

COOPERATION WITH AGENCIES NOT CARRYING OUT ACTIVITIES THROUGH THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM

1. Guiding Principles and Mechanisms for Cooperation and Coordination with Other Agencies and Other Entities

All of these agreements, in addition to all other services and activities of the Wisconsin DVR, are to be guided by:

Our Mission: The Wisconsin Division of Vocational Rehabilitation (DVR) is a federal/state program designed to obtain, maintain, and improve employment for people with disabilities by working with VR consumers, employers, and other partners.

(i) Mechanisms Implementing Cooperative Agreements

The primary mechanism for interagency coordination and cooperative agreements including the cooperative arrangement funding portion of those agreements is the State Plan interagency coordination parameters as described throughout this document.

The primary mechanism for interagency coordination parameters as defined in this attachment does not require a written agreement between cooperating agencies or entities.

A secondary mechanism for interagency coordination and cooperative agreements includes a written agreement. A secondary mechanism in the form of a written agreement must comply with the following:

As the Division deems appropriate, and with approval from the Wisconsin Rehabilitation Council, secondary interagency agreement mechanisms that expand the availability, or improve the coordination of services and which also comply with the interagency coordination parameters of the State Plan may be employed.

Secondary interagency mechanisms require a signed agreement between the Division of Vocational Rehabilitation and the respective officials of the cooperating entities that clearly identifies the responsibilities of each entity for the provision and coordination of services.

As a complement to the primary interagency coordination parameters of the State Plan, such agreements may take the form of a memorandum of understanding or agreement, a letter of agreement, or a contractual arrangement.

Secondary cooperative interagency mechanisms include interagency service agreements between the DVR and state agencies, the University of Wisconsin System; the Wisconsin Technical College System and a Wisconsin American Indian Vocational Rehabilitation Program. These agreements are described in this and in other attachments.

These cooperative agreements may or may not involve funding contributions from the Division of Vocational Rehabilitation. As a secondary mechanism, a cooperative agreement may, within the parameters of the financial responsibilities outlined in *ii* of this section, include a third party cooperative arrangement involving funds from another public agency.

As deemed appropriate by the Division, and when approved by the Wisconsin Rehabilitation Council, short-term waivers from the State Plan primary interagency coordination parameters may be granted. Such waivers will be granted for the purpose of facilitating the transition of secondary cooperative interagency mechanisms and funding to full compliance with the interagency coordination parameters of the State Plan, should such a transition be determined necessary to provide continuous and timely services to DVR consumers.

(ii). Agency financial responsibility

The DVR is primarily responsible for assuring that services within the Scope of Vocational Rehabilitation Services (34 CFR 361.48) are available to assist eligible individuals with an individualized plan for employment (IPE) in achieving their employment goals.

As needed to assure the timely and continuous provision of IPE services, the agency's financial priority is to expend Title I-B operational and discretionary case aid funds to assure the timely and continuous availability and delivery of services to these individuals over the anticipated term of their service plans. The DVR will maintain an IPE obligation reserve to secure the continuous and timely provision of employment plan services. The case aids budget will be dedicated to the continuous and timely support of IPE services and to develop and activate employment plans for eligible individuals with most significant and significant disabilities in a timely manner from the DVR wait list.

After the Division is assured that eligible individuals are adequately supported in their IPE costs, and Title I-B funds have been used to activate individuals with the most significant and significant disabilities from the OOS wait list in a timely manner, up to 2% of Title I-B discretionary case aids funds may be used for other allowable purposes, including innovation and expansion services.

The DVR annually utilizes a portion of funds for the development and implementation of innovative approaches to expand and improve the provision of vocational rehabilitation services. Innovation and expansion services funded under an interagency mechanism must be consistent with the findings of the comprehensive statewide needs assessment and be funded in accordance with the minimum financial responsibilities of a cooperating partner specified in this section.

Developing appropriate long-term employment supports necessary for individuals with the most significant disabilities to obtain and maintain employment is identified as a priority in the comprehensive needs assessment.

Most importantly, DVR has collaborated with the Board for People with Developmental Disabilities, the Department of Health Services, and the Department of Public Instruction on a pilot grant program designed to improve transition services by offering career and work experience while in high school. The "Let's Get to Work" grant allowed a best practice to be developed between special education, DVR and long-term care providers to offer employment focused transition plans for developmental disabled students. The Promise Grant, where Wisconsin is one of six federal demonstration sites, further expands this collaboration and focus on youth.

DVR has a collaborative project with the Great Lakes Inter-Tribal Council as an Innovation and Expansion option. Three tribal entities are currently working with DVR to "Place and Train" Wisconsin DVR consumers in tribal businesses.

For both public and private entities

Funding of I & E and other allowable vocational rehabilitation service projects, including co-funding with another public or private entity, requires the following coordination guarantees, conditions, terms and procedures for reimbursement:

A guarantee that the Division funds will not be used to supplant funding for existing services.

A guarantee that Division funds will not be used to cover the costs of otherwise comparable services and benefits as described in 34 CFR 361.53.

A guarantee that the Division's funding is limited to the timeframe of the project, which is not to exceed 36 months but with annual reviews and renewals, unless the project is funded in part, or whole under a federal appropriation supporting a longer timeframe, in which case, the project timeframe is not to exceed 60 months.

For I & E project services funded with DVR funds, the financial agreement must include a predetermined strategy for project service sustainability and a project funding conversion schedule, as determined by the Division that may include the conversion of time limited project expenditures to DVR fee-for-service payments.

(iii) Conditions, terms, and procedures of reimbursement

If any entity other than the Wisconsin Division of Vocational Rehabilitation is obligated under federal or state law, or assigned responsibility under state policy or under this paragraph, to provide or pay for any services that are also considered to be vocational rehabilitation services (other than those specified in paragraph (5)(D) and in paragraphs (1) through (4) and (14) of section 103(a) of the Rehabilitation Act), such entity shall fulfill that obligation or responsibility, either directly or by contract or other arrangement.

If an entity other than the Division of Vocational Rehabilitation fails to provide or pay for comparable benefits or services for an eligible individual, the Division of Vocational Rehabilitation shall provide or pay for such services to the individual.

The Division of Vocational Rehabilitation will claim reimbursement for the services from the entity that failed to provide or pay for such services. Such entity shall reimburse the DVR pursuant to the terms of the interagency agreement or other mechanism described in this paragraph according to the procedures established in such agreement or mechanism.

Agency partners involved in the interagency agreements specifying the coordination of service procedures are described in this attachment. A DVR services coordination agreement may involve coordinated use of interagency funds.

(iv) Coordination of services procedures

The service delivery timeframes within the Act and those referenced in the Division of Vocational Rehabilitation Policy Manual shall establish the minimum standard for the timely delivery of vocational rehabilitation services. At its discretion, the Division may create additional requirements for the coordination and timely delivery of services when establishing mechanisms for interagency coordination that affect the delivery of services.

The Division shall maintain primary responsibility for assuring the coordination and timely delivery of services. The Division will meet this responsibility through its service agreements and in all other mechanisms used for establishing interagency coordination for the delivery of services.

Interagency Agreements

All Wisconsin State Agency Departments

DVR will continue to consider collaborative agreements with State Agency Departments to target and increase paid on-the-job training (OJT) internship opportunities for DVR job seekers in state positions. This initiative is designed to access state limited term employment (LTE) positions to expand the number of state employment opportunities that contribute to the skills and work experience of persons with disabilities served by DVR. The goal of the OJT LTE paid internship is that upon successful completion, the DVR sponsored intern will have valuable experience and references for their resume and will be prepared to compete for available LTE or permanent state agency positions.

Department of Children and Families/Division of Family Supports

The Department of Children and Families (DCF) operates Wisconsin's Temporary Assistance for Needy Families (TANF), child support and childcare subsidy programs for low-income individuals and families. The purpose of the MOU is for the DVR and the Department of Children and Families/Division of Family Supports to establish communication and a common understanding regarding the roles, policies and procedures to improve services to common customers. The intent is to maximize the employability of DVR/TANF participants by increasing service collaboration and reducing duplicative efforts. By combining areas of expertise and coordinating funding, DVR staff can assist in the development of employment goals and DCF staff can provide supportive resources. Cross training of staff from both agencies has increased communication and service planning and improved cost sharing. This agreement is in place during FY 2014.

Department of Children and Families/Department of Corrections

DVR developed a collaborative relationship with the Department of Children and Families (DCF) and with the Department of Corrections (DOC) coordinate service activities for individuals with disabilities who are interacting with the juvenile justice system, child welfare (especially those aging out of Foster Care) and adults scheduled for community release. Referrals to DVR including assisting inmates in securing documentation of disability. DVR

staff in the Racine area continues to work with Ellsworth Correctional Center (Racine County) in assisting inmates with disabilities with determining if they are eligible for DVR services, and if so, helping them prepare for a successful employment transition as a component of their community transition.

The Wisconsin DOC has awarded a Benefits Specialist Program to Legal Action of Wisconsin (LAW). The project, Disabled Offenders Economic Security (DOES) Project, will work with the 13 DOC institutions identified as having the highest number of inmates with serious mental illness and DD, to ensure that disabled offenders receive their benefits during the re-entry process, including employment and DVR referrals.

DVR is currently working to assist DCF with a major transition to their department of the Juvenile Justice state programs. With this movement, DVR can continue to build on the work of the Promise Grant, identifying common youth who can benefit from DVR services and receive assistance from juvenile justice programs. Especially important is the collaborative individualized programming to aid the youth with wrap around employment services while on probation. Early collaboration with Juvenile Justice and Promise has demonstrated a promising practice of community employment as a deterrent to reoffending.

Department of Public Instruction and Department of Health Services/Division of Long Term Care

DVR has a multi-agency agreement that defines necessary relationships, policies and procedures between the DVR, and the Departments of Public Instruction (DPI) and Health Services (DHS). The agreement is designed to create common understanding, and establish collaborative efforts in the provision of services that ultimately improve employment outcomes for students with disabilities who may be eligible for DVR services. Efforts will continue to maintain the Interagency Agreement with the Department of Public Instruction (DPI) and the Medicaid agency, the Department of Health Services (DHS). DVR utilizes this agreement as the official document to guide its coordination of transition activities for youth with disabilities as they move from school to post-high school vocational rehabilitation services with education officials and with long-term care and employment support providers. Recent updates indicate that the plan is actively being used and updated as needed.

Department of Health Services/Division of Long Term Care

DVR developed an agreement with the Department of Health Services, Division of Long Term Care with guidelines for making determinations of payment for service for common customers. The agreement is intended to provide clarification of funding responsibilities for adults seeking competitive employment who may also require short-term employment supports through DVR and long-term employment supports through the Family Care system. This agreement defines and guides practice and provides a structure to coordinate service planning, appropriately blend and braid funding and to resolve disputes.

Great Lakes Intertribal Council (GLITC) American Indian Vocational Rehabilitation Program

A MOU with the Great Lakes Intertribal Council (GLITC) was implemented to assure that the following objectives of the statewide comprehensive needs assessment are addressed during the state plan period. The DVR funded services in the MOU will be fully compliant with federal program rules.

- Provide training to all VR staff in multicultural awareness
- Increase VRC expertise to address cross-cultural needs
- Develop better methods to identify issues preventing involvement and make appropriate referrals to community resources to consider these issues to increase engagement of individuals in the VR process
- Conduct outreach to recruit potential eligible consumers
- Increase coordination of VR services between the tribal VR agency and DVR, targeting Native Americans not living on or near reservations
- Develop mentoring services related to crime/poverty to support employment efforts
- Improve the service rate for individuals with disabilities from this minority group.

Interagency Memorandum of Understanding with Division of Vocational Rehabilitation, the Office of Veterans Services within the Division of Employment and Training of the Department of Workforce Development and the U.S. Department of Veterans Affairs (Milwaukee Regional Office).

The purpose of the MOU is to ensure seamless, coordinated, and effective vocational rehabilitation services to Wisconsin's Veterans with disabilities by improving cooperation and collaboration among the three agencies, avoiding duplication of services, improving inter-agency communication and establishing staff cross-training opportunities.

Institutions of Higher Education (IHE)

DVR renewed non-financial Memorandums of Understanding (MOU) with the University of Wisconsin System (UWS) and the Wisconsin Technical College Systems Board (WTCS). The purpose of the MOU is to clarify the roles and responsibilities of DVR and the Institutions of Higher Education (IHE) in fostering a seamless delivery system supporting the DVR individualized plan for employment (IPE) and common customers engaged in training at a post-secondary institution as a means to achieve their employment goal. Included in the MOU is an agreement to coordinate financial aid information so that the DVR consumers can make maximum effort to secure financial aid grants.

Each MOU described above is published on the DVR public website.

http://dwd.wisconsin.gov/dvr/pdf_files/uw_system_mou.pdf
http://dwd.wisconsin.gov/dvr/pdf_files/wtcs_mou.pdf

State Use Contracting agency and other agencies

The DVR will, when appropriate, develop agreements with other federal, state and local agencies that are not part of the statewide workforce investment system, including programs carried out by the Under Secretary for Rural Development of the Department of Agriculture and State use programs, when such agreements will benefit the vocational rehabilitation of persons with significant disabilities.

While there are no written cooperative agreements with these entities, the Division has assigned a liaison to the USDA Wisconsin State Chapter to foster a comparable benefit relationship for individuals with disabilities receiving services in rural areas of the state. In 2010, the USDA Wisconsin Chapter Executive Director presented to DVR staff on USDA services for rural families, including individuals with disabilities.

The Division also maintains a permanent seat on the Wisconsin State Use Board. DVR's role is to promote competitive, integrated employment in this system wherever possible.