

Program-Specific Requirements for Vocational Rehabilitation (Blind)

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:

[13] Sec. 102(b)(2)(D)(iii) of WIOA

a. Input of State Rehabilitation Council

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

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

Michigan Council for Rehabilitation Services Mission & Vision

Mission: To improve public vocational rehabilitation (VR) services delivered by the Bureau of Services for Blind Persons (BSBP) and Michigan Rehabilitation Services (MRS).

Vision: BSBP and MRS will provide VR services utilizing service delivery models that are respectful, equitable and effective in achieving meaningful employment outcomes for people with disabilities

Additional details can be found by [visiting the MCRS website LABOR AND ECONOMIC OPPORTUNITY – Michigan Council for Rehabilitation Services](#) or call the MCRS office at 517-335-2400.

Michigan Executive Order (EO) 2019-13

As required under 2 CFR 361.16, Executive Order (EO) 2019-13 established the Michigan Council for Rehabilitation Services (MCRS or Council) as the single State Rehabilitation Council (SRC) for the State's two designated State units (DSUs), Bureau of Services for Blind Persons (BSBP) and Michigan Rehabilitation Services (MRS). MCRS partners with both DSUs to meet SRC requirements and functions under 34 CFR 361.17.

EO 2019-13 also created the Department of Labor and Economic Opportunity (DLEO) and transferred the DSUs to the Department to serve as the designated state agency (DSA) as defined under the Rehabilitation Act of 1973 (Act), Public Law 93-112, as amended, 29 USC 701 et seq.

MCRS's expectation is E.O. 2019-13 will better enable the Council to advise the DSUs in the development of State goals and priorities specific to serving individuals with disabilities. This includes addressing the governor's goal of 60% of Michigan citizens achieving post-secondary credential attainment by 2030.

Required Functions and Performance

The following lists SRC functions and the Council's performance [through fiscal year \(FY\) 2021:](#)

1. Review, analyze, and advise the DSU regarding the performance of the State unit's responsibilities related to eligibility, including order of selection; the extent, scope, and effectiveness of services provided; and functions performed by State agencies that affect or potentially affect the ability of individuals with disabilities in achieving employment outcomes.
 - To review analyze and advise BSBP on performance, Council members participated in the following from 2019-2021: (1) Appeals Hearings Redacted Reports; (2) Consultations with the Hearings Manager; (3) Consultation with the Client Assistance Program; (4) Customer Input at re:con Conference MCRS booth; (5) Review of the Comprehensive Statewide Needs Assessment Report; (6) Annual Achievement Honor Roll Awards event; (7) Presentations of various BSBP data reports at MCRS Quarterly Business Meetings; and (8) Discussions with BSBP Staff at MCRS quarterly Business Meetings.
 - BSBP reviews, updates, and creates policy on a regular basis at specific meetings scheduled for that purpose. MCRS members are invited to participate at each level of policy consideration. Input is also solicited from members at Quarterly Business Meetings.
 - MRS and BSBP state directors serve as ex-officio Council members and participate in quarterly business meetings to update, engage, and respond to the full membership.
 - Each DSU director has designated a state level administrator to serve as liaison to the MCRS. As requested by the Council or the DSU, these individuals provide information/updates/reports, respond to ad hoc inquiries, and participate in workgroups.
 - Staff from both DSUs provided training and technical assistance at the Council's request, e.g., policy updates, WIOA performance accountability, VR processes, and pre-employment transition services.
2. In partnership with the DSU, develop, agree to, and review State goals and priorities; and evaluate the effectiveness of the vocational rehabilitation program and submit reports of progress to the Secretary.
 - To assist in the development, review and agreement of the State goals and priorities the Council received a draft of the 2020 VR program specific section of the Unified State Plan (USP) and an invitation to contribute. Due to the 2019 transfer resulting from EO 2019-13 and new Council member appointments, full participation was only recently possible. In February 2020, the eleven newly appointed members were provided an overview of USP process, (including goals and priorities), relevant regulatory requirements, and operational information about BSBP.
 - Two MCRS members participated in BSBP's "Annual Stakeholder Meeting" in Lansing on May 17, 2019.
3. Advise the DSA and the DSU regarding activities carried out under the Act and assist in the preparation of the vocational rehabilitation services portion of the USP and amendments to the plan, applications, reports, needs assessments, and evaluations.
 - See previous section #2.

- The DSUs have provided multiple opportunities for the Council to learn about WIOA through trainings and consultations.
 - As required under 34 CFR 361.29, the Council and DSUs finalized the 2020 CSA. This initiative is in partnership with Project Excellence at MSU (PE-MSU) and has included the following:
 - Designed with input from an interagency committee of public and non-profit stakeholders.
 - Council member (2) participation on the interagency committee and participation (3 members) in key informant interviews.
 - Data collection and analysis from:
 - Michigan disability statistics (e.g., American Community Survey, Behavioral Risk Factors Surveillance Survey, Current Population Survey) and other state level agency data (e.g., Social Security Administration, Special Education, Workforce Development);
 - Extant VR and Independent Living (IL) data (i.e., RSA-911, RSA-704);
 - Surveys conducted with service agency staff (e.g., MRS, BSBP, Centers for Independent Living (CIL), CMH, WDA, Incompass - formerly MARO);
 - Surveys conducted with individuals with disabilities and their family and friends; and
 - Semi-structured key informant telephone interviews.
 - As in previous years, MCRS hosted a vendor booth at the 2019 annual state re:con conference. The Council utilized the opportunity to disseminate and collect information from a variety of disability stakeholders. The results were shared in a report to the DSUs. In 2020, re:con was not held due to the pandemic. In 2021, the conference was virtual, therefore no vendor booths in those years.
 - Two Council members attended the “Family Engagement Training on Employment First” in Marquette. This training allowed for interaction between students with disabilities, parents, teachers, MRS/BSBP Counselors, and staff from service provider agencies. Discussion centered around the need for collaborative transition and employment programming for students with disabilities in Michigan’s Upper Peninsula.
4. To the extent feasible, conduct a review and analysis of the effectiveness and consumer satisfaction with VR services and employment outcomes, including employment benefits.
- BSBP Customer Satisfaction information was provided to MCRS through a variety of sources including: (1) Consultation with both the Client Assistance Program (CAP) and the Hearings Manager; (2) BSBP Data review; (3) Public Comment; (4) Informal interactions with current and past Customers; (5) Reports provided during regular Council meetings; (6) Quarterly discussions with BSBP managers and staff regarding customer satisfaction and related issues; and (7) the experiences of some MCRS members.

- BSBP does not have a comprehensive Customer Satisfaction Survey process. However, BSBP uses a variety of methods to capture Customer Satisfaction throughout their service delivery system. BSBP staff is interested in working with MCRS in exploring innovative, accessible, and engaging ways of capturing satisfaction data. MCRS members formed an ad hoc work group in 2020 to explore options, which will include methods other than the more traditional mail in survey instrument. The ad hoc work group did not meet due to the pandemic.
- MCRS members participated in BSBP's "Achievement Honor Roll Awards" event in 2019-2021, which empowered customers through "recognition of their exemplary goal achievements in employment and/or independent living after vision loss". Honorees were nominated by BSBP staff, for attaining independence through the diverse set of quality services offered by BSBP. Talking with Honorees about their struggles and successes created a most memorable day. In 2021, the name of the event was changed to (ADD NEW NAME).
- MCRS Business Meetings offer the opportunity for all members to access information, participate in open Q&A interactions with BSBP staff, and offer their personal perspectives and those of the constituent groups they represent. All requested information has been provided by BSBP in user friendly formats and in a timely manner.
- Customer satisfaction and continuous improvement are ongoing goals for BSBP and the Council. To that end, the Council suggests collecting segmented satisfaction data from students with disabilities, parents of minors receiving VR services, and the business customer.

5. Prepare and submit to the Governor and to the Secretary no later than 90 days after the end of the Federal fiscal year an annual report on the status of vocational rehabilitation programs operated within the State and make the report available to the public through appropriate modes of communication.

- MCRS creates an Annual Report each fiscal year. The report presents a summary of the Council's activities and outcomes and provides a summary of BSBP program data and outcomes. The FY 2019, FY2020, and FY2021 MCRS Annual Reports were submitted to RSA by the December 30th due date. They were subsequently distributed to Michigan's Governor, MRS and BSBP, various VR partners, and posted on the Council's website.

6. To avoid duplication of efforts and enhance the number of individuals served, coordinate activities with the activities of other councils within the State, including Statewide Independent Living Council, the Special Education Advisory Council established under the Individuals with Disabilities Education Act, the Developmental Disabilities Council, the State Mental Health Planning Council, the State Workforce Development Board, and with the activities of entities carrying out programs under the Assistive Technology Act of 1998.

- The Council's coordinating activities with Michigan's Statewide Independent Living Council (SILC) include: (1) the Chair of the SILC was an appointed MCRS member in 2019 and 2020; (2) the Executive Director of MiSILC and the Chair of MCRS consult frequently with one another; (3) the MCRS planned to hold a New Member Orientation at the offices of the Lansing CIL, which was cancelled due to the pandemic; (4) the MiSILC Director and the SILC Chair had planned to present at the

Council's cancelled New Member Orientation; (5) The MCRS Chair and/or Vice Chair participate in SILC's Business Meetings.

- **A continuing priority for MCRS in FY 2022** is to expand engagement with all **disability related** councils as identified in SRC regulatory functions.
- Each year MCRS members attend the fall re:con, Michigan's premier statewide VR conference and the spring VR Leadership Conference. Both conferences were opportunities to learn from local, state, and national VR stakeholders. **During FY 2020 and FY2021 these conferences virtual due to the pandemic. In June 2022, the spring VR Leadership Conference is scheduled to be in-person.**

7. Provide for coordination and the establishment of working relationships between the designated State agency and the Statewide Independent Living Council and centers for independent living within the State.

- In Michigan, the Centers for Independent Living association, Disability Network/Michigan, and the Statewide Independent Living Council (SILC) have a long-standing partnership with BSBP. The MCRS works to enhance this partnership by continually advocating on behalf of the independent living needs of customers of BSBP. As described in item 6 above, the Council is actively working with SILC on future collaboration.
- The Chairperson of the SILC was appointed to the MCRS. Other disability agencies and organizations are represented by members including Special Education, the Parent Training Center, Centers for Independent Living, Community Rehabilitation Organizations, the Client Assistance Program, and Native American VR.

8. Perform other functions consistent with the purpose of the Rehabilitation Act. Highlights of other Michigan Council for Rehabilitation Services Functions include the following activities.

- **MCRS conducts four required quarterly business meetings each year. These meetings are held in various locations across Michigan and require in-person participation of MCRS members to meet requirements of the Open Meetings Act (OMA). During the pandemic, meetings were held virtually in 2020 and in the first half of 2021 meeting State of Michigan restrictions. In August 2021, business meetings were changed to a mixed venue, allowing for in-person and virtual participation.**
- MCRS complies with Michigan's Open Meetings Act requirements.
- **The MCRS Chairperson and Vice Chairperson represent Michigan in the National Coalition of State Rehabilitation Councils (NCSRC). Council members regularly participate in national conference calls to learn and share practices with other SRCs. The NCSRC website is also a source for training and technical assistance information. During the pandemic, the NCSRC replaced their two annual national conferences with monthly, virtual professional development meetings. The format of these virtual meetings featured an expert facilitated presentation about SRC topics of interest, followed by a Q&A. In FY2021, RSA utilized SRC expertise to develop four orientation modules designed for new member orientation that we will implement in FY2022.**
- **Members of the MCRS Executive Team participated in-person (FY2019) in three national conferences: the National Coalition of State Rehabilitation Councils**

(NCSRC), the Council of State Administrators of Vocational Rehabilitation (CSAVR), and the National Council of State Agencies for the Blind (NCSAB). In FY2020 and FY2021, the MCRS Executive Team participated virtually.

- An example of the effectiveness of the MCRS/DSUs partnership, was the joint planning and preparation for visits to Capitol Hill during CSAVR in April 2019. Teams consisting of BSBP and MRS (Michigan VR) and MCRS members successfully met with legislators in Washington DC to impress the relevance of services and positive impact that VR delivers for individuals with disabilities and business partners. We look forward

MCRS Plans for FY2020 – FY2023

- FY2019 was a year of change and reorganization for MCRS. As of January 2020, eleven new members were appointed by Governor Whitmer with four continuing members. The Council was strengthened and renewed through the new membership. The Council will continue to work with Governor Whitmer's Appointment Office to seek candidates for open positions, specifically Business, Industry and Labor.
- The MCRS Chairperson and Vice Chairperson, along with one member at large of the Executive Team (ET) continue in their appointments. MCRS will hold an election to fill vacated ET positions.
- Council members selected "learning more about transition services for youth with disabilities as they move from school to adult life" as a priority for FY2020 and FY2021.
- An additional goal for FY2020 and FY2021 was collaborating with other disability related groups to achieve common goals for Michigan's citizens with disabilities.

MCRS Recommendations to BSBP for the 2020-23 Unified State Plan

Based on a review of the BSBP VR Section of Michigan's USP, the Michigan Council for Rehabilitation Services (MCRS) developed the following recommendations. MCRS members are interested in collaborating with BSBP to implement these recommendations in the years ahead.

1. MCRS acknowledges the need for utilizing a variety of methods to ensure valid and reliable Customer Satisfaction data. The Council recommends that BSBP explore innovative, accessible, and engaging ways of capturing satisfaction data from their dual customers of businesses and individuals with disabilities. One additional focus is to create a method to capture meaningful responses from transition age students, youth, and young adults.
2. MCRS acknowledges the need for accurate information about the impact of disability on career development opportunities. The Council recommends that BSBP engage with the Michigan Workforce Development Board by encouraging a combined educational initiative for Board members and partners to learn about pertinent provisions of WIOA and how they impact persons with disabilities seeking education, training, and employment. One focus is addressing employer's perceptions of disability that may limit opportunities for training, employment and career development.

3. MCRS acknowledges the importance of collaborating with other agencies and organizations to achieve positive outcomes for people with disabilities. Some years ago, Michigan disability organizations worked together to create a “Common Disability Agenda”, a written document that guided multiple efforts toward achieving specific outcomes through the coordination of resources and efforts. The Council recommends that BSBP assume a leadership role in creating a collaborative with a new 2022-2023 Agenda: to achieve common goals benefitting people with disabilities across Michigan.
4. MCRS acknowledges the importance of continual outreach to offer vocational rehabilitation services to diverse and underserved groups of Michigan citizens. With the results of the 2020 CSNA available, the MCRS recommends that BSBP utilize results to implement strategies to address discrepancies in access to VR services among underserved groups across all geographic regions of Michigan.
5. MCRS acknowledges the importance of Michigan’s Comprehensive Statewide Needs Assessment. The Council recommends that BSBP partners with MRS, Special Education and others to conduct research similar to the CSNA focusing on the needs, services and outcomes for Michigan’s transition age youth and young adults.

New recommendation

6. MCRS acknowledges the far reaching impact of the pandemic on the delivery of vocational rehabilitation services and the unanticipated outcomes for people with disabilities. The Council recommends BSBP presents examples of impact on services and outcomes to date in the mid-cycle review of their VR section of the USP.

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2. The designated State unit's response to the Council’s input and recommendations; and
 1. The Michigan Council for Rehabilitation Services (MCRS) acknowledges the need for utilizing a variety of methods to ensure valid and reliable Customer Satisfaction data. The Council recommends that the Bureau of Services for Blind Persons (BSBP) explore innovative, accessible and engaging ways of capturing satisfaction data from their dual customers of businesses and individuals with disabilities. One additional focus is to create a method to capture meaningful responses from transition age students, youth, and young adults.

BSBP Training Center conducts a satisfaction survey for participants and that survey is available upon request. BSBP Pre-Employment Transition Services (Pre-ETS) programs incorporate a feedback form for students and parents. For Vocational Rehabilitation services a consistent method and routine of customer feedback from participants and businesses is not yet developed and BPBP is interested in designing a consumer satisfaction tool with the council’s input that can use to inform customer services.

2. MCRS acknowledges the need for accurate information about the impact of disability on career development opportunities. The Council recommends that BSBP engage with the Michigan Workforce Development Board by encouraging a combined

educational initiative for Board members and partners to learn about pertinent provisions of WIOA and how they impact persons with disabilities seeking education, training and employment. One focus is addressing employer's perceptions of disability that may limit opportunities for training, employment and career development.

BSBP's recent transfer to the Department of Labor and Economic Opportunity (LEO) has allowed for enhanced engagement of Workforce. The Employment and Training Division which includes BSBP also includes Workforce Development (WD). BSBP now participates monthly in the Council of Directors of Michigan Works! Agencies. BSBP is represented on some local Workforce Development Boards. BSBP is dedicated to increasing an awareness of the talents that BSBP's customers possess and will continue to address employer perceptions of disability that may limit opportunities for training, employment and career development.

3. MCRS acknowledges the importance of collaborating with other agencies and organizations to achieve positive outcomes for people with disabilities. Some years ago, Michigan disability organizations worked together to create a "Common Disability Agenda", a written document that guided multiple efforts toward achieving specific outcomes through the coordination of resources and efforts. The Council recommends that BSBP assume a leadership role in creating a collaborative with a new 2022-2023 Agenda to achieve common goals benefitting people with disabilities across Michigan.

Key strategic focus areas of LEO include investing in the closure of equity gaps and removing barriers to employment. BSBP collaborates with Michigan Rehabilitation Services (MRS), WDA and other agencies currently to achieve shared common goals. Examples include but are not limited to:

BSBP is represented on the Michigan Interagency Transition Team (MITT). This is a collaborative body comprised of members from public and non-profit agencies with a mission to improve secondary transition services for students with disabilities. In partnership with the National Technical Assistance Center on Transition, the MITT will be surveying transition stakeholders on services and supports currently available in the state.

BSBP also utilizes the partnership with Michigan Low Incidence Outreach, which addresses the specific needs of students who are blind or visually impaired.

BSBP and MRS work together on many projects to ensure that the needs of persons who are blind and visually impaired and who may have other disabilities are considered. Examples of BSBP and MRS collaboration include Employment First, Seamless Transition, and Customized Employment. BSBP has been and continues to be highly invested in collaborating in the implementation of Michigan's Employment First initiative as defined in Executive Order 2015-15 as further detailed in the Michigan Employment First Strategic Plan for Systems Transformation and Improving Competitive, Integrated Employment Outcomes.

4. MCRS acknowledges the importance of continual outreach to offer vocational rehabilitation services to diverse and underserved groups of Michigan

citizens. When the results of the 2020 CSNA are available in March, the MCRS recommends that BSBP utilize results to implement strategies to address discrepancies in access to VR services among underserved groups across all geographic regions of Michigan.

BSBP will utilize the information provided as a result of the most recent Comprehensive Statewide Needs Assessment (CSNA) when it is made available. BSBP has provided Michigan's Project Excellence team all information requested in order to ensure that the best interest of BSBP's consumers and Michigan's blind citizens are represented in the CSNA. This will allow BSBP to strategically consider those needs and how to address challenges and celebrate successes. BSBP appreciates the support of the Council in this process.

5. MCRS acknowledges the importance of Michigan's Comprehensive Statewide Needs Assessment. The Council recommends that BSBP partners with MRS, Special Education and others to conduct research similar to the CSNA focusing on the needs, services and outcomes for Michigan's transition age youth and young adults.

BSBP is represented on the Michigan Interagency Transition Team (MITT). This is a collaborative body comprised of members from public and non-profit agencies with a mission to improve secondary transition services for students with disabilities. In partnership with the National Technical Assistance Center on Transition, the MITT will be surveying transition stakeholders on services and supports currently available in the state. The purpose of the survey is to inform services and improve programming.

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

BSBP accepts all recommendations from the Council's input.

End of MCRS Section - STOP HERE

b. Request for Waiver of Statewideness

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

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

The Bureau of Services for Blind Persons (BSBP) is requesting a waiver of state wideness. BSBP develops Interagency Cash Transfer Agreements (ICTA) in various parts of the state as determined necessary by BSBP and Intermediate School District staff. These ICTA's are not available in all parts of the state. Currently, BSBP has established Interagency Cash Transfer Agreements with some Macomb, Muskegon, and Ottawa county intermediate school districts. These programs provide Pre-Employment Transition services to students in their service area from the five required categories.

The Bureau of Services for Blind Persons and the Macomb Intermediate School District (MISD) will work in partnership to provide career exploration, pre-employment training skills and transition services for school-to-work or higher education for students who are legally blind and continuing until meeting requirements for receiving a diploma or certificate of

completion. These services are to provide the additional supports necessary for blind and visually impaired students to access and receive maximum benefit from the transition services offered to their sighted peers. Transition services are to enhance opportunities for legally blind and visually impaired students to experience positive employment options allowing them to continue toward gainful employment or further education after high school.

Through the Muskegon Intermediate School District's Successful Teens Exploring Positive Skills (STEPS) transition program, will work with teens ages 14 through 26 on developing daily living and job readiness skills in a fun and interactive environment. The program builds on skills explored during SITC and expands them into a year round program. Summer in the City (SITC) is an eight day long youth training program taught in a group setting; to reinforce job readiness skills and daily living skills including, but not limited to, budgeting, job shadowing, non-verbal communication skills, personal grooming, and orientation and mobility skills. The goal is to serve between 3-5 students this fiscal year in Muskegon County.

The services that will be provided under the Ottawa Interagency agreement includes 1) career exploration counseling; 2) work based learning experiences, 3) post secondary counseling; 4) workplace readiness training to develop social skills and independent living; and 5) instruction in self-advocacy. Students will also participate in the STEPS transition and SITC programs mentioned above. ***I'm recommending that we are more general with these descriptions since they can change from year to year or ISD to ISD. We certainly have documentation of the details of the agreement if needed.***