

IMPACT OF WIOA CHANGES

Impact of Workforce Innovation and Opportunity Act Changes on Agencies

Serving Consumers with Blindness and Low Vision

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Abstract

The purpose of this study was to investigate agencies' response to and their perceived impact of two specific changes associated with the Workforce Innovation and Opportunity Act (WIOA): 15% budget allocation for pre-employment transition services (pre-ETS) and elimination of the homemaker closure. Representatives from combined and separate agencies serving consumers with blindness and low vision in all 50 states and the District of Columbia participated in a telephone survey to provide information about the agency's response to these changes. Separate agencies were more likely to experience a challenge with the pre-ETS requirement, but were less likely to be impacted by the elimination of homemaker as a closure status. A concern for all agencies was the yet-to-be-determined impact on services to consumers over age 21.

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Impact of Workforce Innovation and Opportunity Act Changes on Agencies Serving Consumers with Blindness and Low Vision

The Workforce Innovation and Opportunity Act (WIOA), which became law in July 2014, was the first reauthorization of the Rehabilitation Act since 1998. Final regulations associated with WIOA were released in July 2016. WIOA changes included amendments to the Rehabilitation Act that made significant changes to the way state-federal vocational rehabilitation (VR) programs provide services to students with disabilities, and it eliminated the use of homemaker as a closure status (81 FR 55630, 2016). The long-term impact of these changes is unclear but there is the potential that these changes will have a more significant effect on VR agencies serving people who are blind or with low vision. This is because vision loss is associated with aging, disproportionately affecting older persons, with the prevalence of vision loss in youth less than 1% (Congdon et al., 2004; Erickson, Lee, & von Schrader, 2014) and because being closed as a homemaker is much more common among persons with vision loss. This study provides information about how VR agencies are responding to these two specific WIOA changes.

WIOA legislation requires that VR agencies reserve a minimum of 15% of their Federal budget allotment to work with local educational agencies to provide required pre-employment transition services (pre-ETS) to students with disabilities (81 FR 55630, 2016). According to WIOA, required pre-ETS include job exploration counseling, work-based learning experiences, counseling about postsecondary education, workplace readiness training, and self-advocacy instruction to consumers and “potentially eligible” youth to assist these youth in beginning their career planning and facilitating their paths toward competitive employment. Consequently, students receiving services need not be VR applicants or consumers to receive this array of services. Notably, expenses associated with postsecondary education, job placement services, or

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assistive technology may be provided to VR eligible consumers but are not regarded as pre-ETS (81 FR 55630, 2016). The final regulations are specific in differentiating pre-ETS from transition services (81 FR 55630, 2016), thus focusing the scope of pre-ETS to students. The intent of this legislative change is to expand the breadth and scope of vocational rehabilitation services to youth with disabilities so that they receive the services needed to facilitate their participation in competitive employment (81 FR 55630, 2016).

Pre-ETS may be an avenue to serve youth at a younger age, particularly those at high risk for failing to achieve competitive employment, and by offering them the necessary interventions to provide experiences and develop the skills that previous research has identified as leading to employment outcomes. One of the most well-documented factor associated with future employment for youth who are blind or have low vision is early work experiences (McDonnall & Crudden, 2009; McDonnall, 2010; McDonnall, 2011). Rehabilitation counselors reported that becoming involved with youth before they turn 16 years of age, communication among the various service systems and the family, parental involvement, and skill development facilitate competitive employment (Crudden, 2012). Among youth served by VR agencies, factors positively associated with employment outcomes included multiple work experiences, academic competence, self-determination, and use of assistive technology (McDonnall & Crudden, 2009). Interventions that promoted employment among youth who are blind or visually impaired include those directed at addressing career awareness and job seeking skills, parental involvement, and work experience, as well as behavioral interventions to improve independent living skills (Cavanaugh & Giesen, 2012).

Unlike many other disabilities, blindness and low vision are strongly associated with aging, with the vast majority of the population aged 65 and older (Congdon et al., 2004).

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Consequently, VR consumers with blindness and low vision tend to be older than VR consumers with other disabilities (McDonnall, 2016). Requiring VR agencies to allocate 15% of their entire budgets to pre-ETS may present unique challenges to VR agencies that exclusively serve consumers with blindness and low vision, as they are now required to spend a large portion of their budget on a small portion of their population.

In a further effort to promote integrated competitive employment, WIOA eliminated inclusion of homemakers and unpaid family workers in its definition of employment outcomes (81 FR 55630, 2016). Homemaker outcomes have typically been associated with older consumers, women, and consumers with blindness or low vision (Capella-McDonnall, 2006). Although VR agencies' use of homemaker as an employment goal has declined, the decrease has been less among persons with vision loss than among those with other disabilities (80 FR 21091, 2015; Capella-McDonnall, 2006). Commenters about WIOA regulations (81 FR 55630, 2016) made the case that utilizing the homemaker outcome was a means to provide services associated with vision loss, such as braille and orientation and mobility instruction, and that it facilitated movement into employment. However, WIOA regulations directed VR agencies to provide vocational counseling and guidance to these individuals so they could develop employment goals and be served in the VR system (81 FR 55630, 2016). Thus, WIOA legislation eliminates uncompensated employment outcomes, stresses the achievement of high quality employment (81 FR 55630, 2016), and ends the long debate about the legitimacy of the homemaker option as an appropriate VR closure (GAO, 1982; RSA, 2004).

The Independent Living Services for Older Individuals who are Blind (OIB), authorized under Title VII, Chapter 2 of the Rehabilitation Act, provides a mechanism to serve people 55 and older who need assistance to live independently. The average number of persons served

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through the OIB programs from 2008 through 2013 appears relatively stable, but the OIB program has limited funds and is potentially unable to meet the all needs of its consumers (Farrow & Steverson, 2016). The elimination of the homemaker closure is anticipated to result in an increase in requests for OIB services, and the legislation suggests that VR agencies provide training and technical assistance to Centers for Independent Living (CILs) to develop staff competencies to serve persons with vision loss (81 FR 55630, 2016).

Upon publication of the proposed WIOA regulations, VR agency administrators expressed concerns about these changes (Schroeder, 2015). WIOA went into effect in 2014, but no information has been published about agencies' response to the changes or the impacts of the changes thus far. The purpose of this study is to investigate agencies' response to and experiences with the changes to the Rehabilitation Act implemented by WIOA, with a focus on pre-ETS and elimination of the homemaker closure status. The current or anticipated impact of these changes on consumers served by the agency was also investigated.

Method

Participants

VR agencies in all 50 states and the District of Columbia who provide services to blind and visually impaired consumers (i.e., combined and separate, or blind, agencies) were invited to participate in the study. The agency director listed with the Council of State Administrators of Vocational Rehabilitation (CSAVR) was asked to participate, or recommend a designee to participate, in a survey conducted over the telephone. Twenty-seven agency respondents were the agency directors, 23 respondents were their designees, and one respondent was a direct contact of researchers, rather than being recommended by the agency director. Of the 23 designees, 11 were from combined agencies and 12 were from separate agencies.

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Representatives of combined agencies were asked to report, to the best of their ability, only for services concerning persons who are blind or have low vision. The designees from the 11 combined agencies were generally the directors of blind services. The designees from the 12 separate agencies were the assistant or deputy directors or other high-level administrators.

Procedure

Researchers conducted qualitative interviews with five state agency administrators to determine questions for the national VR agency directors' survey. The survey was piloted with three state agency administrators, and some slight changes to questions were made based on their responses and suggestions. The survey items covered in this report consisted of four questions about pre-ETS and three questions about the elimination of homemaker as a closure status. Survey items about pre-ETS included: how agencies were spending the 15% requirement; the potential impact the 15% requirement had, or will have, on the agency; potential reduction of services to consumers older than age 21 because of the new regulation; and potential difficulty meeting the 15% requirement. Survey items about the elimination of homemaker outcomes included: the impact of the elimination of homemaker outcomes; what services will now be available to homemaker or unpaid family worker applicants and who will serve them; and whether the agency is helping to prepare alternative service providers.

After finalizing the survey, requests were made to CSAVR and the National Council of State Agencies for the Blind to approve and support this research prior to contacting agency directors. CSAVR provided additional input into survey items. An announcement about the national survey was posted in CSAVR's weekly newsletter and emails were sent directly to agency directors requesting participation in the research study. Telephone contacts were initiated when emails did not generate responses. Researchers scheduled times with agency

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representatives to conduct the 30 to 45 minute survey via telephone. Interviews began in October 2016 and ended in June 2017 and were audio recorded. Verbatim transcripts of the survey responses concerning pre-ETS and elimination of homemaker as a closure status were generated from the recorded files.

Data Analysis

Descriptive statistics were used to summarize responses to closed-ended items. For open-ended items, researchers employed directed content analysis and used results to supplement descriptive statistics. Researchers analyzed the transcripts and identified key concepts. As patterns emerged, researchers counted and reported similar responses. Summaries of diverse responses were generated and evaluated for potential applicability or interest. To compare responses of separate versus combined agencies, percentages for each group were calculated. A statistical hypothesis test was not necessary to use with this data, as the data represents a population. Any differences noted between separate and combined agencies are real differences that do not need to be tested for significance.

Results

Pre-employment Transition Services

Agency representatives were asked if their agencies were doing any of a list of seven activities to help spend their reserved pre-ETS funds. Percentages of agencies that are counting each activity are provided in Table 1. The majority of agencies are utilizing all of the activities with the exception of serving youth at a younger age. Agencies that are not serving youth at a younger age typically began serving youth at age 14, or younger, prior to WIOA. Fourteen is the typical age that agencies begin serving youth currently, with 71.1% (n = 32) starting services at that age. A few separate agency representatives reported that they are not able to count services

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to youth at the age they begin serving them for pre-ETS purposes because the general agency in the state would not agree to that younger age.

Agency representatives were asked if they were doing anything else to count towards the 15%, and they provided this information as well as other comments about pre-ETS requirements. Four agencies hired staff who work exclusively with pre-ETS youth, including one agency that hired 20 new transition staff and supervisors after WIOA. One agency has counselors who work exclusively in the schools. Interestingly, one agency switched from having dedicated transition counselors to all counselors serving transition-age youth in response to WIOA. The reason given for this change was to reduce travel time, so that counselors could spend less time in transit and more time with consumers. Nine agency representatives commented on the increase in recruitment and outreach to youth that has occurred as a result of WIOA. Outreach to schools has increased dramatically for some agencies, and one representative indicated her agency is aggressively recruiting students to be involved in transition programs. Only one agency representative reported difficulty getting education partners involved, which presented a big challenge for that agency. Change in recruitment and outreach to students was the principal change associated with WIOA for one agency:

For us the biggest change has been making sure that we are getting out to the schools earlier. We are meeting with clients earlier... I have encouraged them to talk to the VI teachers and start getting in touch with parents with students who are in 7th and 8th grade. Maybe attend some IEP meetings, just to be able to start that line of communication.

Impact of 15% Pre-ETS Requirement

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Agency representatives were asked what impact the 15% requirement has had, or they anticipate it will have, on their agencies. The majority of respondents reported challenges, difficulties, and frustrations with WIOA implementation associated with the 15% requirement. Representatives were not specifically queried about an order of selection process, though 16 mentioned it. Five representatives expressed concern that their agencies would implement an order of selection or that the existing order of selection policy would be more restrictive due to WIOA. An additional state implemented an order of selection policy two years ago in response to WIOA. Regardless of whether an order of selection process was mentioned, many representatives expressed financial concerns in response to the 15% requirement. Several representatives discussed frustrations of agency personnel in trying to meet the WIOA requirements, the implementation of which require a significant amount of time and effort, for administrators, counselors, and other staff. Another often-mentioned challenge was being able to actually spend the 15%, which in part stems from the rigidity of the pre-ETS requirements. Representatives noted that much of what they provided to transition-age youth in the past cannot be counted toward the 15% requirement. As one representative stated:

It's a huge impact because it has been very narrowly scoped. It's 15% for a small subset of services, most of which didn't cost us a lot in the past, other than staff time.

Several agency representatives discussed their concerns about *appropriately* spending the 15% requirement. There was a concern expressed by a few representatives that there simply are not enough transition-age youth with blindness or visual impairment on whom to spend such a large portion of the agency's budget. This representative noted that the agency cannot rely on the general agency in the state to help spend some of the separate agency's 15%. One representative stated that the challenge is to develop new programs on which to spend the money, but noted that

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developing quality programs takes time. One agency representative stated that “*Frankly, we’re having to do things that five years ago I would have said weren’t reasonable.*” Another representative had this to say about appropriately spending the money:

...if you don't have the population to spend it on, you're going to be penalized for not spending it? We're not an agency that wants to waste tax dollars. We consider ourselves to be good stewards of tax dollars, and so we're not going to spend money just to spend it.

Other agency representatives discussed the philosophical change, or shift in focus, caused by the 15% pre-ETS requirement. Agencies are clearly now expected to focus more on transition-age students than they did prior to WIOA, as illustrated by this comment from an agency representative:

I think it's defining a philosophical change in the programs from being a generalist agency. I think it's certainly doing what the WIOA wanted, making us all much more keenly aware of students with disabilities...

Another agency representative stated that the biggest impact for his agency was the shift in focus to pre-ETS and the need to develop new programs for these services to spend more than double what they were previously spending in this area, as well as how to serve everyone else with less money. Another representative stated:

The WIOA flips us from being a primary adult-based service to primarily being a youth service. We've had to really start talking with our staff about: We have to understand Special Education way better than we ever did.

Interestingly, eight agency representatives reported that the 15% pre-ETS requirements did not represent much of a challenge, or change, for their agencies. Six of the representatives

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were from separate agencies and only two were from combined agencies. They reported that their agencies had a significant focus on youth prior to WIOA, and a few stated they were already spending 15% on these services. One of these representatives indicated that the biggest challenge was not in meeting the requirements, but in making sure to accurately categorize and determine what qualifies for the 15% requirement. Another representative indicated that they have been providing many services for transition age youth for a long time, and now they need to start identifying and tracking those services, rather than just considering them part of their jobs.

Positive Aspects of 15% Pre-ETS Requirement

Although not asked about any positive aspects of the 15% pre-ETS requirement, many agency representatives (24%, $n = 12$) voluntarily presented positive aspects of the change. A similar percentage of separate (26.1%) and combined agency (22.2%) representatives noted positive aspects. Some felt there were negative aspects too, but did recognize the value that had come from this requirement. The most commonly mentioned positive aspect was that this change required the agency and its staff to be more creative or innovative, in terms of developing new programs and being creative in providing services to transition-age youth. It also helped some agencies begin serving youth at a younger age:

What WIOA did for us was helped us re-look at what we were doing and gave counselors that permission and motivation to say, "No, no, no. We need to really look at their skills earlier, so that they'll be ready for postsecondary school or for employment." It wasn't that we had a rule that we couldn't work with younger individuals. It was just that there was a tendency not to take applications for younger students.

Other commonly mentioned positive aspects were that it caused the agency to reach out and expand partnerships with external organizations and identify additional students who could

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benefit from services. Some representatives mentioned the value of the real work experiences additional youth were receiving as a result of the requirement. A few representatives talked about the expectation that outcomes for transition-age consumers will be better as a result of the change. One representative summed up his feelings about the change in this way:

So while there are some challenges to it, it also should, over the long term, result in some pretty good things. I'm excited that, in my opinion, pre-ETS will assist many young people and not fall into the trap of not working or not working very much in order to keep benefits.

Difficulty Meeting 15% Pre-ETS Requirement

Agency representatives were asked if they had, or they anticipated having, difficulty meeting their 15% pre-ETS requirement. Two representatives responded that they did not know or were unable to answer the question. A majority of agencies (57.1%, $n = 28$) are experiencing difficulty meeting the requirement. Separate agency representatives were more likely to report difficulty meeting the requirement: 62.5% compared to 52.0% for combined agency representatives. Despite this 15% requirement being a statewide requirement rather than an agency-level requirement, this will still be a challenge for separate agencies if the general agency is not spending more than 15%. One separate agency representative commented that he did not think his agency could meet the 15% requirement if it were required by agency rather than by state. Interestingly, although several separate agency representatives reported that they could meet the requirement with the help of the general agency in the state, one separate agency representative reported that her agency could easily meet the 15% requirement and would try to help the general agency by spending more than the required 15%.

Reduction in Services to Consumer Over Age 21

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Agency representatives were asked whether the 15% pre-ETS requirement had caused the agency to reduce services available to consumers older than age 21. Three respondents were not able to provide an answer to this question. A majority of those who answered indicated that this had not happened: only 22.9% ($n = 11$) responded Yes. A slightly higher percentage of separate agency representatives answered Yes compared to combined agency representatives: 27.3% versus 19.2%. Despite the relatively low percentage of agency representatives who answered affirmatively to this question, almost all people who answered No followed that with an indication that it had not happened *yet*, but was a concern for the future. Some indicated it was too early to know what the impact on services to older consumers would be, while others indicated it will definitely happen in the future as essentially a portion of their budgets were cut. One representative described the impact to adult services in this way:

We haven't needed to do a severe reduction yet, but the counselors are being creative in being able to serve everybody that comes in the door that's eligible. But it's getting to be more and more difficult.

A few agencies described cost-savings methods they have instituted to help offset the reduction in funds for adult services. One agency has put in place fee schedules to help maximize the remaining budget, such as limiting expenditures for postsecondary education. Another agency is reviewing its policies about paying for certain equipment, such as hearing aids, and identifying the most cost-effective method to purchase those that can be used statewide. Another agency has changed their fee schedule for community rehabilitation providers (CRPs) in the state, so that they are paying less for some adult services and more for pre-ETS. Overall, the CRPs will receive approximately the same amount of money but will be compensated more heavily for providing pre-ETS. Two agency representatives discussed identifying other resources

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to cover the shortfall for adult services. One agency was actively working on identifying additional resources and another secured additional funding from its state legislature for state match funds.

Elimination of Homemaker Closure

Agency representatives were asked an open-ended question about the impact of the elimination of homemaker outcomes on their agency. Approximately half of the respondents (51.0%, $n = 26$) indicated that this change would have little or no impact on the agency, with more separate agencies reporting limited impact compared to combined agencies: 58.3% versus 44.4%. A common response from those who indicated limited impact was that their agency had already stopped using homemaker as a closure status, prior to WIOA, or used them sparingly. A few representatives reported that the agency had anticipated the change and had therefore responded prior to the implementation of WIOA.

For some agencies who were utilizing the homemaker closure, this change is a concern, primarily in terms of not being able to serve a group of people who need blindness services to help them become independent in their homes. A concern expressed by several agency representatives was that some people who come to the agency for services do not believe in their ability to work; once these people have the opportunity to learn blindness skills and alternative ways of accomplishing tasks, they realize their potential and decide to pursue employment. The elimination of the homemaker closure may remove that opportunity for these people. One representative described the problem in this way:

There are a lot of people out there that are not getting the array of services that they could previously get when we could make them homemakers. They're not getting, especially, the intensive adjustment to blindness-type training...and, as a result, I would

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say that they're not getting as much of an opportunity to consider their options for employment because a lot of times people would start off as homemakers and then realize they could work. I'd say we have less seniors moving toward employment.

Several representatives reported that the agency has provided training to its counselors about how to talk to new applicants about an employment goal. As one representative stated, they are working with staff to “*make sure they understand how we counsel people towards career goals and looking towards the future.*” Another representative described the training with counselors this way:

So one of the things that we are doing on the front end is really working with our staff to counsel these individuals to help them to consider vocation rather than a homemaker goal because, you know, again, a lot of them change their mind and move into other things and so, we're saying, “Rather than to change your mind later, let's work on doing that career assessment” and we're planning stuff on the front when we do eligibility determination and plan development.

Another representative described their agency’s approach this way:

...if someone comes in and says they need blindness skills training and they don't want to work, we provide a tremendous amount of vocational guidance to allow them to understand that work is possible. My personal feeling is that some of the older people that just want the training and don't want to go to work need to be exposed to their potential.

Some agencies are asking their referral sources to continue to refer people, even if they indicate they do not want to work, in order to have the opportunity to provide counseling to encourage employment. Some representatives reported that the agency would provide initial

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services, such as assessment at the blindness center, to give consumers a chance to learn more about their potential and consider all options before making a decision not to pursue employment. One agency representative mentioned that they make sure to explore all options for self-employment with consumers who indicate a desire for a homemaker goal.

Services for People with a Homemaker Goal

Agency representatives were asked about services that will be available within their states for people interested in a homemaker, or unpaid family worker, goal. An obvious potential source of services for those aged 55 or older is the Older Individuals who are Blind (OIB) program, which is operated through the agency. However, many representatives reported that the OIB program was overtaxed prior to WIOA passage. One person indicated that he anticipated OIB services being “*watered down a little bit*” to accommodate the additional people who previously received VR services under a homemaker goal. Other representatives also commented on the decrease in services consumers will receive in the OIB program compared to the VR program.

For people under the age of 55, common referral locations for agencies are Centers for Independent Living (CILs) or local blindness organizations/CRPs. A few representatives reported that the agency does not currently have anywhere to refer people who do not qualify for the OIB program. Approximately a quarter of representatives ($n = 13$) reported that they have state funds to serve people under age 55 who do not have an employment goal; consequently agency staff would serve them under a different funding mechanism. However, all the agencies that reported having state funds for this purpose indicated that the amount of funds available is very small. A few agencies plan to ask, or have asked, their state legislatures for funds to serve this population.

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Agency representatives were asked whether their agencies are actively helping to prepare alternative providers to serve this population. Twelve representatives did not answer this question as they are not referring consumers to other organizations, either because they are providing services internally (with state funds) or they have not identified an appropriate referral source. Of the representatives who did respond, 38.5% ($n = 15$) reported that they are actively working with alternative providers to help them serve this population. More separate agencies (50%, $n = 8$) than combined agencies (30.4%, $n = 7$) are helping to prepare alternative providers. This is how one agency representative described assistance provided to CILs in his state:

Some of them (referring to the CILs) have jumped in and said that was fine, they can provide those services. Others are feeling as if they just aren't ready for that. We're working with them. We are actively working with those agencies to help them come up with ideas and help them figure out how to do that.

Discussion

This is the first formal study evaluating the perceived impact of WIOA changes, specifically the pre-ETS requirement and elimination of homemaker as a closure status, on VR agencies serving consumers with blindness and low vision. Agency administrators reported on their agencies' response to and experiences with these changes, as well as the perceived current and future impact on their agency. The majority of agency representatives described challenges or difficulties associated with these WIOA changes. Our results support that the pre-ETS requirement has been more of a challenge for separate agencies than combined agencies. A larger proportion of separate agency representatives reported difficulty meeting the 15% requirement compared to combined agencies. Separate agency representatives were also slightly more likely to report that the requirement has caused them to reduce services to consumers who

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are older than age 21. It is important to note, however, that six separate agency representatives reported that the new requirement was not a big change for their agencies as they have traditionally provided intensive services to youth. Only two combined agencies made similar statements.

One of the big challenges to the pre-ETS requirement is the narrow scope of what qualifies to apply towards the 15%, which was mentioned by several respondents. For youth with visual impairments, assistive technology (AT) is vitally important, both to being successful in school and in the labor market after school. AT for these youth is often expensive, and although the school system may provide the needed technology, youth may not be able to use it whenever desired. AT or training in the use of AT would be a valuable expenditure of transition funds for youth who are blind or visually impaired as proficiency with technology is important for achieving competitive employment, yet it cannot count towards the required 15%. Another service that would be particularly important for this population is transportation assistance to attend programs and work experiences. Although the agency can provide this assistance, transportation expenditures cannot count towards the 15% requirement. Youth often need transportation to participate in the pre-ETS programs that are included in the 15%.

It is noteworthy that, without being asked, almost a quarter of respondents mentioned positive aspects of the pre-ETS requirement. Many agency representatives indicated that this regulation has compelled them to be creative and innovative in their service delivery for youth, and it has resulted in many new programs being offered to youth. The overarching message about the positive aspect is that it provides an opportunity to help youth more than the agencies have in the past. Several agencies have identified additional blind and visually impaired youth who are eligible for services through their expanded outreach efforts. Some respondents were

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particularly optimistic about the potential positive impact of the additional services being provided to youth because of the pre-ETS requirement, with the thought that the youth will have improved opportunities for competitive employment and may not need VR services when they are older.

Reduction in services to consumers over the age of 21 has been a concern because of the pre-ETS requirement. Most agency representatives reported that this has not happened – yet. Virtually all agencies acknowledged that this is a concern for the future, and some anticipated that this will happen in the future. For separate agencies, who exclusively serve a population that primarily consists of people of older ages, the pre-ETS requirements are more likely to have a negative effect on those over age 21. It is important to continue to monitor the impact of this regulation on adult consumers with visual impairments served by separate agencies.

Although the pre-ETS requirement has been more of a challenge for separate agencies, the elimination of the homemaker closure status was less likely to impact them. Separate agencies were more likely to report that they had eliminated homemaker closures or used them very sparingly before WIOA. Conversely, many separate agency representatives considered the homemaker closure an important goal under which to provide services to consumers, and they expressed concern about taking away services for this population. Many combined agency representatives also expressed concern about eliminating services for this population. In some states, independent living services are readily available for people who do not want an employment goal. However, in other states there are not viable options for these services, with the exception of the OIB program for those 55 and older, which is already overextended in many states. When consumers are not yet 55 years of age and do not have competitive employment as a goal, the primary option for service is through the CILs. In anticipation that CILs are not

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prepared to serve this population, WIOA final regulations suggested that VR agencies provide CIL staff training and technical assistance. Yet at the time of this survey most agencies were not providing this service. If VR agencies received funding for providing this service to CILs, potentially more could receive this support.

Some VR agencies receive funding from their state budgets to provide services to people with vision loss who do not want to pursue a vocational goal. Agencies that do not currently receive such state funding may want to pursue this as an option. However, many states are experiencing financial concerns which may preclude those states from providing additional funds in a new area such as this. Additional research to investigate how to maximize the resources for people with a homemaker goal appears indicated.

Many agency representatives indicated that their agencies are doing what the WIOA regulations recommended, in terms of encouraging people who initially do not want to pursue employment to consider it as an option. Because consumers often change their minds about their vocational goals after learning even some basic blindness skills, several agencies allow the person to decide on their goal after they receive assessment. VR agencies can provide some services during the evaluation period so that consumers with newly acquired vision loss or deteriorating vision have the opportunity to become better adjusted and learn basic skills that might improve their confidence in the ability to continue or pursue employment. Research conducted in the United Kingdom found that people are less likely to pursue employment within their first two years of vision loss (Bruce & Baker, 2005).

Conclusion

The implementation of the new WIOA regulations has been challenging for agencies, as most major changes tend to be. The greatest challenge described by agency representatives to the

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questions posed in this survey was appropriately spending the 15% required funds on pre-ETS. Overall, agencies seem to be adapting well to these major changes and many are enthusiastic about the positive benefits for students with disabilities. A big concern, and an unknown impact at the time of our survey, is the possible reduction in services to people over age 21. This is an important area of focus for future research with consumer data from the Rehabilitation Services Administration Case Service Report (RSA-911 data). Unfortunately, RSA-911 data is not currently available. Without this data, it will not be possible to empirically evaluate the effects of the WIOA changes. It is important that the RSA-911 be made available so researchers can determine the impact of WIOA regulations on VR service delivery and consumer outcomes.

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Table 1

Percentages of Agencies Using Specific Activities to Help Spend Pre-ETS Funds

Activity	Percent	Frequency
Counting staff time towards this dollar amount	90.2	46
Establishing new programs for students (conducted by VR staff)	82.4	42
Providing new programs for students (conducted by external organizations)	98.0	50
Increasing the number of services provided to students	84.3	43
Increasing the amount of services provided to students (duration, intensity, frequency)	84.3	43
Providing additional training for staff who work with students	80.4	41
Serving students at a younger age than you did previously	45.1	23