State who are currently eligible for services by program category are as follows:

- Title I, Basic Support = 158 individuals (ST 10)
- Title VI, Part B, Supported Employment = 27 individuals

While the number of persons potentially eligible for OVR services is variable, our best estimate from data obtained through PSS-SpEd Program is 264 individuals between the ages of 16 and 64 will compose the BS and SE caseloads for FY 2020.

(Estimated calculations based on a three (3) year average as reported in the OVR Consumer Tracking System (CTS) and the RSA 911 data).

2. The number of eligible individuals who will receive services under:

A. The VR Program;

Estimate calculated based on a three (3) year average as reported in the OVR CTS and RSA 911 DATA:

Title I, Basic Support: 141 individuals with approved IPEs.

B. The Supported Employment Program; and

Estimate calculated based on a three (3) year average as reported in the OVR CTS and RSA 911 data:

Title VI, Part B, Supported Employment: 27 individuals

C. each priority category, if under an order of selection;

Currently and historically, the CNMI Office of Vocational Rehabilitation has been able to avoid implementing an order of selection, although policies and procedures are in place to ensure that should the need arise, the Program will be prepared. The OVR will continue to manage its fiscal resources to ensure that all active Individualized Plans for Employment (IPE) are achieved.

3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

Not applicable

4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

Title I, Basic Support: 264 individuals

Cost per individual = \$764

Total cost = \$201,582

Title VI, Part B:

Supported Employment: 27 individuals

Cost per individual = \$275

Total cost = \$10,709

The data from the OVR CTS was used in conjunction with 911 data from the Rehabilitation Services Administration (RSA), as well as the 2017 CNMI Comprehensive Statewide Needs

Assessment (OVR/SRC/SDSU). The data was separated and is reported according to the content areas requested.

General Performance Data for OVR 2017-2019 as per most recent CSNA
Item ALL CONSUMERS

| | 2017 | 2018 | 2019 |
|---|------------|------------|------------|
| New Applicants | 67 | 88 | 85 |
| Total number of cases serviced | 267 | 262 | 264 |
| Ave. cost of all cases | \$715.86 | \$852.98 | \$784.19 |
| Ave. cost of cases closed rehabilitated | \$1,098.08 | \$1,663.11 | \$1,872.70 |
| Ave. cost per case closed unsuccessful | \$256.36 | \$3.53 | \$23.21 |
| Ave. cost per case prior to plan | \$76.56 | \$69.56 | \$46.01 |

I. State Goals and Priorities

The designated State unit must:

1. Identify if the goals and priorities were jointly developed. Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

The CNMI Office of Vocational Rehabilitation (OVR) and the State Rehabilitation Council (SRC) reviewed and jointly developed and approved their State Plan goals and priorities for Program Years 2020-2023 including any modifications and incorporated the findings and recommendations of the most recently conducted Comprehensive Statewide Needs Assessment (CSNA) in 2017. Four (4) priority areas were identified

2. Identify the goals and priorities in carrying out the VR and Supported Employment programs.

Priority 1: Transition and Pre-Employment Transition Services

Goal: Full implementation of pre-employment transition services through the realignment of staff and service delivery methods.

Goal: Expand and improve the CNMI's service delivery infrastructure and the Program's capacity for making available PreETS to students with disabilities in need of such services by utilizing pre-employment transition services Authorized and Coordination Activities.

Priority 2: Business/Employer Engagement

Goal: Increase partnerships with local businesses to develop or expand work experiences through on-the-job and work experience training, internship/ apprenticeship, and employment opportunities for qualified adults and youth with disabilities.

Goal: Develop systems capacity, knowledge and skills to effectively meet the needs of businesses/employers.

Priority 3: Competitive Integrated Employment

Goal: Increase competitive integrated employment opportunities, supports and outcomes for adults and youth with disabilities, particularly those with the most significant disabilities.

Priority 4: Agency Performance

Goal: Improve overall Agency performance

3. Ensure that the goals and priorities are based on an analysis of the following areas:

A. The most recent comprehensive statewide assessment, including any updates;

As previously mentioned, the goals and priorities of the modified VR Portion of the Unified State Plan for Program Years 2020-2023 incorporated the findings and recommendations of the FY 2017 Comprehensive Statewide Needs Assessment (CSNA).

B. the State's performance under the performance accountability measures of section 116 of WIOA; and

OVR and SRC ensure that the VR Portion of the Unified State Plan goals and priorities were developed collaboratively and in consideration of the most recent CSNA findings and recommendations as well as the requirements of the WIOA common performance measures. Other available information on the operations and effectiveness of the Agency, such as fiscal, audits, RSA monitoring, including any other reports received from the SRC will be utilized.

C. other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

No other available information.

m. Order of Selection

Describe:

1. Whether the designated State unit will implement and order of selection. If so, describe:

A. The order to be followed in selecting eligible individuals to be provided VR services.

CNMI OVR has not entered into nor is it requesting for an Order of Selection at this time.

B. The justification for the order.

Not applicable

C. The service and outcome goals.

Not Applicable

D. The time within which these goals may be achieved for individuals in each priority category within the order.

Not applicable

E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and

Not applicable

2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.

Not applicable

n. Goals and Plans for Distribution of title VI Funds.

1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.

The CNMI OVR will distribute Title VI Funds for Supported Employment (SE) Services at the WIOA-mandated requirement of 2.5% for administrative costs (e.g. indirect cost) and the balance for the provision and delivery of services to individuals with the most significant disabilities. Fifty percent (50%) of Title VI funds for SE services will be reserved for youth with the most significant disabilities who are between 14 and 24 years old. Services leading towards competitive integrated employment will include, but are not limited to, the following: job training (work experience and OJT); job coaching, modifications that may be required by VR clients at employment sites; transportation; and/or developing natural supports and assistive technology if needed.

OVR is in coordination with the CNMI Public School System Special Education Program to identify outreach strategies targeting unserved and underserved youth and students with the most significant disabilities. Strategies also include individuals in the outlying islands who might be eligible for Supported Employment services. Plans are in place for the continuation of trainings between OVR and PSS-SpEd Program in collaboration with NTACT and WINTAC. A variety of trainings are being organized that are designed to increase awareness of supported employment as a vocational service for individuals with the most significant disabilities. PSS SpEd Program documents specified services provided to students and data is shared with OVR.

The OVR anticipates achieving its supported employment goals and priorities through strategies noted in Section: State Goals and Priorities (I).

2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:

A. the provision of extended services for a period not to exceed 4 years; and

CNMI OVR will maximize the use of 50% of Title VI funds to support youth consumers with the most significant disabilities in their achievement of competitive integrated employment through the provision of extended services not to exceed four (4) years, such as: job coaches, personal assistance services, transportation, and other employment-related services determined necessary for consumers to further maintain their competitive integrated employment. OVR will be working on revisions to its policies and procedures to ensure extended services to youth with the most significant disabilities.

B. how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

CNMI OVR, in collaboration and coordination with the Council on Developmental Disabilities (CDD) and other Disability Network Partners (DNP), will continue discussions with the Medicaid program to see if they are willing to submit a Home and Community-Based Waiver to use for extended services to support consumers with most significant disabilities including our youth. OVR is also working with the CNMI Workforce Investment Agency (WIA) to explore expansion of its internship/apprenticeship programs to afford students and adults with the most significant disabilities work experience opportunities.

o. State's Strategies

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

1. The methods to be used to expand and improve services to individuals with disabilities.

OVR has developed strategies to support the achievement of its Priorities and Goals identified in Section (I) – State Goals and Priorities for Program Year 2020-2023. These program strategies represent OVR’s approach to increasing PreETS, refining the development of its business engagement, increasing competitive integrated employment, and improving procedures and processes to achieve the priorities and goals, consistent with the most recent comprehensive statewide assessment, SRC recommendations and relevant reports.

Priority 1: Transition and Pre-Employment Transition Services

Goal 1: Full implementation of pre-employment transition services through the realignment of staff and service delivery methods.

Strategies:

- OVR and PSS-SpEd will implement a potentially eligible tracking system.
- Recruit and hire qualified PreETS coordinator and trainers that are strictly allocated to providing direct and authorized services. OVR staff will arrange and directly provide the following five required pre-employment transition services:
 1. Job exploration counseling
 2. Work-based learning experiences
 3. Counseling on post-secondary opportunities
 4. Workplace readiness training
 5. Self-advocacy training
- Provide pre-employment transition services training to the new PreETS staff.
- As needed, collaborate with WINTAC and NTACTION to ensure adequate training and supports are provided to PreETS staff.
- Expand business partnerships to provide opportunities for workbased learning activities.
- Attend IEP meetings of students with disabilities beginning at age 14 to introduce early on the VR program and to establish better coordination with the public schools in the provision of transition services.

- Conduct at least one (1) co-location activity per high school per month while school is in session, as well as at the Northern Marianas College and Northern Marianas Trades Institute to increase student participation and engagement with VR. (Note: Co-locations make it possible for students to participate in the OVR intake and application process. These are also opportunities for OVR to improve networking and strengthen partnerships with school personnel to ensure successful transition outcomes. As well, co-locations provide a forum for Q&A by school staff, parents/guardians, and students with OVR staff.)
- OVR will support the activities of the PSS-SpEd, Co-Op Education & Training Program, etc. that prepare students with disabilities for employment, such as: job shadowing, mentoring, career exploration activities, work-based learning experiences, work readiness training, etc.
- Maintain a “Students Page” on OVR’s website, including specific information about pre-employment transition services.
- Identify methods to address cultural barriers that prevent students with the most significant disabilities from seeking PreETS and OVR services.
- Continue to develop and improve informational material about PreETS to share with teachers, students, and families.

Goal 2: Expand and improve the CNMI’s service delivery infrastructure and the Program’s capacity for making available PreETS to students with disabilities in need of such services by utilizing pre-employment transition services Authorized and Coordination Activities.

Strategies:

- Meet regularly with various partners including public and/or non-profit groups or organizations to discuss implementation and cost-sharing of pre-employment transition services to students with disabilities to better equip them for the workforce.
- Review existing MOUs with partners annually to ensure collaboration and coordination, addressing gaps in services, etc. to ensure maximum vocational outcomes.
- At least annual, ensure that information is presented at regular DNP and Transition Coalition meetings on PreETS and the OVR transition process.
- Develop a communications process to ensure the dissemination of PreETS information to students with disabilities and their families to increase awareness of OVR’s mission and services offered.
- OVR will collaborate with PSS-SpEd and/or other stakeholders to develop and conduct at least annually, pre-employment transition services Authorized Activities to identify needs and gaps in Transition and PreETS.
- Collaborate with the DNP to explore transportation options, assistive technology and accommodations and supports to assist potentially eligible students.

(Note: Members of the Disability Network Partners include: Council on Developmental Disabilities, Transition Coalition, Public School System, Title I Youth Program, VOICES of the CNMI-Saipan, Tinian & Rota Chapters (a non-profit organization run by and for self-advocates with I/DD), Northern Marianas College (UCEDD, DSS, etc.), Center for Living Independently, Statewide Independent Living Council, State Rehabilitation Council, Protection & Advocacy, Commonwealth Office of Transit Authority, etc.)

Priority 2: Business/Employer Engagement

Goal 3: Increase partnerships with local businesses to develop or expand work experiences through on-the-job and work experience training, internship/ apprenticeship, and employment opportunities for qualified adults and youth with disabilities.

Strategies:

- Fill the vacant position of the Employment Specialist.
- Engage employers in identifying OJT and/or job placements for VR consumers.
- Participate in job/career fairs sponsored by both public agencies and private sector businesses.
- Develop and/or strengthen relationships with the local business community through participation in employer-sponsored activities or events such as Chamber, SHRM, and Rotary meetings.
- Support the personnel development of VR professionals and paraprofessionals especially in the areas of marketing the VR program, engaging employers, supported employment, customized employment, pre-employment transition services, work incentives counseling and benefits planning, etc.
- Disseminate information to public and private sector employers to increase their awareness of how VR services could benefit people with disabilities as well as employers. Utilize the Saipan Chamber of Commerce’s website as a repository of disability employment information.
- Utilize as a forum the State workforce development board meetings to bring to the forefront disability employment issues facing the Commonwealth and the integration of quality services to people with disabilities in the workforce system.
- Maintain and improve materials provided to employers on OVR’s website.
- Coordinate with the Workforce Investment Agency when conducting outreach to local business partners.
- Coordinate with the PSS-Cooperative Education Program when conducting outreach to local businesses.
- Identify other stakeholders, such as Hotel Association of the Northern Mariana Islands (HANMI), to partner with for outreach efforts.
- Identify and approach businesses that have public/federal contracts with requirements for the hiring of individuals with disabilities.
- Serve as the lead resource to the SWDB, America’s Job Center, and core partners to support the hiring, retention and promotion of adults and youth with disabilities.
- In collaboration with the DNP, provide Disability Awareness or other trainings to private and public sector employers.
- In collaboration with the DNP, continue providing outreach, education, and technical assistance to government employers with the purpose of increasing the number of people with disabilities hired.
- Utilize the SRC general membership meetings as a forum to engage employers.

Goal 4: Develop systems capacity, knowledge and skills to effectively meet the needs of businesses/employers.

Strategies:

- Develop or adopt training curriculum on career pathways and the utilization of labor market information.
- Assignment of the Employment Specialist to manage Business Services.

- Development and adoption of strategies to improve business engagement.
- Continue to work with WINTAC for technical assistance in improving and enhancing the program's Business Services.
- In collaboration and coordination with various community partners, meet the training needs of employers in the public and private sectors in the areas of reasonable accommodations, the benefits of hiring qualified people with disabilities, tax incentives for hiring individuals with disabilities and making workplaces accessible, etc.
- Identify businesses that have federal contracts with requirements for hiring individuals with disabilities.
- Explore and develop an online service through its website that would allow businesses to request for trainings and supports.
- Continue outreach, education and trainings/technical assistance to state government agencies for the purpose of increasing the number of people with disabilities hired.
- Continue to monitor the effectiveness of the marketing materials targeting businesses to ensure needed modifications or revisions are completed.

Priority 3: Competitive Integrated Employment

Goal 5: Increase competitive integrated employment opportunities, supports and outcomes for adults and youth with disabilities, particularly those with the most significant disabilities.

Strategies:

- Conduct regular case staffing with VR counselors either individually or in a group setting.
- Expand self-employment opportunities for VR clients, especially in Tinian and Rota where the economy can remain stagnant for an indefinite period of time.
- Work with Disability Network Partners including the State Rehabilitation Council to identify potential vendors capable of providing supported employment and/or extended services to VR clients, especially those with the most significant disabilities.
- Support activities that will increase self-advocacy skills of people with disabilities.
- Consider training current or former VR clients to provide much needed supported employment and/or extended services to individuals with disabilities especially those with the most significant disabilities in Saipan as well as the unserved or underserved municipalities of Tinian and Rota. Because the number of CRPs is very low in the CNMI, OVR will continue to try and develop individual service providers to provide service needs like job placement and job coaching.
- Maximize training and/or postsecondary educational opportunities for VR clients to better prepare them for the 21st century workforce and develop support systems for consumers to attend this training.
- Ensure that clients are progressing through the VR process in a timely manner.
- Ensure consumers' full participation in the IPE process (informed choice).
- OVR will ensure timely communication with clients throughout the VR process.
- Continue the provision of supported employment services to consumers with most significant disabilities.
- Identify new providers that can offer work readiness training.
- The OVR will continue coordinating and collaborating with the DNP to identify, prepare and support all individuals with intellectual and developmental disabilities that choose competitive integrated employment.

- Conduct and participate in meetings and forums to disseminate information on achieving competitive integrated employment for individuals with intellectual and developmental disabilities.
- Meet with WIOA core partners to ensure continuous reviews are conducted on the systems and processes of data sharing and the AJC.
- Enhance career counseling and information and referral resources, guidance, and materials for VR staff and stakeholders to optimize service delivery in support of Section 511 of the WIOA and the Competitive Integrated Employment Blueprint.
- Engage in discussions/negotiations with the State workforce development board regarding the development and maintenance of an American Job Center (aka One-Stop Center) where services to people with disabilities are streamlined and accessible.

Priority 4: Agency Performance

Goal 6: Improvement of overall Agency performance

Strategies:

- Review and revisions, as needed, to policy, procedure, practice, and the preparation of personnel to achieve the goals of pre-employment transition services.
- Continue monthly outreach activities in Tinian and Rota, and continue with positive working relationships with the Mayors' Offices to ensure effective services to people with disabilities.
- Work with technical assistance providers to develop and/or strengthen Agency's policies and procedures including internal controls.
- Nurture partnerships with community stakeholders from both the public and private sectors and collaborate on issues affecting disability employment, independence, and integration & full inclusion (including accessibility).
- Identify and utilize comparable benefits to the maximum extent possible.
- Enhance the OVR website so as to create a one-stop for disability employment information beneficial to all stakeholders including consumers/family members (as well as students with disabilities), service providers, and employers.
- Coordinate with partners on outreach activities to better maximize resources and expertise as well as strengthening relationships with each other.
- Utilize the OVR Tracking System to monitor case status movements on a weekly or bi-monthly basis and identify modifications for enhancement, if any, as well as explore a new system with the CNMI WIOA Core Program Partners.
- OVR will conduct internal reviews to ensure any issues identified in its 2019 Monitoring is immediately addressed.
- A review of the program's internal controls is to be completed in FY 2020 with any revisions or changes also completed.
- Review of the program's fiscal forecasting process will be completed in FY 2020 to ensure fiscal integrity.
- Conduct focus groups to solicit feedback about what the partners think is needed to enhance services for people with disabilities.
- Review of referral process and forms for the America's Job Centers will be completed in FY2020.
- Upon completion of the America's Job Center, the OVR will provide training to AJC staff on topics such as: OVR services; eligibility; job placement; case management; benefits

counseling; job readiness and soft skills; disability awareness and etiquette; hiring persons with disabilities; disability disclosures; competitive integrated employment; customized employment; assistive technology; and, reasonable accommodation.

- Provide referral resource information to the WIOA core programs serving individuals with disabilities, such as accommodations for individuals who are blind and visually impaired or deaf and hard of hearing.

2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.

- All VR services, including AT assessment/evaluation, devices and services will be provided in the context of an approved IPE.
- At intake and application for VR services as well as in the IPE development stage, VR counselors will ensure to capture information pertaining to the applicant or consumer's need for assistive technology to facilitate the achievement of their competitive integrated employment.
- VR professionals and paraprofessionals will engage the participation of applicants and consumers to identify and maximize comparable benefits such as the Assistive Technology Center for AT loan, demonstration, and training and the Trankilu Alternative Financing Program for assistance in securing a loan with a local bank toward the purchase of the needed AT device or equipment at a low interest rate. The Public School System-Special Education Program (PSS-SPED) AT expert, if any, will be utilized to provide assessment to students with disabilities. In the event an AT professional cannot be identified locally, CNMI OVR will reach out to the Guam Systems of Assistive Technology for their assistance and any needed service agreement.
- During IEP meetings of students with disabilities, VR professionals will work with our school and/or other community partners to address any significant AT needs of the students especially mutual clients.
- OVR consumers who are residing in Tinian and Rota and who are in need of assistive technology devices or equipment will be provided with the AT after exploring comparable benefits (e.g., Medicaid/Medicare, private insurance, etc.) through an approved IPE that takes into consideration shipping and handling costs for the ATs transport to the outer island of their residence.

3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.

- OVR will strengthen its collaboration with community partners including the CNMI Center for Living Independently, Community Guidance Center, the Behavioral Health Planning Council, the local Autism Society, the Council on Developmental Disabilities, and the Public School System-Special Education Program (PSS-SPED) to identify outreach activities and serve individuals with the most significant disabilities. As expressed in the previous VR State plan, there is no need to specifically target minority individuals in the CNMI because the population are members of minority groups. Nevertheless, OVR will improve on efforts to facilitate information dissemination via the native languages of Chamorro and Carolinian as well as those of other Pacific islands and Asian countries.
- Conduct triennial comprehensive statewide needs assessment.

- Ongoing communication and interaction with community stakeholders comprised of individuals with disabilities and their family members, service providers, and the Disability Network Partners.
- Involvement/engagement at disability public hearings or forums to obtain feedback from minorities and those unserved or underserved to better understand their needs to achieve competitive integrated employment and to live meaningful independent lives.

4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).

OVR has developed the following methods to be used to improve and expand VR services for students with disabilities for Program Year 2020-2023. These methods target improving procedures and processes to achieve the program's priorities and goals, consistent with the most recent comprehensive statewide assessment, SRC recommendations and relevant reports.

- OVR will continue to participate in discussions with the Public School System-Special Education Program (PSS-SPED) via the SESAP (Special Education State Advisory Panel) forums.
- OVR will work with partners to strengthen and solidify the newly-formed CNMI Transition Coalition comprised of partners from the OVR, PSS-SpEd, Council on Developmental Disabilities, Northern Marianas Protection & Advocacy Systems, Inc., University Centers for Excellence in Developmental Disabilities, etc. whose overarching mission is to collaborate to the maximum extent possible to meet the transition needs (e.g., pre-employment transition services) of students with disabilities resulting in the achievement of competitive integrated employment, continued education, and/or independent living.
- VR staff will make regular contact with PSS-SpEd staff so as to strengthen camaraderie and ensure that each stakeholder is on the same page as to what the transition issues and/or needs are and the effective methods for delivering on quality and timely transition/pre-employment transition services.
- VR staff will attend as many IEP meetings as practicable, upon invitation, and will make a concerted effort to start introducing the VR program to families and students as early as age 14. (Transition Planning could be provided to students as early as age 14 whereas Transition Services including Pre-Employment Transition Services are provided to students 16 to 21.)
- VR staff will continue to participate in job/career fairs where students with disabilities will be actively participating.
- OVR will support the activities of the PSS-SpEd, Co-Op Education & Training Program, etc. that prepare students with disabilities for employment, such as: job shadowing, mentoring, career exploration activities, work-based learning experiences, work readiness training, etc.
- OVR will continue to conduct co-locations at the public high schools including the Northern Marianas College to be able to provide another forum in which students with disabilities could seek out and apply for VR services. The co-locations also allow VR staff to further engage in discussions with school personnel on how to better coordinate efforts toward the provision of transition/pre-employment transition services.

- Develop/improve strategies for individuals with intellectual disabilities and individuals with the most significant disabilities to live independently, participate in postsecondary education, and obtain and retain competitive integrated employment.
- Collaborate with Independent Living Centers to disseminate information related to Independent Living Center transition services for out-of-school youth.

5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.

CNMI OVR will continue discussions with community partners/stakeholders for the ongoing exploration and identification of vendors for inclusion in our local CRP network of providers. Currently there is one provider for PreETS and one offering job coaching services, although the CRP only has one job coach at the present time.

In addition, efforts will be taken to develop a mechanism to pay individual service providers to work with consumers in the CNMI, especially in Tinian and Rota where services are very limited due to the lack of CRPs there. The CSNA Report covering FYs 2014-2017 recommended that “Because the number of CRPs is very low in CNMI, OVR should continue to try and develop individual service providers to provide service needs like job placement and job coaching. In addition, OVR should consider investigation whether the secondary school system staff or Northern Marianas College staff can be funded to provide services for OVR consumers” (p. 57).

6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

- a. Evaluate current OVR Tracking System and modify as necessary to be able to efficiently record performance measures data.
- b. Communicate with WIOA core program partners in obtaining and tracking data provided consumer consent is obtained.

7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.

- a. In collaboration and coordination with community partners, OVR will support the training activities through a cost-sharing arrangement/agreement with the statewide workforce development system that aims to increase knowledge of best practices in assisting individuals with disabilities to achieve competitive integrated employment and strategies for effective employer involvement/engagement in the process.
- b. Participate in training and employment activities or initiatives organized by the CNMI Department of Labor.
- c. Maintain and strengthen relationships with the Northern Marianas Trades Institute for continued referrals of VR clients to NMTI for training preparation in the workforce in conjunction with OJT placement in the public or private sectors and to provide guidance/technical assistance to the trades school in the area of reasonable accommodations and effective communications with individuals with varying disabilities.
- d. Increase opportunities for shared-funding on WIA cases thereby demonstrating improved coordination and an overall greater partnership.
- e. Continue the representation of WIA and/or DOL on the State Rehabilitation Council (SRC) as well as VR's representation on the State Workforce Development Board.

- f. OVR to engage in meaningful discussions with the newly-reorganized State workforce development board regarding an all-inclusive workforce that integrates quality services for people with disabilities in pursuit of competitive integrated employment.

8. How the agency's strategies will be used to:

A. achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

- Directly through VR staff
- In collaboration with the CNMI Disability Network Partners including the WIOA Core Programs with regards to the implementation of the VR State Plan
- Through the identification and utilization of comparable services/benefits to the maximum extent possible or allowable
- Through the Agency's existing infrastructure such as the enhanced OVR Tracking System (aka case management system)
- Through a quarterly evaluation and review of progress toward meeting State Plan goals and objectives by OVR's Leadership Team
- Through continuous program improvement efforts to improve overall agency performance
- Through guidance and direction provided by our technical assistance providers including WINTAC and RSA
- In consultation with the CNMI State Rehabilitation Council

B. support innovation and expansion activities; and

Support Council-related activities in the form of: Staff support; travel by Council members to attend conferences, meetings, and trainings; Personal attendant; Board member compensation; Facilities rental for meeting and training sessions; Consultant fees for training and policy development; Meeting materials, supplies, and advertising costs; Printed materials for public awareness/information; etc. Total spent on SRC I&E activities in PY 2019 is \$14,551.

C. overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

CNMI OVR is committed to serving its clients in an equitable and timely manner through the provision of quality services so that they may achieve competitive integrated employment and live full and productive lives in their community. In the most recently conducted Comprehensive Statewide Needs Assessment, OVR recognizes the various potential barriers and strategies to accessing and participating in the VR program statewide, and some of these include:

- The need to establish and enforce a minimum time frame for response to consumers by VR staff.
- The need to encourage self-employment as an outcome for more consumers, especially those in Tinian and Rota.
- The need to ensure that VR counselors are developing IPEs in partnership with their consumers.
- The need for work incentives counseling and benefits planning remains a major need in the CNMI.
- The need to provide training on supported employment to VR counselors on a regular basis.

- The need to investigate whether the use of software programs like Skype can increase communication with Tinian and Rota residents so that there is a mechanism in place for these residents to interact with OVR staff on a more frequent basis than once a month.
- The Pre-Employment Transition Services (Pre-ETS) Program needs to be marketed to students and parents so that they are familiar with the possible activities and the purpose of the program.
- The need to ensure that OVR work with WINTAC to develop internal control policies and procedures on Pre-ETS expenditures and service delivery.
- The need to implement a tracking and reporting system for consumers that have been referred to, or are co-enrolled in the WIOA program.
- The need to work closely with the WIOA program to set-aside a set number of work-based learning opportunities for students with disabilities annually.
- The need to work with the WIOA program to target a set number of co-enrolled individuals with disabilities to share funding for training and employment services.
- OVR and the WIOA program should provide regular and frequent cross-training for their staff on program flow and processes.
- The CNMI WIOA Core Programs should pilot a universal intake process to make co-enrollment a seamless transition for clients with disabilities and to ease the paperwork burden on clients for all programs.
- Because the number of CRPs is very low in the CNMI, OVR should try and develop individual service providers to provide service needs like job placement and job coaching.
- The need to ensure that there is no paperwork or reporting burden on employers that provide job training or work experience opportunities for consumers.

p. Evaluation and Reports of Progress: VR and Supported Employment Goals

Describe:

1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals.

Basic Support Services:

Goal 1: Improve overall Agency performance.

Objective 1.3: In PYs 2018-2019, OVR will continue to support the training and/or education of VR staff.

Extent achieved: Ongoing

Strategies:

- One (1) VR Counselor obtained her Master's in Rehabilitation Counseling degree program through San Diego State University via distance learning. She is expected to complete her CRC by March 2020.
- Continue to provide the necessary support, encouragement, and resources to staff who are pursuing their educational goals.
- Support the personnel development of VR professionals and paraprofessionals especially in the areas of marketing the VR program, engaging employers, supported employment,

customized employment, pre-employment transition services, work incentives counseling and benefits planning, etc.

Objective 1.4: In PYs 2018-2019, VR staff will continue their monthly outreach activities in Tinian and Rota. (Note: OVR will aim to utilize to the maximum extent possible public service announcements in the radio and/or newspaper regarding outreach activities in the 3 official languages of the CNMI.)

Extent achieved: Ongoing.

Strategies:

- In PY 2018, VR Counselors made eight (8) monthly trips to Tinian and seven (7) monthly trips to Rota.
- In PY 2019, VR Counselors made twelve (12) monthly trips to Tinian and ten (10) monthly trips to Rota.
- Ensure continued effective collaboration with internal and external staff with respect to travel preparations.
- Continue monthly outreach activities in Tinian and Rota, and continue with positive working relationships with the Mayors' Offices to ensure effective services to people with disabilities.

Objective 1.5: In PYs 2018-2019, consumers exiting the VR program in ST 26 will report the following:

- 90% will report satisfaction with the quality of services received, and
- 90% will report that services were received in a timely manner.

Extent achieved: Objective met

Strategies:

- In PYs 2018-2019, 94% of respondents reported satisfaction with the quality of services received, and 94% reported that services were received in a timely manner.
- Support activities that will increase self-advocacy skills of people with disabilities.
- VR consumers are treated with upmost respect and dignity.
- VR professionals and paraprofessionals maintain regular contact with consumers.
- VR services provided were comprehensive and met consumers' individual needs.
- Consumers were provided the opportunity to exercise informed choice throughout the VR process.
- Ensure that clients are progressing through the VR process in a timely manner.
- OVR will ensure timely communication with clients throughout the VR process.
- Continue the provision of supported employment services to consumers with most significant disabilities.

Objective 1.7: In PYs 2018-2019, OVR will continue to support the efforts of the Disability Network Partners' ad hoc committee on accessibility.

Extent achieved: Objective met

Strategies:

- Meet regularly with various partners including public and/or non-profit groups or organizations to discuss implementation and cost-sharing of PreETS to students with

disabilities to better equip them for the workforce as well as accessibility and accommodation needs.

- Supported and worked with VOICES of the CNMI, a self-advocacy group that has presented to the CNMI Legislature advocating for accessibility, especially in public areas such as parks and beaches and businesses.
- Nurture partnerships with community stakeholders from both the public and private sectors and collaborate on issues affecting disability employment, independence, and integration & full inclusion (including accessibility).

Objective 1.8: In PY 2018, in an effort to increase the level of direct services to Tinian and Rota, the core partners will begin discussions on the feasibility of cost-sharing for an employee that can be paid by the Mayor's Office and each agency could share a percentage of the individual's salary and allocate that percentage of work time for the program accordingly.

Extent achieved: Ongoing

Strategies:

- Core partners have discussed various options on cost sharing, but this discussion was tabled when it was identified that Tinian and Rota do not currently have the numbers to justify a full time position. Cost analysis indicated the programs would be paying more per consumer with this option as opposed to monthly trips to provide direct services.
- An agreement was reached to review this option on a yearly basis to identify whether there was a need for another feasibility study due to a rise in case load numbers.
- Increase opportunities for shared-funding on WIA cases thereby demonstrating improved coordination and an overall greater partnership.

Objective 1.9: In PY 2018, OVR will pursue discussions and/or agreement with the DOL/WIOA Program regarding use of their office space in Tinian and Rota for VR counselors' monthly outreach activities in an effort to demonstrate increased collaboration between the 2 programs.

Extent achieved: Objective met

Strategies:

- Starting in PY 2017, OVR has been utilizing the labor office in Tinian for its monthly outreach activities.
- Starting in PY 2017, OVR has been utilizing a space that was allocated by the Rota Mayor's Office for its monthly outreach activities.
- Continue monthly outreach activities in Tinian and Rota, and continue with positive working relationships with the Mayors' Offices to ensure effective services to people with disabilities.
- Coordinate with partners on outreach activities to better maximize resources and expertise as well as strengthening relationships with each other.
- Review existing MOUs with partners annually to ensure collaboration and coordination, addressing gaps in services, etc. to ensure maximum vocational outcomes.

Objective 1.9.A: In PYs 2018-2019, OVR will support the activities of The Lady Diann Torres Foundation Disability Center to increase program awareness, to network with various stakeholders including people with disabilities and employers, to provide training opportunities to increase knowledge, skills, and abilities, to increase referrals to OVR, to share program data with partner agencies, and/or to support other related activities that promote independence, productivity, inclusion, integration and self-sufficiency of individuals with disabilities in our communities.

Extent achieved: Objective met

Strategies:

- Nurture partnerships with community stakeholders from both the public and private sectors and collaborate on issues affecting disability employment, independence, and integration & full inclusion (including accessibility).
- Coordinate with partners on outreach activities to better maximize resources and expertise as well as strengthening relationships with each other.
- In collaboration and coordination with various community partners, meet the training needs of employers in the public and private sectors in the areas of reasonable accommodations, the benefits of hiring qualified people with disabilities, tax incentives for hiring individuals with disabilities and making workplaces accessible, etc.
- Ongoing communication and interaction with community stakeholders comprised of individuals with disabilities and their family members, service providers, and the Disability Network Partners.

Goal 2. Facilitate the seamless transition of students/youth with disabilities to employment or continued education through coordination and collaboration with WIOA core and other programs.

Objective 2.1: In PYs 2018-2019, OVR will conduct at least one (1) outreach activity per high school per school year in an effort to educate students and parents about the pre-employment transition services program.

Extent achieved: Objective met

Strategies:

- Strengthening of the relationship between the VR Counselor and Lead Special Education Teacher at each high school. This will ensure continued invitations to present at parent teacher nights and CIRCLES meeting.
- VR staff will make regular contact with PSS-SPED staff so as to strengthen camaraderie and ensure that each stakeholder is on the same page as to what the transition issues and/or needs are and the effective methods for delivering on quality and timely transition/pre-employment transition services.
- VR staff will continue to participate in job/career fairs where students with disabilities will be actively participating.
- OVR will support the activities of the PSS-SpEd, Co-Op Education & Training Program, etc. that prepare students with disabilities for employment, such as: job shadowing, mentoring, career exploration activities, work-based learning experiences, work readiness training, etc.
- OVR will continue to conduct co-locations at the public high schools including the Northern Marianas College to be able to provide another forum in which students with disabilities could seek out and apply for VR services. The co-locations also allow VR staff to further engage in discussions with school personnel on how to better coordinate efforts toward the provision of transition/pre-employment transition services.

Objective 2.2: In PYs 2018-2019, OVR will continue to receive intensive technical assistance from the Workforce Innovation Technical Assistance Center (WINTAC) for the effective implementation of pre-employment transition services.

Extent achieved: Objective met

Strategies:

- A two day training provided by WINTAC (Brenda Simmons) and NTACT (Michael Stoehr) was completed in March 2019. Participants included PSS special education teachers, aides, middle and high school principals, special education administrative staff, SpEd Director, SpEd Coordinator as well as all OVR staff.
- PSS SpEd also brought back Michael Stoehr of NTACT for their professional development which also included a half day follow up PreETS training with VR counselors in September 2019.

Objective 2.3: In PYs 2018-2019, OVR will attend at least ninety percent (90%) of IEP meetings invited to.

Extent achieved: Objective met

Strategies:

- OVR attended IEP meetings at a rate of 92%. OVR and PSS SpEd teachers streamlined the communication and tracking process for IEP scheduling and invitations.
- VR staff will attend as many IEP meetings as practicable, upon invitation, and will make a concerted effort to start introducing the VR program to families and students as early as age 14. (Transition Planning could be provided to students as early as age 14 whereas Transition Services including Pre-Employment Transition Services are provided to students 16 to 21.)

Objective 2.6: In PYs 2018-2019, OVR will conduct at least one (1) co-location activity per high school per school year as well as at the Northern Marianas College and Northern Marianas Trades Institute to increase student participation and engagement with VR. (Note: Co-locations make it possible for students to participate in the OVR intake and application process. These are also opportunities for OVR to improve networking and strengthen partnerships with school personnel to ensure successful transition outcomes. As well, co-locations provide a forum for Q&A by school staff, parents/guardians, and students with OVR staff.)

Extent achieved: Objective met

Strategies:

- PYs 2018-2019 VR counselors completed an average of 7 co-locations per site per year.
- OVR will continue to conduct co-locations at the public high schools including the Northern Marianas College to be able to provide another forum in which students with disabilities could seek out and apply for VR services. The co-locations also allow VR staff to further engage in discussions with school personnel on how to better coordinate efforts toward the provision of transition/pre-employment transition services.

Objective 2.7: In PYs 2018-2019, OVR will collaborate with the Council on Developmental Disabilities (CDD) and Transition Coalition to implement a best practice model in the CNMI high schools (CIRCLES or other model).

Extent achieved: Objective met - Ongoing

Strategies:

- Continue collaboration with CDD and the Transition Coalition to implement best practices model in the CNMI high schools (CIRCLES).

- Implementation of CIRCLES in Kagman high school (pilot school) in PY 2019, with Saipan Southern High adopting CIRCLES this PY 2020.
- OVR has participated in CIRCLES presentations at Kagman high school and discussions are still taking place on full implementation in the four other high schools.

Goal 3. Strengthen partnerships with employers to identify and provide opportunities for competitive integrated employment to VR clients including students with disabilities.

Objective 3.1: In PYs 2018-2019, OVR - in collaboration and coordination with the Disability Network Partners and/or other community partners - will educate 15 and 20 employers, respectively, on the ability of OVR consumers and the potential for all individuals with disabilities in the CNMI.

Extent achieved: Objective met

Strategies:

- In PYs 2018-2019, OVR met and educated 74 employers on the abilities of OVR consumers and their potential.
- Disseminate information to public and private sector employers to increase their awareness of how VR services could benefit people with disabilities as well as employers. Utilize the Saipan Chamber of Commerce's website as a repository of disability employment information.
- Engage employers in identifying OJT and/or job placements for VR consumers.
- Nurture partnerships with community stakeholders from both the public and private sectors and collaborate on issues affecting disability employment, independence, and integration & full inclusion (including accessibility).
- In collaboration and coordination with various community partners, meet the training needs of employers in the public and private sectors in the areas of reasonable accommodations, the benefits of hiring qualified people with disabilities, tax incentives for hiring individuals with disabilities and making workplaces accessible, etc.

Objective 3.2: In PYs 2018-2019, OVR - in collaboration with the Disability Network Partners - will develop or adopt at least one (1) public awareness campaign to engage CNMI employers.

Extent achieved: Objective met

Strategies:

- In PYs 2018-2019, OVR had flyers and informational brochures hand delivered to all major businesses (10 or more employees) on the islands.
- Conducted presentations to the Rotary, Chamber of Commerce, SHRM and the Hotel Association of the Northern Mariana Islands (HANMI).
- Utilize the SRC general membership meetings as a forum to engage employers.

Objective 3.3: In PYs 2018-2019, OVR will participate in at least two (2) job/career fairs sponsored by public and/or private entities per year.

Extent achieved: Objective met - Ongoing

Strategies:

- In PYs 2018-2019, OVR participated in five (5) job fairs sponsored by both the private and public sectors.

- Continuation of partnerships with WIOA partners, PSS, NMC and the private sector for ongoing participation in job/career fairs.

Objective 3.6: In PYs 2018-2019, OVR - through the State Rehabilitation Council - will continue to engage employers by hosting an Employer Forum at all Council general membership meetings. (Note: This strategy officially kicked off at the Council's 12/21/17 general membership meeting.)

Extent achieved: Objective met - Ongoing

Strategies:

- OVR continues to invite employers to present at the SRC quarterly general membership meetings.
- Utilize the SRC general membership meetings as a forum to engage employers.

Objective 3.7: In PYs 2018-2019, OVR - in collaboration with the SRC and business partners - will disseminate at least four (4) disability employment-related information to help increase employer awareness per year.

Extent achieved: Objective met

Strategies:

- In PYs 2018-2019, OVR had flyers and informational brochures hand delivered to all major businesses (having 10 or more employees) on the islands.
- Conducted presentations and disseminated information to the Rotary, Chamber of Commerce, SHRM and the Hotel Association of the Northern Mariana Islands (HANMI).
- Utilize the SRC general membership meetings as a forum to engage employers.

Goal 4. Improve services that address the needs of people with disabilities served through other components of the statewide workforce development system.

Objective 4.1: In PYs 2018-2019, OVR will continue to engage in meaningful discussions with WIOA Core Program Partners and other team members regarding the development and/or implementation of a common case management system to track and report the participation and progress of consumers co-enrolled in the WIOA Core Programs.

Extent achieved: Objective met

Strategies:

- Trainings are still ongoing for the common case management system adopted by the WIOA core partners (GeoSolutions).

Objective 4.3: In PYs 2018-2019, OVR - in collaboration with the WIOA Title I Program - will conduct at least one (1) cross training for staff on progress flow and processes per year.

Extent achieved: Objective met - ongoing

Strategies:

- Trainings are still ongoing for the common case management system adopted by the WIOA core partners (GeoSolutions).
- GeoSolutions has been in continuous contact with Core Programs on the unique needs of each of the programs in the CNMI, to ensure that the progress flow and processes are captured and meets the needs of the respective programs.

Objective 4.6: In PYs 2018-2019, the CNMI WIOA Core Programs will pursue meaningful discussions leading to the development of a memorandum of understanding (MOU) outlining each programs' roles and responsibilities in serving mutual clients in their attainment of competitive integrated employment.

Extent achieved: Objective met

Strategies:

- The CNMI WIOA Core Programs entered into a memorandum of understanding on June 6, 2018. The MOU outlines each programs' roles and responsibilities in serving mutual clients in their attainment of competitive integrated employment.

Objective 4.7: In PYs 2018-2019, OVR will collaborate with the CNMI Workforce Development Board towards the creation and implementation of a physical or virtual American Job Center (aka One-Stop) with an MOU in place that will outline the appropriate roles and contributions of resources for all required AJC program partners.

Extent achieved: Objective partially met

Strategies:

- The CNMI WIOA Core Programs entered into a memorandum of understanding on June 6, 2018. The MOU stated that the Core Programs through the State Workforce Development Board, agreed to a separate MOU for the American Job Center or One-Stop Center.
- A government owned building was identified in PY 2019 for the location of the AJC. The building was allocated to the Workforce Investment Agency and clearing of the building was initiated. The renovation project was stalled due to a lack of funding. The Core Partners, working with the Office of Grants Management and the State Workforce Development Board have been trying to identify the needed funds to finish the project.

B. Describe the factors that impeded the achievement of the goals and priorities.

Objective 1.1: In PYs 2018-2019, ninety percent (90%) of cases will be determined eligible/ineligible within sixty (60) days of receipt of VR application.

Extent achieved: Objective not met

Impediment(s) to achievement:

- In PY 2018-2019, 75% of cases were determined eligible/ineligible within sixty (60) days of receipt of VR application.
- The key factor that brought our percentages down was the de

Objective 1.2: In PYs 2018-2019, the Individualized Plans for Employment (IPEs) will be developed in partnership with consumers within sixty (60) days after eligibility determination with a 90% targeted success rate.

Extent achieved: Objective not met.

Impediment(s) to achievement:

- In PYs 2018-2019, IPEs were developed within sixty (60) days after eligibility determination with an 85% targeted success rate.

- Frequent monitoring of case status movements via the OVR Tracking System.
- Regular case staffing to ensure timeliness of IPE development.
- In the first quarter of PY 2019 a devastating category 5 typhoon hit the islands head on, with a majority of the damages happening on the main island of Saipan as well as in Tinian. Fortunately for the program, we are on the same power grid as the islands only hospital, therefore, we were able to get power restored within three weeks. Unfortunately, for the rest of the island, power was not restored in a number of areas for another four to six months. This presented a challenge in being able to locate individuals to ensure timelines were met. In fact, a handful of schools, as well as the only college are still holding classes in tents to date. The lack of contractors has caused significant delays in getting the islands infrastructure restored.

Objective 1.6: In PYs 2018-2019, OVR will target at least 3 self-employment plans/outcomes.

Extent achieved: Objective not met

Strategies:

- Negotiations on the level of supports and what processes needed to be in place started in PYI 2018 with the Director of the SBDC.
- In the first quarter of PY 2019 a devastating category 5 typhoon hit the islands head on, with a majority of the damages happening on the main island of Saipan as well as in Tinian. Fortunately for the program, we are on the same power grid as the islands only hospital, therefore, we were able to get power restored within three weeks. Unfortunately, for the rest of the island, power was not restored in a number of areas for another four to six months. In fact, a handful of schools, as well as the only college are still holding classes in tents to date. The lack of contractors has caused significant delays in getting the islands infrastructure restored. This hindered the program's ability to ensure that specific key goals and objectives were met.
- OVR counseling staff did receive training from SBDC specially targeting requirements and their processes for self-employment in September 2019.

Objective 2.4: In PYs 2018-2019, OVR - in collaboration with the Disability Network Partners and other community partners - will provide the following pre-employment transition services:

- Job exploration counseling to at least 30 and 35 transition students with disabilities, respectively;
- Work readiness training to at least 30 and 35 transition students with disabilities, respectively;
- Counseling on postsecondary educational opportunities to at least 30 and 35 transition students with disabilities, respectively;
- Work-based learning experiences to at least 15 and 20 transition students with disabilities, respectively; and
- Instructions in self-advocacy to at least 30 and 35 transition students with disabilities, respectively.

Extent achieved: Objective partially met

Strategies:

- In the first quarter of PY 2019 a devastating category 5 typhoon hit the islands head on, with a majority of the damages happening on the main island of Saipan as well as in Tinian. Fortunately for the program, we are on the same power grid as the islands only hospital,

therefore, we were able to get power restored within three weeks. Unfortunately, for the rest of the island, power was not restored in a number of areas for another four to six months. In fact, a handful of schools, as well as the only college are still holding classes in tents to date. The lack of contractors has caused significant delays in getting the islands infrastructure restored. This hindered the program's ability to ensure that specific key goals and objectives were met.

- Due to the limited times (schools focused on make-up days) and locations available (relocation of several schools) for providing PreETS services, the OVR was not able to provide all its planned PreETS for PY 2019.

(Note: Members of the Disability Network Partners include: Council on Developmental Disabilities, Transition Coalition, Public School System, Title I Youth Program, VOICES of the CNMI-Saipan, Tinian & Rota Chapters (a non-profit organization run by and for self-advocates with I/DD), Northern Marianas College (UCEDD, DSS, etc.), Center for Living Independently, Statewide Independent Living Council, State Rehabilitation Council, Protection & Advocacy, etc.)

Objective 2.5: In PYs 2018-2019, OVR will determine eligibility and develop IPEs in partnership with consumers and prior to high school graduation with a 90% targeted success rate. (Note: The IPE will be developed in consideration of the student's IEP.)

Extent achieved: Objective not met - Ongoing

Strategies:

- In PYs 2018-2019, OVR attended 82 IEP meetings, 46 of which were for seniors and developed 18 IPEs prior to their graduation (39%).
- A review of the Programs approach is being completed.
- Continued participation in the Transition Coalition and communication with the schools Special Education teachers to ensure invitations to IEP/CIRLCES meeting are increased.
- In the first quarter of PY 2019 a devastating category 5 typhoon hit the islands head on, with a majority of the damages happening on the main island of Saipan as well as in Tinian. Fortunately for the program, we are on the same power grid as the islands only hospital, therefore, we were able to get power restored within three weeks. Unfortunately, for the rest of the island, power was not restored in a number of areas for another four to six months. In fact, a handful of schools, as well as the only college are still holding classes in tents to date. The lack of contractors has caused significant delays in getting the islands infrastructure restored. This hindered the program's ability to ensure that specific key goals and objectives were met.

3.4: In PYs 2018-2019, OVR - in collaboration with the WIOA Title I Program - will target 5 and 10 OJTs, respectively, to implement as a way to help meet the employment needs of local businesses. (Note: This will provide both programs with positive outcomes and contribute to the common performance measures of effectiveness in serving employers.)

Extent achieved: Objective not met - Ongoing

Strategies:

- In PYs 2018-2019, Four (4) OJTs were completed.

Objective 4.2: In PYs 2018-2019, OVR - in collaboration with the WIOA Title I Program - will target 5 and 10 OJTs, respectively, as a strategy to provide employment opportunities for

individuals with disabilities in the CNMI, as well as share funding for training and employment services.

Extent achieved: Objective not met - Ongoing

Strategies:

- In PYs 2018-2019, Four (4) OJTs were completed.

Objective 4.4: In PYs 2018-2019, the CNMI WIOA Core Programs will pilot a universal intake process to make co-enrollment a seamless transition for clients with disabilities and to ease the paperwork burden on clients for all programs.

Extent achieved: Objective not met - Ongoing

Strategies:

- Trainings are still ongoing for the common case management system adopted by the WIOA core partners (GeoSolutions). The system, called “HireMarianas”, would allow the core partners to have a more seamless transition process for consumers across the programs.
- GeoSolutions has been in continuous contact with Core Programs on the unique needs of each of the programs in the CNMI, to ensure that the progress flow and processes are captured and meets the needs of the respective programs.

Objective 4.5: In PYs 2018-2019, OVR - in collaboration with the San Diego State University-Interwork Institute or other provider - will provide at least one (1) training to core partners in the CNMI on how to recognize, accommodate, and effectively work with individuals with hidden disabilities.

Extent achieved: Objective not met

Strategies:

- The OVR was unable to complete this objective in PY 2018, and with the significant issues faced in PY 2019, such as the Category 5 typhoon and the change in Administrators, the program will continue to try to locate appropriate trainers, preferably within the region.

2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals.

Goal 5. Improve VR service delivery to effectively meet the needs of clients with most significant disabilities.

Objective 5.1: In PYs 2018-2019, OVR will support the training of at least one (1) staff on work incentives counseling and benefits planning.

Extent achieved: Objective partially met

Strategies:

- In PY 2019, OVR was able to identify an off-island provider that could train VR professionals in benefits counseling, in order for clients to understand how working impacts cash payments from SSA. The University of Hawaii, Center on Disability Studies has submitted a proposal for a Benefits Planning Certification Course. Due to the training

costs, the program Director opted to work on writing and submitting a grant to specifically address this training need.

- In PY 2020, follow up on grant application.

Objective 5.4: In PYs 2018-2019, because the number of CRPs is very low in the CNMI, OVR will continue to try and develop individual service providers to provide service needs like job placement and job coaching.

Extent achieved: Objective met

Strategies:

- In PYs 2018-2019, OVR continues to network with various service providers in the disabilities field to promote partnerships and provide incentives for said providers to branch into vocational rehabilitation services. The program will also revisit its previous recruitment strategies to try and identify other methods of reaching potential providers.
- The program continues to identify individuals and organizations in Tinian and Rota to provide job coaching and other supported employment services to VR clients with most significant disabilities. OVR will consider a “Grow your own” concept whereby OVR prepares and trains current or former clients to provide needed services in the sister islands.

Objective 5.5: In PYs 2018-2019, OVR will train its staff on supported employment, customized employment, and/or other best practice employment model to increase knowledge, skills, and abilities to better serve clients with most significant disabilities.

Extent achieved: Objective met

Strategies:

- In PYs 2018-2019, Due to local government restrictions on travel and budgetary constraints the program has mainly be utilizing the free on-line trainings provided by WINTAC.

Objective 5.6: In PYs 2018-2019, OVR will continue to support clients’ needs for supported employment job coaching to assist them to acquire the necessary skills on the job and increase the likelihood that the job will continue when the training (e.g. OJT) is completed.

Extent achieved: Objective met

Strategies:

- Communication/staffing with VR Counselors also include the possibilities and benefits of providing IL services in conjunction with VR services as necessary and in the context of an approved IPE.
- VR Counselors are encouraged to learn more about the services provided by the local Center for Living Independently.

Objective 5.7: In PYs 2018-2019, OVR will continue to refer clients to the Center for Living Independently for Independent Living (IL) services in conjunction with VR services, as appropriate.

Extent achieved: Objective met

Strategies:

- Communication/staffing with VR Counselors also include the possibilities and benefits of providing IL services in conjunction with VR services as necessary and in the context of an approved IPE.
- VR Counselors are encouraged to learn more about the services provided by the local Center for Living Independently.
- Build awareness and understanding that Independent Living (IL) services could be provided in conjunction with VR services, as appropriate.

B. Describe the factors that impeded the achievement of the goals and priorities.

Objective 5.2: In PYs 2018-2019, OVR will provide work incentives counseling and benefits planning to at least ten (10) clients.

Extent achieved: Objective not met

Strategies:

- In PYs 2018-2019, counseling staff were still referring consumers to NMPASI and SSA for benefits planning.
- In PY 2019, OVR was able to identify an off-island provider that could train VR professionals in benefits counseling, in order for clients to understand how working impacts cash payments from SSA. The University of Hawaii, Center on Disability Studies has submitted a proposal for a Benefits Planning Certification Course. Due to the training costs, the program Director opted to work on writing and submitting a grant to specifically address this training need.

Objective 5.3: In PYs 2018-2019, OVR will continue to communicate with the CNMI Medicaid Program regarding a Home and Community-Based Waiver to use for extended services.

Extent achieved: Objective not met

Strategies:

- The OVR has been unsuccessful in bringing the Medicaid program to the table for discussions on Home and Community-Based Waiver.
- OVR did begin the process of discussing Home and Community-Based waiver with their legal counsel to provide longer term supported employment and extended services (e.g. personal assistance) to clients with most significant disabilities. This conversation was stalled when their legal counsel left the CNMI. The OVR Director is continuing in the pursuit of this and is working at trying to get Medicaid back to the table for discussions.

3. The VR program's performance on the performance accountability indicators under section 116 of WIOA.

Table 1. Employment (Second Quarter after Exit)

To calculate the employment rate: The number of participants who exited during the reporting period who are found to be employed, either through direct Unemployment Insurance (UI) wage record match or supplemental wage information, in the second quarter after the exit quarter DIVIDED by the number of participants who exited during the reporting period.

| Program | PY 2020 Proposed/ Expected Level | PY 2020 Negotiated/ Adjusted Level | PY 2021 Proposed/ Expected Level | PY 2021 Negotiated/ Adjusted Level |
|------------------------------|-------------------------------------|--|---|--|
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

Table 2. Employment (Fourth Quarter after Exit)

To calculate the employment rate: The number of participants who exited during the reporting period who are found to be employed, either through direct Unemployment Insurance (UI) wage record match or supplemental wage information, in the fourth quarter after the exit quarter DIVIDED by the number of participants who exited during the reporting period.

| Program | PY 2020 Proposed/ Expected Level | PY 2020 Negotiated/ Adjusted Level | PY 2021 Proposed/ Expected Level | PY 2021 Negotiated/ Adjusted Level |
|------------------------------|--|--|--|--|
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

Table 3. Median Earnings (Second Quarter after Exit)

| Program | PY 2020 Proposed/ Expected Level | PY 2020 Negotiated/ Adjusted Level | PY 2021 Proposed/ Expected Level | PY 2021 Negotiated/ Adjusted Level |
|------------------------------|--|--|--|--|
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

Table 4. Credential Attainment Rate

A recognized postsecondary credential is defined as a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal government, or an associate, baccalaureate degree, or post-graduate degree. A recognized postsecondary credential is awarded in recognition of an individual's attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation. These technical or industry/occupational skills are generally based on standards developed or endorsed by employers or industry associations.

| Program | PY 2020 Proposed/ Expected Level | PY 2020 Negotiated/ Adjusted Level | PY 2021 Proposed/ Expected Level | PY 2021 Negotiated/ Adjusted Level |
|------------------------------|--|--|--|--|
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

Table 5. Measurable Skill Gains

The measurable skill gains (MSG) indicator is used to measure interim progress of participants who are enrolled in education or training services for a specified reporting period. Therefore, it is not an exit-based measure. Instead, it is intended to capture important progressions through pathways that offer different services based on program purposes and participant needs.

Participants may receive annual MSG for advancement through a program. For example, an annual MSG can be gained as a participant advances through college, assuming necessary requirements are met.

| Program | PY 2020 Proposed/ Expected Level | PY 2020 Negotiated/ Adjusted Level | PY 2021 Proposed/ Expected Level | PY 2021 Negotiated/ Adjusted Level |
|------------------------------|--|--|--|--|
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

Table 6. Effectiveness in Serving Employers

The Effectiveness in Serving Employers indicator is a shared indicator across the six core programs within the state. The purpose of sharing the indicator is to ensure that the core programs within the state are using a holistic approach to serving employers. This measure is being piloted to test the feasibility of the three proposed approaches prior to developing a standardized indicator. State VR agencies will be able to use RSA-911 data element 392 in order to determine the retention with the same employer in the 2nd and 4th quarters after exit. This information can be calculated based on information calculated from state wage records.

| Program | PY 2020 Proposed/ Expected Level | PY 2020 Negotiated/ Adjusted Level | PY 2021 Proposed/ Expected Level | PY 2021 Negotiated/ Adjusted Level |
|------------------------------|--|--|--|--|
| Vocational Rehabilitation | Baseline | Baseline | Baseline | Baseline |

Table 7. Combined Federal Partner Measures

| Measure | PY 2020 Proposed/ Expected Level | PY 2020 Negotiated/ Adjusted Level | PY 2021 Proposed/ Expected Level | PY 2021 Negotiated/ Adjusted Level |
|---------------------------|--|--|--|--|
| Employment | Baseline | Baseline | Baseline | Baseline |
| Median Earnings | Baseline | Baseline | Baseline | Baseline |
| Credential Attainment | Baseline | Baseline | Baseline | Baseline |
| Measurable Skills Gain | Baseline | Baseline | Baseline | Baseline |

4. How the funds reserved for innovation and expansion (I&E) activities were utilized.

Innovation and Expansion (I&E) funding was used, in accordance with federal regulation, to provide for allowable activities for the State Rehabilitation Council (SRC). Consistent with OVR goals and priorities, I&E efforts continue to promote competitive integrated employment outcomes for students and youth with disabilities, extend the community’s capacity to serve persons who are blind or visually impaired, and integrate employment outcomes for persons with developmental disabilities. During PY 2019, the SRC spent \$14,551 from I&E funding to carry out their allowable activities.

**q. Quality, Scope, and Extent of Supported Employment Services.
Include the following:**

1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.

The CNMI OVR will continue its efforts to provide supported employment (SE) services to individuals with the most significant disabilities to achieve meaningful employment per their IPE goal. The Office continues to negotiate with both private firms and public agencies to identify opportunities for competitive integrated employment outcomes for clients participating in this program. OVR currently utilizes one (1) private firm to provide both job coaching and personal assistance services for supported employment consumers. As well, consumers may select private citizens/individuals to provide PA services. The limited number of community rehabilitation programs (CRPs) and extended employment service providers in the CNMI pose a significant challenge to providing a full range of services to consumers who are most significantly disabled. Should Title VI, Part B funds not be made available to VR agencies in PYs 2020-2023, OVR will utilize Basic Support Title I funding for the provision of supported employment services.

Quality of Supported Employment: Supported Employment services are coordinated by VR professionals in collaboration with community rehabilitation program providers such as Marianas Health as well as through individual vendors chosen by VR clients themselves to provide the needed personal assistance services at the jobsite to further maintain competitive integrated employment for the duration allowed by law. Ongoing monitoring of Supported Employment cases will be conducted to evaluate the timeliness, appropriateness, and effectiveness of service delivery to VR clients including students and youth with the most significant disabilities.

Scope of Supported Employment Services: Services intended to support the competitive integrated employment of VR clients including students and youth with the most significant disabilities include job coaching services, personal assistance services on the job, assistive technology, and other post-employment services necessary for job preservation. Natural supports provided by the employer to assist an individual with most significant disabilities to maintain employment may be considered a type of supported employment service.

Extent of Supported Employment Services: The specifics and extent of services needed are determined on an individual basis and written into and provided in the context of an approved Individualized Plan for Employment (IPE). A maximum of twenty-four (24) months of supported employment services may be provided to a consumer with the most significant disabilities to help him/her achieve competitive employment and stability in an integrated work setting. Services may lead to natural supports on the job provided by supervisor and co-workers as well as supported by family and friends. When the IPE is developed, extended support services are planned in order to assure continued support for the consumers. Services will continue to be provided until such time the consumer's job skills meet the employer's expectations and the job is stable and permanently secured. Family-provided supports may include transportation as well as personal assistance services.

2. The timing of transition to extended services.

Timing of transition from supported employment to extended services: The timing of the transition to extended services for VR clients with the most significant disabilities receiving supported employment services from CNMI OVR as part of their approved IPE occurs as soon as the IPE services are completed and the consumer has achieved competitive integrated employment as described in the IPE, or after a period of time not to exceed twenty-four (24) months, whichever

comes first. The CNMI OVR may, under special circumstances, extend supported employment services beyond 24 months, if the consumer and the VR counselor agree to extend the time to achieve the desired employment goal as reflected in the approved IPE.

Certifications

Name of designated State agency or designated State unit, as appropriate: CNMI Office of Vocational Rehabilitation

Name of designated State agency: CNMI Office of Vocational Rehabilitation

Full Name of Authorized Representative: Maryann Borja-Arriola

Title of Authorized Representative: Director

States must provide written and signed certifications that:

1. The designated State agency or designated State unit (as appropriate) listed above 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 WIOA*, and its supplement under title VI of the Rehabilitation Act.** Yes

2. 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 listed above agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under section 111 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; Yes

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 agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan* , the Rehabilitation Act, and all applicable regulations , 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;** Yes

4. The designated State agency and/or the designated State unit 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; Yes

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes

7. The Authorized Representative listed above 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; Yes

8. The Authorized Representative listed above has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; Yes

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. Yes
Footnotes

Certification 1 Footnotes

* Public Law 113-128.

** Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

Certification 2 Footnotes

* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

** No funds under title 1 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.

*** 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 3485; and the State VR Services Program regulations.

Certification 3 Footnotes

* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

** Applicable regulations, in part, include the citations in *** under Certification 2 footnotes
Additional Comments on the Certifications from the State
Certification Regarding Lobbying — Vocational Rehabilitation
Certification for Contracts, Grants, Loans, and Cooperative Agreements
The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that: If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

| | |
|---|--|
| Applicant's Organization | CNMI Office of Vocational Rehabilitation |
| Full Name of Authorized Representative: | Maryann Borja-Arriola |
| Title of Authorized Representative: | Director |

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>). If applicable, please print, sign, and email to MAT_OCTAE@ed.gov

Certification Regarding Lobbying — Supported Employment

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of

Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that: If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant’s Organization: CNMI Office of Vocational Rehabilitation
Full Name of Authorized Representative: Maryann Borja-Arriola
Title of Authorized Representative: Director

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>).

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 of the Rehabilitation Services Administration (RSA), 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 State Plan must provide assurances that:

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 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:

a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.

b. the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. No
The designated State agency or designated State unit, as applicable (B) has established a State Rehabilitation Council

c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.

d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).

e. 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.
The designated State agency allows for the local administration of VR funds: No

f. the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
The designated State agency allows for the shared funding and administration of joint programs: No

g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan. No

h. the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.

i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act

j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.

k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.

l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities.

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:

a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act.

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 .

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 in accordance with section 101(a)(5) of the Rehabilitation Act?

Agency will provide the full range of services described above:

Yes

d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.

e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.

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.

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.

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 section 101(a)(14)of the Rehabilitation Act.

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

j. with respect to students with disabilities, the State,

- i. has developed and will implement,
 - A. strategies to address the needs identified in the assessments; and
 - 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
- ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).

5. Program Administration for the Supported Employment Title VI Supplement:

- 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.
- 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.
- c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act.

6. Financial Administration of the Supported Employment Program:

- 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)(G) and (H) of the Rehabilitation Act.
- 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:

- a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.
- b. The designated State agency assures that:
 - iii. 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
- iv. 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)(6)(C) and (E) of the Rehabilitation Act.

Additional Comments on the Assurances from the State