



NEW MEXICO  
DIVISION OF  
VOCATIONAL  
REHABILITATION  
Public Education Department

**Mission Statement:** *The mission of the New Mexico Division of Vocational Rehabilitation is to encourage and assist the efforts of New Mexicans with disabilities to reach their goals for working and living in their communities.*

**Vision Statement:** *Every New Mexican with a disability has the opportunity to contribute to the quality of life and the economic prosperity of the state.*

## **Attachment 4.10: Comprehensive System of Personnel Development**

### **Data System on Personnel and Personnel Development**

In preparation for its budget request, the Division annually assesses the supply of qualified professionals and paraprofessionals available to the Division to ensure an adequate staffing base.

The Division maintains professional vocational rehabilitation counselors to provide direct client services. These counselors manage individual caseloads.

The total number of counselors employed corresponds with a ratio of approximately one counselor per 30,000 of the general population, the number of positions filled as allowed by the State Personnel Office, and the available budget as approved by the State Legislature and Congress. Under this current methodology with 66 caseloads, the Division has enough counselors to serve a population base of 1,980,000.

Ideally, the Division would like to decrease the ratio to one counselor per 25,000 of the general population with prevalence of disability and geographic variables factored into the ratio. Under this new formula with an estimated general population of 1,984,356 (U.S. Census 2008 estimated population), the Division has determined that 13 new counselor positions will be needed to adequately meet the growing population needs in five years, for a total of 79 counselor positions.

The 2008 Disability Status Report, Cornell University provides the following disability statistics specific to New Mexico (Rehabilitation Research and Training Center on Disability Demographics and Statistics, Cornell University, Ithaca, New York 14853 [www.disabilitystatistics.org](http://www.disabilitystatistics.org)):

Prevalence of disability among non-institutionalized people ages 21 – 64 in New Mexico (Working Age) -

- Overall percentage of working-age people with a disability was 12.4%
- Disability Type
  - Any Disability 12.4%
  - Visual 2.5%
  - Hearing 3.2%
  - Ambulatory 6.4%

Cognitive	5.3%
Self-Care	2.4%
Independent Living	4.4%

- Employment rate for working-age people with disabilities was 41.2%
- Actively looking for work among people with disabilities who were not working was 6.5%
- Working people with disabilities working full-time / full-year was 24.5%
- Median annual earnings of working people with disabilities working full-time / full-year was \$37,200
- Median income of households that include any working-age people with disabilities was \$36,200
- Poverty rate for working-age people with disabilities was 25.2%
- Working-age people with disabilities receiving SSI payments in NM was 20.5%
- Educational Attainment of working-age people with disabilities in NM
  - High school diploma or equivalent 32.1%
  - Some college or an associate degree 31.3%
  - Bachelor's degree or more 14.7%

These disability population statistics do not indicate the number of individuals eligible for, available for, or in need of vocational rehabilitation services. However, the numbers suggest that as disability prevalence increases and as age-disability prevalence increases along with an increasing need for older workers in the workforce, the demand for vocational rehabilitation services will continue to increase in New Mexico.

The Division employees 121 direct service positions consisting of Vocational Rehabilitation Counselors, Rehabilitation Technicians, and Caseload Secretaries in the Rehabilitation Services Unit (RSU). There are 66 vocational rehabilitation counselor positions for the 66 caseloads located throughout the state. The Division also employs 34 rehabilitation technicians and 21 caseload secretaries providing direct services to DVR clients (per RSU organizational chart revised December 05, 2008). The ratio of counselor to rehabilitation technician and caseload secretaries varies throughout the state given the available resources. A typical ratio is one caseload secretary and one rehabilitation technician to two vocational rehabilitation counselors. In some offices in rural locations, DVR staff is usually one counselor and one rehabilitation technician.

Mentioned above, RSU re-structured to improve the Division's direct service delivery system. Some of the highlights of the changes include:

- Nine Areas as compared to the previous seven.
- Two new central Area offices – Las Vegas and Albuquerque, South Valley.
- One Area office was closed and moved to Rio Rancho.
- Two new program manager positions – one in Las Vegas and one in the South Valley office, resulting in more opportunities for advancement into management.
- Two administrative secretary positions - Las Vegas and Rio Rancho.
- A more logical geographical distribution of the Areas.
- Fewer satellite offices for all Areas.

- A reduced ratio of staff to managers.
- A reduction in the agency's overall lease expenses.
- A more "level field" which will enable future growth to occur.
- More time for managers to focus on Area needs to promote staff development, services to clients, and continuous quality improvement.

The Division employs 29 individuals with Certified Rehabilitation Counselor designation. All have Masters Degrees. Fourteen of these individuals are caseload Rehabilitation Counselors located throughout the State providing direct services to DVR clients. Another fourteen individuals occupy other professional positions located in the Division as follows:

Administrative Services	
Staff Development	= Two Positions
Director's Office	= Two Positions
Program Development	
And Support	= One Position
RSU Field Operations Directors	= One position
RSU Program Managers	= Seven positions
RSU State Office Positions	= One position

The Division encourages eligible staff to attain CRC designation.

#### **Institutions of higher education in New Mexico:**

Western New Mexico University (WNMU), Silver City, New Mexico provides the following detail regarding their Rehabilitation Services graduates at the baccalaureate and associate level. Thirty-three students are currently enrolled at WNMU Bachelor of Arts in Rehabilitation Services. None of the graduates from this program have certificates or licensure because of the undergraduate status of the program. Two employees are sponsored by RSA with no recent graduates sponsored by RSA.

New Mexico Highlands University (NMHU), Las Vegas, New Mexico has 28 students currently enrolled in the RSA counselor training grant, and vocational evaluation grant. The number of recent graduates by academic year is as follows:

- Summer 2005 = three graduates
- Summer 2006 = two graduates.
- Summer 2007 = seven graduates
- Summer 2008 = Data Not Available
- Summer 2009 = five graduates (all eligible to sit for the CRC exam)
- Summer 2010 = two graduates this academic year thus far, with approximately 10 graduates next year

Graduates with a Masters Degree in rehabilitation counseling from New Mexico Highlands University are eligible to apply for licensure in New Mexico, see page 6 of this document, Part B of the Job Related Qualifications Standards for licensure.

Eleven of 17 graduates from past years are credentialed as follows:

1. Graduated with certification or licensure: None
2. Graduated with the credential for certification or licensure as a CRC: 17
3. Personnel category for which they have received, or have the credentials to receive, certification or licensure:
  - a. LRC – PED: 9
  - b. CVE: 5
  - c. CRC: 2
  - d. LMHC: 2

The Division was instrumental in developing a vocational rehabilitation counselor education program at NMHU. DVR Staff Development personnel sit on NMHU's curriculum advisory council to ensure that coursework is aligned with Agency goals; additionally, individuals from within the agency have taught courses in Foundations of Rehabilitation and Job Placement in NMHU's Rehabilitation Counselor Masters program.

The Division continues to work with New Mexico Highlands University students to complete their internships with the NMDVR. Internships enhance opportunities to hire the NMHU graduates.

New Mexico Highlands University applied for and received three year accreditation in July 2008 from the Council on Rehabilitation Education (CORE) accreditation.

### **Plan for Recruitment, Preparation and Retention of Qualified Personnel**

The implementation of the required standards to a Masters Degree under the Comprehensive System of Personnel Development initially attributed to the high turnover rates in vocational rehabilitation counselor positions. This rate has been as high as 32%. In response, the Division has implemented strategies to reduce the turnover rate. The Division has begun to realize a significant reduction in the turnover rate. The turnover rate for FY 09 was 12% for Rehabilitation. The turnover rate for FY 08 was 17%, FY 07 was 14% down from 19% in FY 06. The Division continues to strive to reduce the turnover rate, excluding retirement of staff.

Six factors are considered to contribute to reducing counselor turnover:

- 1) Employees of the Division are covered by the State Personnel Act:
- 2) The Division has committed to hiring and compensating staff at competitive salaries (appropriate placement);
- 3) State of New Mexico employees are offered an extremely competitive employment benefits package, including premium health care coverage and having the option to retire with 25 years of services (75% of average of top three years salary);
- 4) State Personnel Board Rules allow for VR Counselors to be paid a supervisory differential for assuming supervisory responsibilities inclusive of training staff in effective case management and best practices;

- 5) The Division offers training opportunities not available with other state agencies; and
- 6) Staff is provided with recognition for performance including the awarding of administrative leave.

As of February 2010 direct service positions the Division as a complement of the following positions as noted below:

- 66 Vocational Rehabilitation Counselor Positions with eight vacancies and one additional vacancy based on potential retirements through SFY 2011.
- 34 Rehabilitation Technician Positions with three vacancies and two additional vacancies based on potential retirements through SFY 2011.
- 21 Caseload Secretary Positions with two vacancies and no additional vacancies based on potential retirements through SFY 2011.

Effective November 15, 2008 a hiring freeze was implemented for those agencies under the control of the Governor.

All new hiring and/or selection transactions for filling vacant positions with an effective date of November 15, 2008 or after must have received an approval of an Exemption to the Hiring Freeze before the transaction is processed.

The estimated time the hiring freeze will be in effect is through SFY 10. Division staff is working with the Governor's Office to justify filling vacant positions during the hiring freeze.

The Division has been seeking ways of addressing the salary of Vocational Rehabilitation Counselors to reduce turnover. The Division continues to work with the State Personnel Office to restructure counselor pay to be in line with licensure, education, and competency standards. One compensation mechanism, In-Pay Band Adjustment, is a mechanism to reach and establish appropriate placement through demonstrated performance for those not already appropriately placed. This is a tool that was utilized to provide pay increases in FY 06 through FY 08. Plans were to implement this again through FY 09 pending approval of Department of Finance and Administration and the State Personnel Office. The agency continues to recruit and hire professional staff at competitive salary levels.

One factor, to reduce counselor turnover, is the Division's established Program Policy Instruction addressing and providing guidelines related to the creation and implementation of the supervising counselor in the Rehabilitation Services Program. The intent of this Program Policy Instruction is to assist in decreasing the workload of current Area Managers, improve training, mentoring, and coaching to staff, and support quality case management; PPI 02-02 dated 04/19/2002. Additionally, as part of its pay plan, vocational rehabilitation counselors and program managers have received pay increases and the agency now offers competitive and attractive entry level salaries.

NOTE: while the Division remains committed to this initiative, it is currently on hold given the hiring freeze referenced above. When the hiring freeze is lifted, the Division will revisit reauthorizing In-Pay Band Adjustments.

The Division experiences some barriers in hiring qualified staff particularly in isolated work locations. The State Personnel Director, pursuant to the direction of the State Personnel Board, establishes, maintains and in conjunction with state agencies, administers a pay plan for all positions throughout the classified service. The State Personnel Director conducts an annual survey of Total Compensation (means of all forms of cash compensation and the dollar value of the employer-sponsored benefit package.) The comparison market is comprised of private and public entities within the state of New Mexico, regional state government employers, and Central, Western, and Southwestern state government employers. The pay plan offers many compensation tools for agencies to utilize to help management attract qualified applicants as well as retain employees who contribute to the overall success of the organization, motivate employees to maintain high standards of productivity and service, and reward employees for their specific contributions to the achievement of the organizational goals and objectives.

The Division has committed funds for retraining efforts to ensure that all personnel, particularly vocational rehabilitation counselors, meet the highest requirements in the state applicable to that particular profession. In providing for training programs, the Division takes into consideration succession planning and capacity building as well as evolving issues such as amendments to the Rehabilitation Act, the Workforce Investment Act, Ticket-to-Work, consumer informed choice, etc.

The Division has been largely successful in recruiting individuals with disabilities as well as those from minority groups. The Division continues to hire individuals with disabilities whenever those individuals are viable candidates. Job accommodations for staff with disabilities are routinely provided to maintain employment.

An identified barrier for hiring individuals from minority groups is the fact that it is sometimes difficult to find such individuals with the necessary educational background, particularly among the American Indian population. To address that barrier, the Division contracts for paraprofessional support on the Pueblos as well as Jicarilla and Mescalero Apaches.

The Division advertises job openings on the Internet at [DVRgetsjobs.com](http://DVRgetsjobs.com), in addition to State Personnel Office listings; both are available nationally to anyone with Internet access.

The Division uses the State Personnel automated data system to account for the number of employees, status of individual employees as probationary, permanent, temporary, or term and related information such as salary, earned leave balance, etc. Vacancies are reported on a routine basis and used to monitor hiring activities. All new hires, promotions and transfers require the approval of the Division Director.

In addition, the Division will continue to provide training and experience to all staff interested in increasing their job skills. The Staff Development Unit responds to agency initiatives such as roll-out of AWARE case management software. The Staff Development Unit financially supports training which offers continuing education credits in a variety of training opportunities to assist all DVR staff meet and maintain the highest qualifications. The Staff Development Unit also supports training programs such as baccalaureate programs for Information Technology and Business. NMDVR has a number of staff who are currently in administrative positions working toward Master's Degrees in Rehabilitation Counseling who intend to advance in VRC jobs.

The Division's strategic planning effort includes a Goal Area of Career Development and Succession Planning for all staff. The Division is well aware of the need to hire and retain well qualified staff. The agency is well aware that there will be an increased exodus of senior employees with valuable skills and "agency knowledge." Mechanisms such as post retirement re-employment, job sharing, tele-work and alternative work schedules are considerations to offer opportunities to remain employed or return to work. The agency is currently collaborating with the University of Arkansas TACE Program to address a comprehensive analysis of career development and succession planning as part of strategic planning efforts.

The Division plans to assess the needs of staff in terms of what they are planning to further their career development, and then move toward addressing those needs. To this end, the Division has completed a survey of the demographics of staff in terms of education background, years of experience, expected time to retirement, expected time to leave the agency before retirement, and any staff with disabling conditions who want to advance their careers over the long-term and/or return to employment after retirement.

It is hoped that a well qualified staff will be encouraged to elect to remain employed with the Division beyond retirement eligibility and/or consider post-retirement reemployment to address increased retention during anticipated upcoming shortages of qualified workers.

### **Personnel Standards**

The Division developed state licensure for vocational rehabilitation counselors through its umbrella organization, the New Mexico Public Education Department in 2001. This licensure, endorsed in rule by the Public Education Department is required of all vocational rehabilitation counselors working for the Division of Vocational Rehabilitation and is commensurate with national standards under CSPD.

A policy requiring all VR counselors to apply for state licensure by December 2002 was adopted in January 2002. Counselors who are not eligible for the highest level of state licensure are required to participate in a training plan that will lead to licensure.

As of early 2010, NMDVR has 52 licensed counselors, 6 counselors whose licenses are in progress, and 8 vacancies. All licenses currently in process will be finished by December 2010.

In 2001, DVR included the Master's degree as the academic standard for the Job Related Qualifications Standard to meet the requirement of § 361.18 CSPD of the Rehabilitation Act. Persons seeking licensure in rehabilitation counseling shall meet the requirements of Subsections A, B, C, D, or E:

- A. Valid certification as a Certified Rehabilitation Counselor issued by the Commission on Rehabilitation Counselor Certification, 1699 E. Woodfield Rd, Suite 300, Schaumburg, IL 60173. Phone: 847.944.1325, [www.crc certification.com](http://www.crc certification.com).
- B. Master's degree in rehabilitation counseling from a regionally accredited college of university. This requirement shall be satisfied by meeting the requirements of Subsection B(1) or B(2) below.
  - 1. A master's degree awarded by a New Mexico college or university must incorporate the New Mexico Public Education Department's approved competencies in rehabilitation counseling.
  - 2. A master's degree awarded by a college or university outside of New Mexico must be in a rehabilitation counseling program approved by the New Mexico Public Education Department.
- C. Master's degree in school counseling, vocational counseling or other related field and the provisions of Subsection C(1) or C(2) below.
  - 1. One (1) year of experience in rehabilitation counseling, or
  - 2. Fifteen (15) semester hours of credit in the rehabilitation counseling competency areas of vocational/transition assessment, medical aspects of disability, psychosocial and/or psycho-cultural aspects of disability case management in rehabilitation counseling, issues and practices in rehabilitation counseling, or placement aspects of rehabilitation counseling.
- D. Bachelor's degree in rehabilitation counseling from a regionally accredited college or university and one (1) year of experience in public or private facility in which direct vocational rehabilitation counseling is the primary job responsibility. The degree requirement shall be satisfied by meeting the requirements of Subsection D(1), or D(2) below.
  - 1. A bachelor's degree awarded by a New Mexico college or university must incorporate the New Mexico Public Education Department's approved competencies in rehabilitation counseling.
  - 2. A bachelor's degree awarded by a college or university outside of New Mexico must be for a rehabilitation program approved by the New Mexico Public Education Department.
- E. Bachelor's degree in a related field and the provisions of Subsection E(1) or E(2) below.
  - 1. Two (2) years of experience in a public or private Facility in which direct vocational rehabilitation counseling is the primary job responsibility, or
  - 2. Fifteen (15) semester hours of credit in the rehabilitation counseling competency areas of vocational/transition assessment, medical aspects of disability, psychosocial and/or psycho-cultural aspects of disability, case management in rehabilitation counseling, issues and practices in rehabilitation counseling, or placement aspects of rehabilitation counseling.

Currently, all DVR counselors, with the exception of an occasionally newly hired counselor, have applied for licensure. It should be noted that new counselors have 90 days to apply for their license. Licensure application includes a criminal background check. Licensure applications are monitored for compliance. If new DVR counselors do not meet the experience requirement for State Licensure, they are directed to re-apply upon gaining the necessary experience.

Also, VR counselors have held licensure long enough to require renewal. VR counselor licenses must be renewed after three years.

It is also noted that 48.3% have a Masters Degree in Rehabilitation Counseling. Two DVR caseload counselors have doctorate degrees.

State licensure is identified in policy as top priority and required for continued employment. Identified documents to be submitted in the credentials package for licensure include:

- Official college transcripts of all degrees received;
- Copy of Certified Rehabilitation Counselor certification, if applicable;
- Work history in a rehabilitation field;
- Copies of course syllabi from courses related to counseling and guidance; vocational counseling; disability; psycho-social or psycho-cultural aspects of disability; case management in rehabilitation counseling; and placement aspects in rehabilitation counseling.
- Criminal background information
- Fingerprints

It is important to note that most, if not all, new hires for counselor positions have Masters Degrees. However, there may be rare occasions in which someone is hired without a Masters Degree, especially in rural areas of the state. In these scenarios, these new hires are required to immediately begin working toward their Masters Degree to meet the highest standards of the state.

Counselors without advanced degrees are required to enroll in the NMHU program or in another distance learning graduate program available from other institutions outside the state.

Vocational evaluations and rehabilitation engineering services are purchased through qualified vendors. Other services purchased through qualified vendors include accessibility studies, job modifications, and identifying essential functions of jobs for employers and employees. The Division also employs some staff capable of performing these services.

### **Staff Development**

The Division continues to work cooperatively with the Public Education Department to issue State Licensure for rehabilitation counselors. The Division is coordinating with the State Personnel Office to incorporate the qualifications that are required for licensure into the requirements for vocational rehabilitation counselors within the State's new compensation and classification system and develop pay equity to better reflect the qualifications of licensed counselors. Counselors are encouraged to submit credentials and meet the qualification

requirements of the Certified Rehabilitation Counselor designation, as this is the highest recognized level of a qualified counselor under the licensure rule. The Staff Development Unit will support graduate level course work which, when completed, will allow counselors to sit for the CRC.

The Division maintains a Staff Development Unit (SDU) that is designated to provide for professional and paraprofessional development of all staff from various training facilities. All employees are encouraged to continually update their job skills and knowledge by taking advantage of training available to them through the SDU. Training can be internal to the agency, state sponsored training and training external of the agency through institutions of higher education, private vendors, professional training organizations – any training that a staff member would appreciate taking to enhance job performance with particular emphasis with respect to assessment, vocational counseling, job placement, and rehabilitation technology.

SDU provides and monitors a series of required training that is available to all new employees. NMDVR policy provides that all employees repeat these courses on a regular basis. These computer-based courses include: Prevention of Sexual Harassment, Preventing Employment Discrimination, Workplace Violence Prevention, and Mileage and Per Diem. Counselors and Rehabilitation Technicians also complete on-line courses in Orientation to Rehabilitation and VR 101: Determining Eligibility and Writing the Individualized Plan for Employment.

SDU also offers Rehabilitation Academy to new counselors and rehabilitation technicians (rehabilitation secretaries are highly encouraged to attend). Participants from the Native American partner agencies and community based programs are invited to attend Rehab Academy. The Academy is taught over a three week period in a spaced learning manner and focuses on assessment, eligibility, vocational counseling, job placement and rehabilitation technology. A sample case has been developed which is “worked up” throughout the Academy. As this case develops, new staff learn to make appropriate eligibility decisions as well as decisions about suitable vocational goals. In addition, our case management software, AWARE, is used as well as training games and activities which reinforce the learning. Participants give the Academy high marks in terms of content and satisfaction with content delivery. SDU makes good use of technology in offering the training.

In an effort to promote containment of travel costs, the annual Statewide Staff Meeting was recently replaced by an Awards Webinar. SDU is also in the process of developing a New Employee Webinar which can be viewed by new employees from their offices and eliminate the need for out-of-town travel. Such measures ensure budget is available for direct service delivery.

The Division uses a customized software application called the Training Administration System (TAS) to track employee training progress and CSPD compliance. This software provides the information necessary to summarize the training requested and completed on an individual basis. It provides the data necessary to analyze overall progress of individuals and groups of employees toward obtaining and retaining required credentials. The system offers the agency the ability to track all employees’ training and enable employees to request training offered by other vendors.

The SDU routinely acquires and disseminates research and information via electronic mail and Agency Intranet.

The SDU conducts annual needs assessments and works with the Division to provide the resources necessary to ensure that all personnel employed by the Division receive appropriate training. SDU offers workshops and seminars in various topics related to Rehabilitation Counseling all geared to sharpen counselors' skills and abilities in serving citizens of New Mexico who are disabled. Recently SDU facilitated training for staff in the following areas: Comprehensive Assessment, Comparable Benefits, Office 2001, AWARE 5.6 Case Management System, Fraud Prevention and Prevention of Sexual Harassment Refresher. The training topics are always based on expressed needs, whether by management or by committees such as the agency's Health and Safety Committee.

As part of the Division's overall strategic planning efforts and in spite of these times of difficult budget decisions, NMDVR is proactively working toward the future in terms of career development and succession planning. A Career Development Team is working to develop a plan which will benefit staff, the agency, and the participants served by the Division. The goals of this group are to help staff develop skills that may help them advance or become more effective in their jobs. The Career development Program concept has been endorsed by the Division's Leadership Team and includes the following components: Leadership Foundations, Supervisory Academy, Degree Advancement, Individual Career Development Plans, Mentoring and / or Job Shadowing. A tentative rollout date of July 2010 has been targeted for the LIFT (Leadership Institute for Tomorrow) Program. A steering committee of 12 individuals representing a cross section of the agency is working in collaboration with the Region 6 Technical Assistance and Continuing Education (TACE) Center. A Supervisory Academy is intended to develop the available talent pool within the agency, promoting a learning culture and develop networks of future leaders.

### **Personnel to Address Individual Communication Needs**

In New Mexico, there are large portions of the general population whose first language is Spanish or an American Indian dialect. When necessary, the Division obtains the services of interpreters of Spanish and other languages. However, Division staffing, which is consistent with the percentage of minority population and the general population, includes many individuals who are able to communicate in Spanish and native languages. This is most beneficial to terms of providing services to applicants and eligible individuals with limited English speaking ability.

Although not a requirement, the Division may give preference to individuals who are bilingual or multilingual in applying for Division jobs. Many of the Division's field offices have at least one individual who can speak Spanish or an American Indian dialect. The Division's EEO Plan reflects the State's diversity. The Division successfully recruits graduates of New Mexico Highlands University's Vocational Rehabilitation masters program. Many of these graduates are from various minority groups.

American Indian Rehabilitation Technicians are employed through contractual arrangements to help serve American Indian communities.

In addition, the Division employs several individuals skilled in communicating in American Sign Language. When necessary, interpreters are hired to fulfill communication needs.

Telecommunications, sensory and other technological aids and devices may be used to assist individual applicants and clients to participate in and benefit from the rehabilitation program. The Division may purchase, lease, or utilize equipment from loan banks to meet these needs, as appropriate. Division staff may consult experts in rehabilitation technology and assistive devices to address client needs.

### **Coordination of Personnel Development Under the Individuals with Disabilities Education Improvement Act**

The Division is organizationally placed under the Public Education Department, as is the Special Education Unit, which administers state services under the Individuals with Disabilities Education Act. In developing its comprehensive system of personnel development, the Division has and will continue to coordinate with the Special Education Unit and will coordinate its CSPD activities with those provided under IDEA. This activity will be implemented under the auspices of the Secretary of Education.

The licensure rules for Rehabilitation Counselors in New Mexico are in agreement with the Public Education Department requirements and competencies applicable to both the school systems to effect school-to-work transition in the high schools and the Division.

The aforementioned activities for developing a distinct plan and maintaining a comprehensive system of personnel development will incorporate methodology to ensure cooperation and coordination with the personnel development under the Individuals with Disabilities Education Act.