

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

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 at www.michigan.gov/mcrs.

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 EO 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 percent 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) 2019, with updates added for FY2020 and FY2021 for the USP 2022 mid-cycle review.

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 MRS on performance, Council members participated in the following from FY2019-2021: (1) Appeals Hearings Redacted Reports; (2) Consultations with the hearings manager; (3) Consultation with the Client Assistance Program; (4) MRS Policy Cadre meetings; (5) 2019 re: Con Conference - MCRS customer survey; (6) Customer Satisfaction Survey Reports for FY 2018; (7) Review of the 2017 Comprehensive Statewide Needs Assessment (CSNA) Reports; (8) Annual Champion Awards event; (9) Presentations of MRS data reports and staff consultations at MCRS quarterly business meetings.
 - The MCRS vice chairperson participates in MRS Policy Cadre meetings and apprises Council members on relevant subject matter. This meeting is open to ad hoc attendance by any Council members.
 - The MCRS chairperson actively participated in the MRS Rate Restructuring Team, an advisory body addressing corrective actions to comply with 2 CFR 200.
 - 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 VR program specific section of the 2020 2023 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 the MRS Strategic Plan.
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 CSNA. 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 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, CIL, CMH, WDA, Incompass Michigan - 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 booth surveys 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 on 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.
- Customer satisfaction information has been collected/provided to MCRS through a variety of sources, including: (1) Consultation with Client Assistance Program; (2) Consultation with the hearings manager; (3) MRS data review; (4) Public comment; (5) Informal interactions with current/past customers; (6) Experiences of MCRS members; and 7) Customer satisfaction surveys completed by PE-MSU (see bullet).

MCRS changes comments – teal and purple highlight

MRS changes/comments – yellow highlight added info / ~~strikethroughs~~ indicate info to be removed

- Through PE-MSU, MRS obtains customer satisfaction (CS) feedback at Plan and Exit. Although response rates for FY'18 were low (21 percent/Plan and 14.6 percent/Exit), overall satisfaction rates were positive (91.9 percent/Plan and 86 percent/Exit). The response rate for youth as a subgroup was lower at both survey points.
- Customer satisfaction and continuous improvement are ongoing goals for MRS 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.
- In October of 2018 - 2021, MCRS members and MRS staff facilitated the powerful “Champion Awards” Ceremony, which honored the successes of several MRS customers and business partners throughout Michigan.

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 MRS program data and outcomes. The FY2019 - 2021 MCRS Annual Reports were submitted to RSA before their December due date. Reports were subsequently submitted 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, and 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 is an appointed MCRS member; (2) the Executive Director of MiSILC and the Chair of MCRS consult frequently with one another; (3) the MCRS is planned on holding 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 FY2022 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 are opportunities to learn from local, state, and national VR stakeholders. During FY2020 and FY2021 these conferences were either not held or were virtual due to the pandemic.

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 MRS. The MCRS works to enhance this partnership by continually advocating on behalf of the independent living needs of customers of MRS. As described in item 6 above, the Council is actively working to improve collaboration with the SILC.
- The Chairperson of the SILC was appointed to the MCRS in August 2019. 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 Lansing and in various locations across Michigan. Meetings require in-person participation of MCRS members to meet requirements of the Open Meetings Act (OMA). During the pandemic, meetings were held virtually in FY2020 and the first half of FY2021. In August 2021 MCRS 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 annual conferences with enhanced virtual professional development sessions each month. The format of these meetings featured an expert facilitated presentation on key SRC topics of interest, followed by Q&A. The MCRS is utilizing NCSRC information to design an orientation for new members in FY 2020. In FY2021, RSA utilized national SRC expertise to develop four orientation modules designed for new member orientation. The MCRS will implement this new orientation in FY 2022.
- Members of the MCRS Executive Team generally participate in three national conferences of 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). These conferences are held consecutively during the same week and at the same location.
- One example of the effectiveness of the MCRS/DSUs partnership, was the joint planning, preparation and execution of a full day of visits to Capitol Hill during CSAVR in April 2019 (the most recent in-person conference). Teams consisting of BSBP, MRS and MCRS representatives successfully met with legislators in Washington to tell the

Michigan story of the relevance and positive impact that VR delivers for individuals with disabilities and business partners.

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 is 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.
- Additional goals for FY2020 – FY2022 include increasing Council membership to full capacity and collaborating with other disability related groups to achieve common goals for Michigan’s citizens with disabilities.

MCRS Recommendations to MRS for the 2020 - 2023 Unified Stated Plan

Based on a review of the MRS VR Section of Michigan’s USP, the Michigan Council for Rehabilitation Services (MCRS) developed the following recommendations. MCRS members are interested in collaborating with MRS 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 MRS 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 increase response rates for students and youth with disabilities.
2. MCRS acknowledges the need for accurate information about the impact of disability on career development opportunities. The Council recommends that MRS engage with the State 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 MRS 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 MRS 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 MRS partners with BSBP, Special Education and others to conduct research like the CSNA focusing on the needs, services and outcomes for Michigan's transition age youth and young adults.

NEW Recommendation

6. MCRS acknowledges the importance of the MRS restructuring of reimbursement rates for provision of certain purchased VR services. A rate reimbursement study was required following a RSA 2017 MRS monitoring review. The study was conducted in 2019 - 2020 by Public Consulting Group, Inc. (PCG). Results of the study were released in August 2020, and phased implementation of the new rates began statewide in February 2022. Purchased services are most often provided to MRS customers through Community Rehabilitation Organizations (CROs) and Centers for Independent Living (CILs). Due to the time period of the study (2019 – 2020), review of results, analysis of impact, and statewide implementation all occurred during the scope of the 2020 – 2023 USP. MCRS recommends that MRS present information about the rate restructuring process and its potential impact on MRS Customers, other people with disabilities, and partner agencies in the MRS mid-cycle review narrative.

The designated State unit's response to the Council's input and recommendations; and

Response to recommendation #1: In partnership with MCRS, MRS agrees to jointly explore innovative, accessible, and engaging methods to increase customer satisfaction input and/or response rates from both individuals with disabilities and business.

Response to recommendation #2: MRS takes MCRS recommendation #2 under advisement. MRS will continue to educate workforce development partners, business, and other stakeholders on the impact of the Workforce Innovation and Opportunity Act (WIOA) specific to individuals with disabilities.

Response to recommendation #3: MRS takes MCRS recommendation #3 under advisement. As a result of Executive Order 2019-13, all WIOA core programs in Michigan are under the Department of Labor and Economic Opportunity. This strengthens the alignment of the state workforce development system and allows for unified planning and collaboration. MRS is highly invested in the implementation of Michigan's Employment First initiative as defined in Executive Order 2015-15 and detailed in Michigan Employment First Strategic Plan for Systems Transformation and Improving Competitive, Integrated Employment Outcomes. Both DSUs are represented and active on the Employment First State Leadership Team.

Response to recommendation #4: MRS agrees to utilize the 2020 Comprehensive Statewide Needs Assessment results to identify underserved populations with disabilities and develop

strategies to increase engagement, guide investments, and improve access to VR services statewide.

Response to recommendation #5: MRS takes MCRS recommendation #5 under advisement. MRS 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 results will guide continuous improvement efforts benefiting students and youth with disabilities.

3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

No recommendations were rejected.

End of MCRS Section - STOP HERE

B. REQUEST FOR WAIVER OF STATEWIDENESS

When requesting a waiver of the state wideness 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;

Michigan Rehabilitation Services (MRS) requests a continuation of its waiver of state wideness. For **Federal Fiscal Year (FFY) 2020 2022 and 2023**, MRS has approximately one hundred and fifty Interagency Cash Transfer Agreements (ICTA) and two Third Party Cooperative Arrangements (TPCA) executed with local public agencies.

Each ICTA and TPCA contains sections on the scope of vocational rehabilitation services to be provided, as defined in 34 CFR 361.48, and the following assurances:

- The local public agency will provide non-Federal share as an allowable source of match as referenced in Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 CFR 200.306.
- Non-Federal share will not originate from any other Federal grant or count towards satisfying a matching or cost sharing requirement of another Federal grant agreement, contract, or any other award of Federal funds. Program income generated or earned as