



STATE OF NEW JERSEY

DEPARTMENT OF HUMAN SERVICES (DHS)

COMMISSION FOR THE BLIND & VISUALLY IMPAIRED (CBVI)

STATE REHABILITATION COUNCIL (SRC)

MEETING MINUTES

FEBRUARY 2, 2024 - HYBRID MEETING

130 LIVINGSTON AVE | NEW BRUNSWICK, NJ 08901

Voting Members Present: Ronda Williams Banks, Donald Campbell, Vito DeSantis, Alice Eaddy, Clarke King, John O'Connell, Dr. Amanda Philp, Wanda Williford

Members Awaiting Appointment Present: James Good, Steven McCoy, Linda Melendez, Gwen Orlowski, Gary Robinson, Lauren Weishaar

Absent: Tina Fiorentino, Sioban Leahy, Jeanne McMahon, Kathleen Spata,

Ex Officio Present: Dr. Bernice Davis, Dawn Corbett, Pat McKenna, John Tkacz

CBVI Staff: Esther Lavarin, Bryan McClain

Members of Public Present: Haley Carney, Susan Head, Janna Sheiman

Vito DeSantis, SRC Chairperson, welcomed everyone, calling the meeting to order at 9:35 a.m.

Vito announced that the meeting was being held in compliance with Section 105 of the Federal Rehabilitation Act 1973 as amended; and in compliance with the New Jersey Open Public Meeting Act, NJSA 10:4-6.

After introductions and roll call, a quorum was noted. A reminder was made for those participating on Zoom to keep themselves muted until speaking and for all those participating to announce themselves prior to speaking. Vito reminded members of the public that they are welcome to be at the meeting and if they have questions they can send those via email for a response to Charles Pat McKenna {Charles.McKenna@dhs.nj.gov} and Vito DeSantis {VJDeSantis@optonline.net}.

Approval of Meeting Minutes

The minutes of the December 1, 2023 meeting were acknowledged as received and reviewed. A motion to accept the minutes was made by Wanda Williford and seconded by Alice Eaddy. All were in favor, none opposed. These minutes will be put into the permanent record of the SRC.

Next Meeting Date:

June 7, 2024 (hybrid)

Old Business:

Discuss Letter sent to the Governor

Included with the email invitation to the Council for this meeting was a copy of the letter that was sent to the Governor's Office. Vito asked if the members have read the letter. He also confirmed that he sent the letter via email and mailed a hard copy, as well as sent a courtesy copy to Dr. Davis and Commissioner Adelman of DHS.

Discuss SRC Seats (vacancies/nominations/appointments)

Vito asked of Pat McKenna if there was any word on appointments made for those still pending initial appointment or reappointment to the SRC. There were none.

Vito acknowledged that with this being Clarke King's final meeting, there is now a vacancy for the seat that Clarke was holding. Clarke confirmed that he was appointed to the seat of *Current or Former VR Applicants or Recipients*.

Vito announced to the SRC that if anyone knows of an individual who may be interested in joining the SRC to please send an email to himself or Pat. Clarke mentioned that he sent one person who is interested via email to Pat and Vito just a few minutes before this meeting began.

Discuss SRC Training Date

Previously it was discussed and agreed on that a separate meeting for an SRC Training be held.

Vito asked if Dr. Davis' office can get in contact with the VRTAC-QM in order to schedule them to provide the virtual training to the SRC. Dr. Davis agreed. A training date was not yet selected. Pat McKenna will begin to facilitate the contact for the training.

Discuss and Determine Goals for 2024

Vito noted that the Proposed SRC Goals for 2024 need to be voted on and approved.

The 2024 Proposed SRC Goals were read off to the SRC by Bryan McClain as follows:

- The SRC will meet four times in Federal Fiscal Year 2024, as well as continue ongoing support to foster the goals of CBVI and its excellent services to the consumer population.
- The SRC, by reviewing various reports and current and proposed policies, will:
 1. Work with CBVI to enhance and improve competitive integrated employment outcomes across all VR consumer groups being served;
 2. Assist the commission in identifying and partnering with apprenticeship opportunities;
 3. Assist the commission in enhancing partnerships with the local one-stops and larger workforce system;
 4. Assist CBVI in providing services, ensuring that rapid engagement is utilized, while ensuring informed choice to the consumer;
 5. Assist CBVI in developing career pathways for appropriate consumers who wish to progress from education/training to Competitive Integrated Employment.
- SRC members will continue to participate, as appropriate, in public forums and agency programs for the benefit of consumers.
- SRC will work with CBVI to identify, develop, and provide an on-boarding training for new SRC members, to ensure all members understand the scope and role of SRC membership and the VR program. The SRC & CBVI will conduct a yearly SRC Purpose and Responsibilities training.
- SRC will work with CBVI to identify topical presentations that can be presented at each SRC meeting, related to agency performance and compliance.
- SRC will enhance and operationalize the role of the subcommittees to align its focus with the core requirements of the SRC, the SRC bylaws, Federal Regulations, and the VR program.

After these goals were read, Vito opened the discussion for comments or questions. There were none.

Alice Eaddy made a motion to approve the 2024 SRC Goals and John O'Connell seconded that motion. All were in favor. None opposed.

New Business

Nominations/Vote on SRC Vice Chair

It would be important to receive nominations for and appoint a Vice Chairperson. The previous Vice Chair stepped down from the SRC and the SRC currently does not have one. The duties of the Vice Chair are to be able to step in to Chair the meeting if Vito was unable to do so, as well as to attend the pre-SRC meeting. Vito encouraged the members to think about it but also mentioned that it isn't a lot of work according to the bylaws. Vito asked if there were any who wanted to volunteer to be considered for this role. There were no immediate volunteers. This point will be revisited.

Something the agency should think about is sending the SRC's chair and vice chair to the CSAVR Conference since there are a series of meetings on the topic of the SRC that is held at the conference. This was mentioned to Dr. Davis, Executive Director of CBVI and she agrees with that suggestion.

Discuss SRC Role as it pertains to Regulation Amendment:

A brief discussion on this topic began and after a few comments by Gwen. Vito asked Dr. Davis to explain the new reauthorization process.

Dr. Davis began to explain that if there needs to be revisions or something to be changed in the regulations, there is a discussion that happens within the agency and then again with the Central Office of DHS in Trenton. The discussion with DHS then centers on the pros and cons of making any suggested changes. Much of the current conversations are centered around reimbursements and outdated fee schedules. Any time there is a reauthorization, there is a public comment and response period, the responses identify what is possible and what is not possible. The Central Office makes sure that we are following the legal process around the reauthorization and the readoption process.

Pat McKenna added that there are different regulations and they need to be reauthorized at different time periods. To do so, there is a calendar that is kept for that purpose. The question then arises – is there a need for change and how can the agency make the change. There is a lot of conversation that is then had with DHS regarding these proposed changes.

Vito inquired about this calendar, and if it only has the administrative code 10:91 and the fee schedule that is upcoming? If there are other regulations that are coming due, then he states that the SRC needs to have a process in place to review that regulation.

Dr. Davis mentioned that education as well as independent living is upcoming on the calendar. She also offered to provide a more formal response to Vito regarding the upcoming items.

Vito inquired of Lauren, since she chairs the Policy and Procedures committee, if she agreed with having a private meeting with Kevin Harris of CBVI to hear about this process, also Vito volunteered John O'Connell to join that meeting.

Gwen added to this conversation that there is also a problem in the regulations related to the appeal process for fair hearings that does not adhere to federal law. She was unsure if that was for CBVI or just DVRS. It was clarified that CBVI had this correct appeal process in their regulations but it was removed in 2019.

Vito then agreed that the SRC should look at this as well. This topic of appeal would come under the VR regulations. Vito will also send out a document that he co-authored while at ICI that details what should be in a VR policy & procedure manual.

Review Highlights of CSNA Report:

Our Comprehensive Statewide Needs Assessment is an opportunity to look at what the agency is doing well as well as what the agency can do better. Town Halls, focus groups, surveys, and similar are held so as to get this feedback. Pat was able to conduct the focus groups personally. CBVI's partners were used to send out surveys and put together the substantial report. The following are items of concern that were mentioned in the feedback, listed below from those mentioned most often to least often.

1. Adaptive Technology (AT) – feedback received indicated that AT instruction is one of the most important, if not the most important skillset that is received from CBVI and are looking for ways that this instruction can be expanded by CBVI. Technology Services Specialist (TSS) lessons are now conducted in person, but where appropriate it is offered to the consumer in the remote instruction format. CBVI has also been looking to expand the Library Equal Access Program (LEAP), which is a program that facilitates instruction to a consumer on iOS devices in person, and will expand the program by expanding the number of Libraries that offer the LEAP classes.
2. Orientation and Mobility (O&M) Instruction – This is a key skillset of independent travel instruction to help with travel to work, school, etc. Consumers recognize this as a valued skill, would like to see it continue, and even do more of it. CBVI does have a number of O&M staff positions open, most notably at the JKTC and in the Northern Regional Office (NRO). The recruitment and retention challenges are seen in agencies across the country. CBVI has contracted with several third-party O&M providers to provide instruction at the 2 areas of need {JKTC and NRO}. Another change to be made is that a new IL Coordinator will be brought on at CBVI over the next couple of weeks and O&M will be the #1 priority on their list.
3. The Value of Transition Programs, such as EDGE – The Edge program was mentioned specifically and the feedback was that they should continue and be expanded.
4. Transportation – this is not the instruction of how to use transportation but the provision of Transportation. This is beyond the scope of CBVI, however, it is noted that this is a challenge for many consumers.
5. Programming and similar, and community engagement events that pertain to the deafblind population. CBVI does not have, at present, any program that is specifically targeting the deafblind population. CBVI has been looking into community engagement events that are

focused on the deafblind population such as the Taste of Technology event featuring communication solutions for them and which was held at the JKTC.

6. The challenge of getting the word out about CBVI services to those who do not know about CBVI, and getting the word out about additional CBVI services to existing consumers. Currently CBVI uses email blasts, community connection calls, ASPIRE groups, and increased presence at community events.
7. Delays in response time and return of communication to CBVI staff – This is the least remarked upon point, but it has been remarked on and is being addressed. Supervisors are being worked with to pass along the information that those working directly with consumers should be responding to consumers in a timely fashion when they are contacted.

Gwen, in harmony with the challenge of getting the word out about CBVI services, mentioned that the website link to the Client Assistance Program (CAP) of DVRS listed on CBVI's website was an old and now incorrect web link. Pat assured Gwen that this will be corrected quickly.

Vito, in commenting on point 7, stated that although it is point 7 does not mean that it is not important, but the fact that it is number 7 is significant as other agencies usually have this as point 1 or 2. He then asked if how we are meeting the response time standards could be put in a future report. Pat will make a note of including that.

Dr. Bernice Davis – Executive Director's Report

Dr. Davis began by informing the SRC that there is a lot of preparation being done now around budget items. CBVI in its proposal is asking for additional direct service and a few administrative positions. At this point the agency has already defended their proposal and are waiting to hear back on what will be permitted. Work is also continuing on the social media campaign to recruit Teachers of the Visually Impaired (TVI) for the agency, and there will possibly be additional advertisements for TVIs. Since the certification reimbursement provision has been initiated, 4 TVIs have been added and a 5th TVI should be starting soon. There are also upcoming retirements in 2024 amongst TVIs.

CBVI is also moving closer with solidifying a new case management system which is essential to helping the agency meet the Federal requirements with ease.

The NJ Department of Education (DOE) was awarded a grant from the US DOE for \$8.5million+ from the Disability Innovative Fund (DIF). There were 20 of these grants issued to various organizations across the country, and the grant is focused on transition – to improve competitive integrated employment, secondary education, etc. for children and adults. For NJ it is being referred to as Collaborations in Transitions in New Jersey and is focusing on the following:

1. Improving Interagency Collaboration around Transition
2. Creating a Statewide Transition Website
3. Newark, Edison, and Pinelands School Districts to improve outcomes for individuals, post-secondary income, and career success.

This is the largest discretionary grant that has been administered to CBVI. Both Vocational Agencies will be part of the conglomerate of agencies working on making improvements for Transition.

Dr. Philp added that this is for students aged 18-21, that the DOE will be looking at beginning services for students at the age of 14, and that the grant, as mentioned, is about interagency collaborations, bringing all of the agencies together to help students transition into post-secondary school and the work force.

Pat McKenna, Assistant Division Director - Vocational Rehabilitation (VR) Update:

Joseph Kohn Training Center (JKTC) Updates:

Current consumer numbers have been lower than previously but this is just the typical ebb and flow and should be increasing over the next few weeks. A change in the program will be implemented in the next few weeks. This will be to add a final project for consumers to complete before they graduate. The final project will be determined early on and will be aligned with their interests, skills, their goals, and accomplishments. This might be: cooking a particular meal, reaching a certain location in New Brunswick or the surrounding community, or something pertaining to braille or technology. The idea is to customize the final project for each student.

Transition Statewide Unit:

LIFE 101 program is conducted at JKTC every summer and is on track to be conducted again this summer. The goal is to conduct this 2-week program for 12 students in high school, aged 14-16. Referrals, and applications have begun to be received, and an Open House was conducted to gain interest in the program.

Business Enterprise of New Jersey (BENJ) Updates:

BENJ is continuing its partnership with the EDGE program, to offer internship opportunities at BENJ locations. There will be 4 locations, and interviews will be conducted in the coming weeks. BENJ staff are also continuing their work of gaining locations at Community Colleges.

Vito inquired if there will be a curriculum for the students who will be interning. Pat confirmed yes there is, that there is a list of job responsibilities for the student to do in their internship.

Project BEST:

There are several new fixed sites for the Project BEST program which will allow for more eye screenings in Somerset and Passaic counties.

Agency Specific Information:

Pat is ecstatic that CBVI will be bringing on an IL Coordinator in the weeks ahead.

Community Based Programs:

The Assistive Support Programs for Independence, Renewal, and Education (ASPIRE) Network is bringing on a new ASPIRE group which is for the parents of blind and visually impaired high school students. This will be a statewide group, will meet virtually on a monthly basis, and will be covering topics pertaining to being the parent of a student in high school or college who is blind, deafblind, or visually impaired. The first meeting will be later this month.

Esther Lavarin, VR Coordinator- Vocational Rehabilitation (VR) Update:

Business Relations Unit (BRU) Updates:

The BRU team held a presentation on progressive employment and its approach with the agency's JKTC staff and any interested VRCs. This will give both the employer and the job seeker the opportunity to work together regardless of preexisting independent skill set. BRU is also working to increasing the number of employers that CBVI is working with, establishing goals to optimize their potentials for 2024, including finding ways to engage new employers. One option is modeled on the Dining in the Dark concept so that a limited number of employers can visit JKTC and see how our consumers operate in a sighted world.

Employment, Development, Guidance, and Engagement (EDGE) Program:

Currently, this program is up to 96 referrals and Esther is hoping to get more.

Promoting Academic and Student Success (PASS) Program:

The PASS program took place in January, which is an advocacy program for college students. CBVI would like to have another one take place later this year.

Agency Information:

CBVI is actively looking to develop more transition programs, and are actively pursuing referrals for The College of New Jersey (TCNJ) summer programs.

The College unit is busy preparing students for this spring semester.

The Corrective Action Plan with NJ Vocational Rehab has been submitted as of January 31 and CBVI is awaiting feedback from RSA.

Client Assistance Program (CAP) Report by Disability Rights New Jersey (DRNJ):

The CAP Report was presented by Janna Sheiman, the CAP Coordinator of Disability Rights New Jersey (DRNJ).

Highlights of the report was presented for the first quarter October 1 – December 31, 2023. Regarding some of the outreach accomplished, DRNJ was a part of the Facing the Future conference in New Brunswick. DRNJ had an information table where they gave out information about employment, VR, and CAP services to about 275 attendees. Also appeared at the Burlington County Workforce Development Board Employment and Resource Fair, held a table and provided information.

In October, DRNJ held an initial group meeting for the 14 C Sheltered Workshops presentation to review research that the employment team has been working on over the past 2 years.

There were 19 cases carried over from FY 2023, and since October there were 5 new cases opened, and 8 cases closed. So currently there are 16 active cases – 13 with DVRS and 3 with CBVI.

Some of the issues are as follows (mostly pertaining to DVRS not CBVI):

1. Clients are not getting responses from VR Counselors.
2. Cases are being closed without written notice or cases are being closed with the determination that the client is too disabled, but without going through a trial work experience or any of the protections set forth in the federal regulations.
3. There is 1 case in fair hearings with DVRS, there were no administrative reviews, and no mediations within the 1st quarter.

The full report will be appended after the conclusion of these meeting minutes.

After the report was read, Vito inquired of Gwen if DRNJ has heard anything from RSA with clarifications on the matters pertaining to CBVI. Gwen responded stating that the guidance Janna referred to came out of Advocacy by CAP Programs, the National organization of DRNJ

with DRNJ, and RSA. Gwen also stated that they do sometimes have one on one conversations with RSA and they have had discussions with RSA about these topics.

Dr. Davis asked Gwen if she had something in writing that could be shared with herself, Vito, and Pat McKenna. Gwen is looking to have periodic meetings on the calendar with Dr. Davis. She will reach out to have a conversation about some of the issues that are being reported concerning CBVI policies. Jana mentioned that TAC 22-03 is written information on the topic of costs that college students are required to cover, and that this is publicly available.

Member Updates:

Members were called to see if there were any updates to provide. The following were submitted for inclusion with the minutes:

- **Don Campbell**

- The New Jersey State Independent Living Council is looking for new members.
- The Atlantic Center for Independent Living and the Mental Health Association in Atlantic County received funding from the Division of Disability Services, Inclusive, Healthy Communities Grant to increase civic engagement in the disability community.

- **Dr. Amanda Philp**

- Memorandum of Agreement (MOA) Progress Reporting for 2023-2024 between the NJ DOE and the NJ DHS. This update is for September through December 2023. The MOA is around the duties and activities of NJ CBVI TVIs who support programs and services for students with blindness or vision impairment. During the September - December reporting period, TVIs began work with newly referred students, including those who have transitioned from the Early Intervention System to Preschool, as well as students with newly identified visual impairment, and students who have arrived in NJ from another state or outside the United States. The report also mentions the provision of information and training to family members, teachers, child study teams, and other school personnel, including 7 professional development activities in October with 31 participants and 3 activities in November with 24 participants. Additionally, the report highlights the loaning of appropriate adaptive equipment and special educational materials to local school districts.

- There was a grant awarded to NJ DOE regarding transition services and interagency collaborations to support students with disabilities post-school, as was already mentioned by Dr. Davis.
 - The Office of Special Education is currently working with a panel of external stakeholders on an 18-21 year old Advisory Panel to provide input into Quality Program Indicators for Programs Servicing Students 18-21 Years Old with Disabilities. The purpose of having quality programming indicators for transition programs serving students 18-21 years old with disabilities is to ensure that programs are providing the necessary support to help students achieve their goals and become successful in adult life. These indicators can help measure the quality of services offered by the program, identify areas for improvement, and ensure that the program is meeting the needs of its students. There have been 9 identified indicators that look at program structure, transition assessments, self-determination and self-advocacy, academic and functional curriculum, community-based instruction, interagency collaboration, family engagement, person-centered planning, and adult education. I will keep you all posted on the release of this document; it is anticipated to be in the fall of 2024.
- **John Tkacz**
- NJ DVRS, MHANJ's CCERI, and Rutgers IEI are partnering to bring Certified Rehabilitation Counselors (CRC) Providers a FREE 10 Hour Ethics Conference in NJ.
 - Please fill out the polling survey below for planning purposes if you are interested. Survey closes 2/16/24. <https://forms.office.com/r/fV3khtxmpi>

Announcements:

This will be Clarke King's last meeting. Vito acknowledged Clarke's tenure and role with the SRC after introductory comments and Clarke expressed his appreciation and the honor it was for him to serve as an appointed member of the SRC.

Gary Robinson received an email from the Governor's Office about 3 weeks prior to this meeting, sending him an application and a request for his resume for the SRC seat appointment. The email came from Kathleen Temple. Gary shared the email address in the Zoom chat for others to inquire if they missed an email.

As of December 31, 2023 Vito is no longer a part time employee of the Institute of Community Inclusion (ICI). Vito wanted to be sure there were no perception of conflict with his connection with ICI and wanted all to be aware of his retirement from ICI for the record.

Lauren mentioned that there is an employee at the Hudson Community Enterprises who is deafblind having an issue with Access Link. A complaint was filed with Access Link, and Lauren explained that they are requesting the driver to go inside the complex to pick up the consumer but they will not do it. Lauren asked for assistance on what to do about it now.

Adjournment:

Wanda Williford made a motion to adjourn the meeting. John O'Connell seconded the motion. All were in favor. The meeting was adjourned at 12:10pm.

The next SRC meeting is scheduled for June 7, 2024.

Respectfully Submitted,

Bryan McClain

Bryan McClain

Executive Secretarial Assistant

DISABILITY RIGHTS NEW JERSEY

ADVANCING JUSTICE. ADVOCATING INCLUSION.

GWEN ORLOWSKI, EXECUTIVE DIRECTOR

Disability Rights NJ Report to State Rehabilitation Council

Client Assistance Program (CAP)

Reporting Period: 10/1/2023-12/31/2023

Report Prepared by: Janna Sheiman, Managing Attorney – Employment Team and CAP Coordinator

Brief introduction of CAP

The Client Assistance Program (CAP) at Disability Rights NJ provides legal advocacy and education to people with disabilities applying for or receiving services funded by the Rehabilitation Act, including vocational rehabilitation. CAP also provides legal advocacy and education about Title I (employment rights) of the Americans with Disabilities Act.

Highlights and Summary of Accomplishments

- **Trainings/Outreaches/Resource Development**
 - **Facing The Future Conference:** Disability Rights NJ ran an information table and spoke about the services available to help individuals seek employment at the Facing the Future Conference held on October 13, 2023. Approximately 275 attendees came to the conference and received information about Vocational Rehabilitation Services and the Client Assistance Program.
 - **Burlington County Workforce Development Board Employment and Resource Fair:** Disability Rights NJ ran an information table and spoke about the services available to help individuals seek employment at Burlington County Workforce Development Board Employment and Resource Fair, held on October 23, 2023. Approximately 100 attendees came to the event and received information about Vocational Rehabilitation Services and the Client Assistance Program.
 - **Sheltered Workshop Presentation:** Over the past three years, Disability Rights NJ has been conducting research into the Sheltered Workshops throughout the state. On October 10, 2023, a stakeholder group was convened where Disability Rights NJ discussed our findings, as well as presented on research on five states across the United States that are in the process of ending subminimum wage. The purpose of the group was to identify potential best

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practices for the state of New Jersey to move towards ending subminimum wage for individuals with disabilities.

- **Serving individual clients.**

Number of client cases during DRNJ's 1st fiscal quarter 2024 (Oct 1 – Dec 31, 2023):

Program	Carryover from 2023	New Since October 1, 2023	Closed as of December 31, 2023	Current Active as of January 1, 2024
CAP	19	5	8	13 DVRS 3 CBVI

- Examples of issues in client cases:
 - Communication breakdowns where DVRS clients and DVRS counselor do not have a shared understanding of DVRS client needs
 - Clients not getting timely response from their VR counselors
 - Cases closed by VR agency without any written notice to client
 - Cases being closed with a determination the client was “too disabled” without going through a Trial Work Experience
- Number of active appeals (administrative, mediation, and fair hearings)
 - Administrative: 0
 - Mediation: 0
 - Fair Hearing: 1
- Examples of outcomes for clients:
 - DVRS: Disability Rights NJ represented J.C., a 51-year-old woman with a mental illness. J.C. had contacted Disability Rights NJ after her DVRS referral and application had not been completed and her case with DVRS had been closed, despite her constant reach out to her VR Counselor. Disability Rights NJ reached out to the VR counselor on client's behalf, who was quickly told after Disability Rights NJ's contact that she was eligible for services and a new counselor was assigned to her. J.C.'s case with DVRS did move forward, and the client received a career exploration test to help identify her career objectives and was moving forward with her new counselor to develop an IPE.
 - DVRS: Disability Rights NJ represented a C.F., a 19-year-old girl diagnosed with anxiety and autism, in securing appropriate services for her from DVRS. The client was facing difficulties in receiving services from DVRS due to a miscommunication between the central office and her field office. Disability Rights NJ successfully intervened on her behalf, and client was authorized to move forward and receive the services she was seeking.

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Systemic Issues observed by DRNJ

- The CBVI Graduate Fee Schedule is unreasonable under WIOA and risks depriving applicants access to Graduate School Programs throughout New Jersey. The graduate school fee schedule utilized by CBVI remains so low that it effectively denies access to graduate school programs for individuals who are blind or visually impaired. The WIOA and implementing regulations explicitly prohibit this practice. CBVI utilizes the per credit tuition rate of Jersey City University, the lowest cost public university in the state. Notably, JCU is cutting back its undergrad and graduate programs in response to its ongoing fiscal crisis. Because the fee schedule is pegged at the lowest cost school, CBVI clients with career goals that require a graduate school degree offered only at other schools cannot access those programs.
- There is a systemic failure to identify and properly provide services to individuals who receive SSI/SSDI benefits. CBVI is imposing the cost share on SSI and SSDI recipients or requiring them to show other factors of hardship to receive full sponsorship. This is another practice explicitly prohibited by the Rehabilitation Act of 1973 and further supported by the WIOA, which says that VR programs must not impose the cost share on SSI/SSDI recipients and cannot require them to demonstrate hardship through other means.
- Improper practice regarding student loans, raising them to the level of Comparable Benefit in violation of federal law. Through Disability Rights NJ's representation of clients, Disability Rights NJ has discovered that there is a disconnect between CBVI policy and the federal law. CBVI policy is that it does not "require" individuals to take out student loans to pay for their education, however if the client does take out student loans CBVI will only pay the balance left over after the loan is applied. This is problematic as this practice is treating student loans as a "comparable benefit," which is expressly prohibited under the federal regulations. 34 CFR 361.5(c)(8)(ii). CBVI has in the past taken a good deal of time to determine a tuition decision, and that tuition comes due for the student while CBVI is considering its course of action. The policy of only paying for a balance left after student loans applied is contrary to federal law. A better policy would be to set forth a system that CBVI would fund the tuition and approved costs, regardless of the student loans taken by the student, and work with the University to send the covered portion back to the loan provider. =

Goals and Objectives for Next Quarter (January 1 through March 31, 2024)

- Work with CBVI to update contact information for the Client Assistance Program on their websites. DVRS has recently updated their website with the correct contact information, and it will be incorporated into their client services handbook.
- Develop and deliver posters regarding the Client Assistance Program to DVRS and CBVI to be displayed in the field offices.
- Provide outreach and training to the CILS and their participants on their employment rights.
- Provide outreach and training to individuals with disabilities about their rights to VR services and the Client Assistance Program

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