

# **INTERAGENCY COOPERATION WITH AND USE OF THE SERVICES AND FACILITIES OF FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS NOT CARRYING OUT ACTIVITIES THROUGH THE STATEWIDE WORKFORCE INVESTMENT SYSTEM**

## **General Introduction**

Wisconsin DVR is required to establish agreements with a variety of public and private agencies in order to meet its State Plan obligations. All service agreements described in these attachments meet the statewideness requirements specified in 34 CFR, Part 361.25 unless a waiver of statewideness has been authorized.

This introduction applies to the following required State Plan attachments as well as other sections of the State Plan:

- 4.8(b)(1) - Interagency cooperation with agencies and entities that are not carrying out activities through the statewide workforce investment system;
- 4.8(b)(2) - Coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of vocational rehabilitation services;
- 4.8(b)(3) - Cooperative agreements with private non-profit vocational rehabilitation service providers; and
- 4.8(b)(4) – Arrangements and Cooperative Agreements for the Provision of supported employment services and extended services for individuals with the most significant disabilities.

### **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.

Results of a comprehensive assessment of the rehabilitation needs of individuals with disabilities and the need to establish develop or improve community rehabilitation programs [attachment 4.11(a)].

Established annual state goals and priorities [attachment 4.11(c) (1)].

## **(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 in 1(i), (ii), (iii);(iv) of this attachment.

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 FFY 2014 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, as outlined in attachment 4.8 (b) (1).

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. The WRC has also recommended that the DVR increase the availability of qualified and successful job development and placement providers. In 2010-11, the DVR entered into an agreement with the Department of Health to pilot a new comprehensive approach for the provision of supported employment called customized employment. As part of the pilot, DVR counselors and job development and placement vendors were trained in the new methodology. DVR also issued new guidance on resource ownership, allowing consumers to develop carve out employment opportunities.

Most importantly, DVR is partnering 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 "Lets Get to Work" grant will allow for 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.

Increasing the partnership with Centers for Independent Living (CIL) and their capacity to provide employment services is the focus of 8 unique I & E projects deployed in FFY11. 7 additional I and E projects commenced in FFY14 based on newly identified service needs. These innovation and expansion projects will be conducted in coordination with the State Independent Living Council. An agreed upon commitment of up to \$120,000 per year for up to 3 years has been made for I & E CIL-based projects to provide statewide mentoring services delivered to a minimum of 100 DVR consumers annually, to mitigate with measurable positive impacts, employment barriers identified in the comprehensive needs assessment which include: transportation, housing, long term care, AT and/or assisting VR

consumers with other areas managing work and disability. Additional projects include an expansion of territories served in a timely manner; financial literacy projects, social media safety, etiquette and use for job seeking projects and use of I Pads and other tablets needed for employment activities.

DVR has a collaborative project with the Great Lakes Inter-Tribal Council as an Innovation and Expansion option. Three tribal entities will work with DVR to "Place and Train" Wisconsin DVR consumers in tribal businesses. DVR has also worked within the Walgreen's REDI model to encourage placement of DVR consumers in Walgreen's place and train opportunities. DVR providers are granted a "Train the Trainer" I and E grant to send trainers to the Walgreen's store for two weeks of intensive training. The I and E grant assists with covering their personnel costs for attending the training which ultimately leads to DVR consumers enrolling in the Walgreen's REDI project. The trainers are responsible for then teaching the REDI model to our consumers, leading to employment opportunities. Finally, DVR has I and E projects with two minority agencies : the goals of both projects are to provide "Wrap Around Services" to consumers in the Milwaukee area who , without the removal of social barriers would potentially drop out of DVR employment services.

### ***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, 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 impact 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 Family Services/Division of Family Supports**

The Department of Children and Families (DCF) operates Wisconsin's Temporary Assistance for Needy Families (TANF), child support and child care 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 Corrections**

DVR developed a collaborative agreement with the Department of Corrections (DOC) to pilot a project at the Racine Correctional Facility to coordinate service activities for individuals with disabilities who are scheduled for community release. This memorandum of understanding allowed for the identification of incarcerated individuals that could access DVR services upon release. The agreement allowed for facilitation of referral to DVR including assisting inmates in securing documentation of disability. Joint training of DVR and DOC staff provided programmatic information to assist in the referral and successful transition of common customers. The formal agreement has ended. DVR staff in the area continue 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, Disable Offenders; Economic Security (DOES), 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.**

### **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. This agreement will be in effect during FFY14 and is described in more detail in attachment 4.8(b)(2). Updates have been recently approved by DPI and DVR and awaiting final approval from DHS. This newly updated agreement will be in effect for FFY 15. 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. This agreement will be in effect during for FFY14.

**Great Lakes Intertribal Council (GLITC) American Indian Vocational Rehabilitation Program (described further in attachment 4.8(b) (3))**

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 FFY12 and FFY 13. 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.

### **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. The MOUs for both systems will be in place in FFY 15.

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/uw_system_mou.pdf)

[http://dwd.wisconsin.gov/dvr/pdf\\_files/wtcs\\_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.