2021

Model State Plan for Vocational Rehabilitation Services for Deaf People

CSAVR

Table of Contents

Introduction

The 2021 CSAVR Model State Plan (MSP) for Vocational Rehabilitation Services for Deaf People serves as a foundational resource for the field.

Employment and career outcomes for deaf, hard of hearing, late-deafened, and deafblind adults (collectively, deaf in this document) are far below their hearing peers. Longstanding systemic barriers continue to require proactive, comprehensive approaches to improving access for deaf clients. This MSP gives essential guidance to state vocational rehabilitation (VR) programs in the structure, services, and supports needed to close the employment gap.

This MSP provides:
- High level summary of critical issues and action items for VR leadership
- Content for training and professional development for VR professionals

This guide was developed with the assumption that the audience is largely familiar with the core tenets of VR, the Rehabilitation Services Administration (RSA), and the Workforce Innovation and Opportunity Act (WIOA). It is a deep dive into how to provide meaningful services for deaf people and to improve employment outcomes for this population. States are encouraged to adapt and adopt state-specific information for their own state plans, as needed.

Defining Deaf

This document uses the umbrella term "deaf" to refer to deaf, hard of hearing, late-deafened, deafdisabled, and deafblind categories within RSA (page 26). Please refer to further information from the National Association of the Deaf (NAD) on the history of and considerations in different usages.

Suggested Citation

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Deaf Professionals Network Standing Committee

Bedarius Bell, Jr. (Alabama)
David Hankinson (Oklahoma)
Duane Mayes (Alaska)
Kathy West-Evans (Washington)

Deaf Professionals Network Reviewers

Some reviewers wished to remain anonymous.

Emily Borgel (Missouri)
Cecil Bradley (Florida)
Lori Cielinski (Wyoming)
Kevin Earp (North Carolina)
Amanda Friend (Kentucky)
Christine Fuller (New Mexico)
Russ Goddard (Pennsylvania)
Heidi Henaire (Connecticut)
Sheila Hoover (Oregon)
Sue Kay Kneifel (Arizona)
Elise Knopf (Minnesota)
Crystal Miller (West Virginia)
Terry Morrell (Maine)
Mary Nunnally (Virginia)
Michael Papili (Delaware)
Christina Pean (Illinois)
Isabel Ramos (Hawaii)
Don Redford (Washington)
Shawn Tulloch (Montana)

Editing and design team: Stephanie W. Cawthon, Cassie Franklin, Tracey Bradnan, Emily Egan, and Christine Hahn

Top Priorities in Vocational Rehabilitation Services for Deaf People

Successful employment and independent living outcomes for deaf* people require an intentional and tailored approach to vocational rehabilitation (VR) services. Agency leadership can help close the employment gap for deaf people with these proactive strategies.

Prioritize designated staff.
Deaf-specific VR knowledge is critical for effective service provision, especially the State and Regional Coordinators of the Deaf.

Increase eligibility of services.
Deaf applicants currently face longer waiting lists for services than their peers.

Recognize ableism.
Be a model of a positive workplace culture. Include deaf staff in all levels of leadership within your agency.

Invest in current technology.
Accommodations options are constantly evolving, allowing for greater accessibility for deaf clients and staff.

Prioritize direct communication.
Develop internal resources to support a range of communication modality preferences.

Strengthen business partnerships.
They are a lifeline for successful career pathways in competitive, integrated employment.

Expand professional development.
Interagency and cross-state networking activities are critical to mentorship and career-long success.

Value ongoing community engagement.
Keep open lines of communication with a broad range of stakeholders.

Embed Pre-ETS funding opportunities.
Seek collaborations with secondary programs to leverage flexibility across agency activities.

Leverage the new Model State Plan for agency improvement.
Use it as an opportunity to reflect on your local state context and as a tool for planning, training, and implementation.

DPN

CSAVR Council of State Administrators of Vocational Rehabilitation — Advancing Disability Inclusion & Workforce Innovation

These priorities are based on recommendations within the 2021 Model State Plan report developed in collaboration with the Deaf Professional Network at Council of State Administrators of Vocational Rehabilitation and published at www.csavr.org.

* The umbrella term "deaf" is used to refer to deaf, hard of hearing, late-deafened, deafdisabled, and deafblind.

ABOUT

- **Demographics: Deaf People and VR Services**
- **Historical Context of the Model State Plan**

Demographics: Deaf People and VR Services

Tip: There is a wide range of deaf 101 resources available for anyone new to counseling deaf clients, and working with deaf clients through transition, in particular. In addition to reading this MSP, we encourage you to seek out perspectives from deaf people about ways to create a deaf-centered client experience.

Current Employment Status Data

Deaf people continue to be under- and unemployed at greater rates than their hearing peers. Employment rates have not increased from 2008 to 2017 (these data were collected before the impact of COVID-19). Deaf people with disabilities face even greater barriers and have lower employment rates, with the greatest barriers for deaf people that may need support with independent living skills and self care.

Tip: The majority of the data reported here were analyzed by the National Deaf Center (NDC). See their website for reports and infographics and current data on employment for deaf people in the US.

Data Point: Overall only 53% of deaf people ages 25-64 were employed in 2017, compared to 76% of hearing people – an employment gap of 23**%. Source: NDC**

Because such a large proportion of deaf people have additional disabilities, up to half, the employment figures for deafdisabled people are critical to understanding the overall workforce participation for deaf people. For example, in 2017 only 35% of deafdisabled people reported being employed, compared to 72% of deaf people without disabilities — an employment gap of 37%. Deafdisabled people were also significantly more likely to work part time than full time. The disparities only grow when considering intersectional identities of race and gender (addressed below).

Media Mention: Review of key issues and employment statistics for deaf people. (NDC)

A deeper dive into employment data reveals an important trend in addition to employment rates. A huge percentage, 43%, of deaf people have **opted out of the labor force**, more than double the rate of hearing people. This does not mean they are officially unemployed according to the federal definition. This figure represents those that are not actively looking for work. Yet the low labor force participation rate is not due to a lack of interest in employment — data suggests deaf people are more likely than hearing people to be actively looking for work.

It is more likely that deaf people are opting out of the workforce due to a lack of options. Although, like their hearing peers, deaf people are frequently hired to do low-level jobs, they have a harder path towards career development and advancement.

Deaf people also get burned out facing countless systemic barriers. It takes a lot of energy to navigate a hearing world with few accommodations, considerable bias, and low expectations. Bypassing deeply familiar challenges and biases in the workplace may be why deaf people are also more likely to be self-employed (11.6% vs. 9.8% of hearing people) and business owners (4.1% vs. 3.8%).

Thought Question: Emerging evidence shows that COVID-19 may affect both hearing and balance. What can VR agencies do to support clients who may have late-onset hearing loss?

Thought Question: How do these employment outcome data affect how you engage with deaf clients?

Deaf Identities

There are some historical categories and labels within the deaf community that are still used by some members of the population. For example, the deaf community, with a primary language modality in sign language and interaction as a cultural group, is a different way of being deaf than someone who may identify as hard of hearing, who utilizes hearing aids, or may not have close relationships with other deaf people.

Media Mention: The popular movie "Sound of Metal" tells the story of a late-deafened drummer (National Public Radio)

Late-deafened people are typically those who acquired hearing loss later in life, even into late adulthood. Deafness, a term often used throughout RSA policy, is less used within deaf education, in the workplace, or in the deaf community.

However, there is also an increasing understanding that a deaf identity can rarely be captured by a single word. Even within a single person's life journey, or even in a single day, they can identify with and describe themselves in a different part of that deaf umbrella.

The concept of communication modalities is also evolving, with an increasing emphasis on the interplay between the individual and the context. The accessibility of one's environment, communication partners, and adaptation of different technological tools all come into play when a person identifies as Deaf, deaf, hard of hearing, late-deafened, deafblind, and so forth. Intersectionality with other identities also affects choices and preferences around communication.

When thinking about what defines a deaf person's experience, you might be tempted to begin by asking about how much a person can hear (or for deafblind, can hear and see). In reality, knowing the level of decibel loss, or what is displayed on an audiogram, gives you very little information about how a deaf person navigates the hearing world. Instead, the **quality of access to communication** is a central part of working with deaf people, particularly in the context of VR services that support accessible learning environments and the workplace.

Media Mention: Advocates such as Haben Girma are changing the landscape of possibilities (National Public Radio)

Medical and legal systems often use labels and categories that are only roughly aligned with the lived experience of deaf people. The codes used in the VR system reflect the duality of both the variability within the deaf population and the different ways that people communicate.

Media Mention: The author of *El Deafo* shares how she represents communication access and disability as a super power in her graphic novel (National Public Radio)

RSA Primary Disability Codes

In RSA Primary Disability Codes (page 26), the categories for deaf people focus mainly on the degree and type of hearing loss, use of auditory or visual modality for communication, and identity as a deafblind person.

Yet as a lived experience, there are many different ways to be deaf. For example, someone born deaf into a deaf family will have a very different experience than a late-deafened veteran who loses hearing in one ear due to a combat related explosion. The technology tools and access strategies that support communication for each person may very well overlap.

It is essential to ask the deaf person about their language preferences, communication approaches, and home, school or workplace characteristics to know what support works or does not work for each person. Intersectionality with race, gender, and access to economic and social capital also have an impact on the VR experience.

03. Deafness, Primary Communication Visual. A person who may primarily utilize sign language as both their expressive and receptive language modalities, in addition to visual forms of spoken languages (e.g., texting, captions). A person in this group may identify with membership in the Deaf community.

04. Deafness, Primary Communication Auditory. A person who may primarily utilize lip reading, speech, or hearing amplification devices, and do not also use sign language. Included in this group are adults who acquire hearing loss later in life, or "late-deafened". This group is often associated with hearing loss that comes with aging, and may not identify with membership in the Deaf community.

05. Hearing Loss, Primary Communication Visual. A person who has some access to sound, with or without amplification. Included in this group are people who utilize visual language modalities similar to those in code 03, but who may have more residual hearing.

06. Hearing Loss, Primary Communication Auditory. A person who has some access to sound, with or without amplification. This group may be similar in communication modality as those in code 04, but who may have more residual hearing.

07. Other Hearing Impairments. (Tinnitus, Meniere's Disease, Hyperacusis, etc.) A person who has some reduced access to sound but who does not otherwise use amplification or visual communication strategies. This can include ringing in the ears or other sensitivity that is related to hearing but does not otherwise relate to communication.

08. Deaf-Blind. A person who both has reduced access to sound (consistent with above codes) and is blind or has low-vision. These conditions can be congenital (e.g., Usher Syndrome) or progressive, and do not need to have been acquired at the same time for this code to apply.

Tip: Due to complications in RSA 911 coding, it is possible that deafblind people are under-counted. Be sure to ask questions to determine whether the client may qualify for Code 08, instead of a primary code as deaf or hearing loss and a secondary code as someone who is blind or has low-vision (or vice versa).

09. Communicative Impairments (Expressive/Receptive). A person who experiences difficulty either processing or expressing language via either auditory or visual modalities, or both. There are a range of characteristics including (but not limited to) auditory processing, sign language processing, understanding vocabulary, and grammar.

Disability Significance Code

Record the appropriate code value to indicate whether the individual is classified by the agency as an individual with a significant disability or a most significant disability. If an individual is receiving Social Security benefits they must be classified as an individual with at least a significant disability and may be classified in a more significantly disabled category consistent with the VR agency's approved criteria.

Individuals are to be coded as most significantly disabled if they meet the VR agency's definition of most significantly disabled using criteria consistent with the statutory definition of most significantly disabled described in section 101(a)(5)(c) of the Act as amended.

Code Description

- 1 Individual has a significant disability.
- 2 Individual is most significantly disabled.
- 0 Individual has no significant disability.

States vary widely in the extent to which deaf people are coded as a 1, 2 or a 0. States also vary in the extent to which there is a wait list or an Order of Selection (OOS) procedure in effect that prioritizes people rated as having more significant disabilities receiving services before others with less significant disabilities. Further, some states may have more than three categories for OOS procedures.

The perception that deaf people may not have a most significant disability, particularly if the person is hard of hearing or uses speech, can be detrimental and inaccurate representation of a person's need for and eligibility for VR services. In reality, even hard of hearing people could qualify as someone with a most significant disability if they have several functional capacities affected and are likely to need VR services for a significant period of time. Close assessment and understanding of a person's function within training and employment contexts by VR staff familiar with deaf people is therefore essential making these severity determinations.

Additional Disabilities

Deaf people with co-occuring disabilities represent at least half of the population, a rate far higher than their hearing peers.

These estimates have increased over the past decades as the following has come to light:

- Long term cognitive and socio-emotional impact(s) of early language deprivation;
- The need to develop culturally appropriate measures for identification; and
- Examining the complexity of providing supports not only for people with sensory disabilities, but also learning disabilities and mental health, to name a few.

The majority of deaf education research does not separate out how many people are deaf who have additional disabilities, or what kind, let alone take an intersectional approach to identification and services.

For example, available estimates indicate that the most prevalent category is learning disabilities, although at higher rates overall than for hearing people. Some fields are still emerging, such as the identification of specific language impairment.

What many professionals do not realize is that mental health conditions such as anxiety and depression are at far higher rates in the deaf population; estimates are that deaf people are three times more likely to experience clinical levels of mental health conditions.

Reports of additional disability diagnosis are likely to be less reliable for deaf people than for their hearing peers. Some additional disabilities, such as being on the autism spectrum, are more easily detected when deaf children have access to full language models and are not exposed to the risk factors typically seen in the overall deaf population. Signs of a high quality disability identification and psycho-educational assessment include assessment by someone familiar with deaf youth, multiple measures, and a thorough case study approach. (link to NDC course on this topic).

See page 26-27 of the RSA manual for information on additional codes for co-occurring disabilities.

Data Point: Over 94,000 deaf people contacted VR about services between 2017 and 2018, accounting for almost 8% of all the VR case files. Among deaf people, 5% were deafblind, 31% deafdisabled, and 64% had no additional disabilities. This is an under-representation of deafdisabled clients relative to the US population. Source: NDC

Thought Question: What do you think would help improve the rates of deafdisabled applications for VR services? How can we reduce barriers to services, such as the level of paperwork involved?

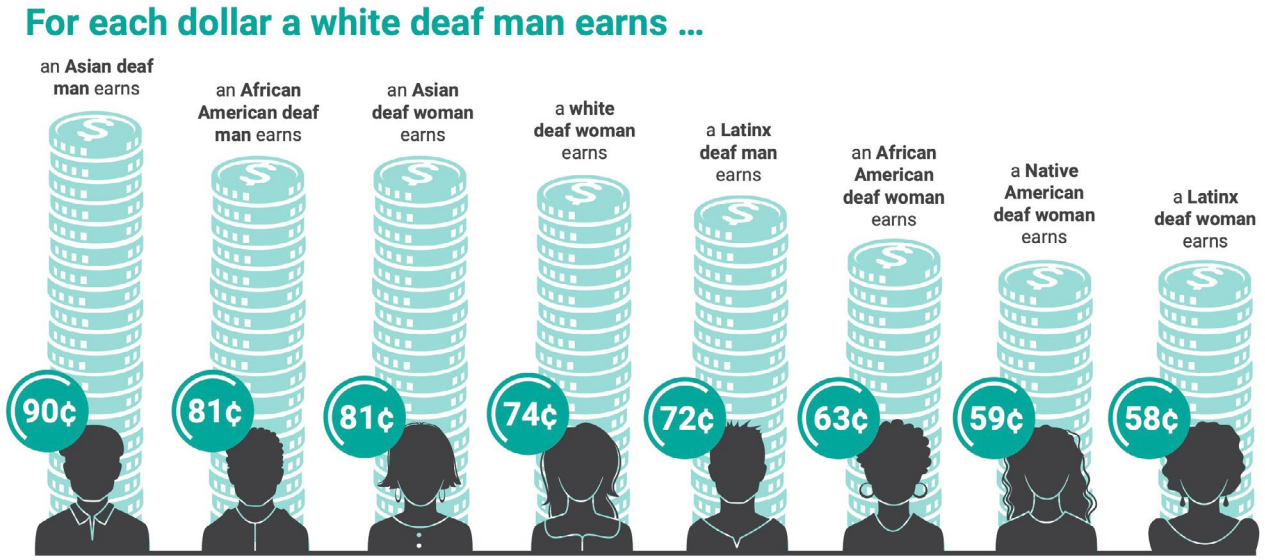
Intersectionality of Race and Ethnicity

Data Point: Nearly 45% of people who applied for or received VR services were Black, Indigenous, or People of Color (BIPOC). Yet among deaf people who contacted VR, only 36% were BIPOC. Across race and ethnicity groups, the group of deaf people least represented compared with other disability groups are Black deaf people, who were only 15% of deaf people compared to 23% of hearing people in the VR database. Source: NDC

Oppression and discrimination is cumulative within the US. In addition to ableism, deaf BIPOC clients often experience racism. White norms and whiteness thus have a cumulative effect on deaf BIPOC. Deaf people who are White experience, on the whole, greater access and opportunity than deaf members of BIPOC populations.

As a federally funded program, state VR services may not discriminate against any individual in the United States on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief. The application process used by VR to determine eligibility for services, any subsequent services and the entire VR process are subject to these non-discrimination requirements.

Understanding intersectionality of race and ethnic identity with deaf identity is critical to understanding the variability in experiences in the deaf community, particularly as they relate to the mission and goals of VR. **This graphic from the National Deaf Center captures the extent of the disparities in earnings.**



Source: NDC

Addressing disparities in the deaf BIPOC community is an important part of work both within VR and across the entire local, state, and federal systems. Perspectives from and networks of deaf clients with intersectional identities are a critical bedrock from which to form layers of support. From leadership to planning to recruitment, making intersectionality visible needs to be integrated into how data are collected and how services are provided in a way that supports the BIPOC community.

Media Mention: Using social media and the nuances of Black American Sign Language are explored in Black, Deaf and Extremely Online (New York Times)

Thought Question: What collaborative steps can support recruiting BIPOC to enter the field?

Multilingual Learners

The US is home to many different cultures and people from many different language backgrounds. We are a home of immigrants and the people that we serve may use a language other than English as their primary spoken language.

Media Mention:
Being Deaf and Latino (National Public Radio)

Deaf multilingual learners (sometimes referred to as English Learners or people with English as a Second Language) are increasing both in prevalence and in diversity within the deaf population, with an estimated 25% of deaf children in the U.S. from multilingual homes. For young people who are enrolled in public education, federal law includes requirements surrounding screening and service provision for multilingual learners, whether they are enrolling in kindergarten or as adolescents.

For deaf young people, there is a need to coordinate screening and assessment of both possible language deprivation due to lack of language access, in addition to their multilingual experiences.

Tip: English language development may be complex for recent deaf immigrants and require utilization of extended secondary grade education such as 18-21 transition programs.

Thought Question: What other identities are a part of a true intersectional understanding of the complexities and diversity of services that support deaf employment? Consider this video series on resources for disabled LGBTQ people as further context.

Historical Context of the Model State Plan

This current version of the MSP comes with a rich and long history. There have been five previous editions: 1973, 1978, 1980, 1990, and 2008. The impetus for this sixth revision of the MSP comes from a number of factors, not limited to but including:

- Many changes due to the Workforce Innovation Opportunity Act, P.L. 113-128, signed into law in 2014, amending the Rehabilitation Act (1973), Workforce Investment Act (1988), Wagner-Peyser Act, Food and Nutrition Act (2008), among others.
- Recognition of the need to ensure accessibility of VR workplace for deaf counselors.
- Reduction in State Coordinators of the Deaf and other designated senior leadership.
- Reduction in pre-service training programs with a specialization in serving deaf people.
- Rapid proliferation of technology tools and communication platforms.
- Increase in deaf consumers on waiting lists or not receiving services.
- Shift in the field to a deaf-centered perspective and client-centered practice.
- Pending retirements of many active VR professionals with experience with deaf clients.
- Significant impact of the COVID-19 pandemic on business operations, as well as potential future increase in clients with long term hearing loss due to COVID-19.

Tip: A full review of the original context of the MSP and historical data regarding VR data and deaf people are available in the 2008 Model State Plan.

A newly constituted group within CSAVR, the Deaf Professionals Network (DPN), formed the core advisory group for the initial development and production of this document. The DPN engaged with an external editor, Dr. Stephanie W. Cawthon, to shepherd the management, revision, and completion of this process.

DPN members participated both in formal surveys and informal dialog regarding MSP priorities and opportunities. Members also contributed components to the draft sections and conducted review of materials as part of the revision process. External organizations were invited to review and provide input towards the end of the development process. Design and editorial contributions were added to improve the accessibility of both the layout and the text.

The format of this MSP is also a radical shift from that of the previous documents. A downloadable PDF of all content as of December 2021 is available, as needed, for offline and printed use. However, in response to increasing emphasis on web-based, searchable, user-friendly, and just-in-time need for information, this MSP is designed to be navigated in an online format. This includes:

- Concise information developed in a modular format
- Hyperlinks to outside resources and materials
- Special sections: Tips, Data Points, Media Mentions and Thought Questions
- Searchable content and easy-to-share references

This MSP is meant to be a living, easily editable document — to be regularly updated as information changes and technologies evolve. As such, it is owned and moderated by the DPN.

FRAMEWORKS

- **Systemic Barriers to Employment**
- **Deaf Centered Framework**
- **The VR Process and Deaf Clients**

Systemic Barriers to Employment for Deaf People

Most initiatives to reduce the education and employment gap for deaf people are focused on interventions for the individual deaf person. Yet often these efforts feel like putting on a band aid because they only address short term needs. Equitable opportunities for long term, sustained success for deaf people in placement, retention, and career advancement have long been out of reach. Systemic barriers need to be addressed in order to reduce the employment gap for deaf people.

Accessibility: A Central Challenge

Systemic barriers typically stem from one central challenge: accessibility.

Access to language.
Access to language is the first barrier often discussed in the field. For those born with hearing loss, early language deprivation can have lifelong effects. For many years, parents of deaf children may not have known about their child's hearing loss until well into early childhood. This led (and can still lead) to significant delays in language development and later academic and socioemotional development in deaf children.

We know that robust models of language and strong communication during infancy and early childhood is a critical part of cognitive development, laying the foundation for later learning. More recent initiatives such as the Early Hearing Detection and Intervention Act (reauthorized in 2017) seek to ensure identification of hearing loss at birth (or soon after) as well as support to parents. For those with later hearing loss, this change often requires a shift to visual language and communication strategies, ones that take time to learn and require changes from family, coworkers and friends, changes that can be very slow to occur.

Tip: Hands and Voices offers a family-centered approach to networking and support. The local state chapters may have resources for your deaf clients and their families that focus on communication in the home.

Access to information.
A more subtle but important extension of barriers is access to information, which can be affected by access to language and communication. Often referred to as "incidental learning" in school or, for adults at work, "the water cooler syndrome", people informally share information in spaces and places outside of direct instruction. Deaf people often feel like they are operating on less contextual information than their peers, and rightly so. Deaf people commonly complain that if there is something missed in a meeting or in a dinner table conversation, hearing peers and daily members will say "oh never mind" or "I'll fill you in later", depriving the deaf person of access to the content, tone, and often important subtle cues that are included in these conversations.

Together with language deprivation, information deprivation can contribute to experiences of trauma that, if not addressed, can have lifelong and compounding effects on socioemotional development and mental health.

Media Mention: Access to Information can be a matter of life and death, particularly in interactions with law enforcement. (National Public Radio)

Access to skilled professionals.
This is a long-standing issue, both within VR and in related fields. It takes time for a professional to build familiarity with deaf people and, because deaf people are so heterogenous, strategies that may be a good fit for one person will not be for another.

The availability of skilled access providers is also a challenge. Interpreters, speech-to-text, audiologists, educators, therapists, doctors, social workers, and yes, even VR professionals with both the cultural and contextual understanding of deaf people can be few and far between. This is particularly true when you consider the under-representation of POC in professional fields and the diversity of the deaf population.

Media Mention: Advocates for Deaf and Blind and Netflix New Playback Features (National Public Radio)

Skilled professionals are also often siloed from each other and can experience burnout and fatigue associated with the lack of robust professional support. This is not just a supply chain issue, either: Generations of deaf people who have not had opportunities to build their careers are opportunities lost for future generations to have deaf professionals who can bring a deaf-centered perspective to their work.

Tip: Telepractice is a growth area in connecting deaf people with skilled professionals.

Thought Question: Where do you see opportunities to promote the development and mentorship of skilled professionals, both deaf and hearing, to work in the VR field? What types of formal training, hands on experiences, or other learning experiences may be available?

Access to positive role models, social contexts, and attitudes.
These are the relational and socioemotional parts of access that cut across all domains. For example, deaf people may not have access to peer groups that can share social capital and support each other in navigating hearing training and workplace contexts.

Negative attitudes about deaf people, audism, and ableism are all embedded throughout our culture. Societal messages lead us to think of deaf people (and disabled people as a whole) as broken, less capable, and "something to be accommodated". Experiencing these negative attitudes and lowered expectations can drain deaf people of their self worth, leaving less energy available to persist through the work of obtaining a job and advancing one's career. Access to a supportive peer network, together with opportunities for self determination, lay the foundation for resilience and quality of life.

Media Mention: Deaf musicians show we cannot make blanket assumptions about what deaf people can do. (National Public Radio)

Access to opportunities.
Opportunities for deaf people can be limited as a result of ongoing, compounding effects of inaccessible environments described above. Training opportunities, internships, jobs, and careers are often rooted in a hearing way of being and can be very difficult to navigate as a deaf person without a change in both attitudes and business practices.

Media Mention: 14 deaf people who changed the world. (AI Media)

One key role of VR is to bridge the gap between deaf people and accessible opportunities for success in training and in the workplace. Businesses and employers are looking for job candidates that are strong problem solvers, think independently, communicate well with colleagues, and maintain a positive and constructive attitude. Yet these skills do not magically appear on their own, particularly when individuals have faced a life-time of audism and discrimination. Understanding the legacy and ongoing impact of systemic barriers is critical to directly re-shaping expectations and bringing resources to deaf people to be prepared for the workforce.

High stakes assessments are often part of how potential employees demonstrate their competencies and qualifications for employment. There continue to be barriers to accessible certification and licensure exams for deaf people. Some issues include prohibitions against interpreters during licensure exams and other accommodations challenges. VR can identify these barriers and offer solutions to address concerns such as confidentiality and score validity.

Thought Question: COVID-19 has, in many cases, resulted in massive shifts in how and where people work. What new opportunities are there to expand access for deaf people to communication, skills professionals, and career pathways?

Tip: Lack of awareness of systemic barriers in the first place is, arguably, the biggest impediment to progress. VR professionals need an understanding of the longstanding issues that deaf people face. Furthermore, VR staff can play a lead role in dismantling systemic barriers by participating in collaborative efforts across both public and private partners.

Deaf Centered Framework

A deaf centered framework for VR services is necessary for the success of deaf people in the workplace. A deaf centered approach to services in the field as a whole builds upon the need to address systemic barriers, understand the demographics of deaf population, and develop an overall client-centered approach that is already a part of best practices in VR.

Key pillars to a deaf centered approach include:

- **High expectations and long term success.** Fight the tyranny of low expectations by being mindful of ableism and audism (including internalized audism) and seeking out opportunities for deaf people to experience success as equal members of society.

- **Prioritize direct communication.** Use direct communication modalities over mediated communication. This includes using technology to increase accessible communication and intentional design of learning and workplace environments that integrate fully accessible face to face and online interactions and engagement.

- **One size does not fit all**. Always start with foundational questions about fit, preference, and flexibility across contexts when thinking about programs and support. Ask your deaf client to think about options instead of making assumptions about what they want or what will work for them.

- **Build community and social connection.** Stay engaged with the deaf community and be aware of what social connections may benefit individual deaf clients. This may be in the form of mentors, role models, peer groups, skilled therapists, and other socioemotional supports.

- **Focus on self-determination and personal agency.** Many deaf people have been disempowered through low expectations for their success, an excess of "helping" by others, and being perceived as incapable. Structure and scaffold opportunities for building self-determination skills — including self-advocacy and autonomous decision making — throughout the deaf client's engagement with VR services.

- **Shared responsibility for accessibility.** Model and advocate for a systemic approach to access that does not leave the deaf person as the one with sole responsibility for access planning and implementation. To the greatest extent possible, think about access in the **design** of VR services (and ask vendors to do the same). For example, caption all videos and media in their development. Be sure to have a system for accommodations requests that includes options for preferences, then collect meaningful feedback for future decision making.

- **Deaf leadership and deaf representation.** Last but not least, engage with deaf leaders and community members when making policy decisions about deaf people and when gathering input (and please gather input) on the quality and type of VR services for deaf youth. Recognize the challenges of developing and being a deaf leader within a dominantly hearing culture. Consider intersectionality in representation and in experiences as well. Within VR operations, create a deaf centered workplace that is a model for vendors and business.

The Vocational Rehabilitation Process and Deaf Clients

VR has a longstanding history, now over 100 years, of supporting disabled people in their pursuit of access to the workplace. The Rehabilitation Act of 1973 and subsequent amendments legislatively defines the VR process and the provision of services to eligible clients. The Act also serves as a guide for rehabilitation administrators and counselors in their efforts to meaningfully serve individuals who apply for services through the state-federal VR program.

This overview of the VR process and deaf clients emphasizes that deaf people are not all the same and that a deaf centered approach is industry standard for quality VR services.

Media Mention
100th Anniversary and History of VR videos. (RSA)

Client Identification and Referral Development

In many cases, potential deaf clients and their families are unaware of VR services and supports. Referral development activities such as outreach, public relations, and information sharing with new and existing referral sources can help facilitate appropriate referrals to VR. Key stakeholders are found throughout the community.

Plan for systematic and regular outreach to school personnel, in particular, as deaf students may arise who are eligible for VR services even if they are not served by an Individualized Education Plan (IEP) in K–12 or by the Services for Students with Disabilities (SSD) in postsecondary settings.

Other ways to connect with deaf people who may benefit from VR services can be via members of the medical and health care professions, hearing aid and assistive technology dispensers, and interpreting agencies.

Within the business community, unions, human resource personnel or employer assistance programs can be particularly helpful for identifying potential VR clients who have acquired hearing loss as adults and/or are experiencing progressive hearing losses and struggling to perform their jobs.

Finally, community agencies and programs focusing on serving individuals from different cultures, languages, and nationalities who may not be equipped to serve those who have a hearing loss coming in for assistance.

Eligibility

One message that deaf clients often need to receive is that VR is an eligibility program, not a program that provides entitlement services such as those provided under the Individuals with Disabilities Education Act (IDEA) or services received through the Social Security Administration.

Media Mention: Explanation of VR eligibility **and services**. **(Illinois workNet)**

To receive VR services, a deaf applicant must be determined eligible based on (a) specific criteria that the individual has a physical or mental impairment that is a substantial impediment to employment, (b) requires VR services to become employed, and (c) can benefit from these VR services in terms of an employment outcome.

Presumptive Eligibility

The intent of presumptive eligibility is to use existing data and information to provide more timely services to individuals who have already met stringent eligibility requirements set by the Social Security Administration (SSA).

Any individual who has been determined by SSA to be eligible for SSI or SSDI because they are blind or disabled is presumed eligible for VR services and considered to be at least significantly disabled. This means any client with a hearing loss who applies for VR services and is also a recipient of SSI or SSDI benefits will become eligible for services based on that information.

VR agencies are mandated to make eligibility decisions within 60 days of the referral date. Thus, a vital role for VR counselors involves obtaining all applicable diagnostic and case finding information, analyzing it as a whole, and determining what specific problems or impairments will interfere with the deaf client's ability to get or keep a job.

This may be daunting for VR professionals without prior experience working with deaf people. However, this phase of the planning process is especially important because, by law, VR services can be provided for only those disability related limitations that specifically impact on the client's employment or ability to gain employment.

In determining eligibility for a deaf client, minimum information needed includes:

- Nature and level of hearing loss.
- Possible vision loss or other disabling conditions.
- Communication mode and language preference (including amplification and communication strategies used).
- Assessment of communication functioning in various environments, such as in one to one or small and large group situations or via telephone (or telecommunications).
- Personal and psychological adjustment.
- Family, social, and work relationships.

Accurately obtaining and considering such information is often helpful for counselors during the process of eligibility determination for diverse deaf clients.

Combined or Separate Agencies for Blind Clients

The Rehabilitation Act allows states to establish a combined agency serving all individuals with disabilities or a separate general agency and a blind agency. As a result, there is confusion within some states as to who will serve the clients who are deafblind. Kentucky is one state which has established a formal agreement between the general VR agency and the blind agency to serve this population.

There is a need for state VR agencies, whether combined or separate, to establish a formal means of serving this population's unique communication and service needs. In addition, states should explore setting up formal agreements for support from their regional representative of the Helen Keller National Center (HKNC). Oftentimes the HKNC regional representatives are a wealth of information, resources, and opportunities for training for staff.

Eligibility and Order of Selection (OOS) for Services

Data Point: Approximately 7% of all people who applied for or received VR services have been on a waiting list. A higher percentage of deaf people (9%) were on or had been placed on a waiting list than their other disabled peers. Source: NDC

If a VR agency cannot serve all eligible clients, then they must, by law, enter into an OOS process. Under this process, clients who are determined to be the most significantly disabled must be served before other eligible clients. It is up to the individual state agencies to determine how they will prioritize, define, and apply criteria to designate eligible individuals as "most significantly disabled."

As more state VR agencies enter into an OOS, there is a concern about deaf clients and their placement on the waiting list. Quite possibly the mandate to serve clients who are most significantly disabled before other eligible clients may be incorrectly interpreted to mean that only persons who are deaf and use sign language would qualify as most significantly disabled under an OOS.

Tip: Degree of hearing loss and communication modality preferences should **not** be used as proxies for severity of disability.

Deaf applicants who are determined eligible for services may be placed on a waitlist due to their determined category in the OOS process. The Rehabilitation Act provides that eligible individuals who do not meet the order of selection criteria shall have access to services provided by other federal and state programs through an information and referral system. This information and referral system may include One Stop Career Centers, state employment agencies, Independent Living Centers and other local programs serving deaf people.

Comprehensive Assessments

Once eligibility has been established, additional information and data often are obtained to help pinpoint the full range, scope, and options of services needed to secure successful employment established at the time of eligibility determination. Be sure to follow best practices in assessment with deaf people, including following ADA requirements for testing accommodations.

Tip: There are many long-standing issues related to fair, quality, valid assessment of deaf people. Approach the assessment process with accessibility and validity in mind, and interpret the meaning of results with caution and a holistic approach.

All standard VR assessments and information collected for clients within your state protocol to make informed choices about VR services are relevant here. These assessments may be conducted by the VR counselor or by a specialist. Examples of additional information and evaluations to consider in the comprehensive assessment and scope of services for deaf clients include:

- Evaluations to identify underlying and possibly progressive medical conditions
- Otologic and audiological hearing assessments
- Opthalmologic or optometric evaluations and visual assessments
- Communication assessments across multiple modalities
- Orientation and mobility assessments
- Rehabilitation technology assessments
- Mental health assessment

These assessments can be used to determine opportunities for training, assistive technology, job readiness and disability management.

Tip: Lack of access to mental health services is a chronic challenge for deaf people. Connecting clients with formal and informal networks of support for wellbeing needs to be considered in each case.

Individual Plan of Employment (IPE)

After comprehensive assessments are completed, counselors and clients together discuss, plan, and determine employment goals and needed services which is the basis for Individual Plan of Employment (IPE).

The IPE planning session must, by law, be conducted in a client's preferred mode of communication. Maximum efforts must take place for informed and effective direct two-way communication between clients and counselors.

Tip: VR agencies are encouraged to ensure that their client information guides are provided in accessible formats for the diverse population of deaf people.

Throughout the VR process, but especially at the time of IPE development, counselors are encouraged to ensure that clients are informed about the choices they have related to available services and have opportunities to utilize self-determination. This often necessitates more than simply listing the names of service providers.

In general, the informed choice process is enhanced when counselors provide more descriptive information about the client's service provider options. For example, for clients considering their options regarding postsecondary training programs, it can be helpful to their decision-making when counselors provide them with information about the types and quality of support services available for deaf students at the programs being considered.

For some clients — particularly those who may require more intensive or comprehensive services — a multidisciplinary team approach for goal development and service coordination is critical.

Deafblind clients may need a variety of specialized services that increase accessibility of training or workplace environments. This may require coordination of services and supports from counselors within the same agency or across agencies, depending on the state structure. Some states with separate agencies for deaf and blind clients have developed agreements to have counselors from both agencies serve these clients at the same time (both with open cases) to provide more effective services, as long as they do not overlap. Often, the state will have a statewide deafblind coordinator to assist these counselors with assessment and identifying appropriate specialized services.

Once counselors and clients agree on an IPE, the next phase of the VR process involves the provision of services to help facilitate attainment of employment goals.

Job Development and Placement

The ultimate goal of VR services is the achievement of employment goals resulting in the attainment of competitive integrated employment and independence. The legacy of low expectations for deaf people persists in many arenas, yet deaf people with strong support and high expectations are more likely to have ambitious employment goals.

To facilitate achievement of employment goals for deaf people through the job development and placement process, a number of factors should be considered:

- Outreach to employers. Many employers may be unfamiliar with deaf employees and the value they add to any organization. Common concerns are related to communication and safety, issues that VR counselors can address directly and proactively with potential employers.

- Conduct job site assessments. Before finalizing a placement, visit the potential work site to make recommendations for needed modifications or accommodations for full access to workplace duties and communication. Together with the deaf client and the job site contact, review the essential functions of the job and make recommendations for assistive technology or to suggest communication strategies to maximize placement success.

- Clarify the role of Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI). A majority of clients served by VR generally qualify for Social Security benefits. Social Security Benefits Specialists (either through the SSA or state VR programs) can be partners in understanding the impact of employment income on SSI and SSDI benefits for clients between the ages of 18-65. SSI and SSDI eligibility may vary depending on disability category and co-occurring disabilities. These specialists can also assist in determining the income level that would impact clients SSI or SSDI benefits.

Data Point: Deaf people vary in their use of SSDI and SSI. Deafblind people are almost twice as likely to receive federal assistance as deaf people without additional disabilities. Source: NDC

- **Support career advancement.** Once clients obtain employment, a desired outcome is that they will retain their jobs and advance in their careers. Deaf people often do not have the same opportunities for advancement as their hearing peers. VR professionals can play a significant role in addressing the systemic barriers that keep otherwise qualified deaf people from climbing the employment ladder. Some specific approaches include advocacy for equity in the workplace, supporting continued development of self advocacy skills, integrating new technologies, ensuring access to in-service training, continuing

education, and advanced credentialing, and establishing connections with coaches, mentors and role models.

Case Closure

After job placement, be sure to stay in regular contact to support adjustment to the new work environment and to be proactive in addressing any issues that may arise.

This may include following up with the deaf client with regard to the match between the job duties and their overall employment goals, accommodations quality and reliability, possible technology solutions to access gaps, and long term planning, including but not limited to post employment services available from VR.

Post-Employment Services

There are times when a VR client may request additional services after official closure of the job placement. The purpose of this service is to regain, maintain, or advance employment. In addition to previously described job placement services, example post-employment services include:

- Consultation or technical assistance to the workplace supervisor
- A further review of the job placement site for accommodations or modifications
- Replacement or repair of assistive technology
- Interpreter services where requested
- Counseling or other mental health services
- Coaching and troubleshooting workplace challenges

Thought Question: What kinds of skills and experiences will the deaf client want to have in order to progress in their career beyond initial placement and entry level positions? How can a strong initial experience lead to later success?

INFRASTRUCTURE

- **VR Personnel: Staffing for Success**
- **Stakeholder Engagement**
- **Program Improvement**

VR Personnel: Staffing for Success

VR personnel are at the heart of quality services for deaf clients. This section reviews core competencies for personnel who interface or lead VR services with deaf clients.

The knowledge, skills, and abilities required both as counselors and in leadership are often unique to this population. Recognizing that not all counselors have all the competencies needed to serve all the subpopulations of deaf people, some states have started to make some significant changes in their staffing arrangements and revamped personnel training.

Thought Question: Whether through designated positions, hiring for specific qualifications within generalist positions, or through professional development for established professionals, how does your state have specific expertise needed for successful service provision?

Overall Planning

According to the Comprehensive System of Personnel Development (CSPD), the VR portion of the Unified or Combined State plan must include a system for annual monitoring of personnel needs and professional development. Qualifications related to serving deaf clients, in particular, lies in the requirement that VR has qualified personnel to work effectively with individuals with disabilities.

Tip: States are encouraged to adapt the following job descriptions to fit their staffing models.

Knowledge, Skills, and Abilities (KSAs)

Counselors, administrators, and leadership that either directly serve or lead the service provision for deaf clients need to have a range of knowledge, skills and abilities in addition to their competencies as VR professionals. Much of the deaf-specific content KSAs are either directly listed or inferred throughout the MSP.

The full counseling team is just that — a team — which shares resources and input on achieving the goals of successful employment outcomes for deaf people. While some of these KSAs may look different depending on the degree of administration or direct service provision, the entire staff that supports deaf clients needs to show competence in the following areas.

Knowledge of:

- Systemic barriers and root causes of employment gaps for deaf people, including compounding barriers for people with intersectional identities that experience discrimination and limited opportunity with US society.
- Ableism, audism, and how to recognize their prevalence and work towards elimination both within the VR agency and in the larger community.
- Conditions that lead to hearing loss, blindness, and low vision.
- The educational, linguistic, psychosocial, sociocultural, and vocational needs that are unique to each of the four hearing loss disability groups within RSA.
- Current software, video, and assistive technology options that support a full spectrum of communication modalities and preferences.
- Resources and organizations at the local, state, and national level.

Skills:

- Demonstrate proficiency in American Sign Language.
- Utilize different access tools and services in communication.
- Proactive problem solving and informed decision making.
- Recognize one's own implicit biases and work towards addressing them.
- Organization, communication, and management skills.
- Strong deaf centered customer service perspective.

Ability to:

- Relate and communicate with deaf people in an effective and meaningful manner
- Support a coordinated system of delivery for deaf clients.
- Advocate for the need to eliminate barriers to employment opportunities for deaf people
- Be responsive to diverse client constituent groups.
- Interface with VR vendors and service providers.
- Develop professional relationships within a wide constituent base.
- Develop and maintain a community network of referral sources.
- Obtain and allocate resources.
- Collaborate and form partnerships with existing statewide service systems and organizations.

Tip: Program review and evaluation should include a comprehensive review of the personnel structure and composition of positions to determine if the appropriate staff is effectively serving the full range of deaf clients and/or whether caseloads and personnel can be better aligned to meet these needs.

State Coordinator for the Deaf

High quality services start with strong leadership. This MSP strongly recommends that each agency have, at the administrative level, a staff person who has sole responsibility and authority for planning, developing and implementing structured, identifiable programming of rehabilitation services for deaf people.

State Coordinator for the Deaf (SCD) is responsible for overseeing VR services to individuals who are deaf, late-deafened, hard of hearing, and deafblind. When these duties cannot be an administrator's sole responsibility because of the small size of the state agency, the duties should, to the extent possible, be an *identifiable* cluster in the job description of a single administrator who is placed highly enough in the organizational hierarchy to influence and implement policy.

Tip: The SCD ideally should not carry a caseload. Combining SCD and counselor functions can work to the detriment of both.

The SCD should have authority and salary level commensurate with administrative responsibilities and to maintain a coordinated service delivery system responsive to the needs of deaf clients. Overall responsibilities include needs assessment, planning, program development, implementation, staff training, and program evaluation. Three possible line authority options within VR agency organizational structure typically include: Full-line, Shared-line, and Without-line authority.

- **Full-line authority**. In a full-line authority model, the SCD manages a special section within the agency, with a separate budget and supervisory responsibilities. The full-line authority alternative assures selection of qualified personnel and effective delivery of rehabilitation services to deaf clients. This model can be very effective as state agencies seek to recruit deaf professionals in counseling and leadership positions. The SCD can be an effective supervisor and communicate directly with these staff persons.
- **Shared-line authority.** When a line supervisor lacks knowledge of best practices in working with deaf clients, shared line authority for the SCD would occur in the areas of recruitment and assignment of counselors, staff training, and programs to enhance the quality of services. While the actual supervision of counselors working with deaf people is handled by the local manager, a strong cooperative relationship exists with the SCD to provide technical assistance with case services and to provide input regarding staff.

- **Without-line authority.** In a without-line authority model, the SCD is a recognized member of the agency's central staff, but acts as a consultant and does not have line authority The SCD preferably reports to the state administrator and has a line of direct communication to counselors and their supervisors.

Essential Functions of the SCD

An SCD should be able to lead, model, and advocate for best practices in VR service provision for deaf people. This position both manages staff that report to them and reports up to senior management. Essential functions of the SCD, beyond those expected within agency leadership, include but are not limited to:

Team Management and Personnel Support

- Identify service needs, coordinate program planning, and recommend policy for the development of quality agency services for deaf clients.
- Guide and participate in the recruitment, interview, and selection of staff.
- Be responsible for developing core competencies expected of their counselors, using the MSP as a guide.
- Create opportunities for VR staff to share resources, be recognized for excellence, and attend professional development opportunities and functions within the deaf community.
- Be responsible for developing and coordinating in-service training across all staff levels within the agency. Seek flexible options such as online, cross-agency, cross-state, and national opportunities.
- Ensure needed technology and accessibility supports are in place to facilitate communication between staff and between staff and clients. This may include access providers such as staff interpreters, part-time interpreters, or both. Some states, such as Minnesota, have Occupational Communication Specialists that provide interpreting and job coaching as needed.
- Ensure that support staff, such as psychological consultants and office administrative assistants, can communicate directly with deaf staff and clients.
- Promote the training, recruitment, retention, mentorship and promotion of VR staff with expertise serving deaf clients.

Tip: Mentorship is critically important for the sustainability of the field, particularly for deaf VR professionals. The SCD can lead efforts within the VR agency to retain and support professional development for their staff.

Leadership and Administration

- Be responsible for annually reviewing and evaluating the state program of services to deaf clients as it relates to the State Plan and the Statewide Comprehensive Needs Assessment.

- Provide ongoing consultation and direction to all phases of the state agency's programs which have bearing on the quality and quantity of services provided to deaf people.
- Be responsible for reviewing, evaluating, and making recommendations relating to grant and legislation proposals having a bearing on services to the target populations.
- Consult with the state VR agency's specialist on facilities regarding grants to facilities serving or planning to serve clients with special communication needs.
- Act as liaison with specialists on deafness in RSA Central Office, in other government agencies, in Regional Resource Centers, and in Research and Training Centers, as well as in other public and voluntary agencies.

Community Engagement

- Recommend deaf people to serve on State Rehabilitation Councils (SRC).
- Join the Deaf Professionals Network within CSAVR.
- Engage with other SCDs in online discussions about hot issues in the field.
- Collaborate with community partners to develop programs that complement VR services.
- Maintain lines of communication and cooperative agreements for mutual support and exchange of information between the various client groups and the state agency.

Media Mention:
Stories on interagency collaboration and state to state connections for VR state leadership. (NDC)

Supervision Considerations

Supervision of deaf client casework may be exercised by either the district administrator or the SCD. The responsibility for casework supervision, approval of financial plans and IPEs should be clearly identified in the state VR agency manual. To be an effective supervisor, they must have some understanding of the special considerations required in order to adequately serve a deaf caseload. The majority of these considerations relate to additional time and flexibility needed to achieve their responsibilities:

- Interviews take longer when they are mediated by an interpreter or other access support provider. Allowances must be made for adequate time to achieve full communication.

- VR counselors and staff may engage in nontraditional VR activities which contribute substantially to the KSAs and duties in their roles individually and part of the larger VR service team. Such activities include attending

community events, assisting deaf clients with court appearances and drivers' license renewal, and assisting deaf clients when they apply for other types of services, such as public assistance, Social Security, and mental health. These activities often require VR counselors (and, where relevant, access providers) to work on weekends and into the evening hours, so their office hours must be kept flexible to compensate them, within agency regulations.

- VR counselors provide close support for deaf clients as they transition into a new job, particularly one that is a primarily hearing-centered environment. The first few days after placement on a job often require support as the client establishes new relationships with colleagues and supervisors, navigates communication strategies and technologies for the workplace, and learns their job requirements and expectations.

Thought Question: How can job responsibilities and time allocations be made more flexible to allow for these client centered and deaf centered activities?

Other State-Level Coordinators and Administrators

Often the administrative workload of an SCD is beyond the duties of a single position. In addition to the lead SCD position, a number of state agencies have assigned additional specific state coordinators for programs such as the Statewide Coordinator for Deaf-Blindness (SCDB) or the Statewide Coordinator of Services to Hard of Hearing and Late Deafened (SCHH/LD). State VR agencies will need to evaluate additional administrative and coordinating duties to determine how the continually evolving client responsibilities can be met. As the population of hard of hearing and late-deafened clients continues to grow, an administrative or coordinator position specializing in this area may be advisable.

Tip: VR agencies are encouraged to have a person at the administrative level whose sole responsibility is services for deafblind persons, such as a Statewide Coordinator of Deafblind Services or a Deafblind Specialist that works under the SCD.

Rehabilitation Counselors Serving Deaf Clients

Depending on state staffing structure and demographics of the state population, VR agencies may serve deaf clients in a variety of models.

- Designated Rehabilitation Counselors for deaf (RCD), hard of hearing and late deafened (RCDHH/LD), and Deaf-Blind (RCDB), or communication specialists (CS).
- Designated RCDs that serve all deaf clients.

- Staff with expertise in serving deaf clients as part of their background and training but not as a designated role within the VR agency.
- Staff without expertise in serving deaf clients as part of their background and training, and thus requiring consultation and technical assistance via professionals with such expertise (such as an SCD or counselor aide).

Tip: Successful services depend on a good fit between the counselor and the client. Having a single or communications specialist serve all deaf clients can result in unsuccessful VR service provision for the client. Staffing needs to include sufficient personnel with experience working with deaf people to allow for flexibility in counselor-client matches.

Essential Functions of RCDs

The section on the VR process and example scope and sequences of services provides a strong overview of VR services. The RCD is critical to the successful identification, implementation, and evaluation of the VR process. In addition to the roles and responsibilities of the entire VR team serving deaf clients, RCDs are expected to:

- Participate in Pre-ETS and transition programming for deaf secondary grade students.
- Evaluate eligibility for VR services, with a specific lens on the individual implications of systemic barriers for deaf people on access to employment.
- Conduct vocational assessments and counsels on career objectives within a self-determined, informed choice, deaf-centered approach.
- Assess and evaluate needed accessibility tools, strategies, and problem solving within a job site.
- Strategize with currently employed clients on supports needed to maintain employment at current or new job sites.
- Refer deaf clients to community resources and additional supports, including any needed mental health services and mentoring opportunities.
- Forms and arranges teams of service providers to meet the needs of their clients.

Media Mention: Accessibility tip sheets for different professional activities can help guide questions about access and support for deaf people in specific job related activities. (Vera Institute of Justice)

Tip: The case of dual cases: In some states, VR programs for deaf clients partner with programs within VR or separate agencies for blind or low vision clients. Shared expertise between the two programs can be combined to provide effective services for deafblind clients. This may also include teams of service providers as needed.

Rehabilitation Counseling Training Programs

Tip: Currently, most general or cross-disability oriented programs in rehabilitation counseling offer minimal, if any, academic curricula and instruction focused on effective intervention and services with deaf people.

There are a small number of graduate training programs in rehabilitation counseling with a specialization in serving deaf people. The majority of these programs now have a significant if not entire online training experience. Encouraging prospective VR counselors to explore this field as a career option now includes increased flexibility in how and when degree requirements are completed. Some example programs include:

- Troy University
- Western Oregon University
- Winston Salem State University
- Springfield College
- University of Tennessee-Knoxville (certificate)
- Emporia State University

Thought Question: Are there ways that your state can partner with a rehabilitation counseling training program to provide opportunities for mentorship and deaf-centered scenarios for future VR professionals?

Stakeholder Engagement

VR is a public facing profession. Not only is it funded via public sources, its goals and mission by definition require VR professionals meaningfully engage with a wide range of stakeholders. Getting grounded with a full range of resources to hone and grow your professional skills will strengthen services for deaf people across the VR system. In some cases, dialog occurs online, such as professional development opportunities on social media.

Tip: If you are active on social media, seek out topics and events that spotlight current issues related to deaf people and employment. For example, the #DeafEd community on Twitter organizes monthly live chats on a broad range of topics for professionals and deaf students.

Tip: Deaf youth are often unaware of the broad range of resources available to them, including community-based resources. Keep this list in mind when working with deaf clients as they develop a plan for networking, job shadowing, and mentorship.

Thought Question: What opportunities do you have for networking with schools, healthcare centers, mental health centers and other organizations that may engage with a diverse deaf population?

Deaf Clients

At an individual level, your primary stakeholders are deaf clients themselves who come to you directly or via referral. Pre-ETS services also open up opportunities to connect with deaf youth who may not already be aware of VR services and supports. You might ask your current deaf clients for referrals, encouraging them to share the fact that VR services are available since so many people are unaware. Think about what key take-aways to share or networking opportunities you can develop that match your own personal style.

Parents and Families

In many cases the parents and families of deaf clients play a major role in supporting deaf clients as they connect with the VR system. Particularly for deaf youth and Pre-ETS services, it is critical to think about how to communicate with the family network as well as the deaf client themselves. This may be applicable in how you approach conversations in IEP meetings or in ways you communicate about services, programs, and supports. Think about what a parent needs to know to be a partner with you and the VR system. RSA parent centers may also have resources to support your connections with families.

K-12 School System

Depending on where you live and the nature of your local public education system, you may engage with leaders, administrators, coordinators, educators, transition specialists and auxiliary staff with many different roles and responsibilities. Establish key points of contact for people in your region and touch base to be sure your list is accurate and up to date. Get to know what their strengths and pain points are and how VR can be a partner with the local education agency (LEA). Some states have regional outreach programming that focuses specifically on transition aged youth and family partnerships. Be aware of current issues in your LEA by reviewing school board agendas, reading the local reviews of school-related issues, and understanding out state level policies are being implemented in your community.

Postsecondary Programs and Institutions

Postsecondary training programs and institutions vary widely in their focus, structure, leadership, and educational goals. In addition to program leadership, identify key decision makers such as admissions coordinators, student services, registrar, internship options, and ADA offices. When possible, get to know deaf students and alumni from the training programs and institutions.

VR Agency Leadership

VR agency leadership at both the state and national (RSA) levels are critical decision makers that may not know what they do not know about the current issues and challenges in support and services for deaf clients. Allyship also starts at home, within the agency itself. Deaf VR professionals often find themselves as the primary advocates for an accessible work environment. If you are hearing, seek ways to amplify and support accessibility and visibility of deaf professionals and, in turn, deaf clients.

State Commissions for Deaf and Hard of Hearing

Many states have statewide commissions which serve the same population as state VR agencies. Often these commissions are charged with specific responsibilities which can greatly assist the state VR agency in serving clients. For example, some commissions may be responsible for the certification or licensure and provision of interpreters, employment services, advocacy, telecommunications access program, and related legislation. These programs and services can prove to be beneficial to SCDs, RCDs, and the consumers they serve.

U.S. Department of Labor

The U.S. Department of Labor supports state level employment resource centers. These centers carry different names in different states, but one common name is the One Stop Center, which brings together business, employment training programs, and job seekers to streamline the job search and employment support service process. One Step Center services may be tiered from self-directed, core services to intensive services to support employment. Their organization and density of locations vary widely by state. One Stop Centers may also vary in the extent to which they have resources that are accessible to deaf people.

Businesses

Employers play a significant role in the success of VR programming and services. Businesses both large and small are important contexts for deaf clients.

Outreach to employers can be done in partnership with allied efforts to match young people with potential career exploration activities, role models, mentors, internship opportunities, and ultimately employment. Connect with other agencies and nonprofit organizations that are focused on transition aged youth. Investigate the emerging and strongly supportive deaf-owned business community, some which are supported by state level start up funds.

Yet the majority of employers may not be familiar with a deaf intern or employee. Make a list of key contacts who ARE familiar with deaf employees and think about how to connect them with potential seasoned employers as a peer mentoring resource for new employers. For example:

- Disability:IN (previously the Business Leadership Network)
- CSAVR the NET
- Rotary International local chapters
- State job placement initiatives, such as Illinois WorkNet Center
- CSDworks

Deaf Community

The deaf community is a vital and often under-tapped stakeholder group. Engaging with the deaf community is an important quality of any public agency that seeks to both empower deaf youth and be a participant in systems change. Steps toward successful community engagement start with showing up in an authentic manner that sees VR as a partner within the larger network of people and organizations that are mobilizing to identify and break down barriers. This video playlist may also offer different perspectives on the role of the deaf community.

Community Rehabilitation Providers (CRPs)

CRPs are local community organizations that provide employment related services to adults with disabilities. They often are the lifeblood of the state VR agencies. CRPs range from specialized programs serving deaf people to those who serve a large spectrum of individuals with disabilities. These programs and services may be available at no cost or they may be paid for by the state VR agency through contracts or fee for service arrangements. Individualized services range from skills training, independent living skills, assistive technology assessment, sheltered workshop experiences, job seeking skills, job placement, job coaching, and interpreter supports.

Mental Health Service Providers

One of the largest gaps in services is in the area of accessible mental health for deaf people. This includes short term crisis counseling to long term hospitalization, drug and alcohol counseling and treatment, monitoring of medications, and other ancillary services such as home visits. Without these services, many deaf clients are unable to fully participate in employment services and programs.

Some states have specialized state programs providing mental health services to the deaf, hard of hearing, late deafened, and deafblind. Others rely on local or county programs to administer mental health services. Many state VR agencies have agreements with their state mental health agency that addresses how access services will be provided and paid for. VR professionals should explore the development of an Interagency Agreement specific for deaf people, either in conjunction with the master agreement or separately.

Interpreters

Interpreters and interpreting organizations are an important partner in securing access. Prior to hiring interpreters, familiarize yourself with this guide to hiring highly qualified interpreters and how to support best practices in access support. Licensure requirements may vary from state to state. Be sure to check out these videos that offer perspectives from deaf clients on interpreter roles, quality and fit.

There are several key resources for interpreting services that may be available in your community.

- Interpreter Referral Agencies are also a resource for securing access providers. These may be local for face to face environments or even national for video remote interpreting (VRI).

- Interpreter Training Programs (ITPs) at local IHE or private organizations may offer opportunities to recruit new interpreters entering the field to work with VR consumers and staff as well as training opportunities for staff interpreters. In addition, you can arrange supervised internships for the ITP students in their field offices so that the students can be exposed to a wide range of new experiences with our staff and consumers.

- Interpreter Professional Organizations are a third interpreter-centered resource that may be significant partners to work with. There are a range of organizations that focus on interpreting in education, licensure and training, and more. Local, state and regional chapters of national organizations may have opportunities for partnership and MOUs.

State Agency Colleagues

Interagency collaboration within and across states is a critical way to build networks of support. Within states, implementation of Pre-ETS programming, transition planning, and workforce development often requires coordination across VR and education systems to both identify potential participants and to design accessible opportunities for deaf students. This coordination is even more critical during times of added stress such as the pandemic, natural disasters, and economic downturns.

Within a given region, or even across the country, opportunities for innovative cross-state collaboration are emerging as an important pillar in the range of partnerships available. The National Deaf Center's Engage for Change initiative brings together interagency teams from each participating state with the goal of improving educational and employment outcomes for deaf people. Although initial collaborations focused primarily within each state, as resources fluctuate and a desire to leverage strengths increase, cross state opportunities, both face to face and online, have also arisen. Regional meetings provide state agency staff with resources and connections to address common barriers and seek sustainable systems change.

Local and Regional Chapters of National Deaf-Related Organizations

- National Association of the Deaf (NAD)
- Hearing Loss Association of America (HLAA)
- Association of Late Deafened Adults (ALDA)
- National Black Deaf Advocates (NBDA)
- National Asian Deaf Congress (NADC)
- National Hispanic Latino Association of the Deaf (NHLAD)
- Council de Manos
- American Association of Deaf-Blind (AADB)
- National Federation for the Blind (NFB)
- National Family Association for the Deaf-Blind (NFADB)
- American Association of Deaf-Blind (AADB)
- Statewide deaf-blind programs
- National Coalition on Deaf-Blindness (NCDB).
- National Association of Blind Merchants
- Hands and Voices

See Resources section for links and website addresses.

Thought Question: What professional networking skills do you need to meaningfully connect with a diverse set of stakeholders?

Program Improvement

This MSP includes an overview of steps for each state to take to improve services for deaf people. This section leans into the knowledge and skills of the Leading by Convening framework. Resources at the National Center for Systemic Improvement include several practical training modules geared towards the needs of state level program administrators. This framework was adapted by the National Deaf Center in its work with state-level support and regional meetings. The Deaf Professionals Network at CSAVR looks forward to serving as a central place for conversation and sharing strategies about how to adapt the MSP to each state context.

Media Mention: State level engagement for leaders in deaf education and VR. (NDC)

Organizational change is an opportunity to clarify goals, gather data, obtain stakeholder feedback, and create an action plan with short and long term steps to take towards those goals. With a growing client base, evolving technologies, and an increase in professionals who are new to the field, an evaluation plan that is both flexible and goal-oriented can help a state VR program optimize its resources and continue on an interactive cycle of program improvement. This outline for program improvement is based on the recommendations made throughout the MSP.

Assemble Your Team

Program evaluation planning **requires a lead person** who has the time, historical context, and interest in program improvement. In states where there is an SCD, this is the logical person to be at the forefront of this effort. Although a staff lead from within an evaluation division may be an alternative, it is critical that the lead for program evaluation have both (a) a direct link to senior management and (b) the confidence of the stakeholders involved in VR services for deaf clients. Administrative support may also be needed for logistics such as meeting scheduling, coordinating access supports, and document preparation.

A core team of VR staff and, if possible, a few key representatives from leaders in the community can form the steering committee for a program evaluation process. People with a range of experience — from seasoned veterans to counselors who are new to the field — offer valuable diversity in perspectives that are needed in this process. Representatives from other state agencies that support deaf people are also valued colleagues to include. Deaf professionals are an essential part of any core team and should be prioritized throughout this process.

Gaining buy-in from senior VR leadership is essential to the success of any program improvement effort. Advocate for opportunities to gain the perspective of VR leadership as well as dedicated staff time to work on the program evaluation process. Prior to any program evaluation activities, senior management must show a commitment to the process and openness to the recommendations made by the program evaluation team. Ideally this forward-looking approach, together with timelines and opportunities for input, is communicated to all staff throughout the program evaluation process.

Tip: The Deaf Professionals Network within CSAVR is a strong resource in strategies for gaining state level leadership buy-in.

Clarify and Prioritize Goals

In addition to a review of key content areas (below) that are known to support the goals of VR programming for deaf people, it can be helpful to discuss and clarify internal goals that are a top priority for the state VR program(s). Keep in mind larger state-wide initiatives that may dovetail with the priorities for deaf clients, specifically. For example, if there is a particular focus on staff recruitment, be sure that this priority is included in the program review as well.

Identify Content Areas for Review

This section emphasizes areas that are seen as supportive of positive deaf employment placement, retention, and advancement. The program review process may benefit from substantive analysis of a few key areas instead of a surface review of many topics. There are no set requirements for a program review; a good program review is one that results in a meaningful path forward and provides opportunities for input from diverse stakeholder groups.

Potential key areas for review include, but are not limited to:

- Qualifications of agency staffing to support deaf clients
- OOS and wait list data, both for prevalence and equity
- Placement and case closure data, for both prevalence and equity
- Reliability of and strategies for case management across clients
- Engagement with IEP planning for deaf secondary students
- Effective use of 15% budget for pre-ETS programming
- Degree of informed decision making within VR service planning
- Accessibility and relevance of programming for deaf clients
- Recruitment and mentoring of new VR counseling staff
- Communication and workflow practices, plus sharing of resources
- Accessibility of VR agency workplace environment
- Networks across stakeholder groups in the community
- Quality and effectiveness of access providers (interpreter, CART, C-print, etc.)
- Client satisfaction with VR services
- Opportunities for advancement beyond initial job placement
- Collaborations with key stakeholder groups in the community

Gather Data

There are several types of data that may be included in the program review. In a diverse and complex system, often a wide array of measures are needed. The specific data collected needs to be aligned with the priorities identified above. If gathering data over time, consider what trendline is relevant and useful in understanding the current state of program quality.

- RSA-911 data
- Case analysis
- Policy review
- Staffing structure, demographics, and caseload
- Technology and equipment inventories
- Interviews or focus groups across stakeholder groups
- Needs assessment and client satisfaction surveys

Collecting data for the sake of collecting data directs energy away from action steps, so make sure each data point has a purpose. Often it can be useful to create a chart that guides what data source is used to answer what questions or topics that are the focus of the program review. For example:

Topic	Client Survey	Case Analysis	RSA-911 Data	Staff Focus Groups
Network Strength	X	X		X
Accessibility of VR Agency	X			X
Equity in Placement	X		X	

Consider a SWOT Analysis

A SWOT (strengths, weaknesses, opportunities, and threats) analysis is a common strategic planning tool that can help to reveal priorities, areas of strengths the organization can leverage, and concerns that may need to be addressed — including programming for deaf people. Strengths and weaknesses typically describe characteristics of the internal status of an organization whereas opportunities and threats represent external factors.

There are many similar tools available that help teams organize their thinking, explore underlying causes, identify initial steps that are within your control, and examine where a systems change approach will help achieve long term goals. This analysis is suggested after data collection so that the SWOT analysis is informed by the diverse perspectives of stakeholders involved.

Here's a sample set of questions that might anchor a SWOT analysis.

Strengths	**Opportunities**
• We are efficient with our funding and resources. • We have strong connections with a range of employers, from deaf-owned businesses to large corporations. • We were able to strengthen our networks with the BIPOC deaf community during the pandemic. • We are knowledgeable and have access to a wide range of emerging technologies	• Online options for remote interpreting and live captioning provide greater flexibility in how to support accessibility across settings. • New parent outreach programs from education to the deaf community can include VR representation. • State-wide emphasis on collaboration opening up opportunities for cross-agency communication.
Weaknesses	**Threats**
• Recent retirement of VR professionals with connections in the deaf community have gone unfilled. • The waitlist for clients eligible for services is longer for deaf clients than their hearing peers. • New vendors are slow to respond to requests for improved accessibility.	• Current turnover in agency senior management is high. • Over-reliance on new technology auto captions means deaf clients have incomplete access in online settings. • Reduced access to national meetings and networking leads to isolation for deaf-focused VR staff.

Tip: Be sure to consider root causes in your SWOT analysis to encourage long term solutions to systemic barriers.

Develop a Report of Findings

A report of program evaluation findings is an important communication tool, both to senior management and to stakeholders. The content and format of the report should provide enough context to understand the relative importance and significance of each finding as well as initial recommendations for the action plan that follows.

An overview or top highlights to orient the reader is helpful before diving into the heart of the report. After that, be sure to ground the report in the current context of your state. Some relevant contextual information might include:

- Summary of previous program evaluations, action steps, and progress
- Current demographics within the served population in the state
- Methods used, tools developed, and people involved in the program evaluation
- Policy context and current events that affect implementation of VR services
- Impetus for this program evaluation process.

Once the context and method for the program evaluation are established, the report can organize the findings thematically by content area identified at the beginning of the process. Remember to include a mix of data points, program examples, and quotes. Highlight both the things that are going well and the things that need to be addressed in an action plan.

Tip: It is helpful to create a clear link between program goals, evidence gathered, and initial conclusions. Graphic organizers and visual features can help emphasize these links.

Communicate and Disseminate Findings

Sharing findings from the program with a broad range of stakeholders is an important part of accountability both internally as an agency and externally with the broader community. Consider ways to share the findings that engage stakeholders in dialog, not simply a one-direction report out of report results. Communicate about the dissemination plan and let people know how and when they can get more information and discuss action steps with decision makers.

Accessible dissemination of evaluation findings is also a way to model best practices for vendors and institutions. Be sure to have a web-based version (or PDF) and possible FAQs available on the VR agency website. Consider short, "snackable" key points and take-away messages, perhaps via an infographic or other user-friendly format. Use visuals (with alt text!) and translate your report findings into Spanish, ASL, and other prevalent languages within your community. Create a one-page of findings to bring with you to your meetings with stakeholders, and include it in information packets.

Create an Action Plan and Engage with Stakeholders

An action plan may be a stand alone document or the latter part of a program evaluation itself. The advantage of a stand alone action plan is that the reader can see a quick summary of the program evaluation to understand the rationale for action plans while being able to quickly focus on the "now what?" steps ahead.

Tip: Action plan steps should be clearly defined with WHAT will happen, WHO is involved, HOW you will know it has happened, and WHEN key steps will be completed.

Implementation of the action plan will necessarily involve people, time, resources, and often resistance to change. When considering action plan steps, remember:

- Change takes a long time, and that's okay.
- Break big steps down into smaller steps.
- Think about what might need to stop in order for something new to start.
- Gather allies together who are motivated to accomplish each goal. Find a buddy.
- Anticipate possible roadblocks and be ready to pivot if needed.
- Take care of the people involved over the project to complete.
- Plan for opportunities to give feedback along the way.
- Document your progress, ask questions, and stay positive!

Thought Question: What resources for program improvement do you have available? What people, tools, or strategies do you need to add for a successful action planning process?

SERVICES

- Communication and Access
- Pre-Employment Transition Services (Pre-ETS)
- Transition Services
- Independent Living Skills
- Example VR Services Sequence
- Working with Businesses

Communication and Access

Not all deaf, deafblind, hard of hearing or late deafened clients will communicate in the same way at all times. Their communication needs will vary based on the setting, situation, and communication partners involved. Taking the time to collect the right information is crucial to ensure the client receives effective communication access and accommodations in all settings and throughout the VR process — from the initial assessment with the VR counselor to implementing the right accommodations in the workplace.

Before the initial intake, the client should be presented with the opportunity to request accommodations with a variety of options. The intake coordinator should be prepared to ask questions and respond accordingly. The priority for all interactions with deaf clients is direct communication in their preferred language modality.

If direct communication is not possible, VR staff must coordinate professional, quality services using a network of in-house or local marketplace resources. These access supports include interpreter and speech-to-text service referral agencies, educational institutions, other human service agencies and technology vendors.

Tip: The FAQ section of this MSP has many answers to questions related to access services. Additional access support resources are also listed at the end of this MSP.

Communication Modalities

Clients may use a variety of speech, sign language or other communication modalities. It is important to identify which language or mode the client uses for coordinating the appropriate interpreting services.

- Oral communication
  - Speechreading and lipreading
  - Listening

- Manual communication modalities
  - American Sign Language (ASL)
  - Sign supported speech
  - Contact Sign/Pidgin Sign (PSE)
  - Signing Exact English/MCE
  - International Sign Language
  - Cued speech

- Deafblind
  - Tactile communication
  - Print-on-palm
  - ProTactile
  - Haptics and touch signals

Tip: Why don't all deaf people speech read? Only 30-40% of sounds are visible on the lips. Speech reading is not easy, as it involves combining contextual information, visual clues from facial expression and gestures, and auditory information from spoken words. The accuracy of speech reading will be diminished if the speaker does not articulate clearly, speaks too quickly or slowly, covers the mouth, has facial hair, or is in front of a distracting background, or is some distance away. Speech reading is NOT considered an accommodation.

Media Mention: There are many critical issues related to intersectionality, deaf interpreters, power, and access within the interpreting field. Streetleverage is one space where interpreters are having these essential conversations as a professional community.

Language and Communication Assessment

It is imperative that VR staff understand the client's preferences and attempt to communicate using the method that works best for each individual client. This understanding of client preference is the basis for and demonstrates the highly-valued "client choice" principle.

As noted in the VR process section, all standard VR assessments and information collected for clients to make informed choices are important. Consistent with the provisions of the regulations of the Rehabilitation Act (as amended by the Workforce Innovation and Opportunity Act), the counselor is responsible for determining the client's preferred language and mode of communication and then coordinating these requests in a timely manner.

Federal Regulations, 34 CFR 361.38 states: The vocational rehabilitation services portion of the Unified or Combined State Plan must describe how the designated State unit includes among its personnel, or obtains the services of:

(1) Individuals able to communicate in the native languages of applicants, recipients of services, and eligible individuals who have limited English proficiency; and

(2) Individuals able to communicate with applicants, recipients of services, and eligible individuals in appropriate modes of communication.

The Department of Justice defines effective communication as "an aid or service that fits the nature, length, complexity, and context of the communication as well as the person's normal method(s) of communication".

As the client begins to navigate accommodation requests in educational settings and the workplace, it is important to remember that the aid or service allows the client to equally participate in all activities, and the client can convey and receive information clearly and effectively.

In order to have a holistic approach to determining effective communication options and accommodations, it will be important to ask the client questions that lead to gaining a better understanding of their communication experiences. Through this interactive process, the VR counselor can also discuss possible accommodations and expectations for using services.

Consider questions related to:

- Age of onset of hearing loss or when disability acquired (can be progressive over time).
- History of communication use in different settings, including educational, social, workplace and at home.
- Understanding pain points or where communication has not been accessible.
- Use of assistive technology or other technology communication tools.
- Use of access supports such as sign language interpreters, CART, protactile, etc.
- Experience in self-advocacy when requesting accommodations.
- Practice in Flexible use of accommodations across different settings
- Skill in communicating with colleagues and supervisors in a workplace environment.

Asking these questions will also help with discovering gaps in self-determination and self-advocacy, and with identifying possible training needs in terms of technology use and accommodations.

Auxiliary Aids and Services

Interpreters and Transliterators
The role of the interpreter or translator is to facilitate communication for persons who are deaf, deafblind or hard of hearing in their preferred communication mode. Interpreters and transliterators can be provided on-site or remotely (video remote interpreting/VRI). While there are no standards that define a qualified interpreter, certification, licensing and credentials are available to help determine if the person being hired is the right fit for the situation.

Learn more about the interpreter regulations for your state. The types of interpreters and transliterators include:

- Sign language interpreters (hearing and deaf)
- Deafblind interpreters
- Trilingual interpreters
- Oral transliterator
- Cued Speech transliterators

Coordinating interpreting services requires knowing the deaf person's preferred communication mode, the deaf person's language level and the context of the assignment, as some providers may be more skilled in some settings than others (i.e., medical or mental health interpreting vs. education or in a legal setting). This information would be gathered during the initial assessment.

Professional interpreters are expected to follow their credentialing organization's respective Code of Professional Conduct (or Code of Ethics). This ensures the interpreter conducts themselves and their business ethically, with maintaining respect for the clients involved, keeping information confidential, ensuring they are qualified to interpret the assignment and remaining impartial in the process.

Speech-to-Text Services
Real-time speech-to-text services (meaning-for-meaning or verbatim systems) provide real-time access to auditory information using text-based systems. C-print, Typewell and CART are the most popular types of speech-to-text services. Speech-to-text can also be provided in-person or remotely in a variety of situations, such as live-streamed events, one-on-one meetings or for in-person presentations.

When hiring access providers, it is important to know what type of situation it is for to ensure qualified providers are available. Relationships with speciality providers, such as those who are familiar with a foriegn language (for multilingual clients) or for specialized content areas (such as a medical setting) are critical to develop and maintain.

Depending on the context and setting, a combination of interpreting and speech-to-text services or ensuring consistent providers are available for the client may be needed to provide effective communication access.

Professional CART providers and transcribers also adhere to a Code of Professional Ethics related to their work and business practices.

Captioned Media Services
Recent legislation supports the need for quality captions in media. These captions can be added post-production or edited from a live broadcast. Not only should materials produced by VR agencies be captioned, but also media made

available by their partners. Captions can be produced in-house or outsourced to a vendor.

Quality captions also require time for editing. Beware of transcripts or captions produced by automatic speech recognition programs, as they are often full of errors, missing punctuation and sometimes will not capture the appropriate information. Ensuring deaf clients can access media through quality captions is an appropriate accommodation.

Tip: Many new accessibility features have been added to communication and workplace platforms as a result of the shift to work from home during the COVID-19 pandemic. There has also been a significant emphasis on the availability of automatic and closed captions for meetings and media products.

Hearing Assistive Technology

There are a variety of hearing assistive technologies (including assistive listening systems) available. They can be coupled with hearing aids, bone-anchored hearing aids (BAHA) or cochlear implants or used with headphones (without aids). It is helpful to work with the deaf client's audiologist to ensure the appropriate fit and use for the client.

There are a variety of microphones available for most systems to fit different settings, such as an omnidirectional microphone for group discussions or a directional microphone for one speaker. Types of assistive listening systems include:

- Personal systems (FM/DM systems)
- Induction loop systems
- Infrared systems

Telecommunication Equipment for Deafblind

Deafblind individuals can communicate using a variety of devices, such as the Tele-touch, Tele-braille or the Deafblind Communicator. Androids and iPhones both have the ability to enable accessibility features and allow apps for enlarging the screen/text, braille, haptics and vibrations.

While these devices are generally considered personal devices (not required to be provided by those covered under the ADA or Section 504), VR counselors should be aware of these types of equipment and how they work, assess the deafblind client for an appropriate fit, and support the deafblind client in obtaining the needed equipment. Some useful resources include:

- Technology Assessment Video Series by the Helen Keller National Center
- iCanConnect equipment distribution for those with significant vision and hearing loss
- Assistive technology organizations by state

Other Technology and Accommodation Considerations
It is important to also consider different types of communication and altering systems that can be used in a variety of situations. While these are not meant to replace auxiliary aids and services for effective communication access, they can be useful tools in the right situations:

- UbiDuo
- Text/instant messaging (Google Hangouts, Slack, Messenger, Teams)
- Writing back and forth on paper or writeboard
- Visual alert systems and visual messaging boards
- Communication apps
- Captioned telephones
- Noise cancelling headsets (for use with assistive listening systems)
- Telephone amplification
- Use of a note taker during meetings

Accessibility Checklist

Successful communication is **the joint responsibility** of all involved in the setting and requires a proactive, intentional approach. First, never assume each deaf person is the same in terms of how they communicate or what access looks like in a particular setting.

The rise of virtual interactions means both an increase in options but also a need for careful attention to access in each setting. The person responsible for the meeting or event or training is responsible for ensuring the environment and setting is optimized for communication, even with the use of qualified interpreters for speech-to-text providers. Continuing a collaborative approach with the deaf client and others involved in the setting will be beneficial to ensure effective communication access.

Communication Tips

- Make sure everyone is ready and has access before starting to talk.
- Allow time for the deaf person to look from one person to another in group settings.
- When using an interpreter or speech-to-text provider, identify who is speaking and allow time to take turns.
- Share the topic of discussion, agenda, and materials ahead of time to help with understanding and following along.
- If there is a deafblind client, obtain information such as text size, paper and ink contrast colors or braille needs.
- Ask the client what color clothing and what should be covered (for example, long-sleeves or no v-neck shirts).

Physical Space

- Make sure the background where the interpreter and speaker are placed is plain, without busy patterns or lights. The room should be well-lit.
- Meet in an area without background noises, such as telephone ringing, other people talking, loud machinery or ventilation systems. Find a room with carpeting or a rug to improve room acoustics.
- Reduce visual distractions, such as people walking behind, blowing curtains, flickering lights or objects in the line of sight.
- Allow the deaf person to determine the best placement of the interpreter or real-time captioning display.

Virtual Settings

- Allow the service provider and deaf person the opportunity to move or pin speakers and content for best viewing.
- Ensure all have access to high speed internet. Speakers should use quality microphones for optimal audio access for both the deaf client and service providers.
- Allow the deaf client the opportunity to communicate with the service provider to troubleshoot access issues.
- Allow time for practice runs with service providers and deaf clients, especially if those are not comfortable with the platform being used.

Tip: Access in online or virtual settings may be very different than in face-to-face meetings or work environments. Be sure to check on the responsibilities and resources available to support access for deaf clients in online settings.

Media Mention: Tips for online learning for deaf people. (NDC)

When Difficult Communication Situations Arise

Communication is a human right. We value nothing more than connecting with one another. When communication fails or is difficult, it invokes negative reactions from all involved. With the client choice principle in mind, practicing positive listening and communication strategies will help reduce frustrations and allow for more meaningful outcomes in different situations.

When there is frustration in the situation, both parties may use a range of coping strategies that, ultimately, reduce the quality of communication. For example, deaf people may use strategies such as:

- Bluffing (pretending to understand, nodding their head as if they understand).
- Withdrawal (no longer participating, making excuses to leave).

- Anger (shows frustration or anger, asks the same questions over again).
- Dominating the conversation to cover for not being able to hear.

Hearing communication partners may react to the breakdown in communication in a variety of ways, such as:

- Dismissing the information (telling the person "never mind", or "you don't need to worry about this").
- Trying to de-escalate by telling them they don't need to be angry.
- Repeating the information in the same way over and over (or by shouting) while visually looking frustrated.

Tip: Preparation is needed for accommodation use in high stakes situations such as entrance or placement exams for training programs or employment. This planning guide may be a useful tool for counselors and clients to document steps needed to ensure an accessible test experience.

These negative situations can be avoided by practicing the following strategies:

- Recognize that visual and tactile communication can be exhausting. Allow time for breaks, or consider breaking up a long appointment into two to better manage eye strain, concentration required, and resultant muscle tension.
- Rephrase the information in a different way or use visuals (such as typing the information on a computer screen or writing things down) if things need to be repeated. Shouting is almost never helpful.
- Ask open-ended questions to allow the person to show what they understood, offering opportunities to clarify or add to missed information. A simple "do you understand" yes/no question is usually ineffective.
- Use facial expressions or gestures to help emphasize important points.
- Provide context when changing subjects or bringing up new information. Set the stage for each topic so that context cues may be used and improve comprehension.
- Ensure the setting allows for good speaking and listening opportunities; no background distractions, good lightning and acoustics and is comfortable for all involved in the setting.

If communication problems continue, consider a change in accommodations, such as using a deaf interpreter or CART or dual accommodations (interpreter plus speech-to-text).

Thought Question: How do you set up your meetings so they are as accessible as possible for deaf colleagues and clients? How can you model for yourself and your colleagues the simple ways a meeting leader can provide flexibility in how participants gain information and contribute to the dialog?

Pre-Employment Transition Services (Pre-ETS)

This section addresses how the Pre-Employment Transition Services (ETS) requirements of the Workforce Innovation and Opportunity Act (WIOA) impact VR services for deaf people.

For overall information and questions about WIOA and Pre-ETS, see OSEP-funded technical assistance centers WINTAC (funding ended in 2020, but the website with early information is still being maintained) and VRTAC-QM (with current funding as of the release of this document).

Data Point: According to Deaf People and Vocational Rehabilitation, Who Is Being Served, a smaller percentage of deaf people who applied for or received VR services (4.4%) received Pre-ETS, or specialized career training for youth, than the average across VR (10.5%). Among deaf applicants, more deafblind (5.8%) and deafdisabled youth (6.7%) received Pre-ETS than deaf youth without any additional disabilities (3.3%). Source: NDC

Defining Pre-ETS

- Pre-ETS are part of the 2014 WIOA amendments to the Rehabilitation Act of 1973.
- State agencies must set aside at least 15% of their federal funds to provide pre-ETS to eligible and potentially eligible students.
- Pre-ETS services can be provided to groups of students in addition to individuals.
- Pre-ETS are the very earliest services available to deaf people under VR services.

Accessible Pre-ETS Activities for Deaf Students

Accessible services for deaf students are not, in general, as readily available as for their hearing peers. Issues include access to direct communication, use of accommodations, negative attitudes about the potential for deaf students, and opportunities to authentically engage in the content or training opportunity.

In addition to whether the program or activity fulfills one of the five required areas, deliberate attention must be paid to ensure that deaf students have equal access to the Pre-ETS opportunities afforded to all students with disabilities. Specific age-related activities and examples across the required areas are outlined in the VR Services Sequence section.

Tip: Funds **can** be used for auxiliary aids and services to support participation in Pre-ETS. This includes American Sign Language (ASL) interpreters, Communication Access Real Time (CART) services, C-Print, and other interpreter services.

Thought Question: What longstanding issues related to access, workplace readiness, and opportunities for deaf youth do you see in your state? How might funding for Pre-ETS help address some of those opportunity gaps?

Programs and Activities are Eligible for Pre-ETS Funding

When WIOA first went into effect, there were many concerns about how to spend the 15% on what are "eligible" services.

Required activities under Pre-ETS focus on the following services (each are described in further detail below):

- Job exploration counseling
- Work-based learning experiences
- Postsecondary enrollment counseling
- Workplace readiness training
- Self-advocacy training, including peer mentoring

Job Exploration Counseling

Job exploration counseling is the process of helping people get to know themselves, their interests, and abilities; and about the world of work and its demands. With this information, students can then make an informed choice on an appropriate employment goal for themselves once they graduate from high school.

It is important that students have flexibility built into this goal setting and an informed understanding of what different career paths look like, both initial and later stages of a career. We want to encourage students to think about what advancement opportunities they might want to pursue beyond an entry-level position (not the stocker-syndrome). The ability to pivot given changing personal or professional circumstances, including family responsibilities, economic downturns, and the advent of new technologies, is also an essential part of a future career vision.

Tip: If a student has internalized audist and ableist assumptions about their own capacities, this is where professionals can identify and help address possible psychological factors that are affecting a student's view of their career possibilities.

Work-Based Learning Experiences

One of the most important predictors of postsecondary employment for deaf people is work-based learning experience while in high school. In-school or after-school opportunities, including internships and volunteer work, are all different possibilities for work-based learning experiences that can be supported via Pre-ETS funding.

The purpose of these experiences is multi-dimensional and are parallel with job exploration counseling. In addition to building a resume, work-based experiences help students make more informed decisions about their lives. On-the-job experiences are a critical part of how we learn about ourselves, what we like in a work environment, and how we build a picture of what we will be in the future.

Second, workplaces are typically not set up for deaf people. Working in the hearing world requires problem solving strategies and self-advocacy skills that need to be built over time. This is an additional burden on deaf people that their hearing peers do not have, and early work experiences are invaluable tools for learning about rights, eligibility, resources, strategies, and communication approaches.

Tip: Encourage some time-limited experiences, such as during a semester or a summer, with a debrief both during and after to process what the student learned and will take with them going forward.

Postsecondary Enrollment Counseling

Postsecondary enrollment counseling including exploring options across a variety of opportunities, including dual credit options, vocational training, certificate programs, community college degree programs (including transfer options), and a range of four-year private and public degree programs. Some training and education programs include a residential experience whereas others are geared more towards commuter students.

Decisions about program fit can also include conversations with program staff, current and former deaf students, as well as considering campus climate towards deaf students, available resources, and institutional support needed to be successful in the program. Postsecondary enrollment counseling also includes mapping out required secondary level coursework and any required academic assessments that will prepare students for postsecondary training and education programs. Finally, the application process itself can be daunting; supporting students as they navigate eligibility and completion of application requirements is an important part of postsecondary enrollment counseling.

Many college campuses include either an online or in person orientation session, particularly during summer session, to help students decide whether the programs are a good fit for them. This can include visits to classes or training settings, having an informational interview with a faculty member or student, reviewing course and training expectations, and learning about exit exam or course completion requirements.

For deaf students, understanding the academic and vocational preparation required must be combined with an understanding of the new learning environments and how to advocate for access and accommodations. The reality is that students often use very different accommodations in postsecondary settings than they did in high school due to a range of factors, including knowledge of the accommodations

request process, what accommodations fit their learning needs, and the different demands of a postsecondary learning environment. This is where knowing about the rights and responsibilities under ADA, in contrast with their IDEA or 504 experiences, will be critical.

Programs specifically designed for deaf students, including state supported community college programs such as at La Guardia (NY), Ohlone (CA), Harper College (IL), and Austin Community College (TX). Institutions such as SWCD, CSUN, Gallaudet University, and NITD also draw from students across the country. A program with a deaf cohort and faculty with experience working with deaf students may provide a peer network and accessible learning environment that is important for student well-being.

Helping students to identify what systemic barriers they may face, what resources are available, and how to manage both the advocacy and the stress that comes with that process, is an important part of transition planning for deaf students.

Tip: Orientation and open house opportunities at postsecondary institutions and training programs are often not designed with accessibility in mind. Students should be coached on how to reach out to the admissions office ahead of time to discuss the format of the orientation, and then request needed accommodations.

Workplace Readiness Training

Workplace readiness training focuses on the assistive technology, independent living, orientation and mobility, and social skills that are needed for successful entry and retention in the workplace. These readiness skills are considered in addition to the vocational or academic skills that students prepare for during secondary education experience. While the vast majority fall under independent living skills, there are additional aspects that lend themselves to consideration here.

Assistive technology is continually evolving and is an area of growth in options for deaf students. In many cases, assistive technology is available as additional features on the phones, computers, and tools that are in use for the general population. In other cases, technology specifically designed to support deaf people within their workplace are a critical part of the access and communication tool box. These tools are discussed in depth in the section on communication, access, and technology.

Students with strong social skills in secondary grades show stronger postsecondary outcomes, controlling for other possible factors. Often social skills are linked to self-concept, self-determination, and communication skills. Students who have suffered from language deprivation, from social isolation, or who experience systemic audism may not have the self-confidence, problem solving, and communication skills to serve them in the full range of workplace interactions. Often simply asking for help or clarifying when there is a misunderstanding are strategies that are helpful as deaf people navigate a hearing work environment.

When supporting students in workplace readiness skills, provide them with opportunities to practice with peers that use a range of communication modalities, supervisors, human resource offices, administrative assistants, and so forth. Also consider embedding experiences interacting with employees such as transit operators, bank tellers, health care professionals, and others that will be in their arena as they transition into adulthood.

Media Mention: Deafverse, now with World Two focused on workplace readiness skills, is a videogame-based experience designed specifically for deaf youth. It comes with accompanying resources and an extensive presence on social media. (NDC)

Tip: Socioemotional well being and social skill assessments, when conducted by a clinician in direct communication with the student and an awareness of deaf experiences, can be valuable information to provide students, parents, and educators as part of workplace readiness training.

Self-Advocacy Training

Self-advocacy is one of the pillars of best practices in transition planning, and it is the last of the five required categories for how Pre-ETS funding is allocated. Self-advocacy skills — and its umbrella framework, self-determination — are foundational to transition success.

The opportunities available for deaf students to practice both the mindset of self-determination and the skills of self-advocacy are one of the powerful expansions afforded by Pre-ETS. Self-advocacy is a journey, not an endpoint, one that continually evolves as our identities, relationships, and communication skills grow.

Essential indicators of self-advocacy are outlined in the sequence for VR services. They include student leadership of IEP and IPE meetings, understanding one's comfort level over disclosure, and knowing about one's communication preferences and strategies.

Tip: Self-Advocacy is often best developed within the context of peers. **Peer mentoring is an especially effective self-advocacy development approach.** Seek out opportunities for deaf students to participate in a "self-advocacy community of practice", whether that be a formal training program in self-advocacy or an experience related to similar content such as leadership, community involvement, career exploration, exchange program, or summer camp.

Pre-ETS and Systems Change

After the required Pre-ETS services are provided, states can use Pre-ETS funding for a range of possible activities. The past few years have been a period of collaboration and growth in these areas, particularly as many of these activities involve coordination with LEAs under IDEA.

SCDs and RCDs play a critical role in the design and implementation of accessible and effective Pre-ETS activities for deaf students. These activities can be either programmatic or systemic in nature. For example:

- Increase and extend support and programming for deaf people to gain independent living, community inclusion, and experience in competitive integrated workplaces.
- Develop and provide evidence-based training to VR staff, school transition staff, and allied professionals that are involved in the preparation and transition of deaf students.
- Dissemination information on innovative, effective, and efficient approaches to implement Pre-ETS, particularly to those who are traditionally underserved.
- Develop model transition demonstration projects, particularly those that engage in multi-state or regional partnerships with an array of partners, including state agencies, developmental disability agencies, private businesses, and non-profit organizations.

Media Mention: Vermont collaboration between education and VR to deliver pre-ETS webinar. (NTACT)

Thought Question: What regional or virtual resources might benefit deaf youth in your state? What Pre-ETS collaborations with education agencies have been successful so far, and why? What lessons can be learned and resources leveraged for deaf youth under Pre-ETS?

Transition Services

Transition planning is at the heart of special education programming for secondary grade students. The Individuals with Disabilities Education Act (IDEA) is a federal special education law that highlights transition services for students enrolled in education systems.

Times of transition are also a time of heightened stress for people and their families. VR professionals can serve as collaborators to reduce uncertainty, encourage exploration, and offer a positive view of the future for deaf people.

Media Mention: Overall introduction to transition services. (NTACT)

Transition services is a coordinated plan designed via an outcome-oriented process that promotes scaffolded movement from school to post-school activities. The range of post-school activities is broad and can include but is not limited to postsecondary education, vocational training, competitive integrated employment, supported employment, continuing and adult basic education, adult services, independent living, and community participation.

As with all aspects of a deaf youth's Individualized Education Program (IEP) plan and Individualized Plan for Employment (IPE) (and links between them), transition planning needs to be rooted in their preferences and interests, as well as be deaf centered. Transition planning includes outreach to and engagement of both the youth and their parents or guardians.

Tip: The NTACT Collaborative offers a wide range of technical assistance and professional development related to transition planning.

Each state interprets their transition services differently, but most students with disabilities who are eligible for special education receive secondary transition services from their school starting in 9th grade until they graduate with a diploma or certificate. In most states, students may be able to access special education services if they have continued educational needs identified in their IEP through age 21 or 22. Deaf students may benefit from these additional services to enhance their readiness skills for postsecondary settings, whether it be academic or vocational.

Pre-ETS and Transition

Whereas Pre-ETS represent the earliest set of services available for deaf students under the VR program, transition services represent the next step of services on the continuum of VR services available to eligible individuals.

Transition services build upon Pre-ETS and provide for further development and pursuit of career interest with postsecondary education, vocational training, job search, job placement, job retention, job follow-up, and job follow along services. Some VR services are beyond the nature, scope, and purpose of Pre-ETS. As such, Pre-ETS services can not be used to pay for those costs. That said, if a student did not participate in Pre-ETS activities, it is critical that the VR counselor circle back to ensure a student has obtained or is on track to obtain with help from vocational rehabilitation the pre-employment and transition skills necessary for a successful transition to adult vocational rehabilitation.

Data Point: Many deaf undergraduates are unfamiliar with VR as a source of support for postsecondary training. Less than 4% of deaf students in postsecondary training were documented as being funded by VR to attend college or job training. Source: NDC

VR Role in Transition Planning

VR professionals play a critical role in facilitating the exploration and placement of deaf students into employment related opportunities, including accessible work-based experiences that can be a significant benefit for deaf students.

Many IEP teams are unfamiliar with the full range of transition related programming that is accessible and a good fit for deaf students. VR counselors need to assess these programs before recommending services and ensure advocacy for the right transition programs to fit individual student needs.

If a student's employment goal requires the student to attend a postsecondary school, it is critical that the VR counselor provide counseling and guidance regarding the differences between accommodations provided under an IEP and college accommodations. The student and the VR counselor should work with the college's disability resource center to implement any accommodations required prior to the start of the semester.

Not only should a student's in-person classes be accessible, but also the full campus experience — college activities, internships, events, and virtual classes. Many careers involved specialized content and training requirements: explore what accommodations might be needed, such as for a medical or clinical training experience.

Tip: For some students, attending a college with access services does not result in full access or equitable opportunity for learning. Some students benefit from an emphasis on direct instruction or a learning environment designed for deaf students.

Media Mention: AHEAD has many online resources for postsecondary institutions as they seek to improve accessibility for disabled students.

Thought Question: What opportunities do you have to engage with educators and other members of IEP teams to further raise awareness of VR services for deaf students?

Independent Living Skills

Independent living is the third of three main sections related to VR services in the MSP (Pre-ETS and transition planning being the first two).

Although employment is the primary goal of VR services, a holistic approach includes attention to the essential underlying identity, social, community, and family contexts that, in turn, support successful sustained employment.

The same systemic barriers that affect deaf people in education, training and employment also affect them across the broader spectrum of life activities. Many deaf people do not have equal access to the incidental learning opportunities that often make up exposure to the "how to's" of navigating a world largely set up to work for hearing people. This includes critical information about health, financial literacy, and how to seek legal help.

A proactive approach to strategies, routines, and skill development will benefit deaf youth and adults that receive VR services and supports.

Data Point: Analysis of long term outcomes indicates that young deaf adults with more education training after high school, including technical education, have higher employment rates, higher wages, and greater civic and social participation. Source: Palmer et al. (2020).

The frameworks that form the foundation for Pre-ETS and transition services also undergird approaches to the development of independent living skills. An effective independent living skill curriculum focuses on opportunities to develop self-determination, including self advocacy and autonomy, within the context of home and the community.

Many deaf people experience low expectations for what they can do and achieve, and with this negative bias, receive fewer opportunities to practice, learn, and develop as individuals in the community. A deaf centered approach integrates the experiences of deaf people and roots services to align with the goals of the client.

Media Mention:
A deafblind athlete quit Team USA after she's told she can't bring a care assistant. (National Public Radio)

Independent living skills does not mean, by definition, that the client is necessarily living outside of a family, group, or shared living environment. The purpose of independent living skill development is to support the right to make decisions for themselves and engage in the local community (and beyond) in a meaningful way. This may look different for someone living alone in an apartment than someone living at home with family members. However, just like transition planning, independent

living skill development is something that can begin at a young age and carry all the way through adulthood.

Examples of Independent Living Skills

- Health care, sexual health, and personal hygiene
- Personal safety at home and in the community
- Mental health and substance abuse
- Housing options and home making skills
- Using an interpreter, CART, and other access supports
- Managing conflict, communication strategies in relationships
- Online safety, privacy, and etiquette
- Civic participation such as voting
- Financial literacy, banking, taxes, and budgeting
- Assistive technology at home and at work
- Strategies for job seeking, retention, and advancement
- Community resources for leisure and recreational opportunities
- Language and literacy development programs
- Transportation and travel options
- Legal rights and responsibilities in the U.S.

Data Point: Deaf youth are more likely to experience abuse than their hearing peers. Survivors of abuse need accessible support, but these resources can be difficult to find. Be aware of survivor supports for deaf people in your state or community. Source: VAWnet

More examples of the broad range of independent living skills programming can be found at the Administration for Community Living website. Examples of how and when to integrate these skills into Pre-ETS and transition is provided in the VR Services Sequence section.

Utilize Partnerships

VR is most successful in supporting independent living skill development when they partner with community organizations that specialize in one or more of these domains. Many of these are listed in the key stakeholders section or in the resources section.

Independent Living Centers and the Independent Living Services Programs are available in many communities and vary by state. A key feature of Center for Independent living is that disabled people form a majority of the staff and Board of Directors, aligned with the deaf centered approach described in this plan.

While it is unlikely that these programs will have accessible services for deaf people, VR professionals can collaborate with these programs to connect VR clients to resources and services with needed access supports. In some cases, resources are available online, particularly useful in bringing together deaf people who otherwise would be isolated from resources and accessible spaces for independent living skill development.

Thought Question: How do you balance the emphasis on self-advocacy and scaffolding independent living skill development with engagement, communication, and collaboration with the client's family and community? What kinds of conversations about privacy and agency might benefit the client during this planning process?

Example VR Services Sequence

The connection between Pre-ETS, Transition, and Independent Living services focuses on scaffolded, iterative, and age appropriate activities. There are responsibilities both in the school system (LEAs) and in VR. These are designed to support individuals from 8th grade or grade 14 until graduation or exit from their high school program, with some activities that can be started at any time in the secondary grades.

These activities are evidence-based and provide opportunities for students to learn more about themselves, the opportunities around them, and what academic preparation, workplace experiences, career development, and independent living skills are part of a Pre-ETS and transition process that works for them.

Media Mention: WaWa Snipes is an incredibly motivating presenter who encourages deaf youth to be resilient and find their own unique path. (NDC)

Yet these steps are only as effective as the mindset that transition is about exploration, growth, steps, learning, and a journey that is for each person, their own. Each deaf person has a unique pathway that requires both flexibility and a positive, supportive approach from the entire transition planning team.

Tip: Many service models and transition programs shifted to online options during the COVID-19 pandemic. In some cases, remote options increased opportunities for deaf people to participate, particularly across long distances.

Tip: Transition is not a checklist, but a journey. These steps could be part of a menu that a student then chooses from and focuses on during each semester, school year or summer. Mapping out the pathway visually, with colorful badges and opportunities for reflection, can be a powerful way to co-construct "story" with students.

8th Grade or Age 14

Students in 8th grade or who are aged 14 are typically at the end of their middle school experience, about to move into high school. Pre-ETS activities for this age group is where the first foundations of VR/school partnerships begin. The following is an example list of priorities for this first year of focus on VR-related services.

School Staff Priorities

- Establish communication with the RCD during the IEP (or 504) planning process.

- Receive any needed professional development in quality and valid assessments with deaf students.
- Administer formal career assessments and interest tools, such as those available at the Zarrow Center and the self-determination inventory.
- Screen for any possible additional disabilities not already identified including mental health risks. Identify support groups or therapists who are familiar with the trauma deaf people experience across the broad range of demographics in the community.
- Support student exploration of values and goals.
- Provide support to educators on transition-related activities.
- Provide student and their family with information about postsecondary pathway options.
- Encourage students to engage in a range of Pre-ETS related activities.

RCD Priorities

- Learn about student goals, extra-curricular activities, and interests.
- Provide specific information about VR services to student and family at IEP meeting.
- Connect student with accessible, youth-focused opportunities and programs.
- Obtain release to receive school records and IEP plan updates.
- Work with schools to coordinate and ensure Pre-ETS services are provided.
- Join a community of practice to share ideas with VR peers (e.g., DPN).

Student and Family Priorities

- Tour local companies, organizations, public resources.
- Attend VR orientations and overviews.
- Engage in career exploration activities, including inventories and career examples.
- Establish connections with deaf peers and deaf role models (also #deafatwork and deaf@work!).
- Explore online resources on job searches and applications.
- Students increase participation in IEP plan meetings.
- Focus on independent living skills you can learn at home or in the dorm.
- Practice time management skills and autonomous decision making home and at school.
- Play Deafverse and other self-determination and self-advocacy related activities.

9th Grade or Age 15

Focus on Pre-ETS and transition related activities intensifies as students enter high school and become eligible for a broader range of activities and services. In addition to those listed above, activities for students in 9th grade or who are aged 15 include the following.

School Staff Priorities

- Advise student in coursework that are aligned with postsecondary goals.
- Identify requirements to graduate such as volunteer hours.
- Integrate computer software skill development into coursework.
- Provide opportunities for student to use different accommodations and auxiliary aids that may provide access in different learning contexts.
- Follow and follow through on vocational planning goals, including steps needed for different types of career pathways.

RCD Priorities

- Establish or build upon connection with student and IEP team.
- Support application to Pre-ETS services if eligible.

Media Mention: Success tips and answers to FAQs from deaf youth. (NDC)

Student and Family Priorities

- Watch NDC introductory videos on what VR services can do for you.
- Pursue required work permit as per state regulations.
- Set up and maintain a personal email account for professional purposes.
- Discuss decisions around personal hygiene, sexual health, and physical health.
- Learn about safe online practices and workplace appropriate online behavior.
- Practice using different communication platforms and technology supports.
- Practice using VRI and describe preferred interpreter characteristics.
- Explore company website for job-related information, positions, and job descriptions.
- Practice mock interviews to prepare for possible job interviews later in adolescence.

10th Grade or Age 16

Transition support continues to intensify in 10th grade, or when a student is aged 16. During this time, students have opportunities to practice independent living skills

in both formal and informal contexts. In addition to continued development of the above transition-related activities, options for students in 10th grade or aged 16 include the following.

School Staff Priorities

- Structure training and time for students to meaningfully lead their IEP planning meetings.
- Increase emphasis on school-supported work-based experiences.
- Identify required coursework, tests, and other college and career readiness opportunities that are applicable to this student.
- Offer financial literacy development opportunities.
- Offer space to discuss decisions around disclosure and advocacy for accommodations.
- Encourage participation in extracurricular activities and support accessibility needs.

RCD Priorities

- Attend IEP planning meetings and reinforce high expectations for deaf youth.
- Discuss questions and options related to disclosure during the job search process.
- Assist students with application for both Pre-ETS and adult VR services, where relevant.
- Work with local workforce development boards, one-stops, and employers to develop work opportunities for students with an emphasis on self-advocacy skill development.

Student and Family Priorities

- Explore postsecondary training and higher education programs.
- Identify costs of postsecondary training options and explore possible funding avenues, including VR, employment, work-study, scholarships, loans, and grants.
- Pursue opportunities for job shadowing and informational interviewing.
- Create resumes and cover letters for possible job applications.
- Practice independent use of transportation, including but not limited to driving (where relevant) and different forms of public transportation or ride share services.
- Consider youth leadership training and summer camp options.
- Identify community based (or online) groups with common extra curricular interests.
- Practice submitting job applications.

11th Grade or Age 17

As students approach the second half of their high school career or prepare to transition into an 18-21 year old program, the focus turns from experiences and skill development for adolescents to those that are geared towards young adults. However, the emphasis on different areas will highly depend on the student.

School Priorities

- Plan for summer programming or work-based experiences.
- Intensify opportunities to practice.

RCD Priorities

- Work with student to identify relevant adult VR services and planning tools.
- Support student understanding of ADA and reasonable accommodations.
- Identify academic or certification assessments and accommodations.
- Support student exploration of complementary adult programs.

Student and Family Priorities

- Participate in parent and family events related to postsecondary goals.
- Visit programs, campuses, and independent living settings.
- Begin to narrow down possible career fields (while not boxing in too soon!).
- Obtain volunteer or paid work experience.
- Increase student social and community network.
- Increase student responsibility for personal and family budgeting.

Media Mention:
Find accessible videos about job searching at the National Employment Resource Center. (NAD)

12th Grade or Age 18+

As students enter 12th grade or an 18+ program, they begin their transition from Pre-ETS services to adult VR services. Under IDEA, some students may continue education in an 18-22 program (varies by state).

School Priorities

- Create a file that the student can take with them after program completion. Update all documentation including disability identification(s), accommodations, and psychoeducational assessments. Include letters of recommendation and certificates of completion, as relevant.

- Provide supports needed for students to lead IEP and transition planning meetings.
- Explore 18-21 program options and appropriate self-determination programming.
- Support application to postsecondary training and education programs, where relevant.
- Support student in navigating placement process during enrollment period.

RCD Priorities

- Support job placement activities that match student knowledge, abilities, and goals.
- Deepen student knowledge related to legal rights, eligibility, and problem solving strategies.
- Support deaf student leadership of IPE meetings, when relevant.

Student and Family Priorities

- Identify possible starting points for employment goals, short and long term.
- Apply to postsecondary programs, where relevant.
- Apply for FAFSA and Pell grants, where relevant.
- Apply to complementary adult programs, where relevant.
- Apply for paid employment, part or full time, where relevant.
- Discuss life course tools and planning.
- Identify post high school living arrangement plans, short and long term.

Tip: Explore the 18+ programs in your area and connect with their staff. These programs may enroll deafdisabled students that do not currently have contact with VR.

Beyond High School

RCD Priorities

- Conduct outreach and networking for potential VR clients outside of K-12 setting.
- Strengthen and expand relationships with local businesses.
- Maintain contact with Pre-ETS clients through postsecondary training and education program, anticipating possible pivots due to degree or major changes.

- Provide post-employment services, as needed, for deaf VR service recipients.
- Identity potential deaf mentors and points of contacts for youth.
- Attend person centered planning meetings for individuals receiving services under Title XIX of the Social Security Act.

Deaf Client Priorities

- Continue to explore formal and informal professional development and training.
- If needed, contact the VR counselor for post-employment VR services.
- Document what accommodations or supports are most effective for you.
- Consider internships, job shadowing, and ways to investigate future career changes.
- Revisit the self-advocacy tool kit for strategies in different work and learning contexts.
- Engage with colleagues at work and in the community to explore new interests.
- Deepen and strengthen financial literacy, discuss financial options with your family.
- Maintain a professional presence on social media, such as LinkedIn.
- Connect with other deaf peers online and in person, individually or at group events.
- Consider serving in mentoring and outreach activities for deaf youth.
- Continue to strengthen and expand your independent living skills.

Thought Question: So many young people, including deaf youth, want to know their exact career journey before they have a chance to explore and learn from different experiences. What strategies or perspectives can support your clients in thinking about a flexible, multi-stage approach to education, employment, and independent living?

Working with Businesses

Businesses are a critical partner in the successful placement, retention, and advancement of deaf people in the workforce. Within the VR agency personnel structure, there are different roles and competencies needed to identify, build, and expand partnerships within the business community.

Some states may have Business Engagement Specialists within their VR staff that work with employers, including designated staff with a focus on deaf clients. Across all VR, however, there are core principles and emerging best practices that can help support and guide engagement within the business community.

Media Mention: A big box store makes their business more accessible for deaf employees. (Lowes)

Thought Question: How can starting with placements for internship or field experiences lead to businesses hiring deaf employees full time?

Strategies for Business Outreach and Engagement

Take a dual customer approach. The dual customer approach is a shift in how VR agencies view their roles and approach to job placement, retention and promotion for clients with disabilities. While traditionally the focus of VR services has been almost solely on the individual disabled client, a dual customer approach views the evolving business ecosystem, or the needs of the business, as part of their service responsibilities.

Include accessibility during recruitment and hiring. Work with businesses to review application processes, including online submissions systems, to see where there may be ways to create a more accessible starting point for deaf applicants. Be solution centered and share examples of models that have worked with other businesses.

Media Mention: Amazon moves to provide interpreters for deaf employees. (YouTube)

Engage with "the NET" at CSAVR. The vision of the National Employment Team (the NET) is to create a coordinated approach to serving business customers through a national VR team that specializes in employer development, business consulting and corporate relations. They have a wealth of resources and opportunities to gain support in building relationships with employers.

Model positive attitudes and open dialog. For deaf people, a history of negative stigma and a lack of awareness about possible accommodations, communication tools, and accessibility strategies both contribute to possible hesitancy. Acknowledge underlying hesitancy, help employers ask questions they may have, and be a space for open dialog and support for both the deaf employee and the businesses.

Connect employers with each other. Employers need and appreciate the perspective of their colleagues within the business community. When working with an employer who has not hired a deaf employee (or intern or student) before, it can be helpful to connect them with an employer who has already had a positive experience.

Provide options for accessibility. Provide concrete examples of tools, strategies, and technology that are available for "leveling" the playing field for deaf employees. Many businesses may not be aware of the advancements available, particularly in light of innovations from remote work requirements in the last two years. A current job site assessment may reveal possibilities that can expand the accessibility of their workspace.

Thought Question: Throughout the COVID-19 pandemic, businesses have made many adjustments to allow for more flexibility in work from home, ways to emphasize employee safety, and strategies to stay afloat during economic downturns. How is this an opportunity to open up conversations about flexibility and access that may make workplaces more inclusive for deaf employees?

Emphasize benefits to coworkers and clients. There are many benefits to having deaf employees that often go unnoticed. The strategies and tools that make a work environment more accessible for deaf employees can make it more accessible for all employees. Emphasize how expanding the diversity of the workforce can also improve services and products for clients who are also diverse.

Encourage review of company policies. There are times when a business may have policies in place that may create unnecessary barriers for deaf employees. For example, when the Post Office removed their ban on deaf drivers, this opened up more work opportunities for deaf people.

Support a strong onboarding process for the deaf employee. Best practices in human resources all point towards the importance of a clear, inclusive, and supportive early experience for new employees or interns. Review current onboarding practices within the prospective business and discuss possible modifications to make it as inclusive and accessible as possible.

Thought Question: How does a dual customer approach change your own practice as a VR professional working with deaf people?

RESOURCES

- **Acronyms**
- **Frequently Asked Questions**
- **Organizations, Centers and Directory**
- **Recommended Readings**

ACRONYMS

AAC augmentative and alternative communication

AADB American Association of Deaf-Blind

ADA Americans with Disabilities Act

ALD Assistive Listening Device

ALDA Association of Late Deafened Adults

ASL American Sign Language

BEI Board of Evaluation of Interpreters

CA communication assistant

CAN computer assisted note taking

CART Computer Assisted Realtime Transcription- also known as Communication Access Realtime Translation

CDI Certified Deaf Interpreter

CFR Code of Federal Regulations

CIL Center for Independent Living

CLV Contact Language Varieties

CRC Certified Rehabilitation Counselor

CRCC Commission on Rehabilitation Counselor Certification

CRP Community Rehabilitation

CS Communication Specialist

CSAVR Council of State Administrators of Vocational Rehabilitation

CSPD Comprehensive System of Personnel Development

DB Deafblind

DSS Disability Support Services Office

EDP Equipment Distribution Program

FCC Federal Communication Commission

FM Frequency modulation

GPS global positioning system

HKNC Helen Keller National Center

HL Hearing Loss

HLAA Hearing Loss Association of America

HoH or **HH** Hard of Hearing

HR Human Resource

IA interagency agreement

IDEA Individuals with Disabilities Education Act

IEP Individualized Educational Plan

IHE institution of higher education

IL Independent Living

ILC Independent Living Center

ILS Independent Living Services

IP Internet protocol

IPE Individual Plan for Employment

IRI Institute of Rehabilitation Issues

ITP Individualized Transition Plan

LD Late-Deafened

LFD Low Functioning Deaf

LVD large visual display

MHz Megahertz

MICS Missouri Interpreter Certification System

MOU Memorandum of Understanding

MSP Model State Plan for Vocational Rehabilitation Services for Deaf People

NAD National Association of the Deaf

NADC National Asian Deaf Congress

NBDA National Black Deaf Advocates

NCDB National Coalition on Deaf-Blindness

NDC National Deaf Center on Postsecondary Outcomes

NFADB National Family Association for the Deaf-Blind

NFB National Federation for the Blind

NTID National Technical Institute for the Deaf

NTS Nex Talk Service

QUAST Mid America Quality Assurance Screening Test

PDA personal digital assistant

PEPNet Postsecondary Education Programs Network

PET-D Post-Employment Training Administration of Programs Serving Consumers Who Are Deaf and hard of Hearing

PL Public Law

POP Print on Palm

RCEP Rehabilitation Continuing Education Program

RCD Rehabilitation Counselor for the Deaf

RCDB Rehabilitation Counselor for Deaf-Blind

RCHH Rehabilitation Counselor for the Hard of Hearing

RID Registry for Interpreters for the Deaf

RP Retinitis Pigmentosa

RSA Rehabilitation Services Administration

RT Research & Training Center

SCD State Coordinator for Services for Individuals Who Are Deaf

SCDB State Coordinator for Services for Individuals Who Are Deaf-Blind

SCDHH State Coordinator for Services Individuals Who Are Deaf and Hard of Hearing

SCHH State Coordinator for Individuals Who Are Hard of Hearing

SCPI Sign Communication Proficiency Interview

SERID Southeast Regional Institute on Deafness

SERTOM Services To Mankind

SILC State Independent Living Council

SLPI Sign Language Proficiency Interview

SRC State Rehabilitation Council

SSA Social Security Administration

SSDI Social Security Disability Insurance

SSI Supplemental Security Income

TDD telecommunication device for the deaf

TEDPA Telecommunications Equipment Distribution Program

TRS telephone relay system

TTY teletypewriter

USBLN United States Business Leadership Network

VCO voice carry over

VR Vocational Rehabilitation

VRI Video Remote Interpreting

VRS Video Relay Services

WIA Workforce Investment Act

Frequently Asked Questions

Demographics

What terms are used to describe a person with hearing loss?
It is important to always ask the deaf individual how they want to be identified. Some terminology you may encounter include:

- Deaf
- deaf
- hard of hearing
- hearing impaired
- Late-deafened
- Deaf-plus
- Deafblind
- Deafdisabled

What is the difference between deaf and Deaf?
NAD explains that deaf refers to the actual hearing loss (the audiological condition) while Deaf refers to a group of individuals who share a common language and culture (American Sign Language and Deaf culture).

A person's identification is part of their journey. Their journey is fluid, as their preferred identity may change over time. This journey should be respected and supported.

Where can I find resources on diverse deaf, deafblind and deafdisabled people?
NDC's FAQ on where to find information about diverse deaf people lists different races, ethnicities, cultures, and languages that contribute to the widely diverse deaf community.

- Diversity in the Deaf Community: Introduction
- Deaf Historical Resources

What does *age of onset* mean and how does it impact language acquisition?
Age of onset refers to the approximate age the deaf person was diagnosed with a hearing loss. Depending on when the hearing loss was first diagnosed and the exposure to an accessible language plays a role in the deaf person's eventual language development. However, this should not be a baseline as to the language levels of deaf people. The deaf person's education, exposure to language at both school and home, access to resources and self-determination play vital roles in language development.

What are the root causes of the barriers for deaf students in completing postsecondary programs or in employment settings?
NDC has identified the following root causes that impact postsecondary outcomes for deaf people:

- Limited access to language and communication
- Reduced social opportunities
- Negative attitudes and biases
- Lack of qualified and experienced professionals

What is language deprivation?
As long as there has been deaf education, there have been disagreements on the method of teaching deaf children, whether using an auditory/oral approach to emphasize speaking and hearing or if the focus should be on sign language immersed with literacy. When deaf students are taught in only one method over another, they are deprived of the opportunity to express themselves in a language that is a better fit for them, not for those around them. The medical model of deafness has also contributed to the polarizing views of how deaf children should be taught language.

NDC's Root Causes of Gaps in Postsecondary Outcomes of Deaf Individuals emphasizes that reduced access to language and communication has an impact on positive postsecondary outcomes for deaf people:

> *Regardless of their communication modality, deaf individuals of all ages often experience reduced access to language and communication in the home, at school, in the community, and in the workplace…Even those who rely on spoken language and auditory channels, such as residual hearing or auditory technologies, face gaps in comprehension and their long-term success rate is highly variable. Reduced access to language and communication has a significant negative impact on the well-being of deaf people. On the other hand, full access to the richness and complexity of language and a range of communication models can contribute to increased readiness for postsecondary environments for deaf people.*

Where can I find a list of deaf schools and programs in the U.S.?
You can find a list of the different programs here.

What are the different educational environments for a deaf student?

- Residential school for the deaf: Students attend a fully-immersed bilingual (ASL and English) teaching environment during the week, staying in residential halls on campus.
- Day school for the deaf: Students attend either a fully-immersed bilingual (ASL and English) or oral (English) focused instructional environment.
- Deaf school with mainstreamed classes: Some deaf students will stay at the school for the deaf part of the time while attending a local public school for additional educational credits.
- Deaf program at mainstream school: Some school districts will have a school

where deaf students will have the support of a teacher of the deaf at the school.

- Fully mainstreamed: The student attends their district school, usually with the support of an intervention specialist a few times per month. A range of accommodations may be a part of their learning and testing experience.
- Homeschool: The student is taught at home with a curriculum approved by the district.
- Online schools/academy: Students participate in online learning academies offered by their district or from a list of approved programs. Maybe combined with an homeschool learning component.

Legal Context

What is the Randall-Shepard Act (R-SA)?
The Randolph-Sheppard Act (P.L. 74-732), as amended, was enacted to provide individuals who are blind with remunerative employment and to enhance their economic well-being. Through Randolph-Sheppard Act (R-SA) programs, individuals who are blind and in need of employment are given priority in the operation of vending facilities on federal property.

What is the Wagner-Peyser Act?
The Wagner-Peyser Act of 1933 established a nationwide system of public employment offices, known as the Employment Service. The Employment Service seeks to improve the functioning of the nation's labor markets by bringing together individuals seeking employment with employers seeking workers. The Wagner-Peyser Act was amended in 1998 to make the Employment Service part of the one-stop delivery system under the Workforce Investment Act. In 2014, the Wagner-Peyser Act was amended again under title III of the Workforce Innovation and Opportunity Act (WIOA). The Employment Service under WIOA builds upon the previous workforce reforms, requires colocation of the Employment Service offices into the nearly 2,500 American Job Centers nationwide, and aligns performance accountability indicators with other federal workforce programs.

What is the Food and Nutrition Act?
The Food and Nutrition Act of 2008 is designed to strengthen the agricultural economy; to help to achieve a fuller and more effective use of food abundances; to provide for improved levels of nutrition among low-income households through a cooperative Federal-State program of food assistance to be operated through normal channels of trade; and for other purposes.

A school, program or employer/company is claiming undue hardship in providing accommodations. What resources are available?
Some states will enact MOUs with VR offices to help support paying for accommodations. There are also some tax-deductions that may help businesses. In the end, the Office for Civil Rights will review the entity's entire budget, not just the one unit, division or office, before agreeing that it would be an undue hardship to

provide reasonable accommodations.

- Undue Hardship for employers and AskJan
- For Postsecondary programs

Where can I learn more about the history of legislation impacting services for deaf individuals?

- Disability History from Colorado State
- The Independent Living Movement from RISE
- Crip Camp - Netflix

Supporting Communication and Access

What evaluations are used to determine sign language competency?
There are two types of sign language competency screenings:

1. Sign Language Proficiency Interview (SLPI:ASL)
   The SLPI:ASL assesses a person's signing skill in both receptive and expressive vocabulary, grammar, fluency and comprehension through an interview with a trained evaluator.

2. American Sign Language Proficiency Interview (ASLPI)
   The ASLPI measures a person's proficiency in ASL, using the appropriate vocabulary, grammatical markers, syntax, fluency and comprehension. The 20-25 minute interview is rated by a team of evaluators.

Both proficiency screenings offer levels that can be used to determine the minimum competency requirements for positions within vocational rehabilitation.

What is the difference between VRI and VRS?
VRI stands for Video Remote Interpreting. This is an accommodation where the interpreter is in a remote location providing interpreting services through a high-speed video connection. VRI is typically used for virtual meetings, medical facilities or other circumstances where a local interpreter was not available.The National Association of the Deaf emphasizes that VRS should not be used in virtual meetings where VRI would be more effective.

VRS is mandated by the FCC, a service that makes phone calls accessible through a telephone number, connecting the people involved in the call with a video relay interpreter. VRS can only be used when people are connecting with one another through a tele[phone connection. The FCC also states that VRS should not be used when people are physically together in the same location

What is the difference between CART and C-Print/Typewell?
Computer Access Realtime Translation (CART) is a speech-to-text service where nearly every word is translated from speech to text. The CART provider is specially

trained with using a steno machine. The output is usually directed to a laptop, through a web browser or projected on a large screen.

C-Print and Typewell are meaning-for-meaning speech-to-text systems where speaker repetition and false starts would be eliminated, providing a more structured format of the information with fewer words. C-Print and Typewell providers train using a regular keyboard with specialized abbreviation software. The output is usually directed to a laptop, through a web browser or projected on a large screen.

When is it appropriate to use remote access services?
Remote access services (interpreting and speech-to-text) may be a good fit in a variety of situations, such as:

- When capacity limits in meeting space need to be considered (e.g., due to COVID)
- If there are no available service providers in the immediate area
- For situations where service providers with specialized knowledge are needed
- Filling last-minute access needs when local staff are not available

Remote services should not be used in the following situations:

- If the internet/wifi bandwidth is not strong enough
- The people involved are not comfortable with technology
- A deafblind individual who may need tactile interpreting support
- Highly interactive settings with dynamic conversations where it becomes difficult for the service provider to auditorily access dialog or audio only using a microphone

What communication technology is available for hard of hearing people?

- Alerting systems that use flashing lights or vibrating notifications. Doorbell, smoke detectors, alarm clocks, baby cry monitors are some of the options. Newer smart technologies allow for alerts to be synced with smartphones or other wireless notification systems.
- Assistive listening devices, such as FM/DM systems, amplification systems or devices that can be connected directly to hearing aids or implants.
- Captioned telephone service/internet relay service, where phone calls are translated into text either through a web browser, smartphone app or using a special display on a phone
- Various apps that allow for speech recognition, sound amplification or accessibility features on smartphones or tablets.
- Picture boards or digitized speech devices.
- Braille displays for deafblind users.

Can automatic speech recognition apps replace professional interpreters or speech-to-text providers?
The short answer is no. While automatic speech recognition apps continue to improve, they are still automated and cannot compensate for certain conditions that may degrade the quality of the translation. ASR quickly degrades in situations with:

- Speakers with foreign accents
- Noisy background interfering with microphone
- Highly technical terms that are not used in everyday conversation
- May not work in situations where there is no internet access

What are technical standards and are they legal?
Technical standards are imposed by programs or employers in which a person must possess in order to meet the program or job requirements. Technical standards may state a person must have the ability to hear or see to meet the basic job functions.

Technical standards are not legal if they do not allow for the person to demonstrate their knowledge and skills with appropriate accommodations.

Can an employer refuse to interview/hire based on job requirements or technical standards?
No, an employer cannot refuse to interview or hire a person based on perceived barriers. The person must be allowed the opportunity to complete requirements or meet standards with accommodations.

Where can I find qualified interpreters in my state?

- The Registry of Interpreters for the Deaf (RID) offers several search tools, such as a directory of both individual interpreters and interpreting coordination agencies. RID also has state chapters that can be contacted for local referrals as well.
- Many states have state affiliated agencies supporting deaf people that offer information and referrals to interpreters. If your state requires interpreters to be licensed, the licensing entity may also have public search options for finding licensed interpreters.
- NDC: Where can I find a directory of interpreters?

Where can I find qualified speech-to-text providers?

- Association of Transcribers and Speech-to-text Providers (ATSP) offers a directory of individuals and agencies.
- National Court Reporters Association (NCRA) has a directory of certified members.
- Described and Captioned Media Program (DCMP) houses a list of vendors, mainly for captioned media service providers, but some companies offer real-time speech-to-text services as an additional service.

- Many states have state affiliated agencies supporting deaf and hard of hearing people that offer information and referrals to speech-to-text providers.
- NDC: Where can I find a directory of real-time speech-to-text professionals (CART, C-Print, and TypeWell)?

What does the term "qualified interpreter" entail?
Each state has their own standards as to what credentials interpreters need to interpret in a variety of situations. The Department of Justice defines a qualified interpreter as:

> For people who are deaf, have hearing loss, or are deaf-blind, this includes providing a qualified notetaker; a qualified sign language interpreter, oral interpreter, cued-speech interpreter, or tactile interpreter; real-time captioning; written materials; or a printed script of a stock speech (such as given on a museum or historic house tour). A "qualified" interpreter means someone who is able to interpret effectively, accurately, and impartially, both receptively (i.e., understanding what the person with the disability is saying) and expressively (i.e., having the skill needed to convey information back to that person) using any necessary specialized vocabulary.

What are the different certification and leveling systems in determining interpreter qualifications?
Some states will require licensing for interpreters, others will require certifications such as the BEI, RID NIC, or EIPA. To see a list of regulations by state, please visit the RID website or the State's Office for the Deaf or Hard of Hearing and Department of Education.

What are the different speech-to-text qualifications?
- CART providers are certified by the National Court Reporters Association (NCRA) and bound to the Captioners Code of Professional Ethics, obligating them to operate with professionalism, confidentiality, and discretion.
- Meaning-for-meaning providers do not have certification or licensing. Qualifications can be determined by asking for their average accuracy rate, years of experience, typing speed and training. Meaning for Meaning providers also agree to follow their respective Code of Professional Conduct tenets. STTS professionals may also be members of the Association of Transcribers and Speech-to-Text Providers (ATSP) which has its own Code of Professional Conduct.
- C-Print Captionist Code of Ethics
- TypeWell Transcriber Duties and Code of Ethics
- Sources: NDC's speech-to-text services information.

A deaf person is complaining about the interpreter's skill. How do I navigate this type of situation?
Open a dialog with the interpreter and deaf person. Discuss the setting and communication with all involved. Ask questions such as:

- Was the interpreter able to hear (speaker's voice) and understand the content being shared?
- Did the interpreter have the appropriate background and credentials interpet effectively?
- Was the interpreter and the deaf person a good language fit?

To ensure the deaf person has equitable access to information through an interpreter, it is important that the deaf person's concerns are addressed and a resolution can be reached in a timely manner.

Transition Services

Where can I find online transition activities?

- NDC: Deafverse interactive game
- Hands & Voices: Postsecondary Transition Online Module for Parents and their Teens
- HKNC: Pre-ETS Services for DeafBlind youth
- NCDB: Transition to Adulthood

What are some examples of Pre-ETS activities?
As early as age 14, deaf students can start exploring career interests. Even if students are not registered with VR, they can participate in school-supported activities. Pre-ETS activities should follow the five areas:

1. Exploring jobs related to their interests and career exploration.
2. Obtain paid employment and work with job coaches
3. Learn about soft skills for work and independence
4. Self-advocacy skills
5. Counseling on educational and training options

How can I find out if a postsecondary program has experience working with deaf students?

- Look to see what information is on the programs' disability resource office website. Look for clear commitment to diversity and equity. See if they provide interpreters and speech-to-text services and if they discuss working with the campus or program as a whole to ensure accessibility.
- Look to see if there are accommodation statements related to public events.
- Contact the disability services office or ADA coordinator and ask if they have provided services for deaf students in the past.
- Ask other VR personnel about previous placement of deaf students in candidate programs.

What mental health resources are available for deaf people?
Deaf people benefit from working with providers who can communicate directly with them or have an understanding of how hearing loss impacts the socio-emotional needs of deaf people.

- The Clerc Center lists several mental health directories.
- The National Deaf Center lists resources and strategies, including contact information for crisis centers.
- NCCSD offers a list of resources for individuals with disabilities.

Who should be involved in a student's transition team?

- The student, who should be given the opportunity to lead
- The parents/guardians, until the student reaches majority age
- The school IEP team, which may be the special education coordinator, intervention specialist, related service providers (speech, mobility, etc.), school psychologist
- The school administration or school district representative
- Guidance counselor, work or service learning coordinators
- VR counselors (when student is getting ready to transition to postsecondary or employment
- Other support professionals.

Where can I find transition resources for deaf students?

- NDC's Transition/Life Skills Checklists and Resources
- Michigan's Secondary Transition Guide
- Clerc Center Transition Resources
- NCDB Transition Assessemtn for DeafBlind

What is the difference between a 504 Plan and IEP? (or, how do services differ between a 504 Plan and IEP)?
A 504 plan allows for accommodations to the learning environment for students who meat a broader definition of disability. It outlines only specific accommodations and what the school will do to provide those services. The 504 plan review varies by state.

An Individual Education Program (IEP) plan is a legal document that directs the school and district to provide individual educational supports and related services to the student. Students must meet one of the 13 disabilities listed under IDEA to be eligible. IEPs are reviewed annually and the child is reevaluated every three years.

The student's family/guardians are not deaf and need deaf role model support. Where can we find deaf mentor resources?

- Find out if your state has statewide educational services for deaf and deafblind students. This is usually through the state school for the deaf or with the state department of education.
- Hands and Voices Learning from Deaf/Hard of Hearing Adults
- Follow NDC's #DeafSuccess Playlist

Employment Related

Are there any job restrictions for deaf people?
Employers cannot assume that the deaf person cannot do the job duties as assigned without evaluating their skills and accessibility strategies. There are several questions employers can ask to evaluate if the deaf person can do the job with accommodations.

Can deaf people obtain a CDL for truck driving?
The U.S. Department of Transportation has granted exceptions for those with a hearing loss to obtain a CDL.

A deaf person wants to bring a friend to interpret at a job site. Is this acceptable?
Open up a dialog with the deaf person and find out their reasons for wanting to bring a friend or family member. The Department of Justice's Effective Communication memo states:

> Historically, many covered entities have expected a person who uses sign language to bring a family member or friend to interpret for him or her. These people often lacked the impartiality and specialized vocabulary needed to interpret effectively and accurately. It was particularly problematic to use people's children as interpreters.
>
> The ADA places responsibility for providing effective communication, including the use of interpreters, directly on covered entities. They cannot require a person to bring someone to interpret for them.

Discuss with the deaf person the importance of having a qualified interpreter and be sure to provide one that matches the deaf person's linguistic needs.

A deaf person is asking for their preferred interpreter, or wants a designated interpreter when training at the job site. Is this an appropriate request?
Yes, this type of request is reasonable. Depending on the type of situation, a deaf person may have worked with one or several interpreters in developing a shared vocabulary, communication methods and other nuances that ensure effective communication access.

Organizations, Centers and Directories

Online Directories

- State level agency list (Gallaudet University)
- State level agency list (HLAA)
- Schools with K-12 programs for deaf students list (CEASD)
- ASL resources national and state list (ASCD)
- Teacher preparation program list (DeafEd.net)
- Deaf LGBTQIA+ organizations (Gallaudet University)
- Mental Health Services list (Gallaudet University)
- Crisis Resources Clearing House (NCCSD)
- Hearing Loss Organizations and Associations (ASHA)

Community and National Organizations

- American Association of the DeafBlind (AADB)
- American Deafness and Rehabilitation Association (ADARA)
- American Society for Deaf Children (ASDC)
- Association of Higher Education and Disability (AHEAD)
- Association of Late-Deafened Adults (ALDA)
- Conference of Educational Administrators of Schools and Programs for the Deaf (CEASD)
- Council de Manos
- CSD
- Deaf Women United
- Described and Captioned Media Program (DCMP)
- Greater Los Angeles Agency on Deafness, Inc (GLAD)
- Hearing Loss Association of America (HLAA)
- Heroes with Hearing Loss
- National Asian Deaf Congress (NADC)
- National Black Deaf Advocates (NBDA)
- National Center on DeafBlindness (NCDB)
- National Federation for the Blind (NFB)
- National Hispanic Latino Association of the Deaf (NHLAD)
- Sacred Circle
- Southeast Regional Institute on Deafness (SERID)
- Veterans Across America Virtual Chapter at HLAA

Videos and Media

- Employment Pathways for Deaf People
- NAD Deaf at Work
- NDC #DeafSuccess
- Junior Achievement World Deaf2Deaf Experience
- These Hands Deaf Workers
- Tips from Deaf Youth on Access Strategies

Deaf 101

- VR4HearingLoss
- Deaf 101 Online Course

Education Related

- Guide to K-12 Deaf Education (NASDSE)
- DeafTEC (NTID)
- COVID19 FAQ page (NDC)
- Tips for teaching deaf students online (NDC)
- Laurent Clerc National Deaf Education Center at Gallaudet
- Postsecondary program accessibility for deaf students (NDC)

Transition Planning

- National Deaf Center Transition Planning Guide
- National Deaf Center VR Guide for Youth
- OSERS Transition Planning Guide for Youth with Disabilities
- O * net Career Exploration
- Self-Determination Training and Inventory
- Virtual Job Shadow
- NAD Self Advocacy Guide
- Link from IEP to IPE Guide
- Connecting with Parents in Transition Planning
- National Youth Transitions Center

Workplace Related

- Job Accommodations Network
- Hearing Loss Association of America Employment Toolkit
- National ADA Network
- Office of Disability Employment Policy
- Workplace Accessibility Assessment
- HKNC: DeafBlind at Work
- Accessible Event Planning
- National Organization on Disability

Interpreting Related

- RID Standards of Practice
- Hiring Qualified Interpreters
- StreetLeverage

Communication Related

- Learning ASL recommendations
- National Cued Speech Association
- Touch Signals
- Communication Tips Late-Deafened
- Protactile Communication
- Pidgin Signed English
- Haptic Communication

Technology Related

- Automatic Speech Recognition
- Assistive Technology list from NCDHH
- Assistive Devices for People with Hearing, Voice, Speech or Language Disorders
- Hearing Assistive Technology list from HLAA
- iCanConnect Equipment for Deafblind
- Platform accessibility
    - Apple Accessibility
    - Google Accessibility
    - Android Accessibility

- TDI for Access
- Telecommunications Relay Services
- Web Accessibility Initiative (W3)

Organizations of Deaf Professionals

- American Sign Language Teachers Association
- Associated of Medical Professionals with Hearing Loss
- Convention of American Instructors for the Deaf
- Deaf and Hard of Hearing Bar Association
- Deaf in Government
- Deaf Truckers United
- Deaf Pilots Association
- Deaf Talent Media & Entertainment Consulting
- National Association of Blind Merchants
- National Theatre of the Deaf

Legal Resources

- National Association of the Deaf
- US DOJ ADA requirements for Effective Communication
- ADA National Network
- Office of Civil Rights, U.S. Department of Education

Youth Development

- Junior NAD
- List of Summer Camps from Gallaudet University
- Camps sorted by interest from Raising Deaf Kids
- Youth Peer Mentoring, from Florida VR
- Council de Manos: Youth Lideres program
- Deaf Women United: Deaf Girls program
- National Association of the Deaf: Youth program
- National Black Deaf Advocates: College & Youth

Parent and Family Related

- Hands and Voices
- The Whole Family Project

- Family Network of Disabilities
- Hands and Voices Military Project
- OSEP Parent Centers
- National Family Association for the Deaf-Blind (NFADB)
- DEAF Project at CSUN

Mental Health Resources

- Mental health directories (Clerc Center)
- Resources and strategies with crisis center contact information (NDC)
- List of Resources (NCCSD)
- National Deaf Counselors Association
- National Deaf Therapy
- Deaf Abuse Survivor Resources
- Deaf Survivors of Domestic and Sexual Violence

Research and Data Centers

- Center for Employment and Disability Research
- Center for Rehabilitation Counseling, Research, and Education at George Washington University
- National Deaf Center at The University of Texas at Austin
- ASL proficiency measure (ASLI)
- Gallaudet University Research Initiatives
- NTACT: The Collaborative
- Boston University Deaf Studies Faculty and Center for the Study of Communication & the Deaf
- UNC - Greensboro Deaf Studies Faculty
- California State Northridge Deaf Studies Faculty
- Lamar University Faculty
- Research at National Technical Institute for the Deaf (NTID)
- National Institute on Deafness and Other Communication Disorders (NIDCD)
- National Institute on Disability, Independent Living, and Rehabilitation Research (NIDILRR)
- Deaf/Hard of Hearing Technology Rehabilitation Engineering Research Center
- Center on Deafness at University of Tennessee-Knoxville
- Center on Literacy and Deafness at Georgia State University
- Research and Resource Center with the Deaf* communities at Western Oregon University

Recommended Reading

Academic Journals

The following academic journals tend to publish current information related to deaf people. Most publish their articles online ahead of print publication. Sign up for their new issue alerts to stay abreast of articles as they become available.

- American Annals of the Deaf
- Applied Developmental Science
- Career Development and Transition for Exceptional Individuals
- Deaf Studies Digital Journal
- Deafness and Education International
- Disability Studies Quarterly
- Ear and Hearing
- Exceptionality
- International Journal of Developmental Disabilities
- Journal of American Deafness and Rehabilitation Association
- Journal of Applied Rehabilitation Counseling
- Journal of Deaf Studies and Deaf Education
- Journal of Developmental and Physical Disabilities
- Journal of Postsecondary Education and Disability
- Journal of Speech and Hearing Research And Education
- Journal of Speech, Language and Hearing Research
- Language, Speech and Hearing Services in Schools
- Odyssey: New Directions in Deaf Education
- Remedial and Special Education
- Sign Language Studies
- Teaching Exceptional Children
- The Volta Review

Books

The range of related books, both electronic and hard copy, continues to expand. Two major publishers focus entire series on deaf related topics:

- Gallaudet University Press
- Oxford University Press

This list of recommended books consists of both academic syntheses and more personal narratives related to deaf people and their experiences.

- Bell, C. (2014). *El Deafo*. Harry N. Abrams, Publisher. *Winner of the John Newbery Medal*.
- Bjorge, H., Rehder, K., & Overas, RM. (2015). *Haptic Communication* (American Edition). Helen Keller National Center.
- Bouton, K. (2014). *Shouting Won't Help –- Why I and 50 million other Americans Can't Hear You*. Picador Paper.
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Research Literature

The Model State Plan draws from a large body of research literature. The following are key articles or chapters for further reading on important topics related to deaf people and best practices for vocational rehabilitation. This list focuses on publications released since the 2008 Model State Plan.

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- Bauman, H. (2014). Deaf space: An architecture toward a more livable sustainable world. In H.- D. L. Bauman & J. J. Murray (Eds.), *Deaf gain: Raising the stakes for human diversity* (pp. 375–401). University of Minnesota Press.
- Belcastro, F. P. (2004). Rural gifted students who are deaf or hard of hearing: How electronic technology can help. *American Annals of the Deaf, 149*(4), 309–313.
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- Bowe, F. (2003). Transition for deaf and hard-of hearing students: A blueprint for change. *Journal of Deaf Studies and Deaf Education, 12*(3), 324-343.
- Burgstahler, S. (2003). The role of technology in preparing youth with disabilities for postsecondary education and employment. *Journal of Special Education Technology, 18(4),* 7-20.

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- Cawthon, S.W., Garberoglio, C.L, Palmer, J., Ivanko, T., *Davidson, S., Ryan, C., & Johnson, P.*, (2020). Accessibility of Postsecondary Education and Training for Deaf Individuals: A Proposed Conceptual Framework. *Future Review: International Journal of Transition, College, and Career Success (3), 1- 15*.
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