

# An examination of vocational rehabilitation requirements for self-employment technical assistance and consultative services

Tim Riesen<sup>a,\*</sup>, Beth Keeton<sup>b</sup>, Rachel Byers<sup>a</sup> and Aubrey Snyder<sup>a</sup>

<sup>a</sup>*Institute for Disability Research, Policy and Practice, Utah State University, Taylorsville, UT, USA*

<sup>b</sup>*Griffin-Hammis Associates, Atlanta, GA, USA*

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## Abstract.

**BACKGROUND:** The Rehabilitation Act references self-employment in its definition of competitive integrated employment (CIE) and description of vocational outcomes. The Act also references self-employment within its scope of services and stipulates that rehabilitation services include “technical assistance and other consultation services to conduct market analyses, develop business plans, and otherwise provide resources, to the extent those resources are authorized to be provided through the statewide workforce development system, to eligible individuals who are pursuing self-employment or telecommuting or establishing a small business operation as an employment outcome” 34 CFR 361.48(b)(19).

**OBJECTIVE:** This policy review identifies and highlights specific SVRA policy regarding TA and consultation for self-employment.

**METHODS:** Policies from all 50 states and the District of Columbia’s combined or general SVRAs and policies from 18 blind SVRAs were reviewed and coded into categories (no reference, generic, internal, and external references) to determine the types of TA and consultation for self-employment that are outlined in state policy.

**RESULTS:** The majority of general or combined SVRAs ( $n = 38$ ) have policies for self-employment technical assistance and consultation that are generic and the majority of blind SVRAs ( $n = 16$ ) have generic policies for self-employment technical assistance and consultation. These rehabilitation agencies’ policies only reference generic services and do not identify dedicated resources designed to meet the intent and scope of rehabilitation services.

**CONCLUSION:** SVRAs must make a concerted effort to ensure that self-employment policy is adequately aligned to account for necessary supports, activities, and interventions that lead to positive self-employment outcomes.

Keywords: Self-employment, technical assistance, rehabilitation counseling, policy

## 1. Introduction

Working-age adults with disabilities encounter several social and systemic barriers to obtaining

and maintaining competitive integrated employment (Awsumb et al., 2022; Graham et al., 2018; Sundar et al., 2018). Consequently, people with disabilities remain chronically underemployed and unemployed (Erickson et al., 2022; U.S. Department of Labor, 2022; Winsor et al., 2021). The U.S. federal government has long recognized these employment gaps and disparities and has taken an active role in devel-

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\*Address for correspondence: Tim Riesen, Institute for Disability Research, Policy and Practice, Utah State University, USU Salt Lake, 920 West Levoy Drive, Taylorsville, UT 84123, USA. E-mail: tim.riesen@usu.edu.

oping civil rights statutes and entitlement programs to help mitigate the perennially poor employment outcomes for people with disabilities. For example, civil rights statutes, such as Title I of the Americans with Disabilities Act (ADA) of 1990, prohibit employers from discriminating against qualified individuals with disabilities in job application procedures, hiring, firing, advancement, compensation, job training, and other conditions of employment (U.S. Department of Justice, n.d.). Other statutes, such as the Rehabilitation Act of 1973, as amended contain entitlement provisions for states to develop and implement broad and coordinated vocational rehabilitation programs for individuals with disabilities. The purpose of the vocational rehabilitation program is to empower individuals to “maximize employment, economic self-sufficiency, independence, and inclusion and integration in society” (p.4) (29 USC §701(a)(1)(f)).

To achieve the service provisions outlined in the Rehabilitation Act, state vocational rehabilitation programs braid federal and state programs to create partnerships that promote valued employment outcomes. The federal government, through the Rehabilitation Service Administration (RSA), monitors and provides guidance to states about implementing rehabilitation service programs in accordance with the Act, and state vocational rehabilitation agencies (SVRAs) develop specific policies to inform direct service provisions at the rehabilitation counselor or practitioner level (Bruyere et al., 2010). Thirty-four states and territories have combined SVRAs that serve individuals with all types of disabilities including blind and visual impairments; 22 states have two SVRAs: blind vocational rehabilitation agencies that serve people who are blind or who have visual impairments and a separate general vocational agency that serves individuals with all other types of disabilities. Regardless of the type of SVRA, self-employment is one of the service provisions that these agencies provide. The Rehabilitation Act references self-employment in its definition of competitive integrated employment (CIE) and description of vocational outcomes. Specifically, CIE is defined as work performed on a full- or part-time basis, including self-employment, for which an individual earns an income commensurate to income received by other self-employed individuals without a disability (29 USC §705(5)). The Act also references self-employment within its scope of services and stipulates that rehabilitation services include “technical assistance and other consultation services to

conduct market analyses, develop business plans, and otherwise provide resources, to the extent those resources are authorized to be provided through the statewide workforce development system, to eligible individuals who are pursuing self-employment or telecommuting or establishing a small business operation as an employment outcome” (34 CFR 361.48(b)(19)).

Because the Rehabilitation Act contains references to self-employment as a service provision and rehabilitation outcome, SVRAs are required to offer self-employment as a service in accordance with the Act. Given that the Rehabilitation Act requires SVRAs to include technical assistance (TA) and other consultative services to eligible individuals pursuing self-employment, SVRAs should have clear policies and procedures that outline how to provide substantive TA and consultative services. The purpose of this manuscript is to identify and highlight specific SVRA policy regarding TA and consultation for self-employment. The manuscript will also provide a discussion on how to enhance TA and consultation specific to self-employment.

## 2. Method

SVRA policies for self-employment were located using the National Center on Self-Employment, Business Ownership and Telecommuting Map (<https://centeronselfemployment.org>). The online policy map provides a clickable interface that allows users to hover and click on all 50 U.S. states and the District of Columbia. After navigating to a state, users can view information about each state’s self-employment policy and affiliated policy web links. Several of the states on the map did not have links to their policy and in these instances, the state was contacted to request the appropriate policy document.

Each state policy was downloaded and reviewed by the third and fourth authors. The reviewers examined each state’s self-employment policy and highlighted specific language that references how the state is meeting the technical assistance and/or consultation provision for self-employment. In addition, the reviewers classified the policy reference into one of four technical assistance and consultation types, including (a) no reference, (b) generic, (c) external, and (d) internal. The reviewer coded “no reference” if the self-employment policy did not reference TA or consultation. The reviewer coded a policy as “generic” if the policy referenced TA or consulta-

tion generic services that are not funded by a SVRA. For example, generic services are available to all members of the community, such as those offered by the small business administration (SBA) and related resource partners such as the SBDC or SCORE. The reviewer coded a policy as “external” if the self-employment policy referenced external services such as consultants, providers, or vendors who are contracted by a SVRA to provide self-employment TA and consultation. Finally, the reviewer coded a policy as “internal” if the self-employment policy referenced internal services that are provided by specialized vocational rehabilitation staff such as a self-employment subject matter expert (SME) or internal self-employment consultant. After the two reviewers independently reviewed and coded the SVRA policies, they met to review their respective codes. If there were questions or disagreements about the policy code, the reviewers met with the other authors to discuss the codes until a consensus code was achieved.

### 3. Results

Table 1 lists the states, agency type, type of TA/consultation, and URL link to policy. Sixty-nine SVRA policies were reviewed. Policies from all 50 states and the District of Columbia’s combined or general SVRAs and policies from 18 blind SVRAs were reviewed and coded to determine the types of TA and consultation for self-employment that are outlined in state policy.

#### 3.1. Combined and general SVRAs

##### 3.1.1. Generic technical assistance and consultation

The majority of general/combined SVRAs ( $n = 38$ ) have policies for self-employment TA and consultation that are generic. These policies only reference generic services and do not identify dedicated or specialized TA or consultation resources designed to meet the intent and scope of vocational rehabilitation services for individuals with disabilities. Fifteen of these states identify specific generic resources for TA and consultation (AL, AZ, DE, ID, KS, KY, NV, NJ, NY, NC, ND, OR, SC, VT, WV). For example, Idaho general vocational rehabilitation identifies Service Corps of Retired Executives (SCORE) as a resource for training and TA:

As appropriate, clients will be expected to attend training, when available, and participate in technical assistance services related to self-employment. This could include options such as training and technical assistance on subjects such as exploring entrepreneurship, small business development, business plan development, small business management, accounting for business, or business financing. Service Corps of Retired Executives (SCORE) is an excellent resource and a no-cost service. (<https://www.score.org>). (p.57).

New York highlights a link to the SBA training courses and indicates that these SBA courses have utility when exploring self-employment feasibility and preparing business plans. North Carolina indicates that primary resources for business counseling are the small business center in community colleges throughout the state, a Small Business and Technology Center (SBTDC), or a SCORE volunteer. Kansas references an array of generic TA resources including the SBA:

The client obtains technical assistance for every aspect of the business, such as funding sources, loans, tax information, licensing, use of attorneys, inventory, and insurance. Sources of technical assistance include similar businesses, industry associations, chambers of commerce, banks, economic development programs, community colleges or universities and the Small Business Administration (SBA). (p.3).

The remaining 23 SVRAs (AK, AR, CA, CO, CT, DC, GA, HI, IN, LA, ME, MI, MS, MO, NH, NM, OH, RI, SD, TN, UT, VA, WI) with generic references for TA and consultation do not specifically identify a generic resource. These states indicate that TA is available but do not identify what these resources are. For example, New Mexico’s policy indicates that counselors can arrange for expert consultation to assist the participant for a specific purpose such as marketing and advertising but does not indicate what these are. California’s policy indicates business/self-employment consultant/trainers may assist a consumer with the development of a small business plan and provide TA but does not indicate the affiliation of these consultants or trainers:

Business/Self-Employment Consultants/Trainers (“Business Consultants”) are individuals who are qualified by education, training, and experience to provide consultation to the DOR and to an eligible

Table 1  
Self-employment policy type by state

State	Agency type		Type of TA/ consultation	URL link to policy
	General/combined	Blind		
AL	X		Generic	Not available online
AK	X		Generic	<a href="https://des.az.gov/sites/default/files/dl/VR-Policy-Manual-4-5-Self-Employment.pdf?time=1659649406690">https://des.az.gov/sites/default/files/dl/VR-Policy-Manual-4-5-Self-Employment.pdf?time=1659649406690</a>
AZ	X		Generic	<a href="https://des.az.gov/sites/default/files/dl/VR-Policy-Manual-4-5-Self-Employment.pdf?time=1659649406690">https://des.az.gov/sites/default/files/dl/VR-Policy-Manual-4-5-Self-Employment.pdf?time=1659649406690</a>
AR	X		Generic	<a href="https://dws.arkansas.gov/ar-rehabilitation-services/public-review-documents/policies/">https://dws.arkansas.gov/ar-rehabilitation-services/public-review-documents/policies/</a>
AR		X	Generic	<a href="https://www.sos.arkansas.gov/uploads/rulesRegs/Arkansas%20Register/2003/nov_2003/016.10.03-002.pdf">https://www.sos.arkansas.gov/uploads/rulesRegs/Arkansas%20Register/2003/nov_2003/016.10.03-002.pdf</a>
CA	X		Generic	<a href="https://www.dor.ca.gov/Content/DorIncludes/documents/RAM/RAM12_VR_Goods_and_Services.pdf">https://www.dor.ca.gov/Content/DorIncludes/documents/RAM/RAM12_VR_Goods_and_Services.pdf</a>
CO	X		Generic	<a href="https://drive.google.com/file/d/1zx5CW-GDnCXATfxrY0WfGgQFH0_WjQn/view">https://drive.google.com/file/d/1zx5CW-GDnCXATfxrY0WfGgQFH0_WjQn/view</a>
CT	X		Generic	<a href="https://portal.ct.gov/-/media/AgingandDisability/BRS/Policy-Manual—Rev-July-2018.pdf">https://portal.ct.gov/-/media/AgingandDisability/BRS/Policy-Manual—Rev-July-2018.pdf</a>
CT		X	Generic	<a href="https://portal.ct.gov/-/media/AgingandDisability/documents/BESB/VR-Policy-Manual-January-2019-PDF-version.pdf?la=en">https://portal.ct.gov/-/media/AgingandDisability/documents/BESB/VR-Policy-Manual-January-2019-PDF-version.pdf?la=en</a>
DE	X		Generic	Not available online
DE		X	No reference	Not available online
DC	X		Generic	<a href="https://dds.dc.gov/sites/default/files/dc/sites/dds/publication/attachments/Self-Employment%20Policy%202015_1.pdf">https://dds.dc.gov/sites/default/files/dc/sites/dds/publication/attachments/Self-Employment%20Policy%202015_1.pdf</a>
FL	X		External	<a href="https://www.rehabworks.org/_resources/docs/policies/manual/counselor-policy-manual.pdf">https://www.rehabworks.org/_resources/docs/policies/manual/counselor-policy-manual.pdf</a>
FL		X	Generic	<a href="https://dbs.fldoe.org/Leadership/Policies/02.10-self-employment-services.html">https://dbs.fldoe.org/Leadership/Policies/02.10-self-employment-services.html</a>
GA	X		Generic	<a href="https://gvs.georgia.gov/resources/gvra-resources">https://gvs.georgia.gov/resources/gvra-resources</a>
HI	X		Generic	<a href="https://humanservices.hawaii.gov/wp-content/uploads/2017/08/17-401.1-VR-POLICY-CHANGES-WIOA.pdf">https://humanservices.hawaii.gov/wp-content/uploads/2017/08/17-401.1-VR-POLICY-CHANGES-WIOA.pdf</a>
ID	X		Generic	<a href="https://icbvi.idaho.gov/VR/Policy%20Manual_NOV2018_Final.pdf">https://icbvi.idaho.gov/VR/Policy%20Manual_NOV2018_Final.pdf</a>
ID		X	Generic	<a href="https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Ficbvi.idaho.gov%2FVR%2FPolicy%2520Manual_MAR%25202021.docx&amp;wdOrigin=BROWSELINK">https://view.officeapps.live.com/op/view.aspx?src=http%3A%2F%2Ficbvi.idaho.gov%2FVR%2FPolicy%2520Manual_MAR%25202021.docx&amp;wdOrigin=BROWSELINK</a>
IL	X		No reference	<a href="https://www.ilga.gov/commission/jcar/admincode/089/08900590sections.html">https://www.ilga.gov/commission/jcar/admincode/089/08900590sections.html</a>
IN	X		Generic	<a href="https://www.in.gov/fssa/ddrs/files/460-IAC-14-VR-Rule.pdf">https://www.in.gov/fssa/ddrs/files/460-IAC-14-VR-Rule.pdf</a>
IA	X		Internal	<a href="https://public.powerdms.com/IVRS/documents/1212613">https://public.powerdms.com/IVRS/documents/1212613</a>
IA		X	Generic	Not available online
KS	X		Generic	<a href="http://www.dcf.ks.gov/services/RS/Documents/Policy/Rehabilitation%20Services%20Policy%20Manual_public.pdf">http://www.dcf.ks.gov/services/RS/Documents/Policy/Rehabilitation%20Services%20Policy%20Manual_public.pdf</a>
KY	X		Generic	<a href="https://kcc.ky.gov/Vocational-Rehabilitation/Blind-Services/Documents/p%20and%20p%20manual.pdf">https://kcc.ky.gov/Vocational-Rehabilitation/Blind-Services/Documents/p%20and%20p%20manual.pdf</a>
LA	X		Generic	<a href="https://www2.laworks.net/Downloads/LRS/412.19_Small_Business_Enterprises.pdf">https://www2.laworks.net/Downloads/LRS/412.19_Small_Business_Enterprises.pdf</a>
ME	X		Generic	<a href="https://casetext.com/regulation/maine-administrative-code/department-12-department-of-labor/division-152-bureau-of-rehabilitation-services/chapter-1-division-of-vocational-rehabilitation-services-rules/section-152-1-9-vocational-rehabilitation-services">https://casetext.com/regulation/maine-administrative-code/department-12-department-of-labor/division-152-bureau-of-rehabilitation-services/chapter-1-division-of-vocational-rehabilitation-services-rules/section-152-1-9-vocational-rehabilitation-services</a>
ME		X	Generic	<a href="https://www.maine.gov/sos/cec/rules/12/150/150c101.docx">https://www.maine.gov/sos/cec/rules/12/150/150c101.docx</a>
MD	X		External	<a href="https://dors.maryland.gov/resources/RSM/RSM2.1400.pdf">https://dors.maryland.gov/resources/RSM/RSM2.1400.pdf</a>
MA	X		No reference	<a href="https://www.mass.gov/doc/107-cmr-6-vocational-rehabilitation-services/download">https://www.mass.gov/doc/107-cmr-6-vocational-rehabilitation-services/download</a>
MA		X	Generic	<a href="https://www.mass.gov/doc/vocational-rehab-supported-employmentpdf/download">https://www.mass.gov/doc/vocational-rehab-supported-employmentpdf/download</a>
MI	X		Generic	<a href="https://www.michigan.gov/-/media/Project/Websites/leo/Documents/MRS2/MRS_Rehabilitation_Services_Manual.pdf?rev=a4e7e1ea470d455aaa5a3cdfbe92aee1">https://www.michigan.gov/-/media/Project/Websites/leo/Documents/MRS2/MRS_Rehabilitation_Services_Manual.pdf?rev=a4e7e1ea470d455aaa5a3cdfbe92aee1</a>
MI		X	N/A	Did not review/unavailable
MN	X		Internal	<a href="https://apps.deed.state.mn.us/ddp/PolicyDetail.aspx?pol=52">https://apps.deed.state.mn.us/ddp/PolicyDetail.aspx?pol=52</a>
MN		X	N/A	Did not review/unavailable
MS	X		Generic	<a href="https://www.sos.ms.gov/ACProposed/00018289b.pdf">https://www.sos.ms.gov/ACProposed/00018289b.pdf</a>
MO	X		Generic	<a href="https://dese.mo.gov/media/pdf/csg-1000">https://dese.mo.gov/media/pdf/csg-1000</a>

MO		X	External	<a href="https://dss.mo.gov/fsd/rsb/manual/vrman/vr-policy-manual.pdf">https://dss.mo.gov/fsd/rsb/manual/vrman/vr-policy-manual.pdf</a>
MT	X		Internal	<a href="https://dphhs.mt.gov/assets/detd/PolicyProcedureManual/chapter4.pdf">https://dphhs.mt.gov/assets/detd/PolicyProcedureManual/chapter4.pdf</a>
NE	X		Internal	<a href="https://webforms.nebraska.gov/program_manual_chapters/503">https://webforms.nebraska.gov/program_manual_chapters/503</a>
NE		X	Generic	<a href="https://ncbvi.nebraska.gov/sites/ncbvi.nebraska.gov/files/doc/Chapter-1.pdf">https://ncbvi.nebraska.gov/sites/ncbvi.nebraska.gov/files/doc/Chapter-1.pdf</a>
NV	X		Generic	<a href="https://cms.detr.nv.gov/Content/Media/Participant_Services_Policy_and_Procedures_Manual_7.1.pdf">https://cms.detr.nv.gov/Content/Media/Participant_Services_Policy_and_Procedures_Manual_7.1.pdf</a>
NH	X		Generic	<a href="https://www.education.nh.gov/sites/g/files/ehbemt326/files/inline-documents/sonh/nhvr-policy.pdf">https://www.education.nh.gov/sites/g/files/ehbemt326/files/inline-documents/sonh/nhvr-policy.pdf</a>
NJ	X		Generic	<a href="https://www.nj.gov/labor/wioa/documents/vocrehab/DVRCSPM2016disclaimer.pdf">https://www.nj.gov/labor/wioa/documents/vocrehab/DVRCSPM2016disclaimer.pdf</a>
NJ		X	Generic	<a href="https://www.state.nj.us/humanservices/providers/rulefees/regs/NJAC%2010.95%20Vocational%20Rehabilitation%20Services%20Program%20of%20the%20CBVI.pdf#:text=C2%A7%2010%3A95-1.1%20Purpose%20and%20scope%20of%20the%28a%29This%20chapter%20contains,and%20integration%20into%20the%20workplace%20and%20their%20communities">https://www.state.nj.us/humanservices/providers/rulefees/regs/NJAC%2010.95%20Vocational%20Rehabilitation%20Services%20Program%20of%20the%20CBVI.pdf#:text=C2%A7%2010%3A95-1.1%20Purpose%20and%20scope%20of%20the%28a%29This%20chapter%20contains,and%20integration%20into%20the%20workplace%20and%20their%20communities</a>
NM	X		Generic	<a href="https://www.dvr.state.nm.us/wp-content/uploads/2021/05/ManualOfOperatingProcedures.pdf">https://www.dvr.state.nm.us/wp-content/uploads/2021/05/ManualOfOperatingProcedures.pdf</a>
NM		X	Generic	<a href="https://www.cfb.state.nm.us/about/downloads/">https://www.cfb.state.nm.us/about/downloads/</a>
NY	X		Generic	<a href="http://www.access.nysed.gov/vr/self-employment">http://www.access.nysed.gov/vr/self-employment</a>
NY		X	Generic	<a href="https://ocfs.ny.gov/programs/nyscb/vr-manual/Ch.12.00-Competitive-Integrated-Employment-Outcomes.pdf">https://ocfs.ny.gov/programs/nyscb/vr-manual/Ch.12.00-Competitive-Integrated-Employment-Outcomes.pdf</a>
NC	X		Generic	<a href="https://www.ncdhhs.gov/media/14265/open">https://www.ncdhhs.gov/media/14265/open</a>
NC		X	Generic	<a href="https://policies.ncdhhs.gov/divisional/blind/policies/vocational-rehabilitation-policies-and-procedures-manual/definitions/@@display-file/policy_file/VR%20Manual%20Definitions%20062019.pdf">https://policies.ncdhhs.gov/divisional/blind/policies/vocational-rehabilitation-policies-and-procedures-manual/definitions/@@display-file/policy_file/VR%20Manual%20Definitions%20062019.pdf</a>
ND	X		Generic	<a href="https://www.nd.gov/dhs/dvr/docs/self-employment-ndvr-op-12-04.pdf">https://www.nd.gov/dhs/dvr/docs/self-employment-ndvr-op-12-04.pdf</a>
OH	X		Generic	<a href="https://ood.ohio.gov/static/Policies/80-VR-16+Self-employment.pdf">https://ood.ohio.gov/static/Policies/80-VR-16+Self-employment.pdf</a>
OK	X		No reference	<a href="https://oklahoma.gov/content/dam/ok/en/okdrs/documents/information/policy/DRS%20Internal%20Policy.pdf">https://oklahoma.gov/content/dam/ok/en/okdrs/documents/information/policy/DRS%20Internal%20Policy.pdf</a>
OR	X		Generic	<a href="https://oregon.public.law/rules/oar_582-070-0042">https://oregon.public.law/rules/oar_582-070-0042</a>
OR		X	Generic	<a href="https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=276768">https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=276768</a>
PA	X		No reference	Not available online
RI	X		Generic	<a href="https://ors.ri.gov/sites/g/files/xkgbur441/files/Regulations/VR-218-RICR-50-00-1_9766.pdf">https://ors.ri.gov/sites/g/files/xkgbur441/files/Regulations/VR-218-RICR-50-00-1_9766.pdf</a>
SC	X		Generic	Not available online
SC		X	N/A	Did not review/unavailable
SD	X		Generic	<a href="https://centeronselfemployment.org/documents/Self%20Employment%20Program%20Guide%202008-02.pdf">https://centeronselfemployment.org/documents/Self%20Employment%20Program%20Guide%202008-02.pdf</a>
SD		X	Generic	<a href="https://centeronselfemployment.org/documents/Self%20Employment%20Program%20Guide%202008-02.pdf">https://centeronselfemployment.org/documents/Self%20Employment%20Program%20Guide%202008-02.pdf</a>
TN	X		Generic	<a href="https://centeronselfemployment.org/documents/TN%20VR%20Self%20Employment%20Policy%20October%202021.pdf">https://centeronselfemployment.org/documents/TN%20VR%20Self%20Employment%20Policy%20October%202021.pdf</a>
TX	X		External	<a href="https://www.twc.texas.gov/vr-services-manual/vrsm-c-1100#c1102-7">https://www.twc.texas.gov/vr-services-manual/vrsm-c-1100#c1102-7</a>
UT	X		Generic	<a href="https://jobs.utah.gov/usor/vr/about/chaptertwentyseven.pdf">https://jobs.utah.gov/usor/vr/about/chaptertwentyseven.pdf</a>
VT	X		Generic	<a href="https://vocrehab.vermont.gov/sites/dvrnew/files/doc_library/VR_PP_Chapter308_SelfEmployment.pdf">https://vocrehab.vermont.gov/sites/dvrnew/files/doc_library/VR_PP_Chapter308_SelfEmployment.pdf</a>
VT		X	Generic	<a href="https://dbvi.vermont.gov/sites/dbvi/files/DBVI%20Chapter%2024%20Self-Employment.docx">https://dbvi.vermont.gov/sites/dbvi/files/DBVI%20Chapter%2024%20Self-Employment.docx</a>
VA	X		Generic	<a href="https://sharepoint.wvrc.net/VRmanual/SitePages/Home.aspx">https://sharepoint.wvrc.net/VRmanual/SitePages/Home.aspx</a>
VA		X	Generic	<a href="https://www.vdbvi.org/documents/DBVI%20VR%20Policy%20and%20Procedure%20Manual%20UPDATED%20August%203%202021.docx">https://www.vdbvi.org/documents/DBVI%20VR%20Policy%20and%20Procedure%20Manual%20UPDATED%20August%203%202021.docx</a>
WA	X		Generic	<a href="https://www.dshs.wa.gov/sites/default/files/dvr/documents/DVRManual.pdf">https://www.dshs.wa.gov/sites/default/files/dvr/documents/DVRManual.pdf</a>
WA		X	N/A	Did not review/unavailable
WV	X		Generic	<a href="http://wvdrs.org/policy/CSM/2000%20EMPLOYMENT%20SERVICES_revNov2021.pdf">http://wvdrs.org/policy/CSM/2000%20EMPLOYMENT%20SERVICES_revNov2021.pdf</a>
WI	X		Generic	<a href="https://dwd.wisconsin.gov/dwd/publications/dvr/pdf/dvr-11074-p.pdf">https://dwd.wisconsin.gov/dwd/publications/dvr/pdf/dvr-11074-p.pdf</a>
WY	X		Internal	<a href="https://dws.wyo.gov/wp-content/uploads/2021/06/vr-policy-manual.pdf">https://dws.wyo.gov/wp-content/uploads/2021/06/vr-policy-manual.pdf</a>

individual who is interested in working in a proposed self-employment setting. These individuals may assist a DOR consumer with the development of a Small Business Plan and provide technical assistance relating to the establishment and operation of the small business. (p. 94).

### 3.1.2. *Internal technical assistance and consultation*

Five states (IA, MN, MT, NE, WY) have policies that outline internal TA and consultation. Iowa outlines that TA is provided as outlined in the individualized plan for employment (IPE) and can be staggered throughout the self-employment process. The policy indicates that TA is “typically” provided by the internal business development specialist who can guide the vocational rehabilitation counselor through the self-employment process. Minnesota policy requires that an agency small business development specialist be consulted before including a proposal for a small business on an employment plan. Montana policy outlines that a “Regional Business Plan Review Group that is comprised of the Montana Vocational Rehabilitation Administration representative, a counselor, a small business lending consultant be established in each region of Montana.” Nebraska policy requires that clients who pursue self-employment must be referred to a self-employment VR specialist. Finally, Wyoming policy outlines the Business Enterprise Program (BEP) which is designed to provide support, education, and training to eligible Wyoming clients interested in self-employment.

### 3.1.3. *External technical assistance and consultation*

Four general/combined SVRAs (FL, MD, TX, WA) have policies that outline external TA and consultation. The Florida and Texas policies outline that if an individual chooses self-employment as a type of employment and develops a corresponding IPE, the rehabilitation counselor can authorize service for assistance to help develop a plan through a Certified Business Technical Assistance Consultant. Maryland’s policy describes how self-employment services are provided through the “RISE” program (Reach Independence through Self-Employment). The RISE program is designed to promote and facilitate self-employment and staff provide TA to support the individuals in exploring market information, business funding, resources, and other pertinent information. Washington contracts with specialized

Small Business Consultants to provide technical assistance to customers pursuing self-employment: “The self-employment feasibility analysis is provided by a DVR approved self-employment consultant or another comparable resource.” (p.454).

### 3.1.4. *No reference for technical assistance and consultation*

Four general/combined SVRAs (IL, OK, MA, PA) had no reference to the TA and consultation provisions.

## 3.2. *Blind SVRAs*

### 3.2.1. *Generic technical assistance and consultation*

Eighteen blind SVRA policies were reviewed. We did not review four blind SVRA policies (MI, MN, SC, WA) because the documents were not available online and we could not locate the documents via other contacts. The majority of these blind SVRAs ( $n = 16$ ) have generic policies for self-employment TA and consultation. Eight of the blind SVRAs with generic references (FL, ID, KS, MA, NM, OR, VT, VA) identify specific generic resources for TA and consultation. For example, Florida policy references referral and coordination with the small business development center or other resources such as a community college or university. Idaho outlines training and TA options related to entrepreneurship, small business development, small business management, accounting, and financing. Idaho also identifies SCORE as a resource. Oregon’s policy indicates that clients prepare a well-researched and written business plan such as that “required by a bank or SBA.” Oregon also indicates that clients can seek assistance from an outside source.

The remaining blind SVRAs with generic references (AR, CT, IA, ME, NE, NJ, NY, SC, SD) do not specifically identify a generic resource. For example, Connecticut lists information about TA but does not identify a generic resources:

Technical assistance and other consultation services to conduct market analyses, develop business plans, and otherwise provide resources, to the extent that such resources are authorized to be provided through the statewide workforce development system to eligible individuals who are pursuing self-employment or telecommuting or establishing a small business operation as an employment outcome. (p.114).

Nebraska's policy identifies TA and other consultation services that include conducting market analyses, developing business plans, and securing resources from sources other than the program for the establishment and operation of the small business enterprise. New York policy indicates that TA may include a referral to community resources for business courses, assistance in developing a business plan, and assistance with business start-up.

### 3.2.2. *Internal and external technical assistance and consultation*

Missouri's policy has language that appears to reference both internal (RSB staff) and external (contracted vendors):

Technical Assistance Services - provided to eligible individuals who are pursuing a vocational goal of self-employment, telecommuting or establishing a small business operation, including the development of business plans, marketing analyses, and resource development, in keeping with the RSB Self-Employment Resource Guide and Chapter 13, subsection (D). This will include assisting the eligible individual in gathering data on the feasibility and specifics of the business concept, refinement of the business concept based on the market research and analyses regarding a business idea, development of financial projections and plans, including break-even analysis, and putting the individual's plan into a presentable form. These services may be performed by RSB staff, contracted vendors or other entities with expertise in the creation and maintenance of small businesses. (D, other services).

### 3.2.3. *No reference to technical assistance and consultation*

Delaware's Blind SVRA policy had no reference to TA and consultation.

## 4. Discussion

This policy review sought to examine general/combined and blind SVRAs' self-employment policy related to the Rehabilitation Act's provision for TA and consultation. An examination of policy is important because of the complexity of developing and supporting self-employment as a vocational rehabilitation service for individuals with disabilities (Arnold & Ipsen, 2005; Yamamoto & Olson, 2016). Therefore, SVRA policy should

clearly and explicitly outline state-specific expectations and requirements for self-employment service delivery.

Over three quarters (78.26%) of the 69 general/combined and blind SVRAs policies that were reviewed contain generic references about TA and consultation in the policy provision for self-employment. That is, these SVRA policies direct participants to generic community business resources, such as the Small Business Development Centers (SBDC), Service Corps of Retired Executives (SCORE), or other community resources for assistance with market analyses and business plans. While these generic business resources serve all individuals who want to start a business, their services may not fully support and address the unique and often complex support needs of individuals with disabilities, especially those with extensive support needs. Indeed, receiving supports from SBDC or SCORE represents inclusive community practices but unfortunately, SBDC or SCORE counselors may not be trained on how to advise a person with a disability and can't provide individualized support to implement feedback on business concepts, feasibility, and business plans or identify or address potential accommodations (Jones & Hansen, 2022). In the context of self-employment for individuals with disabilities, ongoing feedback and individualized supports is critical to ensuring quality self-employment outcomes achieved.

Only nine (13.04%) of SVRA policies referenced internal or external TA and consultation. This finding seems to suggest that SVRAs might be relying on vocational rehabilitation counselors to guide an individual through the business research and development process. Unfortunately, research suggests that many vocational rehabilitation counselors report that they do not have technical skills and need specific training to help facilitate the self-employment process (Inge et al., n.d.). Yamamoto and Olson (2016) also found that vocational rehabilitation counselors report that one of the challenges of self-employment was helping individuals with disabilities navigate the SVRA systems (Yamamoto & Olson, 2016). Not having internal or external self-employment TA and consultation may certainly exacerbate this problem.

## 5. Conclusion

There are several recommendations that emerged from the SVRA policy analysis of TA and con-

sultation. First, self-employment policy should clearly address the scope of TA and consultation needed to achieve positive self-employment outcomes. Planning for and implementing validated self-employment practices for individuals with disabilities, including those with the significant disabilities, requires dedicated resources to actively support prospective business owners to effectively identify potential business concepts, conduct business feasibility studies, create and monitor business plans, develop business financials, identify and address necessary supports or accommodations, and navigate social security. Having policy that clearly identifies the internal and external self-employment experts who can provide substantive self-employment services and supports, including identifying and addressing disability-related considerations and needs, is essential. In other VR services, such as placement services or supported employment, VRCs help individuals with disabilities to identify, secure, and maintain employment, or refer to specialized providers when the level of support required exceeds what the VRC can provide. VR participants considering or exploring self-employment require should have access to the same level of services and supports. Referring an individual seeking self-employment to generic TA and consultation like an SBDC class is analogous to sending a person pursuing wage employment to a generic job service or class without any support. In most cases, the lack of disability-related expertise and individualized supports could compromise any potential benefits or outcomes.

Second, SVRAs must make a concerted effort to ensure that self-employment policy is adequately aligned to account for necessary supports, activities, and interventions that lead to positive self-employment outcomes. Policy at any level is often a broader statement of goals and any given policy alone does not lead to improved outcomes. SVRAs should, therefore, adopt process measures that ensure that self-employment TA and consultation is implemented according to validated strategies at intake, plan development and service delivery, and employment and closure. Adopting a process measure approach can be a powerful tool for quality TA and consultation improvements that increase valued outcomes for individuals with disabilities receiving employment support (Riesen et al., 2022). Because of the complexity of providing self-employment supports, process measures help SVRAs ensure that they are supporting individuals

with disabilities who are seeking self-employment. SVRAs should develop process measures and corresponding proficiency standards that ensure qualified supports are used for all self-employment service provisions, including identifying the business concept, conducting market analysis, writing business plans, and engaging and utilizing community resources. SVRAs should ensure that internal experts, dedicated self-employment vocational rehabilitation counselors, and external vendors are proficient in and have on-the-job experience, knowledge, and skills, and the professional development to facilitate self-employment.

### 5.1. Limitations and future research

One of the limitations of this policy review is that it was limited to policy documents only. SVRAs may have unwritten guidelines and self-employment practices that are not specifically outlined in these policy documents. SVRAs may therefore be providing some level of TA and consultation that is outside of the scope of their policy document. Future research on self-employment should include interviews with SVRAs to determine what additional TA and consultation is being implemented that is not outlined in policy documents. Future research should also be conducted to determine what types of standards are used to measure the proficiency of external and internal experts who are providing self-employment TA and consultation.

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Not applicable.

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