

**2022 Comprehensive Statewide Needs
Assessment of the Rehabilitation Needs
of Individuals with Disabilities
in Maryland**

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



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Executive Summary

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

This year the agency in collaboration with the Maryland State Rehabilitation Council undertook the triennial comprehensive needs assessment in compliance with the Code of Federal Regulations at 34 CFR (361.29). Maryland Division of Rehabilitation Services executive staff decided that not only will the agency examine the required elements, but our agency would also examine additional topics which would benefit the Division of Rehabilitation Services in planning for the future of our consumers. The 35-member team consisted of Division of Rehabilitation Services' staff and consultation from the Maryland State Rehabilitation Council and Melissa Diehl, Senior Technical Assistance & Research Analyst, National Technical Assistance Center on Transition: The Collaborative, The George Washington University Center for Rehabilitation Counseling Research and Education. The Needs Assessment team (1) collected and analyzed relevant existing data, (2) conducted and analyzed findings of supplemental surveys, and (3) facilitated focus groups and key informant interviews to ascertain the needs of individuals with disabilities throughout the state. As a result, the teams developed a list of needs/concerns and recommendations to address such. This report outlines 113 recommendations throughout the required elements and additional topics.

Required Elements

The results of the Needs Assessment include the following required elements:

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

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

1. The Need of Individuals with Most Significant Disabilities for Supported Employment Services in Maryland
2. Individuals with Intellectual and Developmental Disability, including Section 511 Considerations; and Individuals with Severe and Persistent Mental Illness
3. The Need of Individuals with Most Significant Disabilities
 - a. Individuals who are Blind/Visually Impaired
 - b. Individuals who are Deaf and Hard of Hearing

B. Individuals with Disabilities Who Are Minorities and Individuals with Disabilities Who Have Been Unserved or Underserved by The Vocational Rehabilitation Program

1. Individuals With Disabilities Who Are Minorities – Hispanic and Asian Communities
2. Individuals with Disabilities Who Have Been Unserved, Or Who Are Underserved by The Vocational Rehabilitation Program

C. Individuals with Disabilities Served Through Other Components of The Statewide Workforce Investment System

1. Maryland American Job Centers - Workforce Innovation and Opportunity Act Partners
2. Maryland Community Colleges and Apprenticeship

D. Youth with Disabilities and Students with Disabilities

1. Assessment of the Needs of Students and Youth with Disabilities for Transition Services and Pre-Employment Transition Services and the Extent to Which Such Services Are Coordinated with Local Education Agencies

II. Assessment of the Need to Establish, Develop, or Improve Community Rehabilitation Programs within the State – Including the Workforce and Technology Center

In addition to the required elements noted above, Maryland Division of Rehabilitation Services Executive staff chose for the 2022 Needs Assessment to examine an additional area noted below which would benefit the Division of Rehabilitation Services in planning for the future of our consumers.

III. Assessment of the utilization of existing education or vocational training programs leading to a recognized postsecondary credential or employment

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

As emphasized in the previous Needs Assessments, the Division of Rehabilitation Services waiting list and delays in service provision remain a prominent concern and constitute the most prominent barrier to vocational rehabilitation services for individuals with significant disabilities in Maryland. As of the completion of this Needs Assessment, over 2,700 eligible individuals with significant disabilities are placed on a waiting list for vocational rehabilitation services since 2017. Clearly, individuals on the waiting list are the most seriously unserved of populations. Several factors currently prevent the Division of Rehabilitation Services from moving people from the waiting list.

1. Federal Funding Levels

Maryland Division of Rehabilitation Services' funding for the three-year period of FY2020 to FY2022 has increased from \$46,156,368 to \$48,623,984, which is 5.3% increase over the last three years, while inflation over that same period has increased by approximately 12%. The federal funding formula has disproportionately affected Maryland. Division of Rehabilitation Services' funding would have been approximately \$54,458,000 compared to \$48,623,984, a difference of approximately \$5,834,000.

2. Pre-Employment Transition Services: At Least 15% Reserve Fund Requirement

The Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act, requires Vocational Rehabilitation agencies to reserve no less than 15% of the federal Vocational Rehabilitation allotment. This money is reserved to provide or arrange for the provision of Pre Employment Transitioning Services for students with disabilities transitioning

from school to postsecondary education programs and employment in competitive integrated settings. This requirement for the agency to reserve at least 15% of the state grant also applies to re-allotted funds. This leaves only 85% of the annual budget remaining for services to adults. Over the last two years as a result of COVID-19, the Division of Rehabilitation Services saw a decrease in the number of student referrals for Pre Employment Transitioning Services; however, in calendar year 2022 the Division of Rehabilitation Services has seen a dramatic increase in the number of student referrals to the agency. The current trend is tracking between 4,300 and 4,500 Pre Employment Transitioning Services referrals. In Program Year* 2021, 7051 of Pre Employment Transitioning Services students received a Pre Employment Transitioning Services service.

* Under the Workforce Innovation and Opportunity Act, the reporting year has moved from the traditional Federal Fiscal Year, October 1 to September 30, to a Program Year, July 1 to June 30 time frame. The year designation is at the beginning of the year versus the end of the year for the federal fiscal year.

3. State Government Personnel Actions

Prior to COVID-19, Maryland was having difficulties in recruiting for vocational rehabilitation counselors especially in the Baltimore and District of Columbia metropolitan areas due to the low starting State wages. During 2020 and mid-way through 2021 there was a reduction in the number of staff leaving the agency. However, beginning in mid-2021, the number of staff leaving the agency dramatically increased and the ability to replace those staff became even more challenging. As a result, the Division of Rehabilitation Services worked closely with the Maryland State Department of Education to undertake a salary study of the vocational rehabilitation counselor positions to seek a higher starting salary. As a result, starting July 1, 2022, the average starting salary was increased by 20% and brought the salary more in line with other jurisdictions.

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

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

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

Supported Employment services have undergone a transition in the last few years with major changes to the Division of Rehabilitation Services' Supported Employment Policy, the total phase out of 14c subminimum wages, and a focus on training and quality employment outcomes as evidenced by Workforce Innovation and Opportunity Act Benchmarks, across all partners, that include Measurable Skills Gains, Credential Attainment, and Post Exit Outcomes. The Division of Rehabilitation Services anticipated an increase in Supported Employment consumers with the phase out of 14c subminimum wages and an increase in successful outcomes by incorporating training programs alongside job development services.

Since March 2020, the agency has seen a drastic reduction in staff and services available due to COVID-19. Now that things are slowly getting back to normal, these services, including job search and training, will be more available and many now include a hybrid or fully remote

version. This allows for an increase of availability of these services across the entire state allowing participants who would normally need transportation to access services from their home or a more accessible location.

Methodology: Division of Rehabilitation Services Data Review

Data was collected and reviewed to assess the number of participants under an Individualized Plan for Employment who have been, or currently are, receiving Supported Employment services, what percentage of those have engaged in a training service, and their closure outcome.

- Supported Employment Plans and Outcomes Each Program Year:
 - In Program Year 2019, 4,138 plans were issued of which 1,246 were Supported Employment Plans (30%). The successful outcome rate of those participants was 25%. Of those plans, 162 had a training service category on it and those participants had a successful outcome rate of 32%.
 - In Program Year 2020, 2,544 plans were issued of which 815 were Supported Employment Plans (32%). The successful outcome rate of those participants was 22%. Of those plans, 121 had a training service category on it and those participants had a successful outcome rate of 41%.
 - In Program Year 2021, 3,213 plans were issued of which 903 were Supported Employment Plans (28%). The successful outcome rate of those participants was 8%. Of those plans, 97 had a training service category on it and those participants had a successful outcome rate of 42%.

- Recidivism Rates:
 - In Program Year 2019, 2,120 participants had applied to Division of Rehabilitation Services who previously had a case open at some point prior. Of those, 599 participants had a Supported Employment plan (28%).
 - In Program Year 2020, 1,447 participants had applied to Division of Rehabilitation Services who previously had a case open at some point prior. Of those cases, 447 participants had a Supported Employment plan (31%).
 - In Program Year 2021, 1,713 participants had applied to Division of Rehabilitation Services who previously had a case open. Of those participants, 417 had a Supported Employment plan (24%).

- Staff Survey Regarding Supported Employment Services and Training/Post-Secondary:
 - There was an even distribution across the state: 123 respondents, 12% - 22% range for return of surveys per region.
 - 80% of respondents have been in the field for more than 2 years.
 - 80% of respondents work or have worked with Supported Employment participants.
 - 92% of respondents relayed that they know that participants can engage in training/post-secondary and job search services at the same time.
 - 65% of respondents relayed that they have provided training/post-secondary and job search services at the same time with 80% of respondents relaying they feel training/post-secondary contributed to the participant obtaining competitive integrated employment.
 - 76% of respondents relayed that they feel they have adequate knowledge of training/post-secondary programs in their area.

- 48% responded that they currently have participants on their caseload that are engaged in both training/post-secondary and job search services.

Needs/Concerns

- As an agency, the Division of Rehabilitation Services needs to examine how participants who receive Supported Employment Services have been accessing training, identify barriers, and provide support at even the lowest levels so training/post-secondary is accessible.
- The agency needs to make sure staff understand the new Supported Employment policy changes and overall focus of Workforce Innovation and Opportunity Act as it pertains to quality and long-term employment.
- The successful outcomes for Supported Employment participants are lower than the agency's total successful outcomes by 10%, over the last 10 years.
- The agency averaged 28% of Supported Employment participants returning each year in the last 3 years. The more Supported Employment participants are obtaining long-term employment the more this rate should go down.

Recommendations

- Have the agency develop and implement trainings to make sure new staff are being taught correctly on how to provide job search and training/post-secondary education services concurrently.
- Continue to emphasize that counselors need to complete the Natural Supports Worksheet for Supported Employment Assessment with consumers to identify and provide all services necessary to give consumers a higher chance to obtain long-term employment.
- Develop virtual training programs available through the Workforce and Technology Center which lead to industry recognized certification to allow consumers receiving Supported Employment Services to be able to participate from anywhere across the state.
- Students with low scores on placement tests have traditionally been required or encouraged to take developmental Math or English before taking college-level gateway courses. Offer these courses through the Workforce and Technology Center's Academic Services where consumers receiving Supported Employment Services will be able to access the appropriate disability supports more easily.

2. Individuals with Severe and Persistent Mental Illness and Individuals with Intellectual and Development Disabilities

For efficiency, the subtopic areas of individuals with severe and persistent mental illness and individuals with intellectual and developmental disabilities under the main topic of "The Needs of Individuals with Most Significant Disabilities for Supported Employment" have been combined.

Methodology: Division of Rehabilitation Services, Community Rehabilitation Programs, and Consumer Survey Data

The most common services provided to individuals with severe and persistent mental illness and individuals with intellectual and developmental disabilities who were employed, and Closed-Rehab were job search, placement, and short-term job coaching followed by

assessment, benefits counseling after Individualized Plan for Employment, and Supported Employment Services.

An examination of 432 Behavioral Health Administration/Developmental Disabilities Administration cases that were reopened revealed that 85.9% are Behavioral Health Administration and 14% are Developmental Disabilities Administration. Of the total number of Division of Rehabilitation Services cases reopened, 22.3% are Behavioral Health Administration and only 3.9% receive Developmental Disabilities Administration.

Supported Employment plans that were open in 2019 through 2021 that included training:

Region	Total Number of Supported Employment Cases	Training Plan Types	Percentage of Training Plan Types
1	865	25	2.9%
2	977	6	1%
3	722	43	6%
5	648	8	1.2%
6	702	13	1.9%
Total	3914	95	2.4%

In addition to the above data from the Division of Rehabilitation Services' AWARE system, survey results were collected from Community Rehabilitation Programs. The following indicates service of Long-term Supported Employment for people with persistent behavioral health and developmental disabilities.

- 53.1% of the respondents stated their primary funding source is Developmental Disabilities Administration
- 16.3% of the respondents stated their primary funding source is Behavioral Health Administration

Additionally:

- 55.3% of the respondents stated their primary service population is Developmental Disability
- 23.4% of the respondents stated their primary service population is Behavioral Health

Lastly, of the 38 agencies, 73.7% stated they offer training for the individuals they serve. The following are examples of training programs listed:

- Internships (paid and/or unpaid)
- On-the-Job Training
- Skills development

Data revealed that the services which led to employment after Individualized Plan for Employment are 1) Job Search, 2) Placement, 3) Short-term Job Coaching, 4) Assessments, 5) Benefits Counseling After Individualized Plan for Employment, 6) Supported Employment Services, 7) Goods/Services Required for Training, and finally 8) Transportation.

Data revealed the top three disability groups receiving Supported Employment plans are: 1) cognitive impairments, 2) other mental impairments, and 3) psychosocial impairments. For

these disability groups, the highest number of paid authorizations that lead to employment was job search authorizations followed by job support/job coaching authorizations. However, it is important to note that there were a significant number of participants with job support authorizations not paid that were Closed-Rehab.

Individual surveys were sent to Division of Rehabilitation Services consumers. Twenty responses were received. Two individuals stated that their counselors spoke to them about vocational training. These individuals indicated that the training discussed with them was formal career training and internships. Six individuals noted that they received vocational training.

Methodology: Subject Matter Expert Interviews

Interviews were conducted with various Division of Rehabilitation Services' staff to obtain information regarding the use of training and higher education on Supported Employment Plans. Division of Rehabilitation Services' staff reported that they typically do not discuss training or higher education with consumers due to the complexity and time involved with the process. In addition, Division of Rehabilitation Services' staff stated that the use of training and higher education on Supported Employment Plans is challenging as these consumers with these types of disabilities typically do not have the required academic levels and/or resources (e.g., transportation) to be successful in the completion of training programs or higher education. Division of Rehabilitation Services' staff shared that when they pursue training or higher education for this population that results do not yield successful outcomes. Division of Rehabilitation Services' staff have also indicated that knowledge and staff training is insufficient in the areas of vocational training, apprenticeship, and internships.

Needs/Concerns

- Community Rehabilitation Programs are reporting that they are referring consumers more than once because they are stating that the Division of Rehabilitation Services' counselor is stating that the referral has not been received. Community Rehabilitation Programs are questioning what is happening to the referral.
- Vocational training and higher education process is cumbersome and confusing.
- Community Rehabilitation Programs and Division of Rehabilitation Services' staff need to understand and support internships and other forms of vocational training.

Recommendations

- The Eligibility Determination Unit needs to determine if Behavioral Health Administration referrals can be processed through this unit to ensure consistency for these populations.
- Increase training opportunities for Division of Rehabilitation Services' staff and providers regarding services for Behavioral Health Administration/Developmental Disabilities Administration populations regarding how to support both training and employment simultaneously.
- Streamline process to support vocational training and higher education.
- Provide training opportunities for staff and providers for specific disability populations, especially autism.
- Review Closed-Rehab cases to determine how and why they are being closed successfully without job search support.

3. The Need of Individuals with Most Significant Disabilities

a. Individuals who are Blind/Visually Impaired

The Division of Rehabilitation Services' Office for Blindness and Vision Services is committed to providing quality and specialized services to Maryland citizens who are blind and visually impaired. The Office for Blindness and Vision Services operates the following programs and services for eligible participants:

- Vocational Rehabilitation counselors are located throughout the state in Division of Rehabilitation Services field offices and at the Workforce and Technology Center. The staff is providing employment and independent living services for individuals who have a goal of employment.
- Rehabilitation Teachers for the Blind are also located throughout the state in the Division of Rehabilitation Services field offices and the Workforce and Technology Center. The staff is providing independent living assessments and services to individuals who have a goal of employment. Additionally, these rehabilitation teachers are providing in-home teaching for the Maryland Independent Living Older Blind grant. They assess areas such as: mobility, household management skills, and communication skills.
- The Office for Blindness and Vision Services at the Workforce and Technology Center offers services and programs for individuals who are blind and visually impaired. These services and programs address areas of independent living, mobility, technology, and communication training in a residential setting. The program works with Rehabilitation Technology Services at the Workforce and Technology Center for the provision of assistive technology services, including assessments and training, for blind and visually impaired consumers.

During the past three years, the Office for Blindness and Vision Services served 1,286 individuals in our vocational rehabilitation program for whom visual impairment or blindness was reported to be their primary impairment. Ninety-eight (98) of the individuals who applied for services in July 2019 – June 2022 had previous cases and returned for additional services. Of 1,286 served during the past three years, 274 had vocational and occupational skills training listed on their Individual Plan for Employment. To meet the vocational and occupational skills training needs of this population, there are currently two community rehabilitation programs that provide training specifically to this population. However, all Division of Rehabilitation Services approved community rehabilitation programs and the Workforce and Technology Center, which offer vocational and occupational skills training programs, are available for Office for Blindness and Vision Services consumers with assistive technology and accommodations as appropriate. Of the 274 individuals with vocational and occupational skills training listed on their Individualized Plan for Employment, 14 were closed successfully with employment related to their training within the last three years. One hundred seventy-two (172) individuals continue to receive services. Eighty-eight (88) were closed unsuccessfully during the past three years.

Methodology

A survey was sent to Office for Blindness and Vision Services' field counselors to elicit their opinion regarding the main role of the counselor. In addition, the survey solicited the counselors' knowledge of training programs in the community and at the Workforce and Technology Center, and to determine how they are disseminating this information. Surveys

were sent to 15 Office for Blindness and Vision Services field counselors and nine responses were received.

A second survey was sent to a random selection of 40 Division of Rehabilitation Services Office for Blindness and Vision Services' consumers to obtain information regarding their knowledge and awareness of programs and services offered by community rehabilitation programs and the Workforce and Technology Center. Of the 40 surveys sent, 10 responses were received.

Two focus groups were held with a total of five consumers who had multiple cases and received services during the last three years. The purpose of the focus groups was to obtain information on why consumers returned for services. In addition, information was collected from other state agencies including Utah, Rhode Island, Mississippi, and Wisconsin regarding the recidivism rate.

Needs/Concerns

- Lack of introductory immersion training programs for adults who are newly blind or have experienced a change in vision.
- Lack of community-based career training programs that are accessible to consumers with blindness or vision impairments.
- Lack of resources for jobs and/or a network of blind-friendly employers.
- Consumers lack knowledge and awareness of training programs available in the community.
- Counselors do not feel that they are adequately trained to handle some vision-related aspects of their jobs such as adjustment to vision loss and career counseling for the blind.
- Lack of efficiency in the service delivery and follow-up by Office for Blindness and Vision Services' staff.
- Lack of adequate communication between counselors and consumers.
- Lack of access to training programs at the Workforce and Technology Center; programs at the Workforce and Technology Center are not inclusive.
- The Workforce and Technology Center staff lack knowledge of blindness and vision impairments as well as appropriate accommodations for consumers to participate in programs at the Workforce and Technology Center.
- Consumers lack knowledge of training programs at the Workforce and Technology Center.
- Consumers return to the Office for Blindness and Vision Services primarily due to major life changes (e.g., loss of job, decline in vision).
- Consumers return to the Office for Blindness and Vision Services because they require extended training for services such as orientation and mobility and assistive technology training.

Recommendations

- Enhance and emphasize counselor role in:
 - advising consumers about the full scope of services, the rehabilitation team and process, and community resources,
 - focusing on capabilities and individualized needs and learning styles,
 - facilitating access to assistive technology services and ongoing training,
 - minimizing gaps in provision of services, and

- increasing timeliness of the services provided.
- Provide updated case management training to Office for Blindness and Vision Services' counselors.
- Create an updated blindness and visually impaired resource book with statewide community resources for use by Office for Blindness and Vision Services' counselors and consumers, to include but not limited to mental health and housing resources, blindness resources, Social Service resources, blind-related apps for independent living and employment, and technology resources.
- Continue to foster relationships with community providers for services to Office for Blindness and Vision Services' consumers.
- Continue to offer blind awareness to community providers including understanding the value of assistive technology, assistive technology options available, and necessary accommodations.
- Require that all Division of Rehabilitation Services approved community rehabilitation programs and the Workforce and Technology Center, which offer vocational and occupational skills training programs, provide equal access to these services through available technology and accommodations.
- Continue to offer enhanced rates to community providers.
- Provide advanced training to Office for Blindness and Vision Services' consumers on software, devices, and technology used in competitive integrated employment.
- Utilize the Staff Specialist for Blind and Vision Services at the Workforce and Technology Center for the provision of increased and enhanced blind awareness training for the Workforce and Technology Center staff, especially for career training programs, CCBC staff, and employment services staff.
- Collaborate with the Staff Specialist for Blind and Vision Services at the Workforce and Technology Center when developing career training programs at the Workforce and Technology Center to ensure accessibility for all consumers.

b. Individuals Who Are Deaf and Hard of Hearing

The Maryland Governor's Office of the Deaf and Hard of Hearing Annual Report for 2020-2021 reports that there are approximately 1.2 million Marylanders who are Deaf or Hard of Hearing. For Division of Rehabilitation Services Program Years 2019, 2020, and 2021, Division of Rehabilitation Services data indicates that the Division of Rehabilitation Services has served 1,680 individuals who reported Deaf or Hard of Hearing as their primary disability.

The 2019 CSNA report provided recommendations to increase and enhance service delivery for individuals who are Deaf and Hard of Hearing. The need to update eligibility forms and provide training to rehabilitation counselors for the deaf regarding appropriate use of the forms when determining eligibility for Deaf and Hard of Hearing consumers was identified. As a result, all eligibility documents and policies were reviewed in preparation for the creation of the Eligibility Determination Unit to ensure appropriate use of forms when determining eligibility for Deaf and Hard of Hearing individuals. One of the goals of the Eligibility Determination Unit is to ensure consistency in eligibility determination agency wide. There are counselors in the Eligibility Determination Unit who specialize in working with individuals who are Deaf and Hard of Hearing. Some of the recommendations from the 2019 report will be carried over to the 2022 CSNA.

Methodology: AWARE Data

AWARE data was reviewed from program years 2019, 2020, and 2021 to assess the number of Deaf and Hard of Hearing individuals served by the Division of Rehabilitation Services who are in Service status that have vocational and occupational skills training or college/university training on their Individualized Plan for Employment. The data revealed the following:

- Deaf and Hard of Hearing consumers from all regions are in college/university training much more than vocational and occupational skills training.
- Most Deaf and Hard of Hearing consumers attended Gallaudet University and Rochester Institute of Technology.
- Some Deaf and Hard of Hearing consumers attended community colleges.

Methodology: Community Rehabilitation Program Survey

An online survey was distributed to Community Rehabilitation Programs across the state of Maryland to ask questions about people they serve with disabilities. Out of the 52 participants that responded, only 11 Community Rehabilitation Programs answered the survey questions about Deaf and Hard of Hearing and the services offered.

- Only one (1) of 11 Community Rehabilitation Programs has staff who are fluent in American Sign Language.
- Two of the 11 Community Rehabilitation Programs are not familiar with accommodations and accessibility requirements for Deaf and Hard of Hearing consumers.
- Five of 11 Community Rehabilitation Programs are not aware that there are paid incentives from the Division of Rehabilitation Services if the Community Rehabilitation Program qualifies and provides services to Deaf and Hard of Hearing individuals.
- Some Community Rehabilitation Programs need assistance from the Division of Rehabilitation Services with American Sign Language/Deaf Culture training and interpreting services.

Methodology: Focus Group of Division of Rehabilitation Services' Rehabilitation Counselors for the Deaf

During a focus group with Division of Rehabilitation Services' Rehabilitation Counselors for the Deaf meeting, they were asked several questions regarding Deaf and Hard of Hearing consumers returning to the Division of Rehabilitation Services for employment support services or vocational training programs.

- Rehabilitation Counselors for the Deaf explained that Deaf and Hard of Hearing consumers return to the Division of Rehabilitation Services for service due to several reasons, including:
 - Employment support to find a new job,
 - Bad experience in the workplace,
 - Issues with boss,
 - Lost job or laid off,
 - Need Hearing Aids,
 - Disability worsens, and
 - Need additional training to get promoted.
- Rehabilitation Counselors for the Deaf explained that Deaf and Hard of Hearing consumers are no longer employed due to termination, being laid off, transportation issues, and long distances from home.
- Rehabilitation Counselors for the Deaf claimed that they know some employment support services and vocational training programs, such as Work-Based Learning

Experience, Workforce and Technology Center, community colleges, ABC contractors, VSP services, and apprenticeships.

- Rehabilitation Counselors for the Deaf referred their Deaf and Hard of Hearing consumers to several Community Rehabilitation Programs, including:
 - Bell Davis,
 - Deaf Independent Living Association,
 - Vocational Services Program,
 - Family Service Foundation,
 - Humanim,
 - Jewish Social Service Agency, and
 - Deaf Reach.
- Rehabilitation Counselors for the Deaf have mentioned the Workforce and Technology Center services to Deaf and Hard of Hearing consumers; however, some consumers do not want to or could not go to the Workforce and Technology Center due to the long distance from home and the insufficient number of Deaf and Hard of Hearing consumers participating in services at this facility.
- An estimated 50% of Deaf and Hard of Hearing caseloads are interested in looking for employment. On the other hand, 50% of Deaf and Hard of Hearing caseloads seek higher education.
- Some Rehabilitation Counselors for the Deaf are interested in in-person or virtual meetings or training to learn more about vocational training programs or employment services.

Methodology: Focus Group of Deaf and Hard of Hearing Consumers

Five Deaf and Hard of Hearing consumers participated and were asked three questions regarding their return to services with the Division of Rehabilitation Services, in particular employment and the Workforce and Technology Center.

- Reasons why the consumers return to the Division of Rehabilitation Services after their case is closed:
 - “I am no longer employed and seeking assistance to find new employment.”
 - “I am currently employed but seek assistance to find new employment and new hearing aids.”
 - Not applicable to three consumers since they are still involved with their initial Division of Rehabilitation Services case.
- Reason for no longer being employed:
 - “I quit because I didn’t want to lose my benefits after the new manager increased my work hours and would not reduce it.”
 - “I want to find new employment because of communication issues with new management. Have not received a pay increase for some time too.”
 - “I resigned because of the COVID-19 pandemic. I did not work enough hours to risk exposing my elderly mother.”
 - Not applicable to two consumers.
- The consumers were asked if they have heard of the Workforce and Technology Center. Their responses were:
 - “Yes, my vocational rehabilitation counselor told me about Workforce and Technology Center and the training programs in the beginning.”
 - “Yes, when I was referred to a summer program while in high school.”
 - “Yes, I was informed about the programs there when I met my vocational rehabilitation counselor and joined the Starbucks training program.”

- “I was with the Division of Rehabilitation Services for a long time but learned about the Workforce and Technology Center later around 2011 for computer class.”
- “I have known about Workforce and Technology Center probably from the Deaf community in Baltimore. I had a hearing aid evaluation there too.”

Needs/Concerns

- Most Community Rehabilitation Programs staff do not know American Sign Language, do not have signing staff, nor understand what Deaf individuals need including accessibility and accommodations.
- Community Rehabilitation Programs need training regarding Deaf culture, accessibility, accommodations, American Sign Language, and interpreting services.
- Rehabilitation Counselors for the Deaf may not know enough about vocational training programs or Community Rehabilitation Programs because most programs do not serve Deaf and Hard of Hearing consumers.
- The number of Deaf and Hard of Hearing consumers in training programs at the Workforce and Technology Center is insufficient.

Recommendations

The following recommendations are carried over from the 2019 CSNA report:

- Communication devices should be checked every six months to ensure that they are in working order.
- Purchase or replace communication devices, as needed, to ensure effective communication between hearing and Deaf and Hard of Hearing staff or consumers.
- All staff in each office should be trained at least once a year on the communication devices in their office to ensure effective communication with consumers.
- Data documents regarding employment information should be disseminated to appropriate staff on a regular basis.
- Employment specialists and Rehabilitation Counselors for the Deaf serving Deaf and Hard of Hearing individuals should have an employment toolbox which contains information on how to approach businesses.

The following recommendations for the 2022 CSNA are enhancements to the 2019 CSNA recommendations:

- Communication Devices that malfunction should be repaired when the issue occurs vs waiting for the six-month check. All offices should have a device to ensure effective communication between hearing and deaf or hard of hearing staff or consumers.
- The Division of Rehabilitation Services needs to expand the number of Pre Employment Transitioning Services programs provided for deaf and hard of hearing consumers within the State of Maryland.
- A management team needs to be developed to ensure data is shared with employment specialists on a quarterly basis. The Division of Rehabilitation Services should have representation at a national level by attending the NET Summit and National Conferences Training and Council of State Administrators of Vocational Rehabilitation meetings every spring in Bethesda, Maryland.

The following are new recommendations based on current information gathered:

- Provide additional training for Community Rehabilitation Program staff who serve deaf and hard of hearing consumers to learn more about deaf accessibility and accommodations, including Deaf culture and American Sign Language.
- Encourage Community Rehabilitation Programs to consider hiring staff who are fluent in American Sign Language.
- Educate Community Rehabilitation Programs about paid incentives from the Division of Rehabilitation Services for serving Deaf and Hard of Hearing consumers.
- Provide assistance and guidance to Community Rehabilitation Programs regarding interpreting services.
- Provide in-person or virtual training to Rehabilitation Counselors for the Deaf to assist them with learning about vocational training programs.
- Examine solutions which will promote the attendance of deaf and hard of hearing consumers at the Workforce and Technology Center. For example, hiring instructors who are fluent in American Sign Language or establish training designed for deaf and hard of hearing consumers.
- Educate and promote deaf and hard of hearing consumers regarding the benefits of participating in vocational training.
- Provide outreach and education to businesses on the benefits of employing deaf and hard of hearing employees.

B. Individuals with Disabilities Who Are Minorities and Individuals with Disabilities Who Have Been Unserved or Underserved by the Vocational Rehabilitation Program

1. Individuals with Disabilities Who Are Minorities

The 2019 Comprehensive Statewide Assessment of the Rehabilitation Needs of Individuals with Disabilities in Maryland identified a need for the Division of Rehabilitation Services to consider target outreach efforts, in collaboration with workforce and education partners, to increase services to minority individuals with disabilities with an emphasis on Hispanic and Asian individuals.

The 2019 CSNA report provided recommendations to increase accessible services for minority individuals with disabilities. The need to re-establish the Multicultural Access Committee was identified. As a result, in November 2020, the committee was re-established and renamed D.A.R.E. (Diversity, Awareness, Respect, Equity). Several cultural competency trainings were offered to staff by the Division of Rehabilitation Services department of Training and Professional Development including Diversity in the Workplace. Other training for all staff in Diversity, Equity, and Inclusion is in development. The implementation of recommendations for both areas was delayed due to COVID-19, the closure of Division of Rehabilitation Services offices due to the pandemic, and mandatory telework. Some of the recommendations from the 2019 report will be carried over to the 2022 CSNA report.

The Division of Rehabilitation Services continues to be committed to increasing and improving services for minority populations. According to the 2020 US Census Estimates, 15.2% of the population in Maryland are foreign-born. 10.6% of the population identified as Hispanic and 6.7% of the population identified as Asian. These estimates also show that 19% of households speak a language other than English.

<https://www.census.gov/quickfacts/fact/table/md,US/POP645220>

Methodology: AWARE Data

AWARE data was reviewed to assess the number of consumers served by the Division of Rehabilitation Services in program year 2020 (July 1, 2019-June 30, 2020) who are of Hispanic or Asian ethnicity (AWARE Report: Participants Served by Ethnicity). Individuals from Hispanic and Asian backgrounds continue to be underrepresented among individuals receiving services.

Hispanic Served:

- Program Year 2020 number served: 598 (4% of total served) Asian Served (Asian, Pacific Islander, Native Hawaiian, or Other Pacific Islander):
- Program Year 2020 number served: 529 (3.7% of total served)

AWARE data was reviewed to determine the number of individuals who were successfully rehabilitated by the Division of Rehabilitation Services who are of Hispanic or Asian ethnicity (AWARE Report: Rehabilitated Participants by Ethnicity).

Hispanic Rehabilitated:

- Program Year 2020 number rehabilitated: 40 (7% of Hispanics served) Asian Rehabilitated (Asian, Pacific Islander, Native Hawaiian, or Other Pacific Islander):
- Program Year 2020 number rehabilitated: 42 (8% of Asians served)

Methodology: Community Rehabilitation Program Survey

A comprehensive survey was distributed to various Community Rehabilitation Programs throughout the state. Included in the survey were questions related to service provision for non-English speaking individuals. Thirty-two (32) completed responses were recorded.

Needs/Concerns

Here are some highlights from the survey regarding serving non-English speaking individuals:

- Seventy-seven and a half percent (77.5%) responded that they do not provide Division of Rehabilitation Services-funded services to individuals for whom English is a second language. Of the 22.5% that responded that they do provide services, the primary language of individuals served is Spanish (87.5%) and then Korean (25%).
- Community Rehabilitation Program staff fluency in languages other than English was low. Seventy percent (70%) reported that no staff were fluent in another language; 25% were fluent in Spanish; 2.5% fluent in Chinese (Mandarin, Cantonese, other) and 2.5% were fluent in Korean.
- Communication methods used by Community Rehabilitation Program staff were reported as follows: 40.7% utilize a professional translator; 59.3% utilize a family member or friend; 33.3% utilize a staff person fluent in a specific language; 29.6% use Google translate; and 11.1% use translated printed material.
- When polled about barriers agencies have experienced in serving Latino/Hispanic and Asian populations, results were: 38.9% legal or work status in the US; 27.8% lack of access to information; and 11.1% competing demands (inconvenience, cost, lack of time and financial resources).
- Eighty percent (80%) of Community Rehabilitation Programs reported that they have not declined referrals based on language needs but of the 20% that have, they reported the following: 87.5% due to limited non-English speaking staff; 75% limited staff training on the provision of language services to limited English speakers; 75% limited knowledge

of language assistance services; and 62.5% lack of reimbursement for providing interpretation and translation services.

- Eighty-two and a half percent (82.5%) of agencies polled were not aware of potentially paid incentives from the Division of Rehabilitation Services if they qualify and provide services to individuals who need services in a different language other than English. Seventeen and a half percent (17.5%) reported they were aware of this incentive from the Division of Rehabilitation Services.

Methodology: Division of Rehabilitation Services Staff Survey

A comprehensive survey was distributed to Division of Rehabilitation Services' staff covering topics related to all areas of the needs assessment. One hundred ninety-eight (198) responses were recorded, however, not all were fully completed.

Needs/Concerns

Here are some highlights from the survey regarding serving non-English speaking individuals:

- Not all printed materials/documents are available in various languages.
- Although 79.1% of staff reported no issues with using the foreign language translation service, those that did reported issues with dropped or disconnected calls, being on hold for long periods, and lateness of the interpreter arriving for the meetings due to distance traveled.
- Lack of bilingual or multilingual staff.
- Ninety percent (90%) of staff reported no knowledge of any outreach efforts from Division of Rehabilitation Services' staff to assist individuals whose primary language is not English.
- Only 21.5% of staff reported providing information to non-citizens on how to become legally allowed to work in the United States.

Recommendations

The following recommendations are carried over from the 2019 CSNA report:

- Before developing outreach efforts to increase the number of minorities served by the Division of Rehabilitation Services, the agency needs to ensure that the resources needed by field service staff have been developed and disseminated. This will contribute to a better employment outcome for minorities served by our agency.
- Task D.A.R.E. (Diversity, Awareness, Respect, Equity) with developing a resource list for each region of available community agencies that provide assistance in completing the Application for Employment Authorization, Form I-765, which is the first step for non-citizens to become legally allowed to work in the U.S.
- Task D.A.R.E. (Diversity, Awareness, Respect, Equity) with identifying a resource list for each region of English for Speakers of Other Languages (ESOL) providers.
- Task D.A.R.E. (Diversity, Awareness, Respect, Equity) with publishing all information developed as a result of these recommendations on InDORS (the agency's internal intranet).
- Develop a work group led by the Workforce and Technology Center department of Academic Services to explore the option of the Workforce and Technology Center offering English for Speakers of Other Languages (ESOL) classes at the Center, in the regions, or virtually.
- Develop a work group led by the Division of Rehabilitation Services department of Community Rehabilitation Programs to identify Community Rehabilitation Programs that

provide services to non-English speaking consumers in their native language. Ensure that services include an understanding of the complicated vocational rehabilitation and job search process. Services should include identifying appropriate training, completing employment applications, and finding a suitable employer.

- Task the Division of Rehabilitation Services department of Training and Professional Development to continue to provide cultural competency training to ensure staff have been trained and are better sensitized to some of the needs of persons of color and people from different racial/ethnic backgrounds.

The following are new recommendations for the 2022 CSNA based on current information gathered:

- Consider the Division of Rehabilitation Services covering the cost for use of the Language Line for Community Rehabilitation Programs as an incentive to expand service provision to this population.
- Offer placement incentives to Community Rehabilitation Programs who serve individuals with disabilities who speak a language other than English.
- Update the referral portion of the Division of Rehabilitation Services website so that it is accessible in other languages.
- Examine additional options for foreign language interpreting services.
- Examine agency protocols for when there are issues accessing foreign language interpreting services (e.g., dropped/disconnected calls, long holds).

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

Individuals unserved, or underserved, by the Vocational Rehabilitation Program is a constantly evolving area of assessment, reflecting demographic changes, as well as agency initiatives. Previous needs assessments have utilized multiple strategies to identify areas of need and to propose recommendations. The most recent assessment in 2019 identified the following needs:

- Lack of sufficient resources
- Continued use of “Delayed List”
- Staff inexperience
- Barriers to employment

Having identified those needs, the following recommendations were made in the 2019 CSNA:

- To increase vocational rehabilitation staff and manage caseload distribution across both Vocational Rehabilitation and Pre Employment Transitioning Services.
- To provide benefits planning and to address the lack of usage among some populations.
- To improve information and referral to consumers on the Division of Rehabilitation Services Delayed List, including assessment of the Order of Selection for Supplemental Security Income/Social Security Disability Insurance (SSI/SSDI) consumers on the Delayed List.
- To improve intra-agency data sharing and referral.
- To further assess barriers for accessing vocational rehabilitation services (including lack of knowledge of the service).

Since 2019, progress has been made in addressing needs regarding those un/underserved, as follows:

- While additions to total vocational rehabilitation staff have not been made, a reorganization of the agency resulting in the formation of an Eligibility Determination Unit is currently underway. The explicit goal of the Eligibility Determination Unit is to provide vocational rehabilitation staff more time to allocate to vocational rehabilitation services, as well as the Eligibility Determination Unit addressing efforts to remove under and unserved populations from the Delayed List (if the consumer is eligible for vocational rehabilitation services) and to provide information and referral services to Workforce Innovation and Opportunity Act partners.
- Caseload reallocation is undertaken to address these populations as evidenced by interviews conducted with subject matter experts (Jody Boone, Office of Field Services director and Toni March, Office for Blindness and Vision Services director), a review of which will be summarized under “Methodology” below.
- The Division of Rehabilitation Services is preparing to shift the management of certain facets of Pre Employment Transitioning Services case management to a partner agency, as evidenced by discussion with subject matter experts (Scott Dennis, Division of Rehabilitation Services Assistant State Superintendent, Darlene Peregoy, Director of Administration and Financial Services, and Jessica Markum, Staff Specialist for Transitioning Services), a review of which will be summarized under “Methodology” below.
- The Division of Rehabilitation Services has created a position, as well as data and reports, to facilitate Ticket to Work handoff to Employment Network partners, as well as assist counselors in identifying SSA beneficiaries for whom benefits planning phases have not been initiated or fully completed.

As with previous Needs Assessment reports, this current assessment has identified underserved and unserved populations for which the Division of Rehabilitation Services has been unable to fully meet the statutory requirements outlined in the Rehabilitation Act. This assessment has identified the following contributing factors:

- Lack of sufficient staffing and caseload reallocation challenges when addressing this need,
- Caseload size as related to statewide disability populations and agency capacity,
- Community Rehabilitation Program referral and coordination challenges,
- Creation and monitoring of new initiatives (Pre Employment Transitioning Services, Eligibility Determination Unit) and their impact to these populations,
- Continued use of the Delayed List, and
- Challenges with the provision of services tailored to addressing un/underserved populations.

To effectively address this content area, it is necessary to first define underserved and unserved populations. For the purposes of this report, “underserved” Division of Rehabilitation Services consumers largely fall within four categories:

- Those individuals on the Division of Rehabilitation Services Delayed List,
- Those on a caseload which does not have an assigned full-time counselor (“vacant”), or the caseload is being covered by a supervisor or other staff person, or for whom the case has been transferred between multiple vocational rehabilitation counselors within a short period of time or their counselor has less than three years’ experience,

- Those individuals whose case has had little or no activity (case notes, case expenditures, referrals for service, etc.) for an extended period (defined as 6 months for the purposes of this assessment), and
- Those individuals who have been served by the Division of Rehabilitation Services but still require long-term supports and/or follow-along services, which should be identified in the Division of Rehabilitation Services Individualized Plan for Employment and appropriate referral/handoff made at case closure. This includes information and referral to Workforce Innovation and Opportunity Act partners, long-term support providers such as Behavioral Health Administration and Developmental Disabilities Administration, and in the case of SSA beneficiaries, potential handoff to an Employment Network.

It is also important to identify individuals who are “unserved” by the Division of Rehabilitation Services. To address this, one must first identify individuals with a disability in Maryland who are not served by vocational rehabilitation. There are numerous data elements, outlined below, which present either a snapshot in time or trends over time. These elements can be compared to the comparable periods of service for Division of Rehabilitation Services consumers, thus identifying the total population available “to be served,” those being served by the Division of Rehabilitation Services, and the remainder being “unserved.”

Within each population noted above, there are also:

- Those individuals on Social Security Disability benefits and
- Those who have a disability but are not receiving Social Security Disability benefits

And within the Supplemental Security Income/Social Security Disability Insurance (SSI/SSDI) population, there are further subsets of individuals including:

- Those receiving and managing their own funds and
- Those who have a representative payee and often a guardian (whose wishes and decisions may impact the decisions made by and for the Division of Rehabilitation Services consumer)

While there are similarities in the needs of these populations, there are also unique differences both in what services can be provided and how best to serve an individual of a specific type depending upon their vocational rehabilitation case status and those other parties involved in the decision making. Such differences will be highlighted in needs/concerns and/or recommendations, when and as appropriate.

Second, expanding upon the methodology of the 2019 CSNA, this review will focus upon literature from several sectors. This assessment will also call upon subject matter experts, summary and analysis of data sets both internal and external to Division of Rehabilitation Services*, and a brief survey of Community Rehabilitation Program partner agencies. *Current available national census data largely predates the prior CSNA and was discussed in that assessment. As such, data for this assessment will utilize case management and human resource sources.

Third, based upon an analysis of these combined resources, needs are identified, and recommendations proposed to address the documented areas of concern.

Methodology: Literature Review

To assist in evaluating these populations, a literature review of the following has been conducted. Highlights related to un/underserved populations from each report are noted below.

- United States Government Accountability Office (GAO) Reports
 - GAO-22-104031: Social Security Disability, GAO-21-105419: Supplemental Security Income
 - Obstacles to Ticket Participation (defined as those who assign their Ticket to work with a Vocational Rehabilitation or Employment Network) and which may contribute to un/underserved populations include:
 - Severity of disability
 - Fear of loss of cash and medical benefits
 - Fear of overpayment debt which in turn deters participants
 - Ticket participants are more than twice as likely to receive an overpayment than nonparticipants (within 5 years of assignment)
 - Overpayments occur when beneficiaries do not report earnings (results from confusion as to who, how, and where to report) or when SSA does not take timely action on reported earnings
 - Lack of understanding the complex work incentive rules
 - Less than 1.5% of SSI youth benefit from incentives such as student earned income exclusions
- Office of the Inspector General Social Security Administration Audit Reports
 - A-02-18-50544 Office of the Inspector General, SSA. Audit Report: Beneficiaries Who Received Vocational Rehabilitation Services
 - Nationwide, more beneficiaries have unsuccessful outcomes (62%) than successful outcomes (38%) after receiving vocational rehabilitation services
 - Maryland mirrors these national statistics. Since 2019, SSI and SSDI beneficiaries at Division of Rehabilitation Services application (AWARE Table Data)
 - 32.5% Closed-Rehab
 - 67.5% Closed-Unsuccessful
 - Majority of successful beneficiaries report part time work after vocational rehabilitation (76%)
 - Division of Rehabilitation Services mirrors this data (79% of beneficiaries part time at Division of Rehabilitation Services closure)
- SSA Employment Summit Summary Final Report, Achieving Successful Employment Outcomes for SSDI and SSI Beneficiaries: Transforming Ideas into Action Plans, 2019
 - Recommendations proposed to SSA to address un/underserved populations
 - Improve communication to beneficiaries and language tone in SSA letters
 - Programs should be started earlier in the disability application/award process
 - Informing Ticket holders to expect contacts from providers offering services
 - Training local field office staff on return-to-work programs
 - Broaden the focus of Ticket to be more inclusive of part-time work

- Address cash-cliff for SSDI beneficiaries (i.e., reduction of SSDI check to \$0 once over SGA, and after Trial Work has been completed)
 - Establish relationships with families and support group members. Get buy-in from payees/families to improve employment outcomes
- Spotlight on Students with Disabilities (Maryland State Board of Education, October 26, 2021)
 - Secondary students with disabilities are:
 - Less likely to attend and complete college/university
 - More likely to work fewer hours and receive lower salaries
 - More likely to have fewer employment benefits than their peers
 - Total count of students with disabilities and by percent of total students show concentrations in the counties surrounding urban areas of District of Columbia and Baltimore
- Centers for Disease Control and Prevention (CDC) / National Center on Birth Defects and Developmental Disabilities: Disability Impacts Maryland
 - 1,040,158 adults in Maryland have a disability (22% or 1 in 5).
 - Most often reported: 10% mobility, 10% cognition, 6% independent living, 4% hearing, 4% vision, 3% self-care
 - 28,813 high school students with disabilities (2020-2021 school year)

Methodology: Subject Matter Expert Interviews

Subject matter experts were consulted for the following topics.

- Caseload reallocation
 - Caseload reallocation has been conducted by the Division of Rehabilitation Services with the explicit goals of:
 - Tackling un/underserved populations on large and/or vacant caseloads
 - Improving customer service diversifying counselor expertise across new regions and with new resources, programs, providers, etc.
 - Engendering a uniform Division of Rehabilitation Services-approach rather than district-specific tendencies
 - Caseload reallocation is conducted by the Office of Field Services on a district-by-district level and principally began during the COVID-19 pandemic as counselors were required to serve consumers remotely. In so doing,
 - Reallocation facilitated reduction in long-term case vacancy issues to alleviate unserved populations
 - Reallocation was used to standardize caseload size to create parity in workload and improve service to underserved populations on large caseloads
 - Caseload reallocation is conducted by the Office for Blindness and Vision Services differently. Rather than a wholesale transfer of cases; Office for Blindness and Vision Services utilizes temporary assistance via existing staff across all roles during staff vacancy. There is not an attempt towards identifying a target caseload size. Instead, caseload division is conducted by geographical area to ensure customer service locally.
 - Caseload reallocation supports supervisors currently covering multiple vacant caseloads.
- Pre Employment Transitioning Services Service Model Changes

- Goal: reducing Division of Rehabilitation Services' staff time spent on Pre Employment Transitioning Services management to allow for improved services to vocational rehabilitation consumers, including those considered un/underserved.
 - Accomplished by reduction in caseload with the shift of Pre Employment Transitioning Services cases via models discussed below. Smaller caseload size should improve service to underserved populations on open caseloads, and unserved populations exiting the delayed list to be served. Lastly, this will ensure that all Pre Employment Transitioning Services consumers are also equitably served, as there are currently un/underserved populations within this group, due to caseload vacancy, caseload size, and other factors.
- Pre Employment Transitioning Services consumers are all eligible to be served and the Division of Rehabilitation Services cannot predict the flow of referrals, resulting in greater investment by the Division of Rehabilitation Services in these services, and thus limiting vocational rehabilitation services; thereby increasing the populations of un/underserved vocational rehabilitation consumers.
- Since Workforce Innovation and Opportunity Act, the Division of Rehabilitation Services is handling approximately 5,500 Pre Employment Transitioning Services referrals annually and this is expected to rise. A 2019 meeting of vocational rehabilitation directors led to various models to serve these populations.
- Model options to shift management of Pre Employment Transitioning Services include:
 - State coordination with universities to handle Pre Employment Transitioning Services from intake through closure. Vocational Rehabilitation involved if the Pre Employment Transitioning Services consumer chooses to be referred to Vocational Rehabilitation.
 - States utilizing requests for proposals to establish cohorts of providers/Community Rehabilitation Programs to manage Pre Employment Transitioning Services.
- The Division of Rehabilitation Services received funding from the Maryland State Department of Education to create a two-year pilot project that explores an alternative model for the Division to handle Pre Employment Transitioning Services referrals. The Division of Rehabilitation Services will be teaming with the University of Maryland Center for Transitioning and Career Innovation to explore various outreach and communication modes. Over the two years the Center will evaluate which approach or combination of approaches are the best in obtaining the necessary student documentation. Based on the Center's evaluation they will then develop a fee for service model that the Division can use to sustain this effort once the pilot project is completed.
- The Division of Rehabilitation Services will explore what options are available to assist in the overall case management of Pre-Employment Transitioning Services. Under the Workforce Innovation and Opportunity Act, there are specific non-delegable requirements of a vocational agency. The goal is to identify what case management aspects of Pre-Employment Transitioning Services that can be delegated to outside organizations such as a universities or service providers to ease the workload on the Division's Transitioning Counselors.

Methodology: Community Rehabilitation Provider Surveys

To assess Community Rehabilitation Program needs, the following questions and responses were received via electronic survey:

- Are you currently accepting referrals from the Division of Rehabilitation Services?
 - 7.7% (3 respondents) said “No”. Of those, the reasons given were no referrals received, a focus on Developmental Disabilities Administration consumers, and lack of staff.
- Have you seen a change in the number of referrals coming into your agency from the Division of Rehabilitation Services? From other Sources?
 - 43.6% (17 respondents) saw a decrease in referrals, while only 17.9% saw a decrease from other sources.
- Have you noticed changes in the type of individuals being referred by the Division of Rehabilitation Services or who you are referring to the Division of Rehabilitation Services?
 - 15.4% (6 respondents) said “Yes”. Reasons include: individuals who are: increasingly disabled and/or less independent, have a criminal background or other/multiple significant barriers to employment, experiencing mental health challenges, minority (Hispanic), and needing more individualized supports.

Methodology: Data Review

Analysis of data from the following sources will also supplement this assessment.

- Maryland students in high school with an Individual Education Plan
 - 28,813 (for the 2020 - 2021 school year). This is an increase of approximately 1600 students from prior CSNA.
- Social Security Beneficiaries: via SSA’s Ticket Tracker January monthly data sets. (<https://www.ssa.gov/work/tickettracker.html>) 2014 through 2022
 - Ticket Holders served by the Division of Rehabilitation Services (as a % of all Ticket holders in Maryland).
 - 2014 through 2019: average of 4.24% of Assignable Tickets assigned to the Division of Rehabilitation Services
 - 2020 through 2022: 4.33% of Assignable Tickets assigned to the Division of Rehabilitation Services
 - Nationally, Maryland:
 - Is above the 1.54% national average of Assignable Tickets assigned to vocational rehabilitation and above the overall average of 2.44% Tickets collectively assigned to Vocational Rehabilitation and Employment Networks
 - Ranks 3rd in percentage of Tickets assigned of total available, behind only District of Columbia and Utah: which have substantially smaller populations and Tickets assignable
 - Ranks 7th in total Tickets assigned to vocational rehabilitation and 11th for collective number of Tickets assigned to Vocational Rehabilitation or Employment Networks
- Review of Division of Rehabilitation Services-based data: Vocational Rehabilitation Counselor statistics, AWARE case management/caseload statistics, Barriers to Employment, demographics, Benefits Planning/Ticket handoff statistics
 - Division of Rehabilitation Services Counselors
 - 133 full time counselors in Office of Field Services and Office for Blindness and Vision Services, with 20 vacancies as of December 31,2019.

- 133 full time counselors in Office of Field Services Office for Blindness and Vision Services, with 42 vacancies as of May 19, 2022
- As of April 2022, there are:
 - 33 Staff in Region 1
 - Serving 3,098 Consumers
 - 47 Staff in Region 2
 - Serving 4,074 Consumers
 - 39 Staff in Region 3
 - Serving 2,919 Consumers
 - 42 Staff in Region 5
 - Serving 4,775 Consumers
 - 41 Staff in Region 6
 - Serving 4,757 Consumers
 - 39 Staff in Office for Blindness and Vision Services
 - Serving 951 Consumers
- Staff retention. Between January 2020 and 2022 there were:
 - 85 Vocational Rehabilitation Specialist I, II, and Technical Specialist vacated their employment with the Division of Rehabilitation Services
 - 7 of those were hired and then vacated their employment with the Division of Rehabilitation Services during this timeframe. The remaining 78 were hired prior to 2020
 - 30 staff were hired during this period and remain with the Division of Rehabilitation Services
- 2022 Caseload Overview:
 - The average Office of Field Services caseload size is 172 combined Pre Employment Transitioning Services and Vocational Rehabilitation cases
 - 104 for Vocational Rehabilitation and 68 Pre Employment Transitioning Services
 - All supervisors carry a caseload. Average supervisor caseload is 68 (both Vocational Rehabilitation and Pre Employment Transitioning Services), though this varies tremendously based on vacancies
 - Counselors average around 70 cases in Office for Blindness and Vision Services
 - 63 Vocational Rehabilitation cases and 7 Pre Employment Transitioning Services
 - Division of Rehabilitation Services agency-wide case distribution: 14,833 total cases in the following statuses
 - 2,770 Delayed
 - 10,879 Service
 - 658 Eligible
 - 526 Employed
 - 8,406 Total Beneficiaries (defined as receiving Supplemental Security Income/Social Security Disability Insurance (SSI/SSDI) at application) served
 - 494 of these are age 65+ (i.e., SSA retirement benefits)

- The Division of Rehabilitation Services provided services to 6,693 youth (1,326 Pre Employment Transitioning Services to students) per 2021 Division of Rehabilitation Services Annual Report. This is down from 2020 during which 7,282 youth were served (3,264 students receiving Pre Employment Transitioning Services) and from 2019 when 7,479 youth were served and 5737 received Pre Employment Transitioning Services.
- A breakdown of 17,295 (1.6%) Division of Rehabilitation Services Vocational Rehabilitation participants since January 1, 2019, have the following disability impairment reported at application:
 - 7,489 (43.3%) Psychosocial/Other mental; 5,795 (33.5%) Cognitive; 1,782 (10.3%) Other Physical; 1,231 (7.1%) Blind/Low Vision; 749 (4.3%) Hearing Loss; 594 (3.4%) Mobility; 269 (1.5%) Communication
- Delayed list
 - October 2015, the Delayed List was 2,697 individuals with an average wait of 17 months
 - April 2019, the Delayed List was 2,505 individuals with an average wait time of 32 months
 - March 2022, the Delayed List was 2,770 individuals with an average wait time of 26 months
 - Longest delayed period is 01/30/2017 or 1,884 Days
 - Barriers to Employment data (current-2022) Delayed List
 - Homeless - 67
 - Long Term Unemployed - 871
 - Will exhaust Temporary Assistance for Needy Families (TANF) in two years - 30
 - Limited English - 150
- Division of Rehabilitation Services Benefits Planning Usage Statistics
 - 2,677 Benefits Planning Phase 1 which ideally occurs as soon as a consumer signs their plan and encompasses the full Benefits Summary and Analysis Report. Review of authorizations Open, Closed, Paid
 - 1,035 Canceled
 - 439 Open
 - 1,606 Closed (Paid)
 - Provision of benefits planning to eligible beneficiaries declined to 38% in FY22 (same as 2019 CSNA) after briefly rising to nearly 50% in 2020 prior to COVID-19.

Needs/Concerns

Synthesizing the information gathered from literature review, data analysis, subject matter experts, and surveys, the following needs and concerns targeting un/underserved populations were identified.

- Staffing
 - Supervisors and vocational rehabilitation counselors are assigned caseloads left “vacant” when vocational rehabilitation counselors vacate the position, in addition to maintaining their own supervisory duties and/or caseloads (consumers underserved).
 - Caseload reallocation will likely remain an ongoing agency initiative, though its goals and methods may change depending upon agency needs and in response

to un/underserved populations which fluctuate with staffing and referral changes statewide. Care should be taken to address the following concerns:

- Due to staff retention and hiring barriers, what is supposed to be short term coverage by supervisors, instead results in a substantial caseload size for supervisors, contributing to un/underserved populations. Until staff hiring and retention are addressed, this will remain an area of need for future needs assessments.
- Reallocation creates a learning curve for staff familiarity with local services, resources, providers, and job market (local counselors need a system between districts to provide training, resources, and experience in the local area for counselors serving consumers remotely).
- Counselors must ensure consumer choice, including if an individual requests in-person/local services.
- Delineation of responsibilities should be codified in policy.
- Address scale of reallocation to ensure equitable distribution of workload.
- Caseload size
 - Caseload size is above the recommended size (approximately 140 per subject matter experts) to ensure effective provision of services.
- Unserved populations
 - There are far more individuals with disabilities than the Division of Rehabilitation Services has the capacity to serve.
 - Centers for Disease Control and Prevention (CDC) data indicates that most high school students remain unserved.
 - Disabled individuals with barriers to employment (long-term unemployment, homeless, exhausting Temporary Assistance for Needy Families/TANF) are waiting for services from the Division of Rehabilitation Services.
 - SSA Beneficiaries
 - For 2022, only 4.25% of all SSA Ticket Holders in Maryland are receiving vocational rehabilitation services.
 - 2022: 1,157 individuals (42%) currently on the Division of Rehabilitation Services Delayed List have a Social Security “Ticket to Work,” waiting to be assigned to a Vocational Rehabilitation/EN (consumers underserved). This is unchanged from the percentage of Ticket holders on the Delayed List from previous CSNAs.
 - In 2022, only 58 individuals from the Delayed List were assigned to ENs
 - Currently 33% of consumers allowed SSI and/or SSDI at application received benefits planning services or are currently authorized to receive these services.
- Community Rehabilitation Program Needs Identified
 - There is indication in a reduction in Division of Rehabilitation Services referrals to some Community Rehabilitation Programs which may:
 - Contribute to underserved populations (may be related to vacant caseloads, or staff covering multiple or large caseloads)
 - Pose a financial burden to Community Rehabilitation Programs (due to reduced revenue from the Division of Rehabilitation Services)
 - Community Rehabilitation Programs indicated a change in referred individuals towards those with a most significant disability coupled with multiple barriers to employment. These changes in referrals may be attributed to: Order of

Selection, an increase in referrals of populations with multiple barriers, changes in the labor market (allowing those with less significant impairments to find jobs on their own), as well as other factors such as COVID-19, Division of Rehabilitation Services staffing turn-over, and limited community resources.

Recommendations

The following are recommendations to address the needs and concerns outlined above.

- Staffing:
 - Improve vocational rehabilitation staff retention
 - Offer incentives using SSA cost reimbursement funds.
 - Evaluate availability of Community Rehabilitation Programs to provide Workforce and Technology Center-type services in the local community.
 - Continue to evaluate programs at the Workforce and Technology Center to assure their effectiveness in meeting the needs of both the consumers and employers.
 - Reach out to retirees to see if they would be interested in working part-time as a roving counselor to help cover counselor vacancies.
 - Improve the HR hiring process to expedite the filling of vacancies
 - Collaborate with colleges to offer scholarships and increase our internship opportunities for students interested in vocational rehabilitation programs
 - Institute an internship to hire program
 - Develop a cold-case unit or other mechanism to address inactive cases to address underserved populations with no activity. Either:
 - Re-engage that individual to move them from underserved to served, or
 - Close the case
 - Closed cold cases have a ripple effect allowing cases from the delayed list (another underserved population) to be served
 - Caseload reallocation
 - Identify a consistent and equitable statewide consumer/staff workload ratio (data indicates this currently varies substantially by district and region)
 - Codify a formal reallocation process to include cross-training of the counselor, establish counselor supports including toolkits, provider lists, and local resources
 - Consider specific factors in reallocation decisions such as number of cases, type of case (only active cases be reallocated), etc.
 - Establish a reallocation summary/checklist, including contacts/current supports, next steps.
- Pre Employment Transitioning Services
 - The University of Maryland management of Pre Employment Transitioning Services cases will require monitoring during the two-year pilot project.
 - Look for best practices that might be utilized in the vocational rehabilitation program.
 - Develop a fee-based model that will enable Transitioning counselors to shift some of the case management responsibilities to a third party, such as a university or service provider.
- Eligibility Determination Unit
 - The Eligibility Determination Unit will require monitoring and potential revision, as this approach is still being implemented.

- Establish data and accountability procedures, whereby the Division of Rehabilitation Services can track and monitor provision of services by the Eligibility Determination Unit
 - Monitor impact of this process on vocational rehabilitation eligibility to include impact to un/underserved populations once transferred to vocational rehabilitation for service delivery
 - Evaluate the effectiveness of the Eligibility Determination Unit at increasing the productivity of vocational rehabilitation field counselors. This can be done via examination of data including successful rehabilitations, reduction in numbers of cases inactive (no case notes or authorizations for 6 months), etc.
 - Analyze the effectiveness of the Eligibility Determination Unit at appropriately processing SSA beneficiaries on the Division of Rehabilitation Services waiting list.
- Delayed List
 - When individuals are placed on the Delayed List, ensure that they are given referral information to the closest and most relevant Workforce Innovation and Opportunity Act partner. In the case of Social Security beneficiaries, include referral information Partnership Plus Employment Networks.
- Services
 - Consider further assessment strategies to determine whether the barriers to access vocational rehabilitation services or the lack of knowledge of vocational rehabilitation services contribute to populations being unserved/underserved (identify and examine new groups such as LGBTQ+, refugee populations, and others not elsewhere currently examined within the CSNA).
 - Continue to include benefits planning service for consumers who receive Supplemental Security Income/Social Security Disability Insurance (SSI/SSDI) .
 - Track and analyze statistics regarding authorization cancellation. Identify strategies to improve referral process. Develop reports to increase referrals on cases for whom benefits planning should occur but has not.
 - Mitigate benefits planning delays by:
 - Coordination with SSA to address Benefits Planning Query delays and propose solutions, including facilitation of mySSA accounts for vocational rehabilitation consumers.
 - Ensure the inclusion of representative payees, legal guardians in benefits planning and other services to improve buy-in and support for vocational rehabilitation planning and employment goals.
 - Revise the Division of Rehabilitation Services Ticket to Work and benefits planning fact sheets to address consumer fears and demotivating factors identified in literature review.
 - Develop Financial Independence and Money Management training as a new service to increase and maintain independence during and after vocational rehabilitation services.
 - Develop a workgroup to evaluate unsuccessful vocational rehabilitation case closure after Individualized Plan for Employment creation. Identify strategies to increase the likelihood of successful employment outcomes.
- Partners:
 - Address referral changes noted in the Community Rehabilitation Program survey.

- Reduction in referral numbers
 - Encourage collaboration between the Division of Rehabilitation Services and providers regarding services provided by Community Rehabilitation Programs and individuals referred by the Division of Rehabilitation Services.
 - Educate staff covering reallocated caseloads.
- Create a referral screening tool, such as a questionnaire, to determine which partner may best serve amongst Workforce Innovation and Opportunity Act partners.
- Currently, Employment Networks do not wish to accept Ticket handoff candidates that are not already at or near SGA earnings. However, national and Division of Rehabilitation Services data suggest that more than 75% of beneficiaries chose part time. Many of these eventually transition above SGA, as evidenced by cost reimbursement.
 - Efforts should be made to identify those cases likely to lead to SGA, for potential Ticket handoff. Collaboration with SSA's Ticket Program Manager is needed.
- CSNA Methodology:
 - Consideration should be given to refining this content area. As this content area is vast, and extends to multiple populations and areas of concern, separating underserved and unserved into separate content areas, and identifying specific areas of focus for review within the following CSNA is recommended.

C. Individuals with Disabilities Served Through Other Components of the Statewide Workforce Investment System.

In 2016, Governor Larry Hogan directed relevant state agencies to work together to develop a combined statewide workforce plan. Maryland Department of Labor, the Department of Human Services, and Maryland State Department of Education collaborated to develop the operational components of this combined plan. In 2018, the Department of Housing and Community Development's Community Services Block Grant program, the Maryland Labor Division of Unemployment Insurance, and the Senior Community Services Employment Program were added to Maryland's Combined State Workforce Plan.

Workforce Innovation and Opportunity Act State Plan Program	Core Workforce Innovation and Opportunity Act Program as Determined by Law	Additional Workforce Innovation and Opportunity Act Program as Determined by Governor	Maryland State Agency Responsible for Oversight
Adult Program	•		Maryland Labor
Dislocated Worker Program	•		Maryland Labor

Workforce Innovation and Opportunity Act State Plan Program	Core Workforce Innovation and Opportunity Act Program as Determined by Law	Additional Workforce Innovation and Opportunity Act Program as Determined by Governor	Maryland State Agency Responsible for Oversight
Youth Program	•		Maryland Labor
Wagner-Peyser Act Program	•		Maryland Labor
Adult Education and Family Literacy Act	•		Maryland Labor
Vocational Rehabilitation Program	•		Maryland State Department of Education
Temporary Assistance for Needy Families (TANF) Program		•	Department of Human Services
Trade Adjustment Assistance for Workers Program		•	Maryland Labor
Jobs for Veterans State Grants (JVSG) Program		•	Maryland Labor
Unemployment Insurance (UI)		•	Maryland Labor
Senior Community Service Employment Program (SCSEP)		•	Maryland Labor and Senior Service America, Inc.
Reentry Employment Opportunities (REO)		•	Local partners
Community Services Block Grant (CSBG)		•	Department of Housing and Community Development

Table: Partners for Workforce Innovation and Opportunity Act State Plan as listed on the Workforce Innovation and Opportunity Act State plan 2020-2024 Referrals from Workforce Partners including American Job Centers to the Division of Rehabilitation Services

Methodology: AWARE Data

AWARE referral data was requested to determine the number of referrals from Workforce partners including American Job Centers to the Division of Rehabilitation Services. AWARE

referral data was requested from July 2019 through April 2022. Referral data was only available from December 2020 through April 2022 due to major changes in our online referral system that were implemented in December 2020.

Referral data in AWARE indicated that 215 referrals came from workforce partners between December 2020 through April 2022 (a 15-month period). There were 244 referrals from workforce partners recorded from 2016-2018 (a 3-year period). It can be inferred by this data that the number of referrals from workforce partners has increased since our last statewide needs assessment was completed in 2019.

- 160 referrals were received from Department of Social Services,
- 38 referrals were received from American Job Center/One-Stop,
- 11 referrals were received from Adult Basic Education and Literacy Program, and
- 6 referrals were received from Maryland Department of Labor Licensing and Regulation.

Needs/Concerns

- As a result of the pandemic which began in March 2020, many of our workforce partners were operating remotely and American Job Centers were not open to the public therefore causing a dramatic decrease in the number of referrals received.
- Since implementing our new referral process at the end of 2020, Division of Rehabilitation Services' staff were no longer manually entering referral data into AWARE. Referrals are now entered directly into the system by referral sources, and they select the appropriate "Vocational Rehabilitation Referral Source" themselves.
- The list of options under "Referral Source" on our Division of Rehabilitation Services Online Referral, can be confusing for some of our workforce partners that may fall under multiple categories.

Recommendations

- The Division of Rehabilitation Services online referral system has several selections for workforce partners to choose from when entering a referral. It is recommended that this section be updated and streamlined to allow for better data collection. An example of one choice that may not be necessary would be "American Job Center/One-Stop" since staff referring from the American Job Centers identify with agencies already listed as other options.
- Once the Eligibility Determination Unit begins to process all referrals statewide, referral processes that have been established with local workforce partners which include warm handoffs will need to be revisited.
- Continuing with periodic cross-training and education of all partners at the local level will contribute to an increase in referrals as evidenced by the data.

Methodology: AWARE Data, Division of Rehabilitation Services' Staff Survey, and Subject Matter Expert Interviews

AWARE data was requested to determine the number of referrals Division of Rehabilitation Services' staff made to workforce partners between July 2019 - April 2022. AWARE data was only available through November 2021 as the agency made changes at that time related to how referrals to workforce partners were coded under Special Programs in AWARE. AWARE data indicated that Division of Rehabilitation Services' counselors made 1,269 referrals to workforce partners between July 2019 - November 2021.

- 699 referrals to "Other Workforce Innovation and Opportunity Act Funded Programs",

- 325 referrals to “Other One-Stop Partner”,
- 153 referrals to “Department of Labor Employment and Training Services Programs”,
- 83 referrals to “Wagner-Peyser Employment Services Program”,
- 8 referrals were made to “Adult Education and Literacy Programs”, and
- 1 referral to “Workforce Innovation and Opportunity Act Funded Indian and Native Americans Programs”.

A survey was sent out to all Division of Rehabilitation Services’ staff with questions specific to referring to American Job Centers, the services consumers are referred for, referral processes, and referral documentation. Results revealed that 78.4% of Division of Rehabilitation Services’ staff who responded indicated that they have knowledge of what is available to consumers at an American Job Center and 74.5% of Division of Rehabilitation Services’ staff who responded have referred to an American Job Center for one or more services. Division of Rehabilitation Services’ staff indicated that they referred to the following services at the American Job Centers: Job Search/Maryland Workforce Exchange, resume assistance, computer skills, career information sessions, certification training programs, hiring events, and youth services. Most Division of Rehabilitation Services’ staff who have not referred to services provided through American Job Centers indicated that they had not done so because they were either new to the agency and unfamiliar about what is available at the American Job Center or because they didn’t feel that the American Job Center was equipped to serve individuals with more significant needs.

Subject Matter Expert Interviews were also conducted with various Division of Rehabilitation Services’ staff statewide to determine how staff were referring and keeping track of referrals sent to workforce partners in local areas. Both Subject Matter Experts and the Division of Rehabilitation Services’ staff survey revealed that there is not a consistent method of referral to workforce partners or American Job Centers statewide. Referrals to partners occur via telephone, via paper referral if that mechanism exists in that local area, via email, or other computer-based systems if they are available in that local area.

Needs/Concerns

- Changes in the way referrals to workforce partners are coded in AWARE makes it challenging to obtain accurate data related to the number of referrals being made to our workforce partners. Warm handoffs to partners are the only referrals being coded in AWARE.
- Although we have made a lot of progress in cross-training workforce staff, including Division of Rehabilitation Services’ staff, regarding services available through partners since 2019, not all areas have provided such training and the Division of Rehabilitation Services also has a number of new staff who have not yet had such training.
- Staff survey results revealed that there currently are multiple methods used to document referrals to workforce partners as well as uncertainty as to the correct way to document such referrals.
- Without having an established statewide workforce partner referral tracking system, it is difficult to collect and share data related to which agencies staff are referring to and for which services.

Recommendations

- Referrals to workforce partners should be tracked in AWARE regardless of whether they count toward a counselor’s performance evaluation. Currently referrals to workforce

partners that are “warm handoffs” are the only referrals accounted for in our case management system but not all referrals to workforce partners require that level of collaboration. This practice should be revisited as it is not capturing all consumers being referred to partners.

- Cross-training of Division of Rehabilitation Services and workforce partners should be conducted at least twice per year in each local area to ensure that new staff are made aware of the services offered and eligibility requirements for each partner.
- There is still confusion amongst staff distinguishing between referral to workforce partners, referral to American Job Centers, and collaborations with workforce partners. Current AWARE coding should be revisited and statewide training available to show staff how this should be documented.

Apprenticeship

Methodology: Literature Review, Data Analysis, and Division of Rehabilitation Services Staff Survey Results

The 2022 Needs Assessment committee members reviewed the U.S. Department of Labor Office of Disability and Employment Policy research and data regarding apprenticeship opportunities for individuals with disabilities. The following literature resources were used:

1. U.S. Department of Labor Office of Disability and Employment Policy website- Disability Employment Policy Resources by Topic of Apprenticeship: www.dol.gov/odep/topics/youth/Apprenticeship.htm
2. U.S. Department of Labor website: <https://www.apprenticeship.gov>
3. U.S. Department of Labor: Employment and Training Administration: <https://www.dol.gov/agencies/eta/apprenticeship/about/statistics/2021>

Results of Literature Review

- The U.S. Department of Labor is committed to growing and expanding apprenticeship and has recently awarded \$183 million as part of the Scaling Apprenticeship Through Sector-Based Strategies grants to expand apprenticeships and make them available to more workers and employers. The Department of Labor has also awarded a two-year, \$1.9 million contract to Social Policy Research Associates Inc. for the Inclusive Apprenticeship Initiative for Youth and Adults with Disabilities. The Apprenticeship Inclusion Models (AIM) demonstration project will develop pilot projects that research, test, and evaluate innovative strategies in existing apprenticeship programs to expand access, education, and occupational skills training in information technology, health care, and other in-demand sectors.
- The current Department of Labor Strategic Plan documents evidence that supports expanding high quality apprenticeship opportunities across sectors, including manufacturing, transportation, information technology, health care, and the skilled trades. The Department of Labor’s data indicates graduates of Registered Apprenticeship programs earn an average of \$72,000 per year, with a 92% rate of retention after exiting their apprenticeships.
- In FY 2021, more than 241,000 new apprentices entered the national apprenticeship system. Nationwide, there were over 593,000 apprentices obtaining the skills they need to succeed while earning the wages they need to build financial security. Ninety-six thousand (96,000) apprentices graduated from the apprenticeship system in FY2021. In

Maryland, there were 8,040 active apprentices. There were nearly 27,000 registered apprenticeship programs active across the nation. Two thousand eight hundred and seventy-nine (2,879) new apprenticeship programs were established nationwide in FY2021.

- In 2016, the federal Department of Labor’s Apprenticeship Equal Employment Opportunity Regulations were updated to ensure equal employment opportunities in apprenticeship programs for under-represented groups, including people with disabilities. Previous regulations did not include nondiscrimination or affirmative action requirements based on disability. The final rule added disability as an element of sponsors’ affirmative action programs and established a national goal that 7% of programs’ apprentices be individuals with disabilities.
- In 2022, the US Department of Labor Registered Apprenticeship Technical Assistance Center of Excellence was formed and is building strategic partnerships across business, industry, workforce, education, and government. Organizations such as the Division of Rehabilitation Services are invited to join a national community of individuals and organizations working to expand and modernize apprenticeship. The following is offered to organizations that join:
 - recognized nationally for taking a role in scaling apprenticeship,
 - able to network and collaborate with other stakeholder partners,
 - invited to attend Center events with national and state leaders,
 - asked to provide input on state and federal policy,
 - invited to share, present, and apply for awards for organizational best practices,
 - able to access relevant, no-cost technical assistance on apprenticeships, and
 - notified of apprenticeship-related events and news.

AWARE Data was requested to determine the number of apprenticeships coded as evidenced by educational goals as well as authorizations in AWARE. Only 53 were coded between 2019-2022.

Division of Rehabilitation Services Staff were surveyed regarding their apprenticeship knowledge and their ability to assist consumers in accessing apprenticeship programs.

- 21.3% of respondents indicated that they have had consumers involved in apprenticeship programs in the last 3 years.
- 58.3% of respondents indicated they had very little knowledge of registered apprenticeship programs.
- 52.7% of respondents said that they did not feel comfortable communicating the benefits of registered apprenticeship programs to a job seeker.
- 59.1% of respondents indicated that they had little knowledge of existing apprenticeship programs in their local area.

Needs/Concerns

- Historically, apprenticeship opportunities for individuals with disabilities have been limited.
- There is limited collaboration, coordination, and cooperation among youth and adult service systems, state education agencies, state vocational rehabilitation and workforce development agencies, schools, and youth with disabilities and their families to assist students with disabilities in achieving their postsecondary education and career goals.

- There is a service gap between youth and adult programs to encourage and expand opportunities for students and youth with disabilities up to age 24 (e.g., dual enrollment, internships, mentorships, apprenticeships, and postsecondary training options).
- During transition planning, there is limited encouragement provided to students with disabilities to consider apprenticeship programs.
- There are limited efforts to promote apprenticeship training through community college to help reduce costs for Registered Apprenticeship sponsors and youth and adults with disabilities.
- There is a tremendous need to increase outreach and recruitment efforts and tracking of apprenticeship participation and success.
- AWARE data indicates that staff may not be aware of how to code involvement in apprenticeships in our case management system.
- Division of Rehabilitation Services' staff indicated through survey results and the lack of data available in AWARE that overall, there is a significant knowledge gap related to registered apprenticeship programs.

Recommendations

- Complete the hiring process for the Workforce and Technology Center Staff Specialist for Apprenticeship Services and a Workforce and Technology Center Academic Teacher to develop and coordinate an Apprenticeship Exploration Program at Workforce and Technology Center and to work collaboratively to provide apprenticeship consultation and support services at the Workforce and Technology Center on behalf of consumers and staff statewide.
- Re-establish and expand the collaboration with the Maryland Apprenticeship Think Tank to increase the number of individuals with disabilities participating in Youth, pre-apprenticeship and registered apprenticeship programs, and outreach to Workforce Innovation and Opportunity Act partners.
- Utilize the members of the Maryland Apprenticeship Think Tank to identify community colleges and other approved labor vendors to provide training for a variety of apprenticeship programs for individuals with disabilities.
- Designate Division of Rehabilitation Services' Workforce and Technology Center staff to work in collaboration with the Maryland Department of Labor to promote and educate vocational rehabilitation staff and partners such as consumers and their families, schools, Community Rehabilitation Programs, Pre Employment Transitioning Services' providers, career assessment providers and other Division of Rehabilitation Services' vendors about apprenticeship programs and services.
- Assign Division of Rehabilitation Services' Workforce and Technology Center staff to participate in activities such as Apprenticeship Maryland-Career and Technology Academy conferences and meetings, collaborate with Maryland Apprenticeship and Training Program partners, and represent Division of Rehabilitation Services' Workforce and Technology Center on the Youth Apprenticeship Advisory Committee, to better facilitate the transition of high school youth with disabilities into adult Department of Labor Apprenticeship services in collaboration with the Division of Rehabilitation Services.
- Establish a workgroup to fully develop policy and implement training for the tracking and documentation in AWARE of all measurable skills gains and credentials gained through consumer participation in apprenticeship programs and services.
- Utilize the agency's Business Services Representatives to increase the number of businesses offering apprenticeships in growth industries in Maryland in collaboration

with Workforce Innovation and Opportunity Act partners. Coordinate efforts with Workforce and Technology Center staff to align with existing and new training programs offered.

- Review information on the US Department of Labor Registered Apprenticeship Technical Assistance Center of Excellence and join if appropriate to get support in the development of Division of Rehabilitation Services programs and services for apprenticeship.

Apprenticeships and Maryland Community Colleges

In 2019, the American Association of Community Colleges and the U.S. Department of Labor launched the Community College Apprenticeships Initiative, which will produce 16,000 new apprentices over the next three years. Colleges can join this partnership, which will use \$20 million in federal funding to help create apprenticeships.

In 2021, the Maryland Community College Apprenticeship Initiative - Maryland Apprenticeship and Training Program provided funding for expansion of registered apprenticeship opportunities into key economic hubs. Maryland Department of Labor has allocated \$750,000 of the 2020-2023 State Apprenticeship Expansion Grant for the 2021 Maryland Community College Apprenticeship Initiative. Through a Competitive Grant Process, Maryland Labor will distribute three grants of \$250,000 each to increase the integration of community colleges and registered apprenticeships into the workforce system. All apprentices served by this grant must be newly registered apprentices and must meet the criteria for registered apprentices.

While strides have been made partnering with community colleges, there are additional objectives to be met, including advancing apprenticeship as a workforce strategy. Working with community colleges to expand the scope of services provided through registered apprenticeship programs could help state and local workforce systems transform how they meet the needs of businesses and workers fully achieving the vision of Workforce Innovation and Opportunity Act.

Maryland Apprenticeship Think Tank

The Maryland Apprenticeship Think Tank was developed in January of 2018 and is a network of professional organizations committed to expanding apprenticeship opportunities to individuals with disabilities. Through a diverse array of initiatives – research, education, public engagement, and on-the-ground innovation and practice – the Think Tank shares information on emerging trends and opportunities, best practices in apprenticeship and highlight how apprenticeship can break into new industry sectors and serve a more diverse population of vocational rehabilitation individuals. The Maryland Apprenticeship Think Tank members consist of a variety of leaders from the Division of Rehabilitation Services, including Workforce and Technology Center, along with the Department of Labor, Maryland Department of Disabilities, the Community College of Baltimore County, and community program providers such as, the ARC who are collaborating to secure lasting change in Youth, Pre-Apprenticeship and Registered Apprenticeship at the state and local level.

As a result of the COVID-19 pandemic, engagement and progress for the Maryland Apprenticeship Think Tank was severely impacted in 2020 and 2021. At this point in 2022, with the approval to hire a Staff Specialist for Apprenticeship at the Workforce and Technology

Center and to utilize an Academic Teacher position at the Workforce and Technology Center for the purposes of creating and expanding apprenticeship exploration, consultation, and support services on behalf of the Division of Rehabilitation Services, the Think Tank will be reconvened starting fall 2022. The initial goals will be to re-engage existing members and invite new members to the table to help in the development of the new program and services, as well as to deepen the partnership and collaboration with the Division of Rehabilitation Services, Maryland State Department of Education/Youth Apprenticeship and Maryland community college programs, as well as other pre-apprenticeship and registered apprenticeship programs and services statewide.

Methodology: Subject Matter Expert Interviews

During May and June 2022, several Maryland high school and community college staff were contacted to discuss and review their pre-apprenticeship and apprenticeship programs and services. Updates and information were received and compiled for use in Workforce and Technology Center/Division of Rehabilitation Services program development and staff were interviewed and asked for feedback and input as to the challenges faced by students with disabilities in the pursuit of apprenticeships as a career option after graduation or exit from high school.

Contacts included:

- Chaney Enterprises - CDL class B apprenticeship program
- Council for State Governments - compiled links to state apprenticeship laws and guidelines
- Anne Arundel County Public Schools
- Baltimore County Public Schools
- Caroline County Public Schools
- Calvert County Public Schools
- Carroll County Public Schools
- Howard County Public Schools
- Prince George's County Public Schools
- St Mary's County Public Schools
- Talbot County Public Schools
- Washington County Public Schools
- Anne Arundel Community College staff
- Community College of Baltimore County - Earn While You Learn, reviewed related employers and their apprenticeship offerings
- Frederick County Community College - Programs in development, reviewed 4 current programs with office of internship
- Harford Community College - pre-apprenticeship and apprenticeship programs reviewed
- Howard Community College – five (5) programs reviewed
- Montgomery County Community College - Building trades programs reviewed, Associate of Arts' programs offered in apprenticeship fields, certificate fields for apprenticeships

Needs/Concerns

- Consumers transitioning from high school need direct assistance with exploration, remediation, and direct support in the process of preparing for and applying to apprenticeship programs and services.

- Consumers' needs for mental health support, accommodations, securing a driver's license/transportation or passing entrance exams can be significant challenges in succeeding in the apprenticeship career path.
- Need implementation of organizational/structural changes within the Division of Rehabilitation Services to assist students transitioning from high school to Division of Rehabilitation Services programming seamlessly for those interested in apprenticeship services.
- Limited availability of statewide pre-apprenticeship programs in Construction/Electrical/Plumbing and Information Technology.
- Need for expansion of registered apprenticeship programs in collaboration with businesses and community colleges in some parts of the state.
- Lack of methods and strategies for the tracking and sharing of apprenticeship data between Division of Rehabilitation Services, community colleges, and Workforce Innovation and Opportunity Act partners.
- Need representation from Maryland State Department of Education, and Career Technical Education programs specifically, for participation on the Maryland Apprenticeship Think Tank.
- Systems are limited for the collaboration and communication between Maryland State Department of Education and Division of Rehabilitation Services related to youth apprenticeship.
- Lack of consumer/family and staff knowledge regarding apprenticeship programs and services available statewide.

Recommendations

- Implement the plans for an Apprenticeship Exploration Program at Workforce and Technology Center provided through the Academic Services department, in collaboration with the Workforce and Technology Center Staff Specialist for Apprenticeship Services and other Center and agency staff, trade unions, businesses, community colleges, and community partners to create plans and pathways to effectively transition consumers into local, existing pre-apprenticeship and registered apprenticeship programs and services statewide.
- Implement the expansion of Apprenticeship Navigation Services at the Workforce and Technology Center that will be responsible for the coordination, implementation, and documentation of apprenticeship services such as, collaboration with community colleges, Workforce Innovation and Opportunity Act partners, statewide and local trainings, facilitation of consumer services related to apprenticeship consults and linkage to statewide pre-apprenticeship and registered apprenticeship training and programs.
- Finalize plans with CVS Health and the Community College of Baltimore County to conduct the first Pharmacy Technician Training program at Workforce and Technology Center and coordinate with the Maryland Department of Labor to enroll the graduates into the Registered Apprenticeship Program for Pharmacy Technician sponsored by CVS Health.
- The Division of Rehabilitation Services should continue its efforts to develop a system for data sharing agreements between Department of Labor, Community Colleges, and Division of Rehabilitation Services for apprenticeship, employment and credentialing information.

- Identify representation from Maryland State Department of Education and the new apprenticeship coordinator from the Community College of Baltimore County for participation on the Maryland Apprenticeship Think Tank.
- Develop a system to enhance the collaboration and communication between Maryland State Department of Education's Career and Technology Education Instruction branch and Division of Rehabilitation Services' staff serving transitioning youth.
- Work with the Division of Rehabilitation Services Office of Public Affairs to explore and develop marketing strategies to enhance staff and consumer education and awareness about apprenticeships including but not limited to, YouTube videos for staff and consumers, Workforce and Technology Center Instagram, podcast, webinars, training sessions at various conferences and schools, information packets, etc.

D. Youth with Disabilities and Students with Disabilities

1. Assessment of The Needs of Students and Youth with Disabilities for Transitions Services and Pre-Employment Transition Services and The Extent to Which Such Services Are Coordinated with Local Education Agencies.

The Workforce Innovation and Opportunity Act of 2014 has mandated that the Division of Rehabilitation Services set aside 15% of the federal allotment to provide Pre-Employment Services to students with disabilities between the ages of 14 and 21 and are available to all students with disabilities regardless of the severity of their disability. To accomplish this, the Division of Rehabilitation Services must partner and work with local school systems to identify students and coordinate services.

Pre Employment Transitioning Services are very specific in nature and include the following:

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

The need for Pre Employment Transitioning Services and other transition services in Maryland is most evident when reviewing the post-school outcomes of students receiving special education services, as reported on the Maryland Report Card. In 2021:

- 10.19% of students in grades 9-12 receiving special education services and 4.76% of students in grades 9-12 receiving services under a 504-plan dropped out of school, compared to 7.36% of students in regular education.
- 68.7% of students with disabilities graduated compared to 87.20% of all students.
- 37.1% of students with disabilities who received special education services in high school were attending college 16 months post high school, compared to 63.1% of students served in regular education.

The Division of Rehabilitation Services saw a decrease from Program Year* 2018 in the number of students with disabilities who applied for Pre-Employment Transitioning Services from grades 9-12: 1,662 new Pre-Employment Transition Services applications in Program Year 2019; 1,333 in Program Year 2020. However, in Program Year 2021, applications from students began to rebound to 1,539. The Division of Rehabilitation Services has already seen

a 33% increase in applications in the first two months of Program Year 2022 compared to Program Year 2021.

The Division of Rehabilitation Services would like to assess the current 2022 need for viable Pre-Employment Transition Services statewide, as well as the availability of these services coordinated by local school systems. The Division of Rehabilitation Services would like to identify where these services are needed most to engage all students with disabilities, under an Individual Education Plan, 504, or other qualifying services.

The current, statewide distribution of Pre-Employment Transition Services is as follows:

- Region 1 has 35 Pre Employment Transitioning Services partners, 45 secondary schools, 9 colleges and 4 workforce partners.
- Region 2 has 41 Pre Employment Transitioning Services partners, 56 secondary schools, 8 colleges and 1 workforce partners.
- Region 3 has 35 Pre Employment Transitioning Services partners, 53 secondary schools, 15 colleges and 2 workforce partners.
- Region 5 has 54 Pre Employment Transitioning Services partners, 72 secondary schools, 10 colleges and 2 workforce partners.
- Region 6 has 34 Pre Employment Transitioning Services partners, 72 secondary schools, 8 colleges and 2 workforce partners.

In addition, the current caseload distribution of cases in the Division of Rehabilitation Services for students being served under the age of 22 is as follows:

- Region 1 services 1,393 students with disabilities under 22 years of age,
- Region 2 serves 2,008 students with disabilities under 22 years of age,
- Region 3 serves 1,033 students with disabilities under 22 years of age,
- Region 5 serves 2, 042 students with disabilities under 22 years of age, and
- Region 6 serves 2,300 students with disabilities under 22 years of age.

The Division of Rehabilitation Services seeks to use this CSNA to acquire a better understanding of the numbers of potentially eligible students with disabilities who will be able to participate in these services, as well as which local school systems are providing these services. The Division of Rehabilitation Services seeks to understand and increase the collaboration with local school systems, as well as identify how to administer Pre-Employment Transition Programs that are most appropriate to serve these students.

Methodology: Survey of Local Education Agencies and Division of Rehabilitation Services' counselors, Statewide, who Serve Transition Youth and Students with Disabilities

Surveys were sent to each of the Local Education Agencies to determine:

1. Which Pre Employment Transitioning Services are being provided by the schools as part of secondary transition.
2. How are the services coordinated with the local Division of Rehabilitation Services' counselor?
3. Which services are not available in their respective geographical areas?
4. Is the coordination of services between the local school systems and the Division of Rehabilitation Services sufficient to engage and meet the needs of students with disabilities?

Survey Responses:

- When asked in which county your school is located, the following identified:
 - 36% of the responses came from Montgomery County
 - The next largest responses were from: Baltimore County (8%), Howard County (7%) and Washington County (7%)
 - Responses were also received from: Allegany, Anne Arundel, Carroll, Cecil, Frederick, Harford, and Prince George's Counties
- When asked if they have good working relationships with their Division of Rehabilitation Services' counselors, 56% answered Yes and 19% indicated No.
- When asked if they were able to obtain documentation/information from the assigned Division of Rehabilitation Services' staff in a timely manner, 60% replied Yes, while 22% replied Sometimes.
- When asked if their assigned Division of Rehabilitation Services' counselor reaches out for questions or collaboration, 56% indicated Yes, 25% answered Sometimes, and 19% answered No.
- 55% indicated that the Division of Rehabilitation Services' staff attends Transition Fairs and/or school events to promote services, while 25% indicated this happens Sometimes and 20% answered No.
- When asked how many referrals they submit within a year, 83% indicated less than 100, while 13% indicated less than 200 and a small percentage (3%) indicated less than 300.
- Looking at the Division of Rehabilitation Services' counselor attendance at Individual Education Plan meetings, 93% indicated that counselors are attending 1-10 Individual Education Plan meetings a month and of those meetings, 68% were attended virtually.

Methodology: Survey of Division of Rehabilitation Services' Counselors

Surveys were also sent to Division of Rehabilitation Services' counselors providing services to transition youth and students with disabilities to determine: (1) how coordination is being provided between the Division of Rehabilitation Services and local school systems and how often, (2) how many referrals for students with disabilities are received in a year, and (3) how are counselors engaged in attending Individual Education Plan meetings.

Survey Responses: This survey had a 77.1% completion rate, with most responses coming from Baltimore County (32%) and the next largest response from Anne Arundel County (14%). All other counties were represented with a 5% response rate.

- When asked how often Division of Rehabilitation Services' counselors are in touch with the transition teacher in their area, 54% responded Monthly, while 29% indicated Weekly.
- 82% of counselors responded that they have a Good working relationship with their transition support teacher, 11% indicated Somewhat, and 7% indicated No.
- When asked if they receive documentation/information needed from the transition support teacher in a timely manner, 75% indicated Yes, while 22% indicated Sometimes.
- 86% of Division of Rehabilitation Services' staff indicated that their transition support teacher reaches out to them for questions and collaboration.
- When asked about attending transition fairs or school events to promote services, 68% indicated attendance, while 21% indicated that they attend Sometimes.
- When asked how many referrals are received from their schools within a year, 46% indicated less than 100, 32% indicated less than 200, and 14% indicated less than 300.
- 100% of counselors indicated that Individual Education Plan meetings are offered virtually for attendance.

- 82% of Division of Rehabilitation Services' staff indicated that they attend Individual Education Plan meetings monthly and of that number, 89% are attended virtually.

Needs/Concerns

- Survey results indicated there needs to be a larger Division of Rehabilitation Services presence at school events, including transition fairs to promote Pre-Employment Transition and Vocational Rehabilitation. Less than 70% who responded indicated that this was occurring.
- With the number of referrals received from the school on a yearly basis, a higher focus needs to be on reaching students in a variety of settings (e.g., schools, community).
- When asked about receiving needed documentation/information in a timely manner, 75% of Division of Rehabilitation Services' staff indicated that this happens, while only 60% of Transition Support Teachers responded with Yes.
- Although both surveys indicated a positive response regarding collaboration, it appears there is a disconnect between collaboration and getting the information to the students to provide services.

Recommendations

- Each Division of Rehabilitation Services' region needs to develop a plan for an increased level of consistent contact with the Transitioning Youth School Staff.
- The Division of Rehabilitation Services needs to provide updated and accurate transition information/materials, sharing consistently with schools across the state.
- The Division of Rehabilitation Services needs to emphasize the importance of responding to school partner requests for student information.
- Formalize consistent partnerships with Local School Systems through agreements to ensure access to required Pre Employment Transitioning Services and Transition services throughout the state.

Methodology: Virtual Interviews

Virtual interviews were held with surrounding vocational rehabilitation programs in District of Columbia/RSA and Delaware Vocational Rehabilitation to determine how other vocational programs are engaging with their local education agencies and provide Pre-Employment Transition Services to students with disabilities.

Interview responses from: Tikeya Milburn Project Manager, Department of Disability Services, RSA Youth Transition Unit (District of Columbia/RSA):

- *How do counselors connect with LEA's:* While virtual meetings allow for more participation, counselors do connect with students on-site. On average, a transition counselor goes to the school at least weekly, more if they are needed to connect with students. Counselors have monthly meetings with local school systems to review new referrals. Yearly retreats also help for networking and team building between the Vocational Rehabilitation Program and Local School Systems. Counselors provide both case coordination and Pre-Employment Transition Services provision while at the schools, including meetings with parents to conduct intakes and fill out paperwork. At this time, both vocational rehabilitation Staff and vendors provide Pre Employment Transitioning Services.
- *Do any of your LEA's provide Pre Employment Transitioning Services:* Currently, Pre-Employment Transition Services are provided as follows: three Workforce Development

Coordinators coordinate Pre Employment Transitioning Services through an MOU; and one job placement specialist facilitates the provision of Work Based Learning Experiences. Note, these positions are hired by the District of Columbia Public School System and not funded by District of Columbia Vocational Rehabilitation but are provided through Memorandum of Agreements.

- *How do counselors attend Individual Education Plan meetings:* Counselors need to be invited to attend by the local school system.

Interview responses from: David Frye, Delaware Division of Vocational Rehabilitation Statewide, Transition Coordinator:

- *How do your counselors connect with LEA's:* A grant funded MOU is provided by Vocational Rehabilitation for a Work Based Learning Experiences Specialist for the school. This employee has access to the Vocational Rehabilitation AWARE case management system. Delaware also has the Center for Appropriate Dispute Resolution in Special Education (CADRE) meetings with Disability Services, school, vocational rehabilitation, and Department of Education monthly to share information and data.
- *Do any of your LEA's provide Pre Employment Transitioning Services:* A school has been a service provider, but not often. Vocational Rehabilitation has Pre-Employment Transition Service program specialists who meet with local school systems to coordinate services. Many Pre Employment Transitioning Services are provided to groups of potentially eligible students with disabilities.
- *How do counselors attend Individual Education Plan meetings:* They need to be invited and sign a release. They are working on developing a video for school systems to use at Individual Education Plan meetings to provide information about Pre-Employment Transition Services. In addition, he shared information regarding how vocational rehabilitation counselors coordinate with local education systems. This includes a MOU to share data with the Department of Education, mostly for planning services, identifying the number of students with disabilities, and school systems having autonomy. So Pre Employment Transitioning Services service provision varies depending on the local school system.
- Additional information provided regarding caseload size and Vocational Rehabilitation counselor provision of services: Pre Employment Transitioning Services are completely separate from vocational rehabilitation services, with different staff working with eligible students with disabilities and potentially eligible only students.

Needs/Concerns

- Vocational Rehabilitation staff are unable to attend Individual Education Plan meetings without an invitation and permission received from a parent.
- Although virtual attendance at Individual Education Plan meetings is available, Vocational Rehabilitation/Pre Employment Transitioning Services' staff are required to meet in-person with identified students.
- There appears to be a lack of consistency throughout the state regarding attendance at Individual Education Plan meetings.

Recommendations

- Consider a streamlined process for receiving invites to Individual Education Plan meetings that include parent consent as well as needed documentation for the robust discussion of Pre-Employment Transition Services and Vocational Rehabilitation Transition Services.

- Increase the provision of information about transition services. Consideration should be given to developing a video explaining services to students and parents prior to the Individual Education Plan meeting.
- The Division of Rehabilitation Services should consider partnering with transition coordinators to facilitate workshops for transitioning youth and students with disabilities to educate them regarding college or training options. Assistance with enrollment could also be provided.

Methodology: Data Review

Students with 504 Plans in 2021, Source: Maryland Report Card

- Elementary Students: 9,421
- Middle Schools Students: 11,259
- High School: 16,639
- TOTAL: 37,319

Students with Disabilities with Individualized Education Plans in 2021, Source: Maryland State Department of Education

- Kindergarten through 21 years old: 109,443
- Students grades 9-12: 27,400
- Students under an Individual Education Plan in Non-Public Schools: 4,024

TOTAL number of students potentially requesting Pre Employment Transitioning Services and transition services (including students with 504 plans): 48,063

Needs/Concerns

- It is anticipated that based on data collected the number of students accessing Division of Rehabilitation Services for Pre Employment Transitioning Services and other vocational services will increase each year.
- It is anticipated that there are 16,639 students being served under a 504 plan that the Division of Rehabilitation Services will not be able to access due to limited collaboration between the Division of Rehabilitation Services and school staff monitoring 504 plans.
- It is anticipated that the number of students with intellectual and/or developmental disabilities accessing Division of Rehabilitation Services will increase each year due to Workforce Innovation and Opportunity Act requirements related to Section 511.
- It is also anticipated that the Division of Rehabilitation Services transitioning caseloads will continue to grow each year to a size difficult to manage for needed collaboration and outreach.

Recommendations

- State Agency Transition Collaborative of Maryland is working on consistent 504 implementation across the state. The Division of Rehabilitation Services will participate in this larger effort to identify local 504 coordinators in order to provide information about Pre Employment Transitioning Services available.
- Explore possibilities of outsourcing the coordination and or delivery of Pre-Employment Transition Services.
- Develop a tiered plan with varying levels for the provision of Pre-Employment Transition Services programming by designing/structuring services to meet student needs.

II. Assessment of the Need to Establish, Develop, or Improve Community Rehabilitation Programs within the State – Including the Workforce and Technology Center

As noted in the 2019 Needs Assessment, the success of Division of Rehabilitation Services' consumers is due in many instances to the partnerships the Division of Rehabilitation Services has established with Community Rehabilitation Programs and the Workforce and Technology Center. To maintain continued positive partnerships with Community Rehabilitation Programs and the Workforce and Technology Center and to ensure that services provided meet the needs of Division of Rehabilitation Services' consumers, the 2022 Needs Assessment will examine various components related to service delivery. The Needs Assessment will examine job coaching services for job development and how job coaching can be improved including services designed for specific disability populations. In addition, the 2022 Needs Assessment will evaluate which services are leading to an employment outcome and examine additional services that are needed by consumers.

Methodology: Division of Rehabilitation Services' Staff Data Comparison

A survey was sent to Division of Rehabilitation Services' staff regarding Community Rehabilitation Program and Workforce and Technology Center services. One hundred and ninety-eight (198) responses were received from Division of Rehabilitation Services' staff. Sixty-one percent (61%) of staff reported purchasing job development preparation services, 56% purchased short term job coaching with assistance from job search, 41% purchased short term job coaching fading schedule for maintaining employment, and 29% purchased job coaching (supported employment) fading schedule for maintaining employment.

Division of Rehabilitation Services' staff reported limited or no access to services from their community providers for specific consumer disability types. Data revealed that most community providers do not offer services to individuals whose primary language is not English. Secondly, data revealed that community providers have limited to no services for individuals who are deaf and hard of hearing or blind and visually impaired. Remaining data in descending order revealed limited to no access to services for individuals with traumatic or acquired brain injury, autism, and behavioral health and other.

Sixty-seven percent (67%) of the Division of Rehabilitation Services' staff responding indicated that they routinely offer vocational and career training to their consumers. Seventy-seven percent (77%) of staff indicated that they offer formal career training from an outside vendor. Fifty-seven percent (57%) provide Community Rehabilitation Program skills training. Forty-six percent (46%) provide on the job training. Forty-two percent (42%) provide internships.

Seventy-eight percent (78%) indicated that they do not provide internship opportunities. Staff report that a lack of information is the primary reason they do not use internships more often.

Sixty-one percent (61%) of Division of Rehabilitation Services' staff reported that they do not have a process in their office to refer individuals to their local workforce partners. Fifty-nine percent (59%) of staff reported that the services they utilize the most at the Workforce and Technology Center is career training, followed by functional capacity evaluations, occupational therapy evaluations, physical therapy evaluations (34%), and dormitory services (28%).

Eighty-one percent (81%) of respondents reported that they refer individuals for services at the Workforce and Technology Center. Of the Division of Rehabilitation Services' staff who do not refer consumers to the Workforce and Technology Center, cited the following reasons: concerns about location, distance, and transportation. When asked what services they would like to see added to the Workforce and Technology Center, staff indicated more training programs, addiction services, career assessment services provided in American Sign Language, and services and training for individuals with low vision or blindness. Staff also suggested the addition of various programs that the Workforce and Technology Center already has such as childcare training and warehouse training.

Division of Rehabilitation Services' staff were asked to identify concerns that consumers have expressed about receiving services at the Workforce and Technology Center. Concerns identified were the distance, sharing a room on the dorm, dislike of the cafeteria food, and wait times for training programs.

Eighty-eight percent (88%) of respondents reported that the Workforce and Technology Center is an effective partner in their consumers' rehabilitation. Of the remaining twelve percent (12%), concerns identified were lack of services directed at individuals who have low vision or blindness, and the distance of the Workforce and Technology Center from the consumers' home.

Methodology: Division of Rehabilitation Services Community Rehabilitation Program Data Comparison

A survey was sent to approximately 157 Community Rehabilitation Programs. Fifty-two (52) Community Rehabilitation Programs responded to this survey. The primary funding source identified by the Community Rehabilitation Programs were Developmental Disabilities Administration (53%), Division of Rehabilitation Services (29%), Behavioral Health Administration (16%), and other (2%). The Community Rehabilitation Programs surveyed listed their primary service populations as: intellectual disability (55.3%), behavioral health (23.4%), other populations (12.8%), autism (6.4%), and deaf and hard of hearing (2.1%). Division of Rehabilitation Services data below reflects services for special populations by region:

	Region 1	Region 2 - Western Shore	Region 2 - Eastern Shore	Region 3	Region 5	Region 6
D/HOH	1	3	1	2	0	2
Blind, Deaf-Blind & Visual Impairment	10	4	7	10	11	9
DDA	22	9	16	10	34	21
BHA SEP	5	4	4	23	10	10
BHA ACT	0	1	1	5	4	2
BHA EBP	3	2	5	4	5	4
ABI	2	0	2	1	2	4
Autism	2	0	0	3	3	0

*Numbers indicate # of providers, not locations

Additionally, although no blind-specific agencies responded to the survey, there are two agencies providing vocational rehabilitation employment services.

While primary populations are listed above as reported by Community Rehabilitation Programs, it is also worth mentioning that surveyed Community Rehabilitation Programs reported they also serve other populations including traumatic or acquired brain injury, blind and visually impaired, ex-offenders, veterans, physical limitations, homelessness, senior citizens, and transitioning youth.

A majority (54.3%) of the Community Rehabilitation Programs indicated in their surveys that they are not interested in serving any other populations than the ones they currently serve. While others said they would consider serving behavior health, traumatic or acquired brain injury, deaf and hard of hearing, ex-offenders, veterans, and other populations.

To better serve consumers, the Community Rehabilitation Programs reported they would like more training for specific populations. These include:

- Blind/Visually Impaired (71%)
- Autism (67.7%)
- Deaf/Hard of Hearing (54%)

Community Rehabilitation Programs responded Yes that they are aware of the potential enhanced rates for providing services to:

- Blind/Visually Impaired, 71%
- Deaf/Hard of Hearing, 62%
- Individuals who need services in a different language other than English, 17%

When asked if Community Rehabilitation Programs take advantage of placement incentives, 74% reported Yes. Division of Rehabilitation Services' internal reports indicate a discrepancy in the amount of placement incentives offered across regions.

Other than job development and job coaching, 74% of the reported Community Rehabilitation Programs stated they offer the following training services:

- Individualized training (78.6%)
- On-the-job training (67.9%)
- Internships - paid and unpaid (32.1%)
- Apprenticeships (28.6%)
- Contract Work (14.3%, Ability 1 and Maryland Works)
- Work groups (14.3%)

Needs/Concerns

- A need to train Community Rehabilitation Programs staff regarding various disability populations.
- A need for more Community Rehabilitation Programs to provide services for consumers who are blind or visually impaired, deaf and hard of hearing, and those whose primary language is other than English.
- A need for Community Rehabilitation Programs to provide additional training services including internships (paid and unpaid).
- A need for consistent issuance of placement incentives.
- A need for addictions services at the Workforce and Technology Center.

- A need for additional services at the Workforce and Technology Center available to those who are blind or visually impaired.
- A need for more training programs to meet market needs and consumer interests at the Workforce and Technology Center.
- A need for increased promotion of Workforce and Technology Center training programs to improve staff awareness of what is available and timelines for services and training.
- A need for transportation solutions to assist consumers in attending desired training and services at Workforce and Technology Center.

Recommendations

- Train Division of Rehabilitation Services' staff regarding placement incentives including eligibility and issuance to ensure consistent use across all Community Rehabilitation Programs.
- Educate and ensure Community Rehabilitation Programs are aware of all potential enhanced rates offered for services for consumers who are blind or visually impaired, deaf and hard of hearing, and those whose primary language is other than English.
- Conduct a survey which will help to determine the training needs and desires of Community Rehabilitation Programs.
- Consider additional incentives for 2nd and 4th quarter employment.
- Educate Division of Rehabilitation Services and Community Rehabilitation Program staff regarding training services available including internships, paid and unpaid.
- The Workforce and Technology Center will expand its available addictions services through the hiring of staff and the development of the Behavioral Health Services department.
- The Workforce and Technology Center will continue to offer the new pilot training program for individuals who are blind or visually impaired which focuses on mastering the application of technology for competitive integrated employment.
- The Workforce and Technology Center will explore the development of a Certified Nursing Assistant program in conjunction with existing business partners.
- The Workforce and Technology Center will use the coffee hour sessions to inform staff of upcoming trainings and service openings.
- The Workforce and Technology Center will explore transportation assistance to include travel training when needed and other accommodations to make travel more affordable.

III. Assessment of The Utilization of Existing Education or Vocational Training Programs Leading to a Recognized Postsecondary Credential or Employment

The Division of Rehabilitation Services would like to evaluate staff knowledge and challenges with developing Individualized Plans for Employment that contain college, vocational training, and training available through the American Job Centers and Workforce Innovation and Opportunity Act partners. The Division of Rehabilitation Services has been working to increase the number of training services provided to eligible participants since the enactment of the Workforce Innovation and Opportunity Act and has experienced challenges adapting from historically placement-oriented services.

Methodology: Division of Rehabilitation Services' Staff Survey

A statewide survey was conducted of Division of Rehabilitation Services' vocational rehabilitation counselors, vocational rehabilitation technical specialists, and vocational rehabilitation supervisors who develop Individualized Plans for Employment with eligible consumers which may include college and vocational training leading to a recognized postsecondary credential or employment.

Sixty-one (61) surveys were completed. Survey results are as follows:

- Respondents represented various positions within the Division of Rehabilitation Services:
 - 43% Vocational Rehabilitation Counselors
 - 38% Vocational Rehabilitation Technical Specialists
 - 18% Vocational Rehabilitation Supervisors
- Respondents identified their length of service within the agency:
 - 13% Less than one year
 - 8.3% One to three years
 - 18.3% Four to six years
 - 26.7% Seven to ten years
 - 33.3% More than ten years
- Respondents were asked to comment on the obstacles that they face or perceive in informing consumers about training plans. Responses identified several themes:
 - Complexity of requirements, including time necessary to obtain and process financial information and administrative approval,
 - Limited training resources/availability in all areas of the state,
 - Knowledge of available resources, and
 - Lack of consumer participation and follow through with training requirements.
- When asked to select the phrase that best describes "informed choice" 100% correctly indicated "Provide guidance and counseling to explore all options."
- In response to the question "Are you comfortable writing training plans and preparing the case for Administrative Approval (when required)?"
 - 75% Yes
 - 20% Somewhat
 - 5% No
- Respondents were asked to explain any challenges they have when writing training plans and preparing the case for Administrative Approval (when required). Answers identified several themes:
 - Technical challenges including obtaining financial information and other required documentation from the consumer,
 - Not having a clear understanding of all plan requirements, and
 - Time necessary to complete all requirements.
- What training do they feel is needed to improve training plans for consumers?
 - Staff provided 51 responses including training topic ideas and suggestions to improve training plans:
 - Planning, including career exploration and identification of career goals,
 - College plan development including use of financial information and calculation of case expenditures,
 - Reaching Independence Through Self-Employment (RISE) Program training,
 - Training opportunities other than college and proprietary schools, and
 - Plan templates and examples of measures of success.

- Have they ever referred a consumer to an American Job Center or one of our Workforce Innovation and Opportunity Act partners to participate in one of their approved training programs?
 - 68.3% Yes
 - 31.7% No
- They were asked to explain why they do not refer to an American Job Center or one of our Workforce Innovation and Opportunity Act partners to participate in one of their approved training programs.
 - Lack of knowledge of programs,
 - Unsure of referral process, and
 - Limited ability to serve individuals with severe disabilities.
- They were asked to identify any American Job Center or Workforce Innovation and Opportunity Act partner trainings which they have referred consumers:
 - 37 staff indicated that they had referred Division of Rehabilitation Services' consumers to training opportunities offered by Workforce Innovation and Opportunity Act partners,
 - Training programs include virtual job shadowing, basic computer skills, warehouse, Commercial Driver's License, welding, manufacturing, Certified Nursing Assistant, clerical, and resume writing, and
 - Staff responses indicated referrals to 15 American Job Center locations.
- Respondents were asked to identify how important employment retention is in the 2nd and 4th quarter after program exit:
 - 90% Very Important
 - 10% Somewhat important
- Respondents were asked to identify the most important part of the Division of Rehabilitation Services' mission:
 - 6.7% Independence and Economic Self-Sufficiency
 - 3.3% Employment
 - 90% Both are equally important

Needs/Concerns

- Required complexity of Individualized Plan for Employment.
- Various levels of approval required for training plans.
- Lack of understanding regarding the consumer's required financial contribution.
- Time to research training programs and to write extensive plans.
- Lack of knowledge about available training programs.

Recommendations

- Hire a Staff Specialist III for Consumer Education and Training. This person would attend Workforce Development Board meetings and liaison with community colleges and Division of Rehabilitation Services Staff Specialist for Staff Development.
- Streamline the Administrative Approval process and forms.
- Create a college/training checklist for the Counselor Toolkit.
- Use Citrix Sharefile and digital signatures for administrative approvals.
- Lower caseload sizes to allow counselors more time with plan development.
- Create online regional resource manuals with industry profiles and information regarding related training opportunities.
- Improve connection between the Division of Rehabilitation Services and college Disability Support Services.

- Improve connection between Division of Rehabilitation Services' staff and community college staff.